

EXHIBIT 2

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEAMSHIP TRADE ASSOCIATION OF
BALTIMORE – INTERNATIONAL
LONGSHOREMEN’S ASSOCIATION
PENSION FUND, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

OLO INC., NOAH GLASS, and PETER
BENEVIDES,

Defendants.

Case No. 1:22-cv-08228-JSR

CLASS ACTION

Judge: Hon. Jed S. Rakoff

Date: June 10, 2024

Time: 4:00 PM

**DECLARATION OF DARYL F. SCOTT ON BEHALF OF SCOTT+SCOTT
ATTORNEYS AT LAW LLP IN SUPPORT OF APPLICATION FOR
AWARD OF ATTORNEYS’ FEES AND EXPENSES**

I, Daryl F. Scott, declare as follows pursuant to 28 U.S.C. §1746:

1. I am a partner with the law firm of Scott+Scott Attorneys at Law LLP (“Class Counsel” or the “Firm”). I submit this declaration (the “Declaration”) in support of my Firm’s application for an award of attorneys’ fees and payment of certain litigation expenses and charges (“Expenses”) incurred in connection with the proposed Settlement of the above-captioned action (the “Action”).

2. The Firm serves as Class Counsel for Class Representative Steamship Trade Association of Baltimore – International Longshoremen’s Association Pension Fund (the “Class Representative”) for the certified Class in the Action.

3. The information in this Declaration is sourced from time and expense records maintained by the Firm in its usual course of business. The records were compiled by my staff

and reviewed by me. The purpose of the review was to verify the accuracy and necessity of the time and Expenses submitted by the Firm for this Declaration. Throughout my review process, I applied billing judgment by reducing certain time entries and Expenses. I believe that the time (reflected in the Firm's lodestar) and the Expenses being requested are reasonable and necessary for prosecuting the claims in question. I also believe the Expenses are of a type normally charged to a fee-paying client in the private legal marketplace.

4. After the reductions referenced above, the hours spent by the Firm, as set forth in **Exhibit A**, total 7,279.40, and the lodestar, based on current billings rates, totals \$6,237,999.50. The hourly rates are the usual and customary rates set by the Firm for each timekeeper.

5. Additionally, **Exhibit B** sets forth the categories of work performed by the attorneys and professional support staff, as organized by timekeeper, in connection with prosecuting the Action, and **Exhibit C** sets forth the total work performed by the Firm by month from the Action's inception through the date of preliminary approval.

6. The Firm requests an award of \$731,204.77 in Expenses, as summarized in **Exhibit D**. These Expenses include:

- i. **Micah S. Officer, Ph.D. ("Dr. Officer"): \$198,310.00.** Class Counsel retained Dr. Officer to analyze market efficiency and damages issues, and to prepare six expert reports. Dr. Officer was also deposed by Defendants twice, once regarding his market efficiency opinions and once concerning his damages opinions.
- ii. **Forensic Economics, Inc. ("Forensic Economics"): \$260,000.00.** Class Counsel retained Forensic Economics to support Dr. Officer in all facets of the

analyses described above. Additionally, Forensic Economics was responsible for developing the Plan of Allocation.

- iii. **Peter Nagel (“Nagel”): \$14,400.00.** Class Counsel retained Mr. Nagel, an enterprise restaurants technology expert, to analyze technology trends in large restaurant chains and prepare an expert report.
- iv. **McManis Faulkner PC (“McManis”): \$28,772.57.** McManis provided legal representation to former Olo Inc., employees who were deposed in this Action. Class Counsel paid all attorneys’ fees associated with these depositions.
- v. **Deposition Court Reporters & Transcripts: \$74,251.74.**
- vi. **Electronic Discovery: \$28,579.03.** Discovery documentation was electronically managed through the Relativity platform, facilitating storage, organization, and assessment.
- vii. **Mediation: \$11,946.20.** Robert A. Meyer, Esq., a highly regarded mediator with a national reputation and extensive experience in mediating complex securities actions, served as the mediator in the Action. This Expense constitutes Class Representative’s share of the mediation fees.
- viii. **Online Research: \$18,609.07.** PACER, Westlaw, and other online services were utilized to obtain SEC filings, analyst reports, legal research, and court filings, all billed at their respective costs.
- ix. **Transportation, Hotels, & Meals: \$36,399.74.** In connection with the prosecution of the Action, the Firm paid for transportation, meals, and travel costs tied to activities such as depositions and the mediation. Details including dates, destinations, and purposes of each trip are outlined in **Exhibit E**.

- x. **Filing & Service of Process: \$4,597.50.** Costs associated with Court filings and process server fees.
- xi. **Third-Party Document Subpoena Reimbursement: \$48,943.33.** Class Representative issued subpoenas for documents to six third parties, one of whom requested partial reimbursement for costs related to locating, reviewing, storing, and producing the requested documents. Class Counsel, on behalf of Class Representative, negotiated a cost arrangement with the third party, leading to the aforementioned Expense.
- xii. **Telecommunications: \$103.87.**
- xiii. **Courier Services, Overnight Delivery, and Postage: \$1,284.97.**
- xiv. **Printing and Copying Expenses: \$5,006.75.**

7. The Expenses described above are documented in the Firm's accounting records, which were compiled from expense vouchers, check records, and other source materials. These records provide an accurate account of the incurred Expenses.

8. Biographical information about the Firm is set forth in **Exhibit F**.

I declare under penalty of perjury, that to the best of my knowledge, the foregoing is true and accurate. If required by the Court, I am fully prepared to testify and confirm the accuracy of these facts.

Executed in Richmond, Virginia, on May 6, 2024.


DARYL F. SCOTT

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will automatically provide notice to all counsel of record.

s/ Amanda F. Lawrence
Amanda F. Lawrence

EXHIBIT A

STA-ILA v. Olo Inc.

Firm Name: Scott+Scott Attorneys at Law LLP

Reporting Period: Inception through February 20, 2024

PROFESSIONAL	STATUS	HOURLY RATE	TOTAL HOURS	TOTAL LODESTAR AT HOURLY RATES
David Scott	P	\$1,975	45.70	\$ 90,257.50
Deborah Weintraub	P	\$1,900	157.20	\$ 298,680.00
Donald Broggi	P	\$1,900	371.80	\$ 706,420.00
Daryl Scott	P	\$1,545	11.30	\$ 17,458.50
Michael Burnett	P	\$1,400	10.10	\$ 14,140.00
Amanda Lawrence	P	\$1,195	1,369.90	\$ 1,637,030.50
Thomas Laughlin	P	\$1,150	66.00	\$ 75,900.00
Patrick Coughlin	OC	\$1,975	41.70	\$ 82,357.50
Anna Hunanyan	A	\$675	68.20	\$ 46,035.00
Isabella DeLisi	A	\$560	87.20	\$ 48,832.00
Jeffrey Jacobson	A	\$775	1,529.70	\$ 1,185,517.50
Jonathan Zimmerman	A	\$665	31.50	\$ 20,947.50
Mandeep Minhas	A	\$575	1,363.40	\$ 783,955.00
Peter Cherepanov	SA	\$550	98.20	\$ 54,010.00
Stephen Balding	SA	\$525	324.30	\$ 170,257.50
Sun Kim	SA	\$700	885.00	\$ 619,500.00
Allen West	PL	\$435	47.50	\$ 20,662.50
Matthew Molloy	PL	\$415	289.60	\$ 120,184.00
Michael Himes	PL	\$435	23.90	\$ 10,396.50
Shawn Barren	LS	\$435	43.60	\$ 18,966.00
Alex Vargas	I	\$675	18.50	\$ 12,487.50
Jenna Goldin	I	\$545	319.60	\$ 174,182.00
Michelle Petrick	I	\$395	75.50	\$ 29,822.50
TOTAL			7,279.4	\$ 6,237,999.50

(P) Partner

(OC) Of Counsel

(A) Associate

(SA) Staff Attorney

(I) Investigator

(PL) Paralegal

(LS) Litigation Support

EXHIBIT B

*STA-ILA v. Olo Inc.***Firm Name: Scott+Scott Attorneys at Law LLP****Reporting Period: Inception through February 20, 2024**

Categories:

- | | |
|--|-----------------------------------|
| (1) Factual Investigation | (6) Court Appearances/Preparation |
| (2) Pleadings | (7) Experts/Consultants |
| (3) Discovery | (8) Settlement/Mediation |
| (4) Case Management/Client Communication | (9) Litigation Strategy/Analysis |
| (5) Motions and Legal Research | (10) Trial/Preparation |

Name		1	2	3	4	5	6	7	8	9	10	Total Hours	Rate	Total Lodestar
David Scott	P		2.2	4.6	2.7	2.0			31.8	1.2	1.2	45.7	\$1,975	90,257.50
Deborah Weintraub	P	0.1	0.5	63.7		57.1	1.5	9.5	8.9	15.9		157.2	\$1,900	298,680.00
Donald Broggi	P	18.4	17.1	129.7	185.0		4.0	6.6	11.0			371.8	\$1,900	706,420.00
Daryl Scott	P	0.3	1.0		1.2	0.5		3.6	4.7			11.3	\$1,545	17,458.50
Michael Burnett	P	3.0	3.0		4.1							10.1	\$1,400	14,140.00
Amanda Lawrence	P	23.6	116.7	273.3	123.4	368.0	81.9	140.0	106.9	104.2	31.9	1,369.9	\$1,195	1,637,030.50
Thomas Laughlin	P	46.1	14.9		1.5		3.5					66.0	\$1,150	75,900.00
Patrick Coughlin	OC			32.5			9.2					41.7	\$1,975	82,357.50
Anna Hunanyan	A		2.9	15.0		46.0	4.3					68.2	\$675	46,035.00
Isabella DeLisi	A			87.2								87.2	\$560	48,832.00
Jeffrey Jacobson	A	24.8	146.4	336.6	121.4	450.7	24.6	128.7	171.9	94.2	30.4	1,529.7	\$775	1,185,517.50
Jonathan Zimmerman	A	26.6			4.9							31.5	\$665	20,947.50
Mandeep Minhas	A	34.4	123.4	670.9	91.6	184.9	36.7	0.8	21.2	176.6	22.9	1,363.4	\$575	783,955.00
Peter Cherepanov	A			14.0	32.5	51.5				0.2		98.2	\$550	54,010.00
Stephen Balding	A			324.3								324.3	\$525	170,257.50
Sun Kim	A			885.0								885.0	\$700	619,500.00
Allen West	PL			0.5		21.0			26.0			47.5	\$435	20,662.50
Matthew Molloy	PL	3.8	50.3	72.0		141.1	9.1		13.3			289.6	\$415	120,184.00
Michael Himes	PL	1.6	1.4	12.7	4.5	3.7						23.9	\$435	10,396.50
Shawn Barren	LS			43.6								43.6	\$435	18,966.00
Alex Vargas	I	18.5										18.5	\$675	12,487.50
Jenna Goldin	I	319.4				0.2						319.6	\$545	174,182.00
Michelle Petrick	I	60.5	15.0									75.5	\$395	29,822.50
TOTAL:		581.1	494.8	2,965.5	572.9	1,326.7	174.8	289.2	395.7	392.4	86.3	7,279.4		6,237,999.50

- | | |
|---------------------|-------------------------|
| (P) Partner | (I) Investigator |
| (OC) Of Counsel | (PL) Paralegal |
| (A) Associate | (LS) Litigation Support |
| (SA) Staff Attorney | |

EXHIBIT C

*STA-ILA v. Olo Inc.***Firm Name: Scott+Scott Attorneys at Law LLP**

MONTH	YEAR	TOTAL FIRM HOURS
October	2022	7.1
November	2022	56.6
December	2022	347.5
January	2023	502.2
February	2023	252.5
March	2023	202.9
April	2023	81.5
May	2023	343.2
June	2023	936.9
July	2023	1085.1
August	2023	789.9
September	2023	391.8
October	2023	559.7
November	2023	521.9
December	2023	674.9
January	2024	300.8
February	2024	224.9
TOTAL HOURS:		7279.4

EXHIBIT D

*STA-ILA v. Olo Inc.***Firm Name: Scott+Scott Attorneys at Law LLP**

EXPENSE	AMOUNT
Consultants/Experts:	
Forensic Economics, Inc	\$260,000.00
Dr. Micah S. Officer	\$198,310.00
Peter Nagel	\$14,400.00
McManis Faulkner PC	\$28,772.57
Mediation	\$11,946.20
Filing & Service of Process	\$4,597.50
Deposition Court Reporters & Transcripts	\$74,251.74
Online Research	\$18,609.07
Telecommunications	\$103.87
Courier Services, Overnight Delivery, Postage	\$1,284.97
Transportation, Hotels, & Meals	\$36,399.74
Third-Party Document Subpoena Reimbursement	\$48,943.33
Printing and Copying	\$5,006.75
Electronic Discovery	\$28,579.03
TOTAL	\$731,204.77

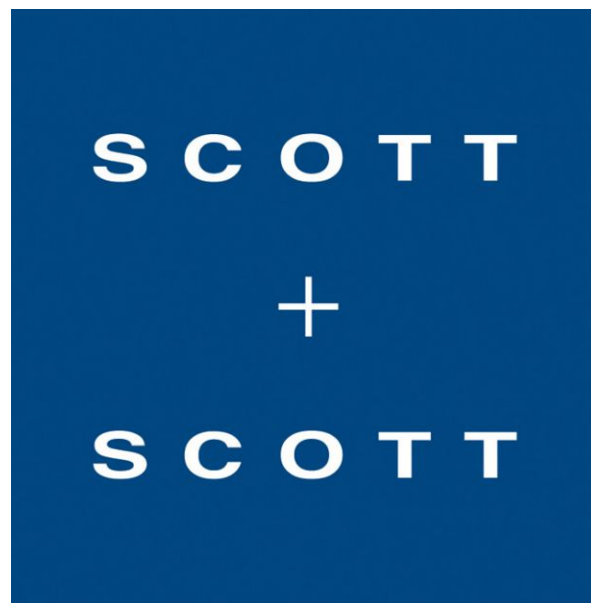
EXHIBIT E

*STA-ILA v. Olo Inc.***Firm Name: Scott+Scott Attorneys at Law LLP**

NAME	DATE	DESTINATION	PURPOSE
Amanda F. Lawrence; Richard P. Krueger, III; Fund Counsel	12/16/2022	New York, New York	Prepare for and attend court hearing
Amanda F. Lawrence	3/27 - 3/28/2023	New York, New York	Prepare for and attend court hearing
Donald A. Broggi; Jeffrey P. Jacobson	5/18/2023	Baltimore, Maryland	Collect discovery evidence and prepare for class certification
Amanda F. Lawrence; Richard P. Krueger, III	6/7/2023	New York, New York	Prepare for and attend deposition
Jeffrey P. Jacobson	6/8/2023	Baltimore, Maryland	Prepare for and attend deposition
Mandeep S. Minhas; Isabella De Lisi	6/25 - 6/30/2023	San Diego, California	Prepare for and attend deposition
Amanda F. Lawrence; Jeffrey P. Jacobson	7/6/2023	Los Angeles, California	Prepare for and attend mediation
Amanda F. Lawrence	7/20/2023	New York, New York	Prepare for and attend deposition
Jeffrey P. Jacobson; Matthew Molloy	7/20/2023	Philadelphia, Pennsylvania	Prepare for and attend deposition
Amanda F. Lawrence	8/7 - 8/9/2023	New York, New York	Prepare for and submit court filing
Patrick Coughlin	9/19/2023	New York, New York	Prepare for and attend court hearing

Amanda F. Lawrence	9/20 - 9/21/2023	New York, New York	Prepare for and attend court hearing
Amanda F. Lawrence	10/25 - 10/27/2023	New York, New York	Prepare for and attend court hearing
Amanda F. Lawrence; Jeffrey P. Jacobson	11/2 - 11/3/2023	Boston, Massachusetts	Prepare for and attend deposition
Amanda F. Lawrence	12/13/2023	San Diego, California	Prepare for and attend deposition
Amanda F. Lawrence	2/6/2024	New York, New York	Prepare for and attend court hearing
Amanda F. Lawrence; Richard P. Krueger, III; Fund Counsel	2/15/2024	New York, New York	Prepare for and attend court hearing

EXHIBIT F



FIRM RESUME

A faint, light-colored background image of a pair of scales of justice, symbolizing law and equity. The scales are centered behind the text.

Scott+Scott specializes in the investigation and prosecution of complex actions across the globe – recovering billions for its clients. The Firm has extensive experience litigating securities fraud, antitrust, consumer and other complex cases and is a pioneer in structured finance monitoring for client portfolios. We represent individual, institutional, and multinational clients in the United States, United Kingdom, and European courts, offering a one-stop shop for international recoupment.



THE FIRM

Scott+Scott was founded in 1975 and began its securities litigation practice in 1997. The Firm has since grown into one of the most respected U.S.-based law firms specializing in the investigation and prosecution of complex securities, antitrust and other commercial actions in both the United States and Europe. Today, the Firm is comprised of more than 135 team members, including more than 100 attorneys supported by a seasoned staff of paralegals, IT and document management professionals, financial analysts, and in-house investigators.

Scott+Scott's largest offices are in New York, N.Y. and San Diego, C.A., with additional U.S. offices located in Connecticut, Virginia, Ohio, and Arizona. The Firm's European offices are currently located in London, Amsterdam, and Berlin.

Scott+Scott has extensive experience litigating cases on behalf of our institutional and individual clients throughout the United States, having served as court-appointed lead or co-lead counsel in numerous securities, antitrust, and consumer class actions, as well derivative and other complex proceedings, in both state and federal courts. The Firm also represents large investors and numerous corporations in commercial and other litigation in courts within the European Union (EU) and the United Kingdom.

Scott+Scott's attorneys are recognized experts and leaders in complex litigation and corporate governance. They have been regular speakers on CLE panels as well as at institutional investor educational conferences around the world and before boards of directors and trustees responsible for managing institutional investments. Scott+Scott attorneys educate institutional investors and governmental entities on the importance of fulfilling fiduciary obligations through the adoption of appropriate asset recovery services, as well as through the development and enforcement of corporate governance initiatives. The Firm's vast experience in structured debt financial litigation has also enabled us to provide clients with in-depth monitoring of their structured finance products, which often come with substantial undisclosed risks due to investors' limited ability to assess what they are acquiring. The Firm also has experience evaluating and monitoring for our clients' debt and debentures originating from private placements and non-public companies, including municipal bonds and derivatives.

SECURITIES AND CORPORATE GOVERNANCE

Scott+Scott has extensive experience litigating claims for violations of the federal securities laws on behalf of our municipal, institutional, and individual investor clients, serving as lead counsel in numerous securities class actions brought under the Securities Act of 1933, the Securities Exchange Act of 1934, and other statutes.

Scott+Scott recognizes that, particularly since the passage of the Private Securities Litigation Reform Act of 1995, bringing successful claims for violations of the federal securities laws requires not only significant litigation experience, but also the ability to bear the skills of its in-house investigators and financial analysts (and often outside consultants) to build a case that can survive both early-stage motions to dismiss and later stage motions for summary judgment. Our philosophy is also based on our view that efforts to negotiate a successful settlement are typically built on the quality of pre-filing investigation diligence, and our willingness to litigate deep into discovery and, if necessary, through summary judgment and trial.

Our securities litigators have experience practicing in state and federal courts across the country. The Firm's attorneys have regularly retained and worked with leading accounting experts, damages experts, and relevant industry experts to build their clients' cases against defendants involved in virtually every type of industry, from pharmaceuticals to dot.coms, from retailers to manufacturers, and from investment banks to accounting firms. The Firm has also submitted *amicus curiae* briefs to the United States Supreme Court on behalf of its clients on important securities laws issues, including in support of the plaintiffs in *California Public Emps.' Ret. Sys. ANZ Securities, Inc.*, 137 S. Ct. 2042 (2017) and *Cyan Inc. v. Beaver County Emp. Ret. Fund*, 138 S. Ct. 1061 (2018).

When appropriate, Scott+Scott prosecutes actions on a class or individual basis. Through our commitment to the best interests of those the Firm represents, Scott+Scott has successfully obtained exceptional monetary results and precedent-setting corporate governance reforms on behalf of investors.

SECURITIES CASE EXAMPLES

Securities class actions where Scott+Scott currently serves as lead or co-lead counsel include:

- *Severt v. UiPath, Inc.*, No. 1:23-cv-07908 (S.D.N.Y.);
- *City of Omaha Police and Firefighters Ret. Sys. v. Cognyte Software Ltd.*, No. 1:23-cv-01769 (S.D.N.Y.);
- *Pompano Beach Police and Firefighters Ret. Sys. v. Olo Inc.*, No. 1:22-cv-08228 (S.D.N.Y.);
- *In re Yatsen Holding Limited Sec. Litig.*, No. 1:22-cv-08165 (S.D.N.Y.);
- *Jochims v. Oatly Group AB*, No. 1:21-cv-06360 (S.D.N.Y.);
- *Gupta v. Athenex, Inc.*, No. 21-cv-337 (W.D.N.Y.);
- *Silverberg v. DryShips Inc.*, No. 2:17-cv-04547 (E.D.N.Y.);
- *Robinson v. Diana Containerships Inc.*, No. 2:17-cv-06160 (E.D.N.Y.);
- *City of Southfield Fire and Police Retirement System v. Hayward Holdings, Inc.*, No. 2:23-cv-04146 (D.N.J.);
- *In re SentinelOne, Inc. Sec. Litig.*, No. 4:23-CV-02786 (N.D. Cal.);
- *Peterson v. TriplePoint Venture Growth BDC Corp.*, No. 3:23-cv-02980 (N.D. Cal.);
- *Sundaram v. Freshworks, Inc.*, No. 3:22-cv-06750 (N.D. Cal.);
- *Strezsak v. Ardelyx Inc.*, No. 4:21-cv-05868 (N.D. Cal.);
- *Golubowski v. Robinhood Mkts.*, No. 3:21-cv-09767 (N.D. Cal.);
- *In re Vaxart, Inc. Sec. Litig.*, No. 3:20-cv-05949 (N.D. Cal.);
- *City of Birmingham Relief and Ret. Sys. v. Acadia Pharms. Inc.*, No. 3:21-cv-00762 (S.D. Cal.);
- *Frouws v. Edgio, Inc., et al.*, No. CV-23-00691 & No. CV-23-01170 (D. Az.);
- *In re Infinity Q Divers. Alpha Fund Sec. Lit.*, No. 651295/2021 (N.Y. Supr. Ct. N.Y. Cnty.);
- *Patel v. Viatrix, Inc.*, No. GD-21-13314 (Pa. Ct. Com. Pl.);
- *In re Cloudera, Inc. Secs. Litig.*, No. 19CV348674 (Cal. Super. Ct. Santa Clara Cnty.);



- *In re Slack Techs., Inc. S'holder Litig.*, No. 19CIV05370 (Cal. Super. San Mateo Cnty.); and
- *Mancour v. SmileDirectClub, Inc.*, No.: 19-1169-IV (Tenn. Chancery Ct, Davidson Cnty.).

Securities class actions which have been resolved where Scott+Scott served as lead or co-lead counsel include:

- *Alaska Elec. Pension Fund v. Pharmacia Corp.*, No. 03-cv-01519 (D.N.J.) (\$164 million settlement);
- *Thurber v. Mattel, Inc.*, No. 2:99-cv-10368 (C.D. Cal.) (\$122 million);
- *In re LendingClub Corp. S'holder Litig.*, No. CIV 537300 (Cal. Super. Ct, San Mateo Cnty.) (part of \$125 global settlement);
- *In re Micro Focus Int'l plc Sec. Litig.*, Lead Case No. 18CIV01549 (CA Super. Ct. San Mateo Cnty.) (\$107.5 million settlement);
- *Okla. Firefighters Pens. vs. Newell Brands Inc.*, No. L-003492-18 (N.J. Sup. Ct. Hudson Cnty.) (\$102.5 million settlement);
- *In re Priceline.com, Inc. Sec. Litig.*, No. 00-cv-01884 (D. Conn.) (\$80 million settlement);
- *Irvine v. ImClone Sys., Inc.*, No. 02-cv-00109 (S.D.N.Y.) (\$75 million settlement);
- *Cornwell v. Credit Suisse Grp.*, No. 08-cv-03758 (S.D.N.Y.) (\$70 million settlement);
- *Policemen's Annuity & Benefit Fund of Chi. v. Bank of Am., N.A.*, No. 12-cv-02865 (S.D.N.Y.) (\$69 million settlement);
- *In re Nw. Corp. Sec. Litig.*, No. 4:03-cv-04049 (D.S.D.) (\$61 million);
- *In re SanDisk LLC Sec. Litig.*, No. 15-cv-01455 (N.D. Cal.) (\$50 million settlement);
- *In re Sprint Sec. Litig.*, No. 00-230077 (Mo. Cir. Ct., Jackson Cnty.) (\$50 million);
- *In re Emulex Corp. Sec. Litig.*, No. 8:01-cv-00219 (C.D. Cal.) (\$39 million);
- *Weston v. RCS Cap. Corp.*, No. 14-cv-10136 (S.D.N.Y.) (\$31 million settlement);
- *In re Greensky Sec. Litig.*, No. 1:18 Civ. 11071 (S.D.N.Y.) (\$27.5M settlement);
- *Irvine v. ImClone Sys., Inc.*, No. 1:02-cv-00109 (S.D.N.Y.) (\$75 million); *Schnall v. Annuity & Life Re (Holdings) Ltd.*, No. 3:02-cv-02133 (D. Conn.) (\$27 million);
- *In re Wash. Mut. Mortg.-Backed Sec. Lit.*, No. 2:09-cv-00037 (W.D. Wash.) (\$26 million recovery);



- *ATRS v Insulet Corp.*, No. 15-12345 (D. Mass.) (\$19.5 million settlement);
- *In re King Digit. Ent. PLC S'holder Litig.*, No. CGC-15-544770 (Cal. Sup. Ct. San Francisco Cnty.) (\$18.5 million settlement);
- *In re Evoqua Water Corp. Sec. Litig.*, No. 1:18-cv-10320 (S.D.N.Y.) (\$16.65 million settlement);
- *In re Conn's, Inc. Secs. Litig.*, No. 4:14-cv-00548 (S.D. Tex.) (\$22.5 million settlement);
- *In re DouYu Int'l Hold'gs Ltd. Sec. Litig.*, No. 651703/2020 (N.Y. Supr. Ct. N.Y. Cnty.) (\$15 million settlement);
- *Abadilla v. Precigen, Inc.*, No. 5:20-cv-06936 (N.D. Cal.) (\$13 million settlement);
- *Collins v. Oilsands Quest Inc.*, No. 11 Civ. 1288 (S.D.N.Y.) (\$10.235 million settlement);
- *Kaplan v. S.A.C. Cap. Advisors, L.P.*, No. 1:12cv-9350 (S.D.N.Y.) (\$10 million settlement);
- *Rosenberg v. Cliffs Natural Res. Inc.*, No. CV 14 828140 (Ct. Common Pleas Cuyahoga Cnty. Ohio) (\$10 million settlement);
- *Erie Cnty. Empl. Ret. Sys. v. NN, Inc.*, No. 656462/2019 (N.Y. Supr. Ct. N.Y. Cnty.) (\$9.5 million settlement);
- *In re Endochoice Holdings, Inc., Sec. Litig.*, No. 2016 CV 277772 (Ga. Sup. Ct. Fulton Cnty) (\$8.5 million settlement);
- *Okla. Police Pension Fund & Ret. Sys. v. Jagged Peak Energy, Inc.*, No. 2017 CV 31757 (Colo. Dist. Ct., Denver Cnty.) (\$8.25 million settlement);
- *In re Netshoes Secs. Litig.*, No. 157435/2018 (N.Y. Sup. Ct. N.Y. Cnty.) (\$8 million settlement);
- *City of Omaha Police & Fire Ret. Sys. v. LHC Grp, Inc.*, No. 6:12-CV-01609 (W.D. La.) (\$7.85 million settlement);
- *In re Pac. Coast Oil Trust Secs. Litig.*, No. BC550418 (Cal. Sup. Ct. Los Angeles Cnty.) (\$7.6 million settlement);
- *In re Pacific Biosci. of C.A., Inc. Sec. Litig.* (Cal. Sup. Ct. San Mateo Cnty.) (\$7.6 million recovery);
- *Plymouth Cnty. Contributory Ret. Sys. v. Adamas Pharms., Inc.*, No. RG19018715 (Cal. Sup. Ct. Alameda Cnty.) (\$7.5M settlement);
- *St. Lucie Cnty. Fire Dist. Firefighters' Pens. Trust v. Southwestern Energy Co.*, No. 2016-70651 (Tex. Dist. Ct. Harris Cnty.) (\$7 million settlement); and



- *Mo-Kan Iron Workers Pension Fund v. Teligent, Inc.*, No. 1:19-cv-03354 (S.D.N.Y.) (\$6 million settlement).



SHAREHOLDER DERIVATIVE CASE EXAMPLES

Shareholder derivative actions where Scott+Scott currently serves in a sole or leadership role include:

- *In re Facebook Derivative Litig.*, Consol. No. 2018-0307 (Del. Ch.)
- *Evergreen Capital Mgmt. LLC v. Pacific Coast Energy Co. LP*, No. 20STCV26290 (Cal. Sup. Ct.)
- *In re Alphabet, Inc., S'holder Deriv. Litig.*, No. 3:21-cv-09388-RS (N.D. Cal.)
- *Lindsey v. Immelt*, Index No. 202019718 (N.Y. Sup. Ct.)
- *Bottoni v. Hernandez*, No. 20-cv-01442 (S.D.Tex.)
- *Savage v. Kotick*, No. 22STCV17478 (Cal. Sup. Ct.)
- *In re Exelon Corp. Deriv. Litig.*, No. 1:21-cv-03611 (N.D. Ill.)
- *Presura v. Casey*, (Del. Ch.)
- *Trimm v. Schultz*, (Wash. Sup. Ct., Kings County)
- *In re Abbott Laboratories Infant Formula Shareholder Deriv. Litig.*, No. 1:22-cv-05513 (N.D. Ill.)

Representative shareholder derivative actions litigated by Scott+Scott which have been successfully resolved include:

- *Irving Firemen's Relief & Ret. Fund v. Page*, C.A. No. 2019-0355-Sg (Del. Ch. 2020) (\$310 million in funding for corporate governance reform programs over 10 years);
- *In re DaVita Healthcare Partners Deriv. Litig.*, No. 13-cv-01308 (D. Colo.) (corporate governance reforms valued at \$100 million);
- *Buffalo Grove Police Pension Fund v. Diefenderfer*, No. 19-cv-00062 (E.D. Pa.) (claims vs. Navient Corp. officers & directors settled for corporate governance reforms valued at \$139 million);
- *Tharp v. Acacia Commc'ns, Inc.*, No. 1:17-cv-11504 (D. Mass.) (claims vs. company and corporate officers & directors settled for corporate governance reforms valued at \$57-\$71 million);

- *N. Miami Beach Gen. Emps. Ret. Fund v. Parkinson*, No. 10-cv-06514 (N.D. Ill.) (corporate governance reforms valued between \$50 and \$60 million);
- *In re Marvell Tech. Grp. Ltd. Deriv. Litig.*, No. 06-cv-03894 (N.D. Cal.) (\$54.9 million settlement and corporate governance reforms);
- *Rudi v. Wexner*, No. 2:20-cv-3068 (S.D. Ohio) (\$90 million in funding for corporate governance reform programs over at least 5 years);
- *In re Universal Health Servs., Inc. Derivative Litig.*, No. 2:17-cv-02187 (E.D. Pa.) (Settled for corporate governance reforms conservatively valued at \$110 million);
- *In re Altria Group, Inc. Deriv. Litig.*, Consol. No. 3:20-cv-00772 (E.D. Va.) (successfully resolved for corporate governance reforms with multi-year funding commitment of \$117 million);
- *In re Symantec Corp. S'holder Deriv. Litig.*, Consol. C.A. No. 2019-0224-JTL (Del. Ch.) (successfully resolved for \$12 million cash payment to company and corporate governance reforms); and
- *In re World Wrestling Ent., Inc. Deriv. Stockholder Litig.*, Consolidated C.A. No. 2023-0039-JTL (Del. Ch.)

ACCOLADES

U.S. News & World Report “Best Law Firms”

The Firm is currently ranked by U.S. News & World Report as a “Best Law Firm” in commercial litigation in the New York region.

American Antitrust Institute

The 2018 Antitrust Annual Report recognized *In re Foreign Currency Benchmark Rates Antitrust Litigation* as the #1 settlement of 2018, as well as ranking the Firm #1 nationally for aggregate settlements: 2013-2018.

Global Competition Review

At the 6th Annual Global Competition Review (“GCR”) Awards, Scott+Scott won for Litigation of the Year – Cartel Prosecution, which recognized the Firm’s efforts in the foreign exchange settlements in the United States, a landmark case in which major banks conspired to manipulate prices paid in the \$5.3 trillion-per-day foreign exchange market and have thus far settled for more than \$2 billion.

Law 360 Glass Ceiling Report

Scott+Scott is recognized as one of the top law firms in the nation for female attorneys by the legal publication Law360. The Glass Ceiling Report honors firms that “are demonstrating that the industry’s gender diversity goals can turn into a measurable result, and boost the number of women at all levels of a law firm.”^{1,2} This selection highlights the importance Scott+Scott places on diversity and inclusion within the Firm.

Center for Constitutional Rights

Scott+Scott was the recipient of the 2010 Center for Constitutional Rights’ Pro Bono Social Change Award for its representation of the Vulcan Society, an association of African-American firefighters, in challenging the racially discriminatory hiring practices of the New York City Fire Department.

¹ <https://www.law360.com/articles/1310926>

² <https://www.law360.com/articles/1162859/the-best-law-firms-for-female-attorneys>.



WORLD-CLASS ATTORNEYS

We pride ourselves on the caliber of legal talent on our team. In addition to some of the best and brightest rising stars, we have attorneys who have served with distinction in the U.S. Department of Justice, been admitted to the U.S. Supreme Court, served in OAGs at the state level, argued before the UK's CAT and High Courts, and received virtually every accolade offered in our profession.





ADMISSIONS

U.S. Admissions: United States Supreme Court; United States Courts of Appeal for the First, Second, Third, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, and Eleventh Circuits; United States District Courts for the Districts of California (Northern, Southern, Eastern, and Central), Colorado, Connecticut, Florida (Northern), Illinois (Northern), Massachusetts, Michigan (Eastern), Missouri (Eastern), New Jersey, New York (Southern, Eastern, and Western), Ohio (Northern and Southern), Pennsylvania (Eastern and Western), Texas (Northern, Western, and Southern), Wisconsin (Eastern and Western), and the District of Columbia; and the courts of the States of Arizona, California, Connecticut, Delaware, Florida, Maryland, Pennsylvania, Massachusetts, Nebraska, New Jersey, New York, Ohio, West Virginia, Wisconsin, Texas, and the District of Columbia.

ATTORNEY BIOGRAPHIES

DAVID R. SCOTT

PRACTICE EMPHASIS

Managing Partner David R. Scott represents multinational corporations, hedge funds, and institutional investors in high-stakes, complex litigation, including antitrust, commercial, and securities actions.

ADMISSIONS

States of New York, Pennsylvania, and Connecticut; United States Tax Court; United States Courts of Appeal: Second, Third, and Fifth Circuits; United States District Courts: Southern District of New York, Connecticut, Eastern District of Pennsylvania, Northern and Southern Districts of Texas, and Colorado

EDUCATION

New York University School of Law (LL.M. in taxation); Temple University School of Law (J.D., Moot Court Board, 1989); St. Lawrence University (B.A., cum laude, 1986)

HIGHLIGHTS

Mr. Scott is the Managing Partner of Scott+Scott with offices in New York, Amsterdam, London, Berlin, California, Connecticut, Virginia, Arizona, and Ohio.

In addition to managing the firm's lawyers worldwide, Mr. Scott advises some of the world's largest multinational corporations in cartel damages and other complex matters. He has been retained to design corporate policies for the global recoupment of losses, and transatlantic private enforcement programs.

He currently represents multinational companies and hedge funds in cases involving, among other things, price-fixing in the trucks, foreign exchange, high voltage power cables, cardboard, and payment card sectors.

Mr. Scott's antitrust cases in the United States have resulted in significant recoveries for victims of price-fixing cartels. Among other cases, Mr. Scott served as co-lead counsel in *Dahl v Bain Cap. Partners*, No. 1:07-cv-12388 (D. Mass.), an action alleging that the largest private equity firms in the United States colluded to suppress prices that shareholders received in leveraged buyouts and that the defendants recently agreed to settle for \$590.5 million. He was lead counsel in *Red Lion Med. Safety v. Ohmeda*, No. 06-cv-1010 (E.D. Cal.), a lawsuit alleging that Ohmeda, one of the leading manufacturers of medical anesthesia equipment in the United States, excluded



independent service organizations from the market for servicing its equipment. The case was successfully resolved in settlement negotiations before trial.

Mr. Scott has received widespread recognition for his antitrust and competition law work. He has been elected to Who's Who Legal: Competition 2015- 2020, which lists the world's top antitrust and competition law lawyers, selected based on comprehensive, independent survey work with both general counsel and lawyers in private practice around the world. He has also received a highly recommended ranking by Benchmark Litigation for each of the years 2013-2015. In addition, Mr. Scott is continually recognized in the U.S. by Best Lawyers and Super Lawyers.

In addition to his extensive competition law work, Mr. Scott has also taken the lead in bringing claims on behalf of institutional investors, such as sovereign wealth funds, corporate pension schemes, and public employee retirement funds. For example, he has been retained to pursue losses against mortgaged-backed securities trustees for failing to protect investors. He also represented a consortium of regional banks in litigation relating to toxic auction rate securities ("ARS") and obtained a sizable recovery for the banks in a confidential settlement. This case represents one of the few ARS cases in the country to be successfully resolved in favor of the plaintiffs.

Mr. Scott is frequently quoted in the press, including in publications such as The Financial Times, The Economist, The Guardian, The Daily Telegraph, The Wall Street Journal, and Law360. He is regularly invited to speak at conferences around the world and before Boards of Directors and trustees responsible for managing institutional investments.



DARYL F. SCOTT

PRACTICE EMPHASIS

Daryl F. Scott specializes in complex securities litigation.

ADMISSIONS

State of Virginia

EDUCATION

Georgetown University Law Center (Masters in Taxation, 1986); Creighton University School of Law (J.D., 1984); Vanderbilt University (B.A. Economics, 1981)

HIGHLIGHTS

Mr. Scott is a partner across all offices and involved in complex securities litigation at Scott+Scott. In addition to his work with the firm, Mr. Scott has specialized in private foundation and ERISA law. He was also formerly an executive officer of a private equity firm that held a majority interest in a number of significant corporations. Mr. Scott is admitted to the Supreme Court of Virginia and is member of the Virginia and Connecticut Bar Associations.



AMANDA LAWRENCE

PRACTICE EMPHASIS

Amanda F. Lawrence is actively engaged in the Firm's complex securities, corporate governance, consumer, and antitrust litigation.

ADMISSIONS

States of Connecticut and Massachusetts; United States Courts of Appeal: First and Ninth Circuits; United States District Courts: Southern District of New York, Connecticut, and Massachusetts

EDUCATION

Yale Law School (J.D., 2002); Dartmouth College (B.A., *cum laude*, 1998)

HIGHLIGHTS

Ms. Lawrence is a partner in our Connecticut office. In the antitrust realm, Ms. Lawrence served as co-lead counsel in the matter, *In re: GSE Bonds Antitrust Litigation*, No. 1:19-cv-01704-JSR (S.D.N.Y.) which alleged manipulation of the prices in the \$550 billion government sponsored entities bond market by some of the largest banks in the world. The case settled for \$386.5 million as well as requiring injunctive relief. Ms. Lawrence was also intricately involved in the "ISDAFix case" – *Alaska Electrical Pension Fund v. Bank of America*, 1:14-cv-07126-JMF-OTW (S.D.N.Y.). That achieved over \$504.5 million in recovery from large financial institutions for investors. Currently, Ms. Lawrence also works on *In Re Cattle Antitrust Litig.*, 0:22-md-03031-JRT-JFD (D. Minn.) and *In re European Governments Bonds Antitrust Litig.*, 1:19-cv-2601 (S.D.N.Y.), two large international antitrust actions.

In her securities practice, Ms. Lawrence has worked on numerous Exchange Act and 1933 Act cases that have resulted in substantial settlements. For example, she served as co-lead counsel in *In re: Micro Focus International PLC Securities Litigation*, No. 18-cv-01549 (Cal. Super. Ct. San Mateo Cnty.), a California 1933 Act that settled for \$107.5 million. Other securities cases Ms. Lawrence has worked on include: *Police and Fire Retirement System of the City of Detroit v. Crane*, No. 13-cv-00945-VC (N.D. Cal.) (\$5.1 million securities class action settlement); *Rubenstein v. Oilsands Quest Inc.*, No. 11-1288 (S.D.N.Y.) (securities settlement of \$10.235 million); *Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass-Through Certificates*, No. 09-cv-00037 (W.D. Wash.) (\$26 million securities class action settlement); *In re Fireeye, Inc. Securities Litigation*, No. 14-cv-266866 (Cal. Super. Ct. Santa Clara Cnty.); *St. Lucie Cnty. Fire Dist. Firefighters' Pension Trust v. Southwestern Energy Co.*, No. 4:16-cv-569 (S.D. Tex.); *In re LendingClub Corp. Shareholder Litig.*, No. CIV537300 (Cal. Super. Ct. San Mateo Cnty.); and *In re TETRA Technologies, Inc. Securities Litig.*, No. 4: 07-cv-00965 (S.D. Tex.) (\$8.25 million securities class action settlement).



In addition to antitrust and securities matters, Ms. Lawrence has also worked on consumer cases that have resulted in significant settlements for the affected classes. For example, Ms. Lawrence helped achieve a settlement in the *The United States v. The City of New York*, No. 07-CV-2067 (E.D.N.Y.) that awarded back pay and lost fringe benefits to a class of African American and Hispanic firefighters in New York City, as well as a settlement in *In re Prudential Life Insurance Co. of America SGLI/VGLI Contract Litig.*, No. 11-02208 (D. Mass.) that brought a \$39 million settlement on behalf of families of deceased servicemen and women against Prudential.

Ms. Lawrence has taught Trial Practice at the University of Connecticut School of Law and is very actively involved in her community, particularly in recreational organizations and events.

A five-time NCAA National Champion cyclist who raced throughout the United States, Europe, Bermuda, and Pakistan, Ms. Lawrence is now an avid endurance athlete. Ms. Lawrence has competed in dozens of marathons, including the New York Marathon and the Boston Marathon, and in 18 full-distance ironman competitions – five of which were at the Ironman World Championships in Kona, Hawaii.



DONALD A. BROGGI

PRACTICE EMPHASIS

Mr. Broggi is engaged in the Firm's securities, antitrust, mass tort, and consumer litigation practices.

ADMISSIONS

States of New York and Pennsylvania

EDUCATION

Duquesne University School of Law (J.D., 2000); University of Pittsburgh (B.A., 1990)

HIGHLIGHTS

Mr. Broggi is a partner in the Firm's New York office and has represented institutional investors, including public pension funds and Taft-union funds in a variety of complex cases, including: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-07789 (S.D.N.Y.): an antitrust class action alleging the world's largest banks conspired to fix the price of foreign currencies (\$2.3 billion in settlements to date); *Alaska Elec. Pension Fund v. Bank of Am. Corp.*, No. 14-cv-07126 (S.D.N.Y.): an antitrust class action alleging the world's largest banks conspired to manipulate the ISDAfix rate (\$504 million settlement); *Dahl v. Bain Capital Partners*, No. 07-cv-12388 (D. Mass.): an antitrust class action alleging that the nation's largest private equity firms, including KKR, Blackstone, TPG, Carlyle, Bain Capital, and Goldman Sachs, colluded to restrain competition and suppress prices paid to shareholders of public companies in connection with multi-billion dollar leveraged buyouts (\$590.5 million settlement); *In re GSE Bonds Antitrust Litigation*, No. 19-cv-01704 (S.D.N.Y.): an antitrust class action alleging manipulation in the market for bonds issued by Government-Sponsored Entities, e.g., Freddie Mac and Fannie Mae (\$386.5 million settlement pending final approval); *Irvine v. ImClone Sys., Inc.*, No. 02-cv-00109 (S.D.N.Y.): a securities fraud class action alleging that defendants violated Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 by issuing materially false and misleading statements to the market regarding the cancer drug Erbitux (\$75 million settlement); *In re Wash. Mut. Mortg.-Backed Sec. Litigation*, No. 09-cv-00037 (W.D. Wash.): a securities fraud class action against Washington Mutual Bank alleging violations of §11 of the Securities Act for misleading investors about the quality of their mortgage-backed securities (\$69 million settlement); *In re SanDisk LLC Sec. Litigation*, No. 15-cv-01455 (N.D. Cal.): a securities fraud class action alleging that defendants intentionally inflated the price of the Company's stock by making false and misleading statements and concealing information relating to SanDisk's business, operations, and prospects (\$50 million settlement); and *Arkansas Teacher Retirement System v. Insulet Corp.*, No. 15-cv-12345 (D. Mass.): a securities fraud class action alleging Insulet Corporation intentionally inflated the price of the Company's stock by issuing false and misleading statements concerning Insulet's launch of its new insulin infusion system, branded the OmniPod Eros (\$19.5 million settlement), among others.



Currently, Mr. Broggi is also representing cities, counties, and other municipalities from Massachusetts, Pennsylvania, New Jersey, and Florida in both state and federal litigation against the manufacturers and distributors of opioid medications.

Mr. Broggi also works with the Firm's institutional investor clients, including hundreds of public pension systems and Taft-Hartley funds throughout the United States, to confirm their funds have proper safeguards in place to ensure against corporate malfeasance, and regularly consults with institutional investors in the United States on issues relating to corporate fraud in the U.S. securities markets, as well as corporate governance issues and shareholder litigation.

Mr. Broggi has lectured at institutional investor conferences throughout the United States on the value of shareholder activism as a necessary component of preventing corporate fraud abuses, including the Texas Association of Public Employee Retirement Systems, Georgia Association of Public Pension Trustees, Michigan Association of Public Retirement Systems, Illinois Public Pension Fund Association, and the Pennsylvania Association of County Controllers, among others.



DEBORAH CLARK-WEINTRAUB

PRACTICE EMPHASIS

Deborah Clark-Weintraub has extensive experience in all types of class action litigation.

ADMISSIONS

State of New York; United States Courts of Appeal: First, Second, Sixth, Seventh and Eighth Circuits; United States District Courts: Southern and Eastern Districts of New York, Eastern District of Michigan and Eastern District of Wisconsin

EDUCATION

Hofstra Law School, Hempstead, NY (J.D., with distinction, 1986); St. John's University, Queens, NY (B.A., *summa cum laude*, 1981)

HIGHLIGHTS

Ms. Weintraub is a partner in the firm's New York office and focuses her practice on securities litigation.

Ms. Weintraub has represented investors in numerous cases that have resulted in substantial recoveries, including *In re Oxford Health Plans, Inc. Securities Litigation*, MDL No. 1222 (S.D.N.Y.) (\$300 million settlement); *In re CVS Corporation Securities Litigation*, No. 01-11464 (D. Mass.) (\$110 million settlement); *Policemen's Annuity and Benefit Fund of the City of Chicago v. Bank of America, NA*, No. 1:12-cv-2865 (S.D.N.Y.) (\$69 million settlement); *In re SanDisk LLC Securities Litigation*, No. 3:15-cv-01455-VC (N.D. Cal.) (\$50 million settlement); *Weston v. RCS Capital Corp.*, No. 1:14-cv-10136 (S.D.N.Y.) (\$31 million settlement); and *In re Conn's, Inc. Securities Litigation*, No. 4:14-cv-00548 (S.D. Tex.) (\$22.5 million settlement), among others.

Ms. Weintraub has also obtained substantial recoveries in consumer litigation, including *Young v. Wells Fargo & Co.*, No. 4:08-cv-00507-RP-CFB (S.D. Iowa) (\$25.7 million settlement).

Ms. Weintraub is currently representing investors in several ongoing securities class action cases, including *Oklahoma Firefighters Pension and Ret. Sys. v. Newell Brands, Inc.*, No. HUD-L-003492-18 (N.J. Super. Ct.); *In re Lyft, Inc. Securities Litigation*, No. CGC-19-575293 (Cal. Super. Ct.); *Erie County Emps. Ret. Sys. v. NN, Inc.*, No. 656462/2019 (N.Y. Sup. Ct.); *In re JPMorgan Precious Metals Spoofing Litigation*, No. 1:18-cv-10356-GHW (S.D.N.Y.); *In re Merrill, BOFA, and Morgan Stanley Spoofing Litigation*, No. 19-cv-6002 (LJL) (S.D.N.Y.); and *City of Warren Police & Fire Ret. Sys. v. CVS Health Corp.*, No. PC-2019-5658 (R.I. Super. Ct.).



Ms. Weintraub is the co-author of *Gender Bias and the Treatment of Women as Advocates*, *Women in Law* (1998), and the *Dissenting Introduction* defending the merits of securities class action litigation contained in the 1994 monograph *Securities Class Actions: Abuses and Remedies*, published by the National Legal Center for the Public Interest.

While in law school, Ms. Weintraub was a member and research editor of the *Hofstra Law Review*. Following her graduation from Hofstra Law School, Ms. Weintraub served as a law clerk to the Honorable Jacob Mishler, United States District Judge for the Eastern District of New York (1986-1987).

Super Lawyers 2019 - 2021



THOMAS LAUGHLIN

PRACTICE EMPHASIS

Thomas Laughlin's practice focuses on securities class action, shareholder derivative, ERISA, and other complex commercial litigation.

ADMISSIONS

State of New York; United States Courts of Appeal: Second, Third, Ninth, and Eleventh Circuits; United States District Courts: Southern and Eastern Districts of New York, Northern District of Florida, District of Columbia, and Eastern District of Michigan

EDUCATION

New York University School of Law (J.D., *cum laude*, 2005); Yale University (B.A. History, *cum laude*, 2001)

HIGHLIGHTS

Mr. Laughlin is a partner in the New York office and focuses on securities class action, shareholder derivative, ERISA, and other complex commercial litigation. After graduating from law school, Mr. Laughlin clerked for the Honorable Irma E. Gonzalez, United States District Court Judge for the Southern District of California.

While at Scott+Scott, Mr. Laughlin has worked on several cases that have achieved notable victories, including *Cornwell v. Credit Suisse*, No. 08-3758 (S.D.N.Y.) (securities settlement of \$70 million), *In re SanDisk LLC Securities Litigation*, No. 3:15-CV-01455-VC (N.D. Cal.) (securities settlement of \$50 million); *Weston v. RCS Capital Corp.*, No. 1:14-cv-10136-GBD (S.D.N.Y.) (securities settlement of \$31 million); *In re King Digital Entertainment plc Shareholder Litigation*, No. CGC-15-544770 (Cal. Super. Ct. San Francisco Cnty.) (securities settlement of \$18.5 million); and *Rubenstein v. Oilsands Quest Inc.*, No. 11-1288 (S.D.N.Y.) (securities settlement of \$10.235 million).

Mr. Laughlin also has significant appellate experience, having represented clients in connection with several appellate victories, including *Cottrell v. Duke*, 737 F.3d 1238 (8th Cir. 2013); *Westmoreland County Employee Ret. Sys. v. Parkinson*, 727 F.3d 719 (7th Cir. 2013); *Pfeil v. State Street Bank and Trust Co.*, 671 F.3d 585 (6th Cir. 2012); and *King v. VeriFone Holdings, Inc.*, 12 A.3d 1140 (Del. Sup. 2011).

In 2014, Mr. Laughlin was co-chair of a 13-day bench trial in *Bankers' Bank Northeast v. Berry, Dunn, McNeil & Parker, LLC*, No. 12-cv-00127 (D. Me.). He represented a consortium of 10 community banks asserting negligence and professional malpractice claims against the former officers and



directors of a bank and its auditor in connection with an \$18 million loan made to that bank in September 2008. Among other things, Mr. Laughlin conducted the cross-examination of all three witnesses from the defendant's auditing firm and the direct examination of plaintiff's auditing expert. The parties to the action succeeded in resolving the action after trial.

Mr. Laughlin has also been named a Super Lawyer for 2021.



PATRICK COUGHLIN

PRACTICE EMPHASIS

Patrick Coughlin is “of counsel” to the firm in the firm’s San Diego office. His primary practice focuses on securities and competition law.

ADMISSIONS

State of New York; New York State Supreme Court, Appellate Division, Third Judicial Department; State of California; District of Columbia; United States District Courts: Northern, Eastern, Southern, and Central Districts of California; United States District Court for the District of Columbia, the Northern District of Illinois, the Southern and Eastern Districts of New York; United States Court of Appeals for the Second, Fifth, Sixth, Seventh, Ninth, Eleventh Circuits, and D.C. Circuit; United States Supreme Court

EDUCATION

Golden Gate University School of Law (J.D., 1983); Santa Clara University (B.S., 1977)

HIGHLIGHTS

Patrick started his law career with the DOJ Criminal Division Appellate Section in the Honors Program handling numerous appeals in a number of circuits. From there, Patrick moved on as an Assistant United States Attorney in the District of Columbia and the Southern District of California, handling complex white-collar fraud matters. During this time, he helped try one of the largest criminal RICO cases ever prosecuted by the United States. *United States v. Brown*, No. 86-3056-SWR (D.D.C.), as well as an infamous oil fraud scheme resulting in a complex murder-for-hire trial, *United States v. Boeckman*, No. 87-cr-00676 (S.D. Cal.).

Over his career, Patrick has tried more than 50 cases, including some of the most complex civil matters to go to trial against some of the largest companies in the World such as: Apple, Nationwide, the large tobacco companies, Wells Fargo, and Credit Suisse. Patrick was pivotal in the case against RJ Reynolds for using its Joe Camel cartoon mascot to target children and secured a multibillion-dollar payout for California cities and counties in the State’s landmark 1998 settlement with the tobacco companies. Patrick was also one of the lead attorneys who, representing the Class on a *pro bono* basis, recovered \$25 million on behalf of Trump University students in a class action against former President Donald J. Trump.

Patrick has extensive federal appellate class action experience having argued dozens of appeals including a number of significant class cases such as **Enron**. *Regents of the Univ. of Cal v. Credit Suisse First Boston*, 482 F.3d 372 (5th Cir. 2007) (the largest securities Class recovery – \$7.2 billion); **Aluminum**, *Eastman Kodak Co. v. Henry Bath LLC*, 935 F.3d 86 (2d Cir. 2019) (the most recent antitrust standing case



out of the Second Circuit); **America West**, *No. 84 Employee Teamster Joint Council Pension Trust Fund v. Am. W. Holding Corp.*, 320 F.3d 920 (9th Cir. 2003) (first securities case in the Ninth Circuit reversing a dismissal under the PSLRA); **AT&T**, *In re: Text Messaging Antitrust Litigation Aircraft Check Services Co. v. Verizon Wireless*, 782 F.3d 867 (7th Cir. 2015) (Seventh Circuit antitrust case dealing with conscious parallelism versus an express agreement); and *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, 62 F.4th 704 (2d Cir. 2023) (the largest antitrust recovery – \$6.2 billion). Patrick has argued in both the California and United States Supreme Courts. See *Harris v. Superior Court of California*, California Supreme Court Nos. S156555 and S205097 and *Dura Pharmaceuticals, Inc. v. Broudo*, 544 U.S. 336 (2005).

A talented athlete, Patrick received multiple scholarship offers to play football in his home State of Arizona including from the University of Arizona and Arizona State, ultimately choosing to go out of State to the University of Santa Clara where he played football and ran track. Just after college, Patrick traveled to Puebla, Mexico to coach football and attend medical school for a year before law school.



MICHAEL BURNETT

PRACTICE EMPHASIS

Michael G. Burnett practices complex securities litigation at the firm, where he consults with institutional clients on corporate fraud in the securities markets as well as corporate governance issues.

ADMISSIONS

State of Nebraska; United States District Courts: District of Nebraska

EDUCATION

Creighton University School of Law (J.D., 1984); Creighton University (B.A. Finance, 1981)

HIGHLIGHTS

In addition to his work with the firm, Mr. Burnett has specialized in intellectual property and related law. His representations include: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y.) (\$2 billion settlement); *Alaska Electrical Pension Fund v. Bank of America Corporation*, No. 14-cv-7126 (S.D.N.Y.) (\$325 million settlement); *Dahl v. Bain Capital Partners*, No. 07-cv-12388 (D. Mass.) (\$590.5 million settlement).

Michael is also a member of the Nebraska Bar Association.

PERSONAL LIFE

Mike and his wife, Mary, are lifelong residents of Nebraska. The entire Burnett family (7 in all) share a special bond with Creighton University. Mike played collegiate golf on the Creighton Division 1 golf team. Mary is a graduate of Creighton University and the University of Nebraska Medical School and was until recently a practicing anesthesiologist. Mike and Mary have five children. Three children are graduates of Creighton and two are attending the University. Two dogs (Tyson and Luna) round out the Burnett family.



JEFFREY P. JACOBSON

PRACTICE EMPHASIS

Jeffrey P. Jacobson specializes in complex securities and commodities litigation.

ADMISSIONS

State of New York; United States Courts of Appeal: Second Circuit; United States District Courts: Southern, Eastern, and Western Districts of New York

EDUCATION

George Washington University Law School (J.D., High Honors, Order of the Coif, 2017); The George Washington University (B.A., Journalism & Political Science, *summa cum laude*, Distinguished Scholar, 2013)

HIGHLIGHTS

Jeff is a litigation associate in our New York office where he specializes in securities litigation in both federal and state court. Jeff represents pension funds and individuals in their civil suits prosecuting publicly traded companies and their principals for securities fraud and malfeasance. Jeff also represents institutional and individual investors in commodities fraud cases against corporate traders that manipulate the commodities markets.

Jeff was named a Super Lawyers Rising Star by Thompson Reuters in 2021, 2022, and 2023.

Several of Jeff's recent settlements include:

In re Micro Focus Int'l PLC Secs. Litig., No. 18CIV01549 (Cal. Super. San Mateo Cnty.) (\$107.5M settlement); *In re JPMorgan Precious Metals Spoofing Litig.*, No. 1:18-cv-10356 (S.D.N.Y.) (\$60M settlement); *In re Greensky Sec. Litig.*, No. 1:18 Civ. 11071 (S.D.N.Y.) (\$27.5M settlement); *Abadilla v. Precigen, Inc.*, No. 5:20-cv-06936 (N.D. Cal.) (\$13M settlement); *In re Vaxart, Inc. Sec. Litig.*, No. 3:20-cv-05949 (N.D. Cal.) (\$12.015M settlement); *Erie County Emps. Ret. Sys. v. NN, Inc.*, No. 656462/2019 (N.Y. Sup. Ct.) (\$9.5M settlement); *In re Netshoes Secs. Litig.*, No. 157435/2018 (N.Y. Sup. Ct. N.Y. Cnty.) (\$8 million settlement); *Plymouth Cnty. Contributory Ret. Sys. v. Adamas Pharms., Inc.*, No. RG19018715 (Cal. Sup. Ct. Alameda Cnty.) (\$7.5M settlement); and *Mo-Kan Iron Workers Pension Fund v. Teligent, Inc.*, No. 1:19-cv-03354 (S.D.N.Y.) (\$6M settlement).

Prior to joining Scott+Scott, Jeff was a litigation associate at a major international law firm where he represented clients in securities cases, bankruptcy proceedings, and antitrust matters, and advised clients on employment matters.



JONATHAN ZIMMERMAN

PRACTICE EMPHASIS

Jonathan Zimmerman's practice primarily focuses on identifying, investigating and initiating complex federal securities class actions on behalf of individual and institutional shareholders. He is also involved in multiple shareholder derivative actions and other complex commercial matters.

ADMISSIONS

States of New Jersey and Pennsylvania; United States District Courts: District of New Jersey and Eastern District of Pennsylvania

EDUCATION

Temple University, Beasley School of Law (J.D., 2016); McGill University, Desautels School of Management (Bachelor of Commerce, 2009)

REPRESENTATIVE CASES

- *In re SanDisk LLC Securities Litigation*, No. 3:15-CV-01455-VC (N.D. Cal.) (part of the team that recovered \$50 million in class action alleging violations of the Securities Exchange Act of 1934)
- *City of Birmingham Relief and Retirement System v. Hastings*, No. 5:18-cv-02107-BL (N.D. Cal.)

HIGHLIGHTS

Mr. Zimmerman is an associate in the New York office where he focuses on federal securities and shareholder derivative litigation. He is the Former Staff Editor of Temple's *International and Comparative Law Journal* and Recipient of Best Paper Award in Advanced Financial Regulations for his work entitled *Corporate Diversions: Short-Term Tax Savings at the Expense of Shareholder Rights* (Spring 2015).

Mr. Zimmerman is a former two-time All-Canadian collegiate lacrosse player and co-captain of McGill University's men's varsity team.



MANDEEP S. MINHAS

BIO

Mr. Minhas is an associate in the Firm's New York office. He specializes in federal and state securities litigation on behalf of individual and institutional shareholders. Before joining Scott+Scott, Mr. Minhas was an associate at a trial firm in New York. He has represented plaintiffs on complex international matters including unfair competition, racketeering, and human trafficking.

ADMISSIONS

State of New York; U.S. District Courts for the Southern, Eastern, and Northern Districts of New York

EDUCATION

Boston College Law School (J.D., 2020); Columbia University (M.A., 2016); University of Texas (B.A., 2013)



ANNA HUNANYAN

PRACTICE EMPHASIS

Anna Hunanyan focuses on complex antitrust litigation and class actions.

ADMISSIONS

State of California; State of Massachusetts

EDUCATION

University of California, Los Angeles (Bachelor of Arts, Honors, Business Economics, 2013); Boston College School of Law (Juris Doctor, 2017); Columbia University (Master of International Affairs, 2023)

HIGHLIGHTS

Ms. Hunanyan works primarily in Scott+Scott's Antitrust and Competition Practice. She is presently part of the team that acts as Co-Lead Counsel for the ranchers and exchange classes in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-md-03031 (D. Minn.) She is also active in the Scott+Scott team dedicated to counseling corporates on the private enforcement of competition laws globally. Ms. Hunanyan also serves on the executive committee for *Dennis v. The Andersons, Inc.*, No. 1:20-cv-04090 (N.D. Ill.).

Prior to joining the Firm, Ms. Hunanyan was an associate at Milbank LLP. Her practice there consisted of representing financial institutions and international companies in domestic and cross-border complex transactions and regulatory matters.



ISABELLA DE LISI

PRACTICE EMPHASIS

Isabella De Lisi focuses on complex antitrust litigation and class actions.

ADMISSIONS

State of Connecticut

EDUCATION

University of Connecticut School of Law (J.D., 2022); Hofstra University (B.A., Political Science, minors in Philosophy, and Creative Writing, 2017)

HIGHLIGHTS

Ms. De Lisi is an attorney in Scott+Scott's Colchester office. Ms. De Lisi acts for Scott+Scott on behalf of ranchers and live cattle futures traders in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-md-03031 (D. Minn.), where Scott+Scott serves as co-lead counsel. She also acts on behalf of dairy farmers accusing Dairy Farmers of America of anticompetitive conduct in the Northeast. *S.R.J.F., Inc. v. Dairy Farmers of America, Inc.*, No. 2:22-cv-00147 (D. Vt.). Outside of antitrust, Ms. De Lisi is also active in commodities manipulation cases, including *Two Roads Shared Trust v. John Does*, No. 1:20-cv-00831 (N.D. Ill.).

While at the University of Connecticut School of Law, Ms. De Lisi served as the Senior Articles Editor for the Connecticut Public Interest Law Journal, was named President of the Italian American Law Students Association, and acted as Secretary for the First-Generation Law Students Association. During Law School, Ms. De Lisi also managed a start-up and co-authored *Chapter 3 - The pattern alphabet: Nature's patterns are the language of spatial reasoning and biomimicry*, *Biomimicry for Materials, Design and Habitats: Innovations and Applications* (2022). Prior to attending law school, Ms. De Lisi worked in investigative journalism, start-up management, and children's systems design in New York and Connecticut.



PETER CHEREPANOV

PRACTICE EMPHASIS

Peter Cherepanov focuses on complex antitrust litigation and class actions.

ADMISSIONS

State of Connecticut

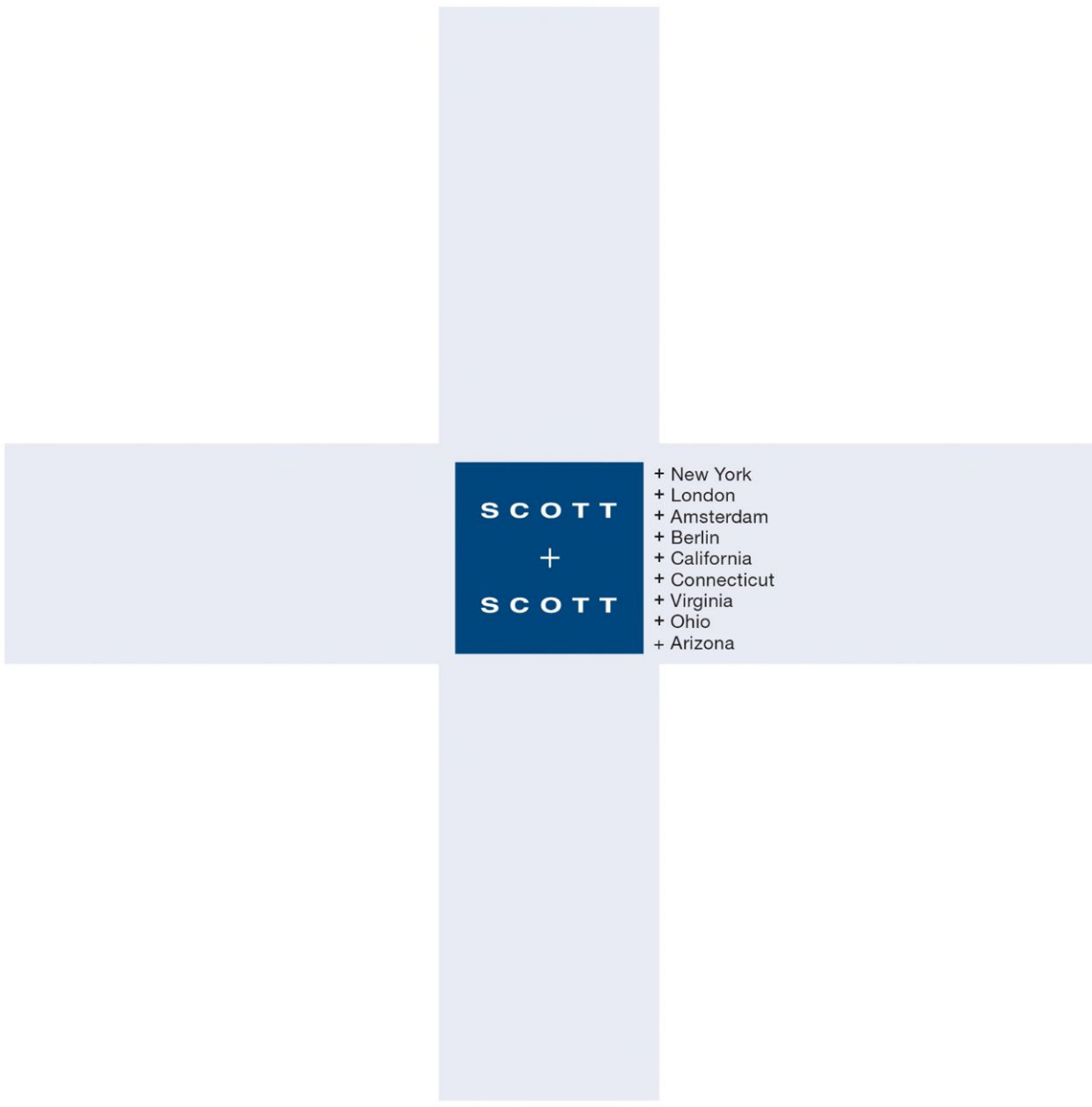
EDUCATION

University of Connecticut School of Law (J.D., 2023); Quinnipiac University (BBA, Business Administration, 2019).

HIGHLIGHTS

Peter Cherepanov is an attorney in the Firm's Connecticut office.

While at the University of Connecticut School of Law, Mr. Cherepanov participated in the Asylum and Human Rights Clinic, the Animal Law Clinic, and a field-placement with a local Public Defender's office.



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