

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

SKYLAR WILLIAMS, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

GALDERMA LABORATORIES, L.P.,

Defendant.

Case No.: 1:24-cv-02222

Honorable Lindsay C. Jenkins

**DECLARATION OF NICK SUCIU III IN SUPPORT OF PLAINTIFF’S MOTION FOR
ATTORNEYS’ FEES, EXPENSES, AND INCENTIVE AWARD**

I, Nick Suciú III, declare:

1. I am over eighteen years of age and a Named Partner at Bryson, Harris, Suciú & DeMay PLLC (“Bryson”), counsel for Plaintiff in the above titled action. I submit this declaration in support of Plaintiff’s Motion for Attorneys’ Fees, Expenses, and Incentive Award. I have personal knowledge of the facts set forth herein, and if called as a witness could and would competently testify thereto.

2. The relevant background regarding the litigation and settlement, as well as the attorney’s fees and costs incurred by the other firms representing Plaintiff, is detailed in the accompanying declaration, specifically that of Philip L. Fraietta. Accordingly, for the sake of brevity, I will not reiterate this background information here. However, suffice to say that the proposed Settlement would provide significant value, a full refund of the price of the Differin Acne Treatment Products at issue. Accordingly, Bryson fully supports the proposed Settlement.

BRYSON'S QUALIFICATIONS

3. Bryson is one of the longest-tenured class action litigation firms in the country. The attorneys at the firm bring their respective decades of experience prosecuting class action cases in both federal and state venues nationwide, recovering over \$50 billion for the firm's clients. Bryson's attorneys represent the pioneers in plaintiffs' litigation, who have been widely recognized as a leader in defending the rights of victims of corporate wrongdoing, focusing on class action, mass tort, consumer, and shareholder rights services, both domestically and globally. Bryson is committed to practicing law in an ethical and professional manner, ensuring the best possible outcomes for our clients and the injured classes we represent. Together with Bursor & Fisher, P.A., Bryson represents Plaintiff in the above-titled action. Collectively, our firms have ample experience litigating complex class actions. Attached hereto as **Exhibit 1** is the Firm Resume for Bryson.

4. Our attorneys have immense experience representing parties against unlawful and fraudulent business practices, product mislabeling, and drug defect cases. And our lawyers have been regularly recognized as leaders in the plaintiffs' bar by the National Law Journal, Legal 500, Chambers USA, and Super Lawyers, among others, and possess a renowned depth of legal expertise, employ the highest ethical and legal standards, and pride themselves on providing stellar service and achieving extraordinary results for their clients.

5. I currently oversee the day-to-day litigation of this action on behalf of Bryson. I lead a practice group which has significant experience in the litigation, certification, trial, settlement, and appeal of national class actions, and has recovered hundreds of millions of dollars for the classes we have represented. Indeed, I have extensive experience in both consumer class actions and the regulation of dietary supplements. I began my legal career as in-house counsel for

a company that owned other bodybuilding supplement companies and retail websites. With extensive experience with the FDCA regulated industries, I have represented several such manufacturers and retailers, advising clients in the areas of FDA regulations, advertising, and marketing law. However, in 2011, I started representing plaintiffs in class action lawsuits. In the past twelve years, I have been appointed as counsel in consumer class actions involving purchasers of dietary supplements and achieved significant results. Some of my notable cases include *Clay et al. v. Cytosport, Inc.*, No. 3:15-cv-00165-L-AGS (S.D. Cal.) (a \$12-million class-wide settlement after successfully moving for class certification); *Gregorio v. Premier Nutrition Corp.*, No. 17-cv-05987-AT (S.D.N.Y.) (a \$9-million class-wide settlement); and *Carter, et al. v. General Nutrition Centers, Inc., et al.*, No. 2:16-cv-00633 (W.D. Pa.) (a \$5-million class-wide settlement).

APPROPRIATE SERVICE AWARDS FOR THE REPRESENTATIVES

6. Plaintiff is requesting that the Court approve a modest service award of up to \$2,500. Based on my personal experience representing Plaintiff during the course of the litigation, I believe that she is deserving of the requested award.

7. Indeed, Plaintiff spent substantial amounts of time and energy assisting counsel in the prosecution of this action. Plaintiff provided counsel with vital assistance in gathering facts relevant to her and other Class Members' potential claims. Additionally, Plaintiff reviewed the complaints, made themselves available for consultation during settlement negotiations, and generally kept themselves apprised on the status of the case. This included phone conversations, electronic correspondence, and meetings with Counsel.

8. It is my strong belief that the Settlement Class would not have obtained the outstanding results discussed above without the consistent, ethical, and vigorous efforts provided by Plaintiff in this action. At no small risk to herself, Plaintiff engaged herself at the forefront of

a class litigation not merely to obtain a monetary compensation, but—more importantly—to right a wrong and obtain a far greater remedy than the one to which she herself was entitled. The substantial remedy obtained by Plaintiff accrues to the benefit of, at least, thousands of her fellow consumers.

BRYSON'S HOURS AND LODESTAR

9. The information in this declaration regarding Bryson's time and expenses is taken from time and expense records and other supporting documentation prepared and/or maintained by Bryson in the ordinary course of business. I am the attorney that oversaw much of the day-to-day activities in the litigation at the firm. For the purposes of this motion, I have reviewed Bryson's records (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration.

10. As a result of this review, I believe that the time reflected in the firm's lodestar calculation as set forth in this declaration are reasonable in amount and were necessary for the effective prosecution and resolution of this litigation. The fees incurred were all of a type that would normally be charged to a fee-paying client in the private legal marketplace. Bryson's rates and hours for this case, as of November 2025, are as follows:

Staff	Hours	Rate per Hour	Total
Nick Suciu (P)	31.6	\$1,100.00	\$34,760.00
Trenton Kashima (P)	175.1	\$1,019.00	\$178,426.90
Russell Busch (A)	11.7	\$902.00	\$10,553.40
Luis Cardona (A)	156	\$625.00	\$97,500.00
Christian Torres (A)	2.8	\$625.00	\$1,750.00
Tiffany Kuiper (Para)	70	\$277.00	\$19,390.00
Kimberly White (Para)	3.3	\$277.00	\$914.10
Shannon Bishop (Para)	4.3	\$ 277.00	\$1,191.10
Amanda Mkamanga (Para)	0.5	\$277.00	\$ 138.50

Amber Brashear (Para)	0.8	\$277.00	\$221.60
Sandra Passanisi (Para)	0.2	\$277.00	\$55.40
TOTAL	456.3	\$755.86	\$344,901.00

The number of hours spent on this litigation by Bryson is 456.3. The professionals at Bryson have collectively spent a total of 377.2 hours of attorney time, and 79.1 staff hours of litigation support time to this litigation. The lodestar amount for attorney/professional time based on Bryson's current rates is \$344,901.00. If you divide the total billings (\$344,901.00) by the hours worked (456.3), you reach a blended rate of \$755.86.¹

11. Declarations detailing the hours and billing rates for timekeepers from the other firms representing the class are being concurrently submitted herewith. Here, the vast majority of attorney time was allotted to three tasks: initial investigations, drafting the complaint, and settlement negotiations (and related investigations and discovery). More detailed billing information, including billing narratives, may be made available upon request by the Court.

12. The billing rates for each of the attorneys included herein are the firm's customary billing rates charged for complex litigation, such as class actions. Such rates are also in keeping with the LSI-Adjusted Laffey Matrix, which provides the average billing in 2026 for: a paralegal is \$277, a one to three year attorney is \$508, a four to seven year attorney is \$625, an eight-ten year attorney is \$902, and an eleven to nineteen year attorney is \$1,019. *See* <http://www.laffeymatrix.com/see.html> (last visited on March 22, 2026); *see also* *Citizens for Resp. & Ethics in Washington v. United States Dep't of Just.*, 80 F.Supp. 3d 1, 3-4 (D.D.C. 2015)

¹ Please note, Nick Suciu, Trenton Kashima, Russell Busch, Luis Cardona, and Amanda Mkamanga were originally associated with Milberg LLC before joining Bryson in 2025. Kimberly White joined Bryson in 2026. The remaining attorneys and staff members were employed by Milberg LLC. I provide this declaration on behalf of both Milberg's and Bryson's collective litigation of this case.

(adopting the LSI-Adjusted Laffey Matrix as the prevailing market rates for attorneys); *Schultz v. City of Burbank*, No. 06 C 5646, 2007 WL 1099479, at *2 (N.D. Ill. Apr. 10, 2007) (noting that the *Laffey* Matrix has been considered with approval by courts within the Seventh Circuit, and suggesting that an upward departure from the Laffey Matrix is necessary to account for the cost-of-living differences between Chicago and Washington D.C.). Counsel’s hourly rates are in keeping with the rates currently charged by firms which practice within this District, for complex litigation, based on years of experience.² Indeed, our firm’s attorneys’ fees were recently approved in this District by Judge Sara L. Ellis in *In Re: Beyond Meat, Inc., Protein Content Marketing and Sales Practices Litigation*, where the firm based its lodestar cross check also rates which largely mirrored the Laffey Matrix at the time of settlement approval. *See In Re: Beyond Meat, Inc., Protein Content Marketing and Sales Practices Litigation*, No. 1:23-cv-00669, MDL No. 3059, Dkt No. 66 (N.D. Ill. 2025) (final approval order); *see also id.*, Dkt. No. 54-1 (my declaration in support of plaintiffs’ request for attorneys’ fees); <http://www.laffeymatrix.com/see.html> (last visited on March 22, 2026).

13. I am a Named Partner at Bryson with over a decade of experience in FDCA compliance and class action litigation. I am based out of our firm’s Detroit office. Mr. Trenton Kashima is a Partner at Bryson with twelve years’ experience exclusively in arbitration, class action, and related appellate litigation. Mr. Kashima is based out of our San Diego office. Christian Torres, Russell Busch, and Luis Cardona are Senior Associates at the firm with approximately

² Industry defense rates are often much higher than those of Plaintiffs’ Counsel here. *See, e.g.,* Roy Strom, Big Law Rates Topping \$2,000 Leave Value ‘In Eye of Beholder,’ BLOOMBERG LAW (June 9, 2022) (noting that partners at certain defense firms, including those who help clients “accused of fraud,” were charging near or more than \$2,000 per hour for their work). Accordingly, if we are be judged by the quality of our opposition, Plaintiff’s attorneys’ fees are well within reason.

seven, seven, and six years of experience, respectively, prosecuting consumer cases and class actions. Each of these attorney's billing rates can be found in the chart above. My qualifications can be found in Exhibit 1.³ However, below is a synopsis of my resume.

14. I have extensive experience in both consumer class actions and the regulation of food, drugs, and cosmetics under the FDCA. I began my legal career as in-house counsel for a company that owned other bodybuilding supplement companies and retail websites. With extensive experience with the dietary supplement industry, I have represented several such manufacturers and retailers, advising clients in the areas of FDA regulations, advertising, and marketing law. More specifically, I worked several years representing dietary supplement distributors, manufacturers, and retailers, consulting these companies in Good Manufacturing Practices ("GMP"), labeling and marketing, and regulatory issues.

15. However, in 2011, I started representing plaintiffs in class action lawsuits. In the past twelve years, my legal practice has been focused on Consumer Products Class Actions, specifically, violations of the United States Food, Drug, and Cosmetic Act ("FDCA") and parallel state statutes. As lead counsel, I have helped form the landscape regarding preemption and standing in cases involving violations of the FDCA and parallel state statutes.

16. Some of my notable cases include *Clay et al. v. Cytosport, Inc.*, No. 3:15-cv-00165-L-AGS (S.D. Cal.) (a \$12-million class-wide settlement after successfully moving for class certification); *Gregorio v. Premier Nutrition Corp.*, No. 17-cv-05987-AT (S.D.N.Y.) (a \$9-million

³ While the attorneys that worked on these cases are located outside the District, this is understandable in this action. *United States ex rel. Rai v. KS2 TX, P.C.*, No. 3:17-CV-834(JBA), 2019 WL 1397290, at *5 (D. Conn. Mar. 27, 2019). This case involved a consolidation of claims involving nationwide claims. Accordingly, "given the breadth and complexity of this case, a reasonable, paying client would likely hire national counsel experienced in the type of investigation and litigation implicated here." *Id.*

class-wide settlement); *Carter, et al. v. General Nutrition Centers, Inc., et al.*, No. 2:16-cv-00633 (W.D. Pa) (a \$5-million class-wide settlement); *Debernardis v. IQ Formulations, LLC*, 942 F.3d 1076, 1085 (11th Cir. 2019) (Finding plaintiffs had standing to sue a dietary supplement distributor and manufacturer that sold illegal dietary ingredients because they were illegal to sell and worthless to plaintiffs).

17. Class Counsel initiated the lawsuit knowing that it would require significant time, effort, and money to achieve a successful resolution of the matter. Collectively, Class Counsel has devoted substantial time and resources to this Action, are qualified to represent the Settlement Class, and will, along with Plaintiff, continue to vigorously protect the interest of the Settlement Class.

18. Class Counsel undertook this action on a contingent-fee basis, assuming significant risk that the action would yield no recovery and leave them uncompensated. From the outset of this action, Class Counsel has not been compensated for any time or expenses incurred. Given this is a complex class action involving highly technical aspects, Class Counsel assumed that pursuing this action would be costly and undertook the representation understanding the commitment required. Indeed, litigating this case would involve, at minimum, several additional years of time and effort, including producing additional discovery (both on Defendant, and third-party retailers), briefing class certification and dispositive motions, trial, and potential appeals. In would also involve additional expert expenses, which could reach over a half a million dollars at trial. Indeed, before a class was certified, Bryson has paid \$169,751.24 in expenses (see below).

19. Class Counsel understood we were embarking on a complex and expensive litigation with no guarantee of ever being compensated for the investment of time and money this case would require. In undertaking the responsibility of representing the putative class, Class

Counsel was obliged to ensure that sufficient resources were dedicated to the prosecution of this litigation and that funds were available to compensate staff and to cover the considerable costs that a case such as may require. With a potential lag time of several years for class cases to conclude, the financial burden on contingent-fee counsel is far greater than on a firm that is paid on an ongoing basis.

20. Class Counsel diligently and efficiently prosecuted this litigation for over two years. Class Counsel did so also in the face of skilled, professional, and determined opposition from Defendant and its capable counsel. These efforts required *inter alia* conducting discovery (written discovery and depositions), expert testing and analysis, and negotiating the settlement on behalf of the Class.

21. Further, our work on this litigation has not ended and will not end until the last settlement distribution payment is made to eligible Settlement Class Members after the Final Approval Order. We expect to expend additional hours going forward, which of course are not included in Class Counsel's lodestar, concerning the Settlement approval and administration processes, preparing for the Final Approval Hearing, and, if the Court grants final approval, overseeing Settlement administration.

22. Class Counsel's lodestar calculation does not include the substantial work that the attorneys and support staff at Bryson must still perform before the litigation is complete, such as overseeing the settlement administration process, communicating with Settlement Class members, and responding to any associated objections and related appeals. This work will further benefit the Settlement Class and could potentially last for years. Under the Settlement Agreement, Class Counsel will not be compensated for this additional work.

23. Class Counsel's lodestar calculation also does not include any time that will be

expended analyzing and categorizing the time entries or preparation of this fee submission, drafting the final approval motion, responding to objections, or appearing at the final approval hearing

LITIGATION EXPENSES

24. Bryson's expenses and charges in connection with the prosecution of the litigation are \$169,751.24 and include the following:

- Court Fees and Other ECF Charges: \$405.30
- Service and Postal Costs: \$194.30
- ESI Vendors: \$729.73
- Expert Costs: \$173,522.50
- Deposition Costs: \$12,449.41

Please note that Bryson was reimbursed for \$74,755.00 by Bursor & Fisher, P.A. for the above-mentioned litigation costs. Accordingly, Bryson's portion of the above expenses comes to \$89,996.24.

25. The expenses pertaining to this case are reflected in the books and records of this firm. The expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 20, 2026 in Bloomfield Hills, Michigan.

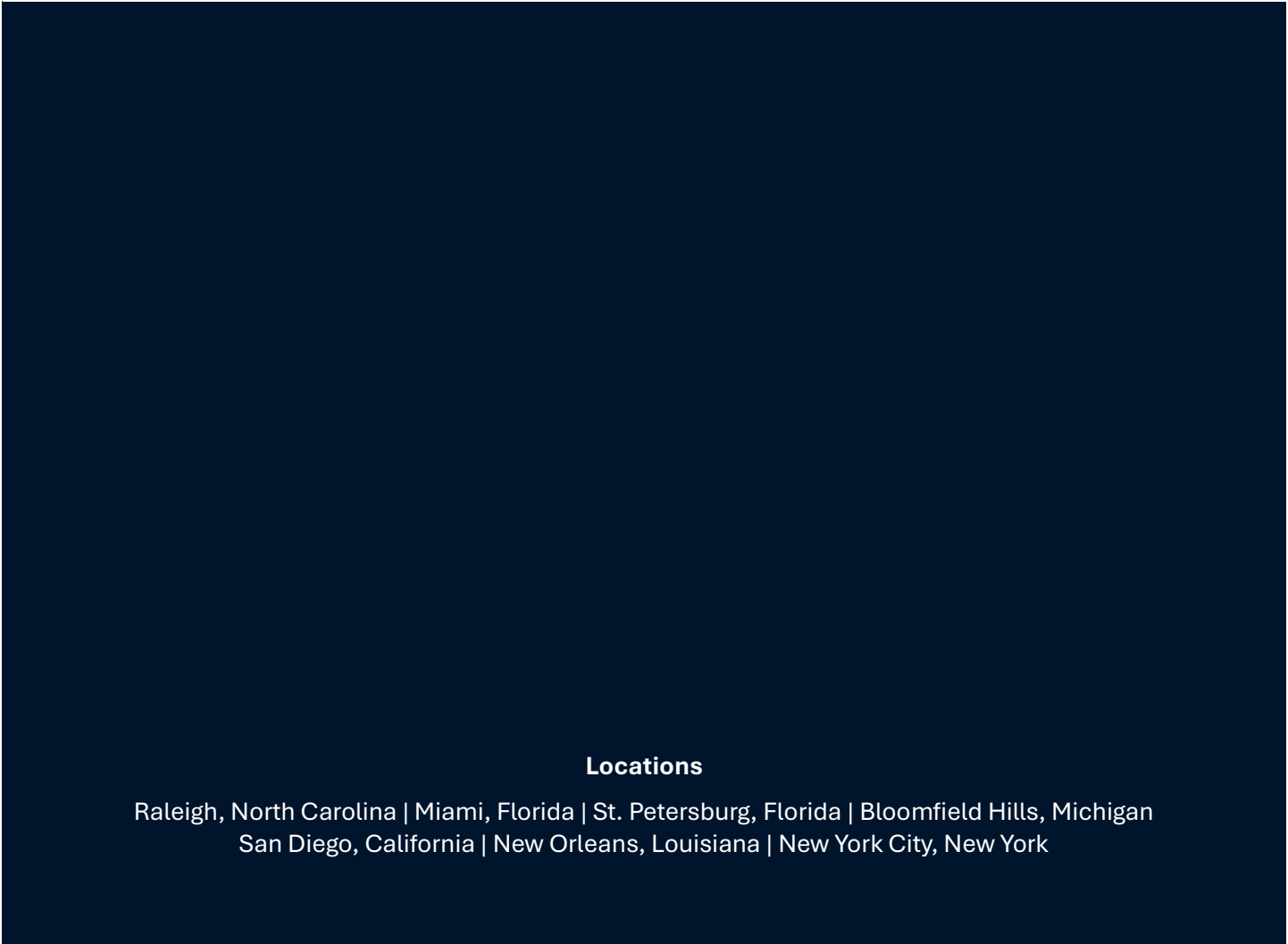
/s/ Nick Suciu III
Nick Suciu III

EXHIBIT 1



Bryson Harris Suci DeMay

www.brysonpllc.com | 844-201-292



Locations

Raleigh, North Carolina | Miami, Florida | St. Petersburg, Florida | Bloomfield Hills, Michigan
San Diego, California | New Orleans, Louisiana | New York City, New York



Firm Profile

Bryson Harris Suci DeMay is a national plaintiff's law firm that holds powerful interest accountable. We fight for those harmed by greed, misconduct, and systematic injustice, using agile strategy and creative thinking to secure compensation for our clients and to reform an unfair system.

We believe that all people deserve to have strong representation when corporate interests are causing harm. Our attorneys have been alongside victims through some of the most daunting actions in American history, and in actions that occur every day across the country and barely earn a headline. The common element in our practice is that we stand for what is fair and just, and we have the financial and operational capacity to go the distance.

As a profoundly ethical firm, the legal team at Bryson has shaped the way plaintiffs are respected in the law. We are the firm for complex legal cases that require a depth of expertise and pursuit of fact-finding that is severe; it is our standard of service and we provide it with every client. When people face unfair circumstances, made so by corporations that knew better and chose not to do better, we feel compelled to be present. The injury suffered, the damage sustained, the loss incurred—those are all motivators for our efforts to bring forward a successful outcome.

That's our starting point.

Bringing significant cases forward for deliberation takes a strong arsenal of financial resources, precise expertise and a ferocious following of the law. When a corporate interest has chosen to present something to a consumer without integrity because they are confident they can escape any liability, it requires a persistence to hold someone accountable for that decision. That persistence is not common; but at Bryson, it's our foundation.

We have advocated for clients in state and federal courts, and we have persisted for clients all the way to the Supreme Court of the United States.

We go the distance it takes for the outcome people deserve.

We are attorneys who believe that accountability is necessary, and consequences are important. If we are going to preserve being a nation of opportunity, there must be trust. When that trust is squandered, there must be responsibility.

We are Bryson Harris Suci DeMay.

www.brysonpllc.com



Practice Areas

Mass Arbitration

Companies insert arbitration clauses to push complex consumer disputes underground. We specialize in mass arbitration strategies, organizing hundreds or thousands of individual claims into coordinated action. We are leaders in mass arbitration with a proven system of getting results and forcing companies to pay attention.

Data Breach & Data Privacy

Every login leak, forgotten password glitch, or pixel tracker can become a violation of trust and of law, and individuals can be harmed by data breaches, privacy violations, or unlawful tracking. This is an evolving landscape and we're at the forefront, holding companies accountable for exposure, notification failures, and misuse of personal data.

Class Action

Class actions are the ultimate tool for people who've been wronged en masse. We onboard top-tier cases where one person's harm is truly everyone's harm: misleading marketing, dangerous products, or financial wrongdoing. With a deep bench of leadership in this area of law, we deliver meaningful justice at scale.

Fraudulent Lending

We cut our teeth against predatory lenders, hidden fees, and unscrupulous brokerage. We fight for consumers trapped in fraudulent lending schemes and undisclosed charges, and falsifying documents. When lenders break the rules, we help people get their money back.

Bad Faith Insurance

When insurance companies unreasonably deny claims, stall payouts, or misrepresent your policy, we go all in. You paid your premiums; you shouldn't get short-changed when it counts. We hold insurers to their contracts, their duty of good faith, no matter what it takes.

Defective Products

When products pose unforeseen danger, we enforce safety through accountability. We have the investigative expertise to pursue compensation and pressure product makers to raise safety standards.

Catastrophic Personal Injury

Some injuries change your life, livelihood, and the ability to move forward. We take on the toughest catastrophic injury cases, locating every source of fault, accountability, and recovery. With multidisciplinary experts and trial-tested strategies, clients and their families receive the full compensation they need to rebuild.

Consumer Protection

False advertising, surprise subscription enrollments, and junk fees hidden in fine print—these are some of the misleading practices we pursue. We represent consumers nationwide using state and federal consumer laws. If you were misled or taken advantage of, we're your legal team.

State & Local Government Litigation

We represent cities, counties, and public entities against corporations that pollute, overburden budgets, or ignore contractual commitments. Whether it's environmental degradation, being short-changed in social services or broken vendor deals, we stand with communities and their citizens.

Mass Torts

A mass tort is when thousands are hurt by the same drug, product, or chemical, and each has their own story to tell. When the negligence of the biggest players in pharma, manufacturing, and industry causes real harm, we bring those actions to the forefront of assigning responsibility.

Commercial Litigation

Business deals can go sideways with a breach of contract, partnership dispute, or fraud. When that happens, we combine transactional insight with persistent litigation tactics to resolve cases involving contracts, real estate, joint ventures, and beyond.

Environmental Litigation

We take on polluters and the systems that let them cut corners. Whether it's PFAS in the water, toxic air emissions, oil spills, or legacy waste sites, we represent communities, businesses, and individuals harmed by environmental abuse. These are science-heavy, legally complex, and personal cases. We get that.



Attorney Profiles: Senior Partners

Daniel K. Bryson, Senior Partner



Dan is one of the nation's most respected and experienced attorneys in areas of consumer class actions, mass arbitrations and commercial litigation. He has handled numerous class actions and held significant positions including lead counsel in numerous MDLs.

He has been lead counsel in numerous jury and bench trials across the country and his efforts have resulted in the recovery of billions of dollars for his clients. He also has extensive experience working with attorneys, funders and other partners on international litigation projects in the Courts in Amsterdam, the United Kingdom, Belgium, France, Spain, and Portugal, among others.

Dan has been named as a member of the "Legal Elite" and "Super Lawyers" in North Carolina" for many years, including 2025. He is a frequent speaker and writer on a variety of CLE topics and has been quoted by numerous publications. Dan has been an adjunct professor at Campbell Law School in North Carolina. He has received a number of awards, including the Thurgood Marshall award from the NC Advocates for Justice in recognition of his work supporting diversity, equity and inclusion in North Carolina. He is a past president of the Public Justice Foundation Board, a national public interest law firm.

Jonathan Cohen, Senior Partner



Jonathan Cohen leads the firm's mass arbitration division. With a legal career dedicated to advocating for consumers, Jonathan focuses his practice on high-stakes mass arbitrations and complex class action litigation involving deceptive business practices, data privacy violations, and other consumer protection issues. His experience also includes litigating an array of consumer class actions in both state and federal courts.

He has represented plaintiffs in cases against banks, mortgage servicers, debt collectors, manufacturers, retailers, insurance carriers, and media companies. Jonathan has bar admissions in Florida state courts, the U.S. District Courts for Florida, Illinois, Wisconsin and Colorado, and the U.S. Court of Appeals for the First, Fifth and Eleventh Circuits.

Jim DeMay, Senior Partner



Jim DeMay's focus is on class actions, mass torts, appellate, and other complex litigation matters. In 20 years of practice, Jim has served as lead or co-lead counsel in cases recovering over \$250 million for his clients.

His class action practice includes cases involving unfair and deceptive fees, unlawful utility rates, consumer fraud, wiretapping statutes, state and federal privacy laws, and other matters. He served as co-lead class counsel in *Daedalus, LLC v. City of Charlotte* which resulted in a \$106 million settlement on behalf of property owners who were coerced into paying unlawful development fees, as well as in dozens of other class actions that have resulted in multi-million-dollar judgments or settlements. Jim has represented cities, counties, and other governmental entities across the country in cases involving environmental and consumer protection matters.

Scott C. Harris, Senior Partner

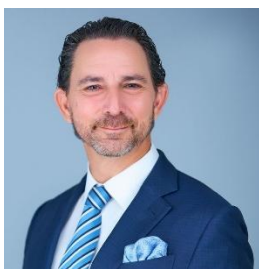


Scott has built his career on the belief that ordinary people deserve extraordinary advocacy. Everyone deserves fairness and justice in the courts, no matter how big the opponent. His practice is focused on complex consumer and construction defect litigation, product liability, and wrongful practices that harm everyday people. His work has touched every stage of the process, from initial client conversations and case investigation to working with experts, managing discovery, coordinating class procedures, and ensuring fair distribution of settlements.

Scott has played a key role in securing substantial verdicts and settlements in a variety of cases, including a multi-million-dollar verdict in favor of homeowners for a developer's unfair and deceptive advertising and shoddy road construction, a legal malpractice case, and several defective condominium construction cases.

He has been recognized year after year as a North Carolina Super Lawyer, following earlier recognition as a Rising Star, and has been consistently named among the Legal Elite by Business North Carolina. He is an active member of the American Association for Justice, the North Carolina Advocates for Justice (and serves on the board of governors), and Public Justice, organizations dedicated to strengthening consumer rights.

Patrick Montoya, Senior Partner



Patrick Montoya's career philosophy is to be the lawyer you want for yourself. With over 20 years of experience, Patrick's expertise includes class action and commercial litigation, products liability, personal injury litigation, aviation law, construction law, and toxic torts. He has earned several multi-million-dollar verdicts as well as having initiative changes to laws to more efficiently protect society.

A champion of community, Patrick has been recognized as one of the nation's leading plaintiff consumer lawyers as well as a Top Up & Comer in South Florida, a Florida Rising Star and a Florida Super Lawyer.

Patrick is also the co-author of the book Florida Evidence and Procedure, a contributing writer and a frequent CLE lecturer. He is extensively involved in the legal professional including the paralegal program at the University of Miami, and the National Conference of Community and Justice in Greater Miami.

Mark Silvey, Senior Partner



Mark Silvey's career spans nearly 40 years and has included litigation from both the plaintiff's and defendant's perspectives. At Bryson, he uses this unique experience to provide a comprehensive understanding of how cases are originated, researched, initiated, and resolved through either ADR or trial. He has tried more than 100 civil cases to verdict, along with dozens of bench trials and appellate arguments.

Mark brings a formidable knowledge base from which he advocates for clients facing simple or complex legal issues. He spent half his career in state courts, before moving his current practice to primarily federal concentration at both trial and appellate levels. He works in class actions, mass arbitrations, data breach and data privacy, consumer protection, product liability and mislabeling.

Nick Suci III, Senior Partner



Nick has extensive experience in both consumer class actions and the regulation of food, drugs, and cosmetics under the Food, Drug and Cosmetic Act (FDCA). He represents plaintiffs in class action lawsuits, and his legal practice has been focused on consumer products class actions, specifically, violations of the FDCA and parallel state statutes. As lead counsel in several consumer protection class actions, he has helped form the landscape regarding pre-emption and standing in cases involving violations of the FDCA and parallel state statutes.

He has earned tens of millions of dollars for clients in class action settlements against some of the largest manufacturers in the nation. He has been recognized by Super Lawyers as a Rising Star and has bar admissions in Michigan, Eastern and Western District of Michigan, Northern District of Illinois and the 6th and 7th Circuit Court of Appeals.



Attorney Profiles: Partners

Karl Amelchenko, Partner

Karl Amelchenko is one of the leaders of the firm's national mass arbitration and consumer protection practice. A significant part of his work involves challenging unfair and unconscionable arbitration clauses. He pursues claims against video game developers that unlawfully transmit players' personal data without consent, mass arbitrations involving state wiretapping statutes, the illegal collection of biometric information, and other state and federal privacy laws. Karl is the co-chair of the annual American Association of Justice (AAJ) Trial Advocacy Competition in North Carolina, and is a member of AAJ, the North Carolina Advocates for Justice, and Public Justice.

Hunter Bryson, Partner

Hunter Bryson has recovered over \$168 million for aggrieved individuals as court appointed class counsel in state and federal court. These results have been secured often after lengthy litigation with defendants that have considerable resources and a "scorched earth" mentality in litigation. He has argued dispositive motions, preliminary and final settlement approval motions, and engaged in discovery at all levels and sizes, from \$300,000 to \$106 million. He has been recognized as a Rising Star by Super Lawyers.

Justin Day, Partner

A lawyer with a proven record of success in complex, high-stakes litigation, Justin Day has secured numerous settlements including individual recoveries from \$1 million to \$18 million. His practice focuses on class actions and mass arbitrations, particularly those involving data privacy and consumer technology. With a foundation in computer programming, he also develops custom software tools to support investigative work, streamline case development, and tackle emerging forms of tech-enabled misconduct. He is regularly listed in Best Lawyers: Ones to Watch, the National Trial Lawyers Top 40 Under 40 in Tennessee, and selected as a Rising Star in Tennessee by Super Lawyers Magazine.

Scott Falgoust, Partner

Scott Falgoust focuses his practice on complex civil litigation, with a particular emphasis on data privacy, data breach, and mass arbitration matters. He has represented over 30,000 clients in mass arbitrations and hundreds of thousands more in data breach class actions. His work spans arbitration forums and federal courts across the United States. He began his legal career on the trial team for the Deepwater Horizon oil spill litigation and has since spent more than a decade advocating for individuals harmed by corporate misconduct. He is admitted to practice in all Louisiana courts and is a member of the Louisiana State Bar Association. He is a member of the American Association for Justice, and Public Justice.

Marty Geer, Partner

Marty Geer brings more than 40 years of litigation experience and judicial service to her role as one of the firm's lead partners for appellate practice and strategic briefing. As a former North Carolina Court of Appeals judge, she heard more than 3,800 appeals and authored more than 1,350 opinions with fewer than 2% reversed—a record that reflects both rigor and clarity in legal analysis. A board-certified appellate specialist, she focuses her practice primarily on consumer protection class actions, crafting key high-stakes motions at the trial level, handling appeals and helping strategically to ensure that cases are built for long-term success across all phases of litigation. She has bar admissions in the United States Supreme Court, United States Court of Appeals for the First, Second, Fourth, Sixth, Ninth, and Eleventh Circuits, United States District Courts for the Eastern and Southern Districts of New York and the Eastern, Middle, and Western Districts of North Carolina, and New York and North Carolina.

Lucy Inman, Partner

Lucy Inman contributes decades of experience in civil litigation and service as a North Carolina trial and appellate judge. She concentrates her practice in appeals and dispositive trial and arbitration proceedings on behalf of consumers, primarily in class actions and mass torts, including as co-counsel with attorneys outside the firm. In addition to her work as an advocate, Lucy serves as an arbitrator in commercial disputes nationwide. She is licensed to practice law in California and North Carolina and has represented clients in state and federal courts throughout the United States. She serves on the board of the Council of Appellate Lawyers within the American Bar Association's Judicial Division and is a trustee of the National Civil Justice Institute. Lucy has also presented continuing education programs for the bench and bar on topics including writing, trial and appellate practice, and the connection between wellness and professional ethics.

Robert Jimenez, Partner

Robert Jimenez has a diverse litigation background, including a focus on electronic discovery. His experience ranges from commercial litigation and real estate to intellectual property and data privacy matters. Robert has represented some of the largest banking and financial institutions in the world, has litigated for and against famous trademark owners, and has secured millions of dollars in judgments and settlement awards on behalf of institutional and individual clients. Additionally, he counsels clients, other law firms and attorneys, on electronic discovery issues. He has been awarded certifications from The Electronic Discovery Institute, The Sedona Conference, and the Association of Certified E-discovery Specialists.

Trenton Kashima, Partner

Trent Kashima's experience as a complex litigation lawyer sees him representing consumers, employees, and businesses in complex actions. He offers a specialized focus on consumer protection status and wage-hour matters. Trent has recovered over \$50 million on behalf of class members, managed practice groups, trained attorneys and law school students. Among his most notable cases, he secured a RICO judgment, halting unfair and predatory loans leveraged against veterans and service members. He has bar admissions to practice in both California and Michigan, and has been an adjunct professional at the University of San Diego School of Law.

Natalie Rico, Partner

Natalie Rico brings experience in mass tort litigation, class actions, products liability, medical malpractice, catastrophic personal injury, and construction litigation to the firm. Prior to joining private practice, she was the Assistant City Attorney with the City of Miami. her appointments and service includes the Spellman-Hoeveler Inns of Court, Mimia=Dade County Bar Association (board member and executive board member), American Association for Justice, Cuban American Bar Association and Florida Association for Women Lawyers.



Recent Leadership Roles

2025: Lead counsel in numerous mass arbitrations leading to over \$250M in confidential settlements

2023: Lead counsel for Parris, et al. v. Meta Platforms, Inc., Case No. 2023LA000672, Cir. Ct. DuPage Cty., July 3, 2023 – Class settlement of \$68.5M resulting from mass arbitration of 100,000 individual Instagram BIPA claims

2023: Lead counsel for Deadalus, LLC v. City of Charlotte, Case No. 2022-NCCOA-203 – Class settlement of \$106M on behalf of developers and home builders for illegally charged water and sewer capacity fees

2022: Lead counsel for Boone, et al. v. Snap Inc., Case No. 2022LA000708, Cir. Ct. DuPage Cty., Aug. 8, 2022 – Class settlement of \$35M resulting from mass arbitration of thousands of individual Snapchat BIPA claims

2020-2025: Member of consortium pursuing emissions cheating claims against VW, Mercedes and others in the European Union and the United Kingdom

2020: Class Counsel for Thomas Macone v. Sharp Electronics Corp., No. 1:19-cv-12021-WGY, (U.S. District Court for the District of Massachusetts) – Class Action lawsuit on behalf plaintiffs with defective Sharp microwave drawers. Status: National Settlement

2019: Court-appointed Lead Counsel for In re Allura Fiber Cement Siding Prod. Liab. Litig., MDL No. 2:19-md-2886 (U.S. District Court for the District of South Carolina) – Class Action arising from allegedly defective cement board siding. Status: National Settlement

2019: Court-appointed Lead Class Counsel for Upright Builders Inc. et al. v. Town of Apex, No. 18-cvs-3720 & 18-cvs-4384, (Wake Co., NC) – Class action settlement with a \$15.3 million fund for builders and developers to recover improper capacity replacement and transportation paid fees to the town

2019: Court-appointed Lead Class Counsel for Town of Holly Springs, No. 17-cvs-6244, 17-cvs-6245, 18-cvs-1373 (Wake Co., NC) – Class action settlement with a \$7.9 million fund for builders and developers to recover improper capacity replacement and transportation fees paid to the town

2019: Court-appointed Class Counsel for Berman et al. v. General Motors LLC, No. 2:18-cv-14371 (S.D. Fla.) – \$40 million national settlement for repairs and reimbursement of repair costs incurred in connection with Chevrolet Equinox excessive oil consumption

2019: Lead trial counsel in jury trial for FieldTurf Artificial Turf Marketing Practices Litig., (Cook County Court, Chicago) – Case deals with allegedly defective turf sold and marketed by the company and sold nationwide. Status: confidential settlement during trial

2018: Lead trial counsel in jury trial for Dennis D. Chisum v. Rocco J. Campagna, Richard J. Campagna, No. 16-cvs-2419 (North Carolina Business Court, New Hanover County) – Shareholder derivative case with a jury verdict for plaintiff. Status: on appeal

2018: Interim Co-Lead Counsel for Outer Banks Power Outage Litig. – \$10.35 million settlement for residents, businesses, and vacationers on Hatteras and Ocracoke Islands who were impacted by a 9-day power outage

2017: Co-Lead Counsel for Smith v. Floor and Decor Outlets of America, Inc. in the United States District Court for the Northern District of Georgia – Case dealt with formaldehyde levels of laminate flooring sold nationwide. Status: Settled, confidential terms

2017: Co-lead Counsel for Elliott v. KB Home Raleigh-Durham in the Superior Court Division of the State of North Carolina. Class action case dealt with new homes constructed without a weather-resistant barrier underneath exterior siding. Status: Settled

2017: Co-Lead Counsel for In re Lumber Liquidators Chinese-Manufactured Laminate Flooring Durability Marketing and Sales Practices Litig., MDL 2743, in the United States District Court for the Eastern District of Virginia – \$36 million national class action settlement for members who purchased a certain type of laminate flooring

2016: Lead Counsel for In re Windsor Windows Wood Clad Window Prod. Liab. Litig., MDL 2688, in the United States District Court for the Eastern District of Wisconsin – Case dealt with windows sold nationwide that allegedly permitted water intrusion. Status: Settled

2016: Lead Counsel for In re MI Windows and Doors, Inc. Prod. Liab. Litig., MDL 2333, in the United States District Court for the District of South Carolina – Case dealt with windows sold nationwide that allegedly permitted water intrusion. Status: Settled

2015: Lead Counsel for In re Elk Cross Timbers Decking, Marketing, Sales Practices and Prod. Liab. Litig., MDL 2577, in the United States District Court for the District of New Jersey – Case dealt with decking and railing material that allegedly degraded prematurely. Status: Settled

2014: Co-lead Counsel for In re Atlas Roofing Corporation Chalet Shingle Prod. Litig., MDL 2495 in the United States District Court for the Northern District of Georgia – Case concerns defective allegedly shingles sold nationwide. Status: Settled

2014: Co-Lead Counsel for In re Pella Corporation Architect Designer Series Windows Prod. Liab. Litig., MDL 2514, in the United States District Court for the District of South Carolina – Case dealt with windows sold nationwide that allegedly permitted water intrusion. Status: Settled

2013: Plaintiffs Steering Committee (Co-chair Science and Expert Committee) for In re Chinese Manufactured Drywall Prod. Liab. Litig, MDL 2047 in the United States District Court for the Eastern District of Louisiana. Dan served on the trial team in Federal Court in Louisiana before the Honorable Eldon Fallon for each of the three Chinese Drywall bellwether cases. Status: Settlement in excess of \$1 billion

Co-lead Counsel on a three-week jury trial in Madisonville, Kentucky resulting in a \$1.39 million verdict in favor of a church and a business against two coal companies for causing subsidence to their properties

Represented hundreds of homeowners in Western Kentucky for defective concrete utilized in their homes and businesses; Settlement in excess of \$50 million

Represented hundreds of homeowners throughout the Southeast for defective EIFS (exterior installation finishing systems) utilized in homes and businesses; Settlement in excess of \$150 million

Lead Counsel on a three-week jury trial in Wilmington, North Carolina resulting in a verdict and judgment of over \$3 million for a contractor's defective construction of marine bulkhead

Lead Counsel on a two-week jury trial in Bryson City, North Carolina resulting in a verdict and judgment in excess of \$3.5 million for a developer's deceptive advertising and shoddy construction of subdivision roads in the mountains of Western North Carolina

Milberg Recent Leadership Roles

In re Google Play Consumer Antitrust Litigation, 20-CV-05761 (N.D. Cal.)

In re: Elmiron (Pentosan Polysulfate Sodium) Products Liability Litigation MDL No. 2973

In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices & Products Liability Litigation

In re: Blackbaud Data Privacy MDL No. 2972

In re: Paragard IUD Products Liability Litigation MDL No. 2974

In re: Seresto Flea & Tick Collar, Marketing Sales Practices & Product Liability Litigation MDL No. 3009, Master Case No. 21-cv-04447

In re: All-Clad Metalcrafters, LLC, Cookware Marketing and Sales Practices Litigation, No. 2:21-mc-00491-NR (W.D. Pa.)

In re: Allergan Biocell Textured Breast Implant Product Liability Litigation, No. 2:19-md-02921-BRM-ESK (D.N.J.)

In re: Zicam

In re: Ortho Evra

In re: Yaz

In re: Kugel Mesh

In re: Medtronic Sprint Fidelis Leads

In re: Depuy Pinnacle

In re: Stand 'N Seal

In re: Chantix

In re: Fosamax

In re: Mirena

In re: Incretin

In re: Depuy Pinnacle

In re: Fluoroquinolones

In re: Olmesartan

In re: Zimmer Nexgen Knee

In re: Fresenius Granuflo

In re: Propecia

In re: Transvaginal Mesh

In re: Guidant Corp. Implantable Defibrillators

In re: Onglyza (Saxagliptin) And Kombiglyze XR

State Court

In Re Risperdal & Invega Product Liability Cases, CA

In Re Chantix, NY

In Re Reglan, NJ

In Re Propecia, NJ

In Re Levaquin Litigation, NJ

Milberg Notable Recoveries

- \$3.2 Billion Settlement – In re Tyco International Ltd., Securities Litigation
- \$4.0 Billion Settlement – In re Prudential Insurance Co. Sales Practice Litigation
- \$1.14 Billion Settlement – In re Nortel Networks Corp. Securities Litigation
- \$1.0 Billion+ Trial Verdict – Vivendi Universal, S.A. Securities Litigation
- \$1.0 Billion Settlement – NASDAQ Market-Makers Antitrust
- \$1.0 Billion Settlement – W.R. Grace & Co
- \$1.0 Billion+ Settlement – Merck & Co., Inc. Securities Litigation
- \$775 Million Settlement – Washington Public Power Supply System Securities Litigation

Antitrust

In re: TFT-LCD (Flat Panel) Antitrust Litigation, No. 3:07-cv-01827, MDL No. 1827 (N.D. Cal.) Combined settlement totaling nearly \$1.1 billion in suit alleging the illegal formation of an international cartel to restrict competition in the LCD panel market (2012).

Apartment Fee

Stewart v. Southwood Realty Company (Cumberland Co., NC) Settlement of class claims arising from apartment communities allegedly assessing improper eviction fees (2020).

Lewis et al. v. Bridge Property Management, LLC et al. (Wake Co., NC) Settlement of class claims arising from apartment communities allegedly assessing improper eviction fees (2020).

Hargrove v. Grubb Management, Inc. et al. (Wake Co., NC) Settlement of class claims arising from apartment communities allegedly assessing improper eviction fees (2020).

Rush v. The NRP Group LLC (USDC MD NC) Settlement of class claims arising from apartment communities allegedly assessing improper eviction fees (2020).

Hamilton v. Arcan Capital, LLC et al. (Forsyth Co., NC) Settlement of class claims arising from apartment communities allegedly assessing improper eviction fees (2021).

Suarez v. Camden Development, Inc. et al. (USDC ED NC) Settlement of class claims arising from apartment communities allegedly assessing improper eviction fees (2021).

Milroy et al. v. Bell Partners Inc. et al. (USDC ED NC) Settlement of class claims arising from apartment communities allegedly assessing improper eviction fees (2021).

Davis v. RAM Partners, LLC (USDC MD NC) Settlement of class claims arising from apartment communities allegedly assessing improper eviction fees (2021).

Hampton v. KPM et al. (USDC WD NC) Settlement of class claims arising from apartment communities allegedly assessing improper eviction fees (2021).

Brogden v. Kenney Properties, Inc. et al. (Wake Co., NC) Settlement of class claims arising from apartment communities allegedly assessing improper eviction fees (2021).

Williams v. Pegasus Residential, LLC (USDC MD NC) Preliminary approval of settlement of class claims arising from apartment communities allegedly assessing improper eviction fees (2021).

Medina v. Westdale et al. (USDC ED NC) Settlement of class claims arising from apartment communities allegedly assessing improper eviction fees (2021).

Talley et al. v. Lincoln Property Company (USDC ED NC) Preliminary approval of settlement of class claims arising from apartment communities allegedly assessing improper eviction fees pending (2021).

McCord v. PRG Real Estate Mgmt, Inc. et al. (USDC MD NC) Pending final approval of settlement of class claims arising from apartment communities allegedly assessing improper eviction fees (2021).

Appliances

Erstler, et. al v. Toshiba America et. al, No. 07- 2304 (D.N.J.) Settlement of claims arising from allegedly defective television lamps) (2009).

Maytag Neptune Washing Machines Class action settlement for owners of Maytag Neptune washing machines).

Stalcup, et al. v. Thomson, Inc. (Ill. Cir. Ct.) \$100 million class settlement of claims that certain GE, PROSCAN and RCA televisions may have been susceptible to temporary loss of audio when receiving broadcast data packages that were longer than reasonably anticipated or specified (2004).

Hurkes Harris Design Associates, Inc., et al. v. Fujitsu Computer Prods. of Am., Inc. Settlement provides \$42.5 million to pay claims of all consumers and other end users who bought certain Fujitsu Desktop 3.5" IDE hard disk drives (2003).

Turner v. General Electric Company, No. 2:05-cv-00186 (M.D. Fla.) National settlement of claims arising from allegedly defective refrigerators (2006).

Automobiles

In re General Motors Corp. Speedometer Prods. Liability Litig., MDL 1896 (W.D. Wash.) National settlement for repairs and reimbursement of repair costs incurred in connection with defective speedometers (2007).

Baugh v. The Goodyear Tire & Rubber Company Class settlement of claims that Goodyear sold defective tires that are prone to tread separation when operated at highway speeds; Goodyear agreed to provide a combination of both monetary and nonmonetary consideration to the Settlement Class in the form of an Enhanced Warranty Program and Rebate Program (2002).

Lubitz v. Daimler Chrysler Corp., No. L-4883-04 (Bergen Cty. Super. Ct, NJ 2006) National settlement for repairs and reimbursement of repair costs incurred in connection with defective brake system; creation of \$12 million fund; 7th largest judgment or settlement in New Jersey (2007).

Berman et al. v. General Motors LLC, Case No. 2:18-cv-14371 (S.D. Fla.) Co-Lead Counsel; national settlement for repairs and reimbursement of repair costs incurred in connection with Chevrolet Equinox excessive oil consumption.

Civil Rights

In re Black Farmers Discrimination Litigation, Case No. 1:08-mc-00511 (D.D.C.) \$1.25 billion settlement fund for black farmers who alleged U.S. Department of Agriculture discriminated against them by denying farm loans (2013).

Bruce, et. al. v. County of Rensselaer et. al., Case No. 02-cv-0847 (N.D.N.Y.) Class settlement of claims that corrections officers and others employed at the Rensselaer County Jail (NY) engaged in the practice of illegally strip searching all individuals charged with only misdemeanors or minor offenses (2004).

Commercial

In re: Outer Banks Power Outage Litigation, 4:17-cv-141 (E.D.N.C) Co-Lead Counsel; \$10.35 million settlement for residents, businesses, and vacationers on Hatteras and Ocracoke Islands who were impacted by a 9-day power outage (2018).

Construction Materials

Cordes et al v. IPEX, Inc., No. 08-cv-02220-CMA-BNB (D. Colo.) Class action arising out of defective brass fittings; court-appointed member of Plaintiffs' Steering Committee (2011).

Elliott et al v. KB Home North Carolina Inc. et al 08-cv-21190 (N.C. Super. Ct. Wake County) Lead Counsel; class action settlement for those whose homes were constructed without a weather-resistant barrier (2017).

In re: Pella Corporation Architect and Designer Series Windows Marketing, Sales Practices and Products Liability Litigation, MDL No. 2514 (D.S.C.) Class action arising from allegedly defective windows; Court-appointed Co-Lead Counsel.

In re MI Windows and Doors, Inc., Products Liability Litigation, MDL No. 2333 (D.S.C) National class action settlement for homeowners who purchased defective windows; Court-appointed Co-Lead Counsel.

In re: Atlas Roofing Corporation Chalet Shingle Products Liability Litig., MDL No. 2495 (N.D. Ga.) Class action arising from allegedly defective shingles; Court-appointed Co-Lead Counsel.

Helmer et al. v. Goodyear Tire & Rubber Co., No. 12-cv-00685-RBJ (D. Colo. 2012) Class action arising from allegedly defective radiant heating systems; Colorado class certified, 2014 WL 3353264, July 9, 2014.

In re: Zurn Pex Plumbing Products Liability Litigation, No. 08-md-01958, MDL No. 1958 (D. Minn.) Class action arising from allegedly plumbing systems; member of Executive Committee; settlement (2012).

Hobbie, et al. v. RCR Holdings II, LLC, et al., No. 10-1113, MDL No. 2047 (E.D. La.) (\$30 million settlement for remediation of 364-unit residential high-rise constructed with Chinese drywall (2012).

In re: Chinese Manufactured Drywall Products Liability Litigation, No. 2:09-md-02047, MDL No. 2047 (E.D. La.) Litigation arising out of defective drywall; appointed Co-Chair, Insurance Committee (2012).

Galanti v. Goodyear Tire & Rubber Co., No. 03-209 (D.N.J. 2003) National settlement and creation of \$330 million fund for payment to owners of homes with defective radiant heating systems (2003).

In re Synthetic Stucco Litig., Civ. Action No. 5:96-CV-287-BR(2) (E.D.N.C.) Member of Plaintiffs' Steering Committee; settlements with four EIFS Manufacturers for North Carolina homeowners valued at more than \$50 million.

In re Synthetic Stucco (EIFS) Prods. Liability Litig., MDL No. 1132 (E.D.N.C.) Represented over 100 individuals homeowners in lawsuits against homebuilders and EIFS manufacturers.

Posey, et al. v. Dryvit Systems, Inc., Case No. 17,715-IV (Tenn. Cir. Ct) Co-Lead Counsel; national class action settlement provided cash and repairs to more than 7,000 claimants (2002).

Sutton, et al. v. The Federal Materials Company, Inc., et al, No. 07-CI-00007 (Ky. Cir. Ct) Co-Lead Counsel; \$10.1 million class settlement for owners of residential and commercial properties constructed with defective concrete.

Staton v. IMI South, et al. (Ky. Cir. Ct.) Co-Lead Counsel; class settlement for approximately \$30 million for repair and purchase of houses built with defective concrete.

In re Elk Cross Timbers Decking Marketing, Sales Practices and Products Liability Litigation, No. 15-cv-0018, MDL No. 2577 (D.N.J.) Lead Counsel; national settlement to homeowners who purchased defective GAF decking and railings.

Bridget Smith v. Floor and Decor Outlets of America, Inc., No. 1:15-cv-4316 (N.D. Ga.) Co-Lead Counsel; National class action settlement for homeowners who purchased unsafe laminate wood flooring.

In re Lumber Liquidators Chinese-Manufactured Flooring Products Marketing, Sales Practices and Products Liability Litigation MDL No. 1:15-md-2627 (E.D.Va.) Formaldehyde case; \$36 million national class action settlement for member who purchased a certain type of laminate flooring.

In re Lumber Liquidators Chinese-Manufactured Laminate Flooring Durability Marketing, Sales Practices Litigation MDL No. 1:16-md-2743 (E.D.Va.) Co-Lead Counsel; Durability case; \$36 million national class action settlement for member who purchased a certain type of laminate flooring.

In re Windsor Wood Clad Window Products Liability Litigation MDL No. 2:16-md-02688 (E.D. Wis.) National class action settlement for homeowners who purchased defective windows; Court-appointed Lead Counsel.

In re Allura Fiber Cement Siding Products Liability Litigation MDL No. 2:19-md-02886 (D.S.C.) Class action arising from allegedly defective cement board siding; Court appointed Lead Counsel.

Environmental

Nnadili, et al. v. Chevron U.S.A., Inc, No. 02-cv-1620 (D.D.C.) \$6.2 million settlement for owners and residents of 200 properties located above underground plume of petroleum from former Chevron gas station (2008).

Fair Labor Standards Act/Wage and Hour

Craig v. Rite Aid Corporation, Civil No. 08-2317 (M.D. Pa.) FLSA collective action and class action settled for \$20.9 million (2013).

Stillman v. Staples, Inc., Civil No. 07-849 (D.N.J. 2009) FLSA collective action, plaintiffs' trial verdict for \$2.5 million; national settlement approved for \$42 million (2010).

Lew v. Pizza Hut of Maryland, Inc., Civil No. CBB-09-CV-3162 (D. Md.) FLSA collective action, statewide settlement for managers-in-training and assistant managers, providing recompense of 100% of lost wages (2011).

Financial

Roberts v. Fleet Bank (R.I.), N.A., Civil Action No. 00-6142 (E. D. Pa.) \$4 million dollar settlement on claims that Fleet changed the interest rate on consumers' credit cards which had been advertised as "fixed." (2003).

Penobscot Indian Nation et al v United States Department of Housing and Urban Development, N. 07-1282 (PLF) (D.D.C. 2008) Represented charitable organization which successfully challenged regulation barring certain kinds of down-payment assistance; Court held that HUD's promulgation of rule violated the Administrative Procedure Act (2008).

Impact Fees

Town of Holly Springs, No. 17-cvs-6244, 17-cvs-6245, 18-cvs-1373 (Wake Co., NC) (Court appointed Class Counsel; Class action settlement with a \$7.9 million fund for builders and developers to recover improper capacity replacement and transportation fees paid to the town (2019).

Larry Shaheen v. City of Belmont, No. 17-cvs-394 (Gaston Co., NC) (Court appointed Class Counsel; Class action settlement with a \$1.65 million fund for builders and developers to recover improper capacity replacement and transportation fees paid to the city (2019).

Upright Builders Inc. et al. v. Town of Apex, No. 18-cvs-3720 & 18-cvs-4384, (Wake Co., NC) (Court appointed Class Counsel; Class action settlement with a \$15.3 million fund for builders and developers to recover improper capacity replacement and transportation paid fees to the town (2019).

Mayfair Partners, LLC et al. v. City of Asheville, No. 18-cvs-04870 (Buncombe County) Court appointed Class Counsel; Class action settlement with a \$1,850,000 million fund for builders and developers to recover improper impact fees paid to the city (2020).

Shenandoah Homes, LLC v. Town of Clayton, No. 19-cvs-640 (Johnston County) Court appointed Class Counsel; Class action settlement with a \$2.7 million fund for builders and developers to recover improper impact fees paid to the town (2020).

Brookline Homes LLC v. City of Mount Holly, Gaston County file no. 19-cvs-1163 (Gaston County) Court appointed Class Counsel; Class action settlement with a \$483,468 fund for builders and developers to recover improper impact fees paid to the city (2020).

Eastwood Construction, LLC et. al v. City of Monroe, Union County file nos. 18-CVS-2692 (Union County) Court appointed Class Counsel; Class action settlement with a \$1,750,000 million fund for builders and developers to recover improper impact fees paid to the city (2020).

Insurance

Young, et al. v. Nationwide Mut. Ins. Co, et al., No. 11-5015 (E.D. Ky.) Series of class actions against multiple insurance companies arising from unlawful collection of local taxes on premium payments; class certified and affirmed on appeal, 693 F.3d 532 (6th Cir., 2012); settlements with all defendants for 100% refund of taxes collected (2014).

Nichols v. Progressive Direct Insurance Co., et al., No. 2:06cv146 (E.D. Ky.) Class Counsel; class action arising from unlawful taxation of insurance premiums; statewide settlement with Safe Auto Insurance Company and creation of \$2 million Settlement Fund; statewide settlement with Hartford Insurance Company and tax refunds of \$1.75 million (2012).

Privacy and Data Breach

In Re: U.S. Office of Personnel Management Data Security Breach Litigation, No. 15-1393 (ABJ), MDL No. 2664 (D.D.C.) Court-appointed interim Liaison Counsel.

In re Google Buzz Privacy Litigation, No. 5:10-cv-00672 (N.D. Cal.) Court-appointed Lead Class Counsel; \$8.5 million Cy Pres settlement) (2010).

In re: Dept. of Veterans Affairs (VA) Data Theft Litig., No. 1:2006-cv-00506, MDL 1796 (D.D.C.) Co-Lead counsel representing veterans whose privacy rights had been compromised by the theft of an external hard drive containing personal information of approximately 26.6 million veterans and their spouses; creation of a \$20 million fund for affected veterans and a Cy Pres award for two non-profit organizations (2009).

In re: Adobe Systems Inc. Privacy Litigation, No. 5:13-cv-05226 (N.D. Cal. 2015) Settlement requiring enhanced cyber security measures and audits (2015).

