

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FREE RANGE CONTENT, INC., a California)
corporation, COCONUT ISLAND)
SOFTWARE, INC., a Hawaii corporation,)
TAYLOR CHOSE, a Minnesota resident, and)
MATTHEW SIMPSON, a British Columbia,)
Canada resident, on behalf of themselves and all)
others similarly situated,)

Plaintiffs,)

v.)

GOOGLE INC., a Delaware corporation,)
Defendant.)

Case No. 5:14-cv-02329-BLF

**DECLARATION OF SIMON BAHNE
PARIS, ESQ. IN SUPPORT OF
PLAINTIFFS’ MOTION FOR AN
AWARD OF ATTORNEYS’ FEES,
REIMBURSEMENT OF EXPENSES,
AND INCENTIVE AWARDS**

I, Simon Bahne Paris, declare and state as follows:

1. I am Simon Paris of the law firm of Saltz, Mongeluzzi, Barrett & Bendesky, P.C. (“SMBB”). I submit this declaration in support of Plaintiffs’ application for an award of attorneys’ fees and reimbursement of expenses in connection with the services rendered in this litigation. I make this Declaration based on my own personal knowledge, and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm worked with Hagens Berman on behalf of Plaintiff Free Range Content, Inc. and the Settlement Class during the course of this litigation. The background and experience of SMBB and its attorneys are summarized in the *curriculum vitae* attached hereto as Exhibit 1.

3. SMBB worked on this litigation solely on a contingent-fee basis, and has been at risk that it would not receive any compensation for prosecuting claims against the Defendant. While SMBB devoted its time and resources to this matter, it has foregone other legal work for which it could have been compensated.

4. During the pendency of the litigation, SMBB performed the following work: we

helped to respond to Defendant's initial motion to dismiss and challenges to the Complaint.

5. Attached as Exhibit 2 is a true and correct summary of my firm's total hours and lodestar, computed at current rates, for the period of inception through June 30, 2018. The total number of hours spent by SMBB during this period of time was 19, with a corresponding lodestar of \$10,377.50. My firm's lodestar figures are based on the firm's current billing rates, which do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates. The summary to which I refer was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm. The lodestar amount reflected in the summary is for work assigned by Lead Counsel Hagens Berman, and was performed by professionals at my law firm for the benefit of the Settlement Class. If called upon, I could and would provide greater detail to the Court regarding the time entries that comprise our accrued lodestar.

6. The hourly rates for the attorneys and professional support staff in my firm included in the summary are the same as the regular rates charged for their services in non-contingent matters and/or which have been accepted in other complex or class action litigation. They include rates for two attorneys: mine, at \$660 per hour, and that of my associate Charles Kocher, who bills at the rate of \$535 per hour. The hourly rates of SMBB have been approved in this District among others across the United States, including but not limited to: *In re: Lithium Ion Batteries Antitrust Litigation*, No. 13-md-02420-YGR (N.D. Cal.), MDL No. 2420; *Jason Trabakoolas, et al. v. Watts Water Technologies, Inc., et al.*, No. 12-cv-01172-WHO (N.D. Cal.); *In re: Apple In-App Purchase Litigation*, No. 11-cv-1758-EJD (N.D. Cal.).

7. My firm has expended a total of \$610.00 in unreimbursed costs and expenses in connection with the prosecution of this litigation. These costs and expenses are broken down in the chart attached hereto as Exhibit 3. They were incurred on behalf of Plaintiffs and the Settlement Class by my firm on a contingent basis, and have not been reimbursed. The expenses incurred in this action are reflected on the books and records of my firm. These books and

records are prepared from expense vouchers, check records, and other source materials and represent an accurate recordation of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 3rd day of August, 2018 at Horsham, Pennsylvania.

/s/ Simon B. Paris
Simon Bahne Paris

EXHIBIT 1



Stephen Saltz

Founder

1941-2006

Stephen T. Saltz, the gifted lawyer-mentor and co-founder of Saltz Mongeluzzi Barrett & Bendesky, PC, a leading Philadelphia plaintiff litigation firm, died Tuesday, September 6, after a long illness. Not surprisingly to those familiar with Mr. Saltz and his passion for advocacy, he continued to work and battle on behalf of his clients during much of his own bout with cancer.

Mr. Saltz, born November 11, 1941, was a skilled litigator whose courtroom tenacity was in marked contrast to his typically easy-going manner, became a co-founder of the Firm following a distinguished public sector career that

included representing indigent clients as a criminal defense attorney with the Philadelphia Defenders Association and later as a Deputy City Solicitor and then Solicitor in Charge of the Philadelphia Office of Civil Rights Office Litigation.

During his nearly 40-year legal career, the former president of the Philadelphia Trial Lawyers Association developed a renowned reputation within the Philadelphia legal community as a relentless fighter for his clients – winning many landmark personal injury and civil rights cases -- while always following the highest ethical standards of legal practice. In so many ways, he was regarded among his peers as “the lawyer’s lawyer”. Mr. Saltz was selected by his colleagues as one of Pennsylvania’s “Super Lawyers” every year since the list was first published in 2004.

“As part of his extended family, we mourn Steve’s passing along with his loved ones and celebrate his extraordinary accomplishments during his brilliant legal career in which he positively influenced the lives of so many, especially those who were the victims of injustice,” said Michael Barrett of the Firm. It is so rare in any profession to find someone who is universally liked and respected, but that was Steve. He set the bar very high and challenged us all to raise it even higher.”

He faced his illness with the same drive and determination he handled the most difficult legal cases. He trained for and rode in the 2005 American Cancer Society 62-mile Bikeathon, serving as co-chair of the Philadelphia Bar Association Bikeathon team.

A 1967 graduate of the Villanova University School of Law, Mr. Saltz held an undergraduate degree from the University of Miami. He chaired the Pennsylvania Supreme Court Disciplinary System between 1994 and 1996 following four years as a hearing examiner for the system. He also was a judge pro tem of the Philadelphia Court of Common Pleas since 1991 and served as a federal mediator for the U.S. District Court between 1992 and 2003.

He was also a member of the boards of governors of the Philadelphia Bar Association (1987-89) and the Philadelphia Trial Lawyers Association (1992) and a seven-year member of the Temple American Inn of Court. He chaired several Bar committees.

Mr. Saltz is survived by his wife, Rowena, of 36 years.



Robert J. Mongeluzzi

Founder

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Robert J. Mongeluzzi is the most respected and successful construction accident attorney in the United States. A founder of Saltz Mongeluzzi Barrett & Bendesky, he has been a driving force in establishing the firm's reputation as one of the Philadelphia region's leading plaintiff personal injury law firms and the leading U.S. law firm representing construction accident victims. He was co-lead counsel for the largest recovery of a construction accident case in American history.

Mr. Mongeluzzi also focuses on cases involving catastrophic injury and death stemming from electrical accidents, crane accidents, aerial lift accidents, brain injuries, burn injuries, product liability and sports and recreational accidents.

For clients in Philadelphia, Pennsylvania and New Jersey and elsewhere, Mr. Mongeluzzi has more than 150 verdicts and settlements of a million dollars or more in construction accidents alone, more than any attorney in the world. Overall, he has secured at least a million dollars in more than 200 cases, including:

- * \$101 million settlement - the largest in U.S. history - in the collapse of the Tropicana Casino parking garage
- * \$75 million verdict - the largest for an individual construction worker in U.S. history

Mr. Mongeluzzi has consistently ranked second out of 48,000 Pennsylvania lawyers in Philadelphia magazine's peer-selected Super Lawyers of Pennsylvania publication. That magazine, in a cover story entitled "Don't Mess with Mongo," noted his "reputation as one of the top construction accident plaintiff's attorneys in the country and probably the leading lawyer for accidents involving cranes and aerial lifts."

The Philadelphia Inquirer stated that he "has made a career representing the victims of construction accidents." The Philadelphia Business Journal added that "when someone ... is catastrophically injured in a workplace accident and millions of dollars are at stake chances are ... Robert Mongeluzzi will have a hand in representing the plaintiff." Finally, Lawdragon magazine selected him as one of the 500 best attorneys in American and called him "the king of construction site accidents." He was named Philadelphia's 2009 Litigator of the Year.

Mr. Mongeluzzi graduated from the University of Pennsylvania and earned his law degree from the Fordham University School of Law (1981). He is also a graduate of the nationally ranked LL.M. (Master's of Law) in Trial Advocacy program at the Temple University Beasley School of Law, where he currently serves as an adjunct professor of law.

His commitment to preserve and protect the rights of working men and women is rooted in his own family history. His great grandfather was killed and his grandfather was seriously disabled in workplace accidents. Witnessing the consequences of having insufficient legal resources, Mr. Mongeluzzi now devotes himself to representing catastrophically injured workers.

Mr. Mongeluzzi is the author of the Construction Accident Litigation chapter in Tort Litigation, the American Association for Justice's most ambitious publication ever. For decades he also has written about and taught other lawyers how to handle construction accident and workplace accident cases at seminars throughout the region and the country. He also frequently appears in print and electronic media as a legal expert on construction and workplace accidents.

Mr. Mongeluzzi is a member of the Board of Trustees of Drexel University and a former member of the board of directors of the Phoenix Society, which supports burn survivors. He also coaches youth and high school lacrosse players.



Michael F. Barrett

Shareholder

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Michael F. Barrett is a personal injury attorney who focuses on medical malpractice, professional negligence, civil rights and a broad spectrum of other civil litigation cases in Philadelphia, Pennsylvania, New Jersey, New York and the District of Columbia.

A champion of medical malpractice victims, Mr. Barrett is committed to raising the level of care provided by healthcare providers. He has achieved numerous multi-million dollar verdicts and confidential settlements for Saltz Mongeluzzi Barrett & Bendesky clients, including:

- * \$6.6 million verdict for a woman who suffered from a delayed diagnosis of breast cancer
- * \$1.8 million verdict for a construction worker who underwent two unnecessary back surgeries

Mr. Barrett is considered one of Pennsylvania's best medical malpractice attorneys. He has been a member of Philadelphia magazine's peer-selected, top 5 percent Super Lawyers of Pennsylvania every year since 2005. In 2008, 2009 and 2010 the same publication named him one of the 100 best lawyers in both Philadelphia and Pennsylvania. Mr. Barrett in 2010 was also named one of the Best Lawyers in America by Best Lawyers®, the U.S. legal profession's oldest peer-review publication. He has received an AV rating, the highest possible rating, from Martindale-Hubbell. In 2006 Mr. Barrett received the President's Award from the Philadelphia Trial Lawyers Association.

Mr. Barrett graduated magna cum laude from the University of Pennsylvania and holds a J.D. law degree from the Villanova University School of Law (1984). He began working as an office aide with what is now Saltz Mongeluzzi Barrett & Bendesky while an undergraduate student, clerked for the firm during law school and then joined it as an attorney. Mr. Barrett is a Fellow of the American College of Trial Lawyers and is a Certified Civil Trial Advocate of the National Board of Trial Advocates. He also serves as a judge pro tempore, or temporary judge, for the Philadelphia Court of Common Pleas.

Mr. Barrett regularly lectures lawyers and other professional groups on such topics as personal injury law, handling delayed diagnosis of cancer cases and selecting jury members and expert witnesses.

Mr. Barrett's current service to the legal profession includes:

- * Board of Directors, Philadelphia Bar Foundation,
- * Trustee, Committee for A Better Tomorrow, the political action committee of the Philadelphia Trial Lawyers Association

Mr. Barrett's past service to the legal profession includes:

- * President, President-Elect, Vice President and Board Member, Philadelphia Trial Lawyers Association
- * Hearing Committee Chairman, Disciplinary Board of the Supreme Court of Pennsylvania
- * Board of Governors, Pennsylvania Association for Justice
- * Co-Chairman, Medico-Legal Committee, Philadelphia Bar Association
- * Chair, Brennan Award Committee, Philadelphia Bar Association
- * Group Captain and Master, Villanova University School of Law Inns of Court

Mr. Barrett is a member of the board of directors of the Louis D. Brandeis Law Society Foundation. He also is a member of the board of trustees of Har Zion Temple in Penn Valley, Pa., where he formerly served as legal counsel.



Larry Bendesky

Shareholder

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Larry Bendesky is a personal injury attorney who focuses on complex civil product liability cases and catastrophic construction accident cases in Philadelphia, Pennsylvania and New Jersey. As a product liability attorney, he has successfully handled cases involving the operation of elevators, motor vehicles, motorcycles, power tools and a wide array of equipment used in industry and manufacturing.

A skilled trial lawyer, Mr. Bendesky has been lead or co-counsel in numerous complex, high-profile cases - including more than 50 cases that resulted in verdicts or settlements over \$1 million for Saltz Mongeluzzi Barrett & Bendesky clients. Among them:

- * \$101 million settlement - the largest in U.S. history - in the collapse of the Tropicana Casino parking garage
- * \$14 million settlement for a roofer whose skull was crushed by a falling hoist

Mr. Bendesky is considered one of Pennsylvania's best product liability attorneys and construction accident attorneys. He has been a member of Philadelphia magazine's peer-selected, top 5 percent Super Lawyers of Pennsylvania every year since he became eligible in 2004. In 2009 the same publication named him one of the 100 best lawyers in both Philadelphia and in the Commonwealth of Pennsylvania. Mr. Bendesky also has been named one of the Best Lawyers in America by Best Lawyers®, the U.S. legal profession's oldest peer-review publication.

Mr. Bendesky is an honors graduate of Pennsylvania State University and holds a law degree from the Widener University School of Law (1987). He is also a graduate of the nationally ranked LL.M. (Master's of Law) in Trial Advocacy program at the Temple University Beasley School of Law. Based on his outstanding courtroom performance, at graduation he received the Faculty Award as his class's outstanding student/lawyer. He is now an adjunct professor of law with the Temple Master's of Law program and co-director of its Experts Program. He also serves as a judge pro tempore, or temporary judge, for the Philadelphia Court of Common Pleas.

Mr. Bendesky has lectured lawyers, judges and other professional groups more than 35 times on trial techniques, cross-examinations, evidence and the latest developments in product liability and construction litigation.

Mr. Bendesky laid the foundation for his significant appeals court experience by serving as chief clerk to the Honorable James R. Melinson of the Superior Court of Pennsylvania. Relying upon that expertise, in 2008 the Supreme Court of Pennsylvania appointed him to its Appellate Rules Committee, where he continues to serve.

Professional Service

Mr. Bendesky's current service to the legal profession includes:

- * Board of Governors, Pennsylvania Association for Justice
- * Board of Directors, Philadelphia Trial Lawyers Association
- * President of the Temple American Inn of Court, a group of judges and lawyers devoted to promoting professionalism and ethics in the practice of law

Mr. Bendesky's past service to the legal profession includes:

- * Hearing Committee Chairman, Disciplinary Board of the Supreme Court of Pennsylvania

A long-time basketball and little league baseball coach, Mr. Bendesky is the immediate past president of the 2,000-member Lower Merion Little League.



Robert N. Braker

Partner

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Robert N. Braker, Esquire, a Partner in the firm, focuses his practice on civil litigation, motor vehicle accidents and premises liability.

His concern for the rights of victims is greatly influenced by his father, Herbert Braker, a practicing Plaintiff's personal injury attorney for more than 50 years prior to retiring in 2002.

He specializes his practice in handling complex motor vehicle and trucking accident cases as well as premises liability cases. He has handled thousands of cases successfully throughout his career with numerous 6 and 7 figure settlements and verdicts.

Mr. Braker has been selected by his peers as a Pennsylvania Super Lawyer for the past 6 consecutive years (2005-2010). He was recently named as one of the "Top 100 Trial Lawyers" by the American Trial Lawyers Association for 2009.

He is a member of the American, Pennsylvania and Philadelphia Bar Associations, the Pennsylvania and Philadelphia Trial Lawyers Associations, and the Association of Trial Lawyers of America.



David L. Kwass

Partner

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David L. Kwass, a partner at Saltz, Mongeluzzi, Barrett & Bendesky, PC, focuses his practice on cases involving constructions accidents, crane and aerial lift accidents, equipment tipover accidents, electrical contacts, workplace falls, recreational products, and liquor liability.

He is the co-chairman of the Crane and Aerial Lift Litigation Group of the American Association for Justice. His passion for workplace safety and safe product design has resulted in more than 40 separate verdicts and settlements in excess of \$1 million. Mr. Kwass is a 1987 graduate of Haverford College, receiving a B.A. with Honors. He earned a Masters degree from Georgetown University (1989), a J.D. from the University of Virginia School of Law in 1992, and in 2002, a Masters degree with honors in Trial Advocacy from the Temple University School of Law.

Mr. Kwass counts among his greatest successes his pro bono representation of a boy who needed surgery on both hips just to be able to walk. His insurance carrier denied coverage, deeming the femoro-acetabular surgery to be "experimental." Mr. Kwass brought suit in federal court, and marshaled a substantial body of medical literature to prove that the procedure was both safe and effective. In the fall of 2009, the insurance carrier not only agreed to cover his client's surgery, but also changed its classification of the surgery, and now provides routine coverage of the surgery for all its subscribers.



Ara R. Avrigan

Partner

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Ara Richard Avrigan, a partner in the Firm, joined Saltz Mongeluzzi Barrett & Bendesky in 1998. He concentrates in medical malpractice liability, motor vehicle accidents, workplace accidents, premises liability and product liability.

He is a 1988 graduate of Moravian College, received his J.D. from Penn State Dickinson School of Law in 1992 and his LLM in trial advocacy from Temple University in 2003. His court admissions include the State of New Jersey, the

Commonwealth of Pennsylvania and The United States Court of Appeals, Third Circuit

Mr. Avrigan serves as a Judge Pro Tempore for the Philadelphia Court of Common Pleas in medical malpractice cases. Prior to joining the Firm, Mr. Avrigan worked as a medical malpractice defense associate with Wright Young & McGilvery, where he participated in bringing more than 25 malpractice trials to verdict over the course of five years.

He is a member of the American, Pennsylvania and Montgomery County Bar Associations, and the Pennsylvania and Philadelphia Trial Lawyers Associations.



Eunice Trevor

Partner

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Eunice Trevor is a personal injury attorney who focuses on complex, catastrophic burn injury cases stemming from negligence or defective products and catastrophic brain injury cases.

A burn injury attorney for more than two decades, she has been responsible for numerous multi-million dollar settlements and verdicts for Saltz Mongeluzzi Barrett & Bendesky clients, including:

- * \$16.5 million settlement for a millwright who suffered burns over 60 percent of his body
- * \$6.3 million settlement for a N.J. surveyor who suffered a traumatic brain injury when struck by a vehicle

Widely regarded as one of the nation's best burn injury attorneys, in 2007 Ms. Trevor was among the Top 500 Personal Injury Lawyers in America chosen by an independent survey group and Lawdragon magazine. Two years later Lawdragon featured her as The Attorney of the Month for her innovative use of documentary video settlement "brochures" to favorably resolve complex burn injury cases for our clients. She also received the Philadelphia Trial Lawyers Association 2007 President's Award.



Andrew R. Duffy

Partner

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Andrew R. "Drew" Duffy is a personal injury attorney who focuses on catastrophic construction accident cases, product liability cases and premises liability cases in Pennsylvania and New Jersey. He has successfully handled cases involving construction accidents, falls from scaffolding and roofs, industrial plant accidents, defective products, explosions, tractor-trailer/automobile accidents and other preventable events.

Mr. Duffy has achieved numerous multi-million dollar verdicts and settlements for Saltz Mongeluzzi Barrett & Bendesky clients, including:

- * \$16.5 million settlement for a millwright who suffered burns over 60 percent of his body
- * \$10 million settlement for a warehouse worker paralyzed by a defective racking system

Mr. Duffy is considered one of Pennsylvania's best construction accident attorneys and premises liability attorneys. He is a member of Philadelphia magazine's peer-selected, top 5 percent Super Lawyers of Pennsylvania. In recognition of his trial skills, the New York City Bar Association also presented Mr. Duffy with its Award for Trial Advocacy.



Simon B. Paris

Partner

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Simon Bahne Paris, Chair of the Firm's Class Action Practice Group, is consistently recognized by his peers for his novel approach to identifying and challenging improper business practices.

Mr. Paris represents businesses and consumers in complex class actions with a focus on antitrust and consumer protection matters. His recent successes include *In re OSB Antitrust Litigation* (E.D. Pa.) where he was the first to uncover a conspiracy to fix prices amongst the largest producers of oriented strand board in the United States, which resulted in settlements of over \$120 million.

Before joining Saltz Mongeluzzi Barrett & Bendesky, P.C., Mr. Paris served as an Assistant State Attorney for the State of Florida, where he was lead trial counsel in over fifty jury trials. A 1993 graduate of Rutgers University, Mr. Paris received his law degree from Widener University School of Law in 1996. He has been admitted to practice in the courts of New Jersey, Florida, the United States Courts of Appeals for the Third Circuit, and the United States District Courts for the District of New Jersey.



Brian E. Fritz

Partner

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Brian E. Fritz is a personal injury attorney who focuses on catastrophic personal injury cases in Pennsylvania and New Jersey. These personal injuries result from construction accidents and workplace accidents, including industrial accidents, electrical accidents, negligently maintained premises and defective or malfunctioning products.

Mr. Fritz has assisted in securing verdicts and settlements for Saltz, Mongeluzzi Barrett & Bendesky clients worth a total of more than \$100 million, including:

- * \$11 million settlement for steel worker who ultimately died after falling into a pit of molten metal
- * \$5.9 million settlement for a Delaware natural gas explosion that injured four construction workers

Mr. Fritz is a graduate of Pennsylvania State University and holds a law degree from the Widener University School of Law (1999). His law school honors include membership in the Moot Court Honor Society and the Moe Levine Trial Advocacy Honor Society. Mr. Fritz is also a graduate of the nationally ranked LL.M (Master's of Law) in Trial Advocacy program at the Temple University Beasley School of Law.



Patrick Howard

Partner

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Patrick Howard joined SMBB in 2007 as an associate in the firm's Class Action Practice Group. Mr. Howard brings with him significant experience in the prosecution of consumer fraud and antitrust cases.

Mr. Howard's efforts resulted in SMBB's appointment as lead counsel to a class of over 17,000 consumers in *Weldon v. Cherry Hill Nissan, Inc.*, a case arising out of the alleged deceptive sales practices of an automobile dealership. Without a single objection, the Court approved a settlement that provided consumers with the option to receive a cash payment or a discounted future service of their choice.

For his efforts, Mr. Howard was recently selected from among thousands of attorneys for inclusion in the December 2008 issue of Pennsylvania Super Lawyers—Rising Stars edition, a listing which includes the top 2.5 percent of attorneys in the state who are 40 years old or younger or who have been practicing less than 10 years.

Mr. Howard is a 1998 graduate of the University of Scranton, where he received a B.S. in both Political Science and History. He received his law degree from the University Of Pittsburgh School Of Law in 2001. While in law school, Mr. Howard received Dean's Honors, was a member of the school's Moot Court Board and participated in the Robert Wagner National Labor and Employment Moot Court Competition.



Adam Pantano

Partner

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Adam J. Pantano is an accomplished trial lawyer in complex civil matters including construction, products liability, crane accident, and premises liability cases involving catastrophic injuries.

While he now exclusively represents injured victims, prior to joining SMBB, Mr. Pantano served as one of the lead attorneys of a National Coordinating Counsel team for a leading national insurance company's Crane and Heavy Machinery Program. Mr. Pantano is experienced handling crane-related accidents involving both personal injury and property damage claims in the millions of dollars.

Mr. Pantano was recognized as a "Rising Star" in 2008, 2010 and 2011 by Pennsylvania Super Lawyers editions of Pennsylvania Super Lawyers Rising Stars, a distinction reserved for only the top 2.5 percent of attorneys 40 and younger.

Mr. Pantano is a 1995 graduate of West Chester State University and a 1999 graduate of Widener University School of Law. His law school honors include memberships in the Moot Court Honor Society and the Moe Levine Trial Advocacy Honor Society.



Pasquale Bianculli

Of Counsel

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Pasquale "Pat" Bianculli, of Counsel to Saltz Mongeluzzi Barrett & Bendesky, is a personal injury lawyer. He focuses on construction and workplace accidents, premises liability, electrical and motor vehicle accidents.

Before becoming an attorney, Pat worked in the construction industry for 18 years as a Rodsetter/Ironworker Supervisor. He has also been a member of electrician's union IBEW Local 98. His extensive experience in the construction industry, coupled with more than 22 years of legal representation of injured workers has made Pat an invaluable consulting resource.

Pat is the recipient of the 2014 Peggy Browning Award in recognition of his outstanding advocacy for the rights of working families. Pat is the founder and Vice-President of Union Services Access "USA" which educates workers regarding their legal rights and the choices of medical treatment to which they are entitled. The company also offers educational seminars, health fairs, and scholarships.

Pat Bianculli received his undergraduate degree and law degree from Temple University. He is licensed to practice law in Pennsylvania and New Jersey.



Danny A. Schwarz **Of Counsel**

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Daniel A. Schwarz is of Counsel to the Firm and concentrates his practice in civil litigation, products liability and personal injury. Mr. Schwarz has a history of obtaining substantial verdicts and settlements for clients, many of whose cases were initially declined by other counsel due to their complexity or perceived unlikely success.

Mr. Schwarz is 1987 graduate of Tulane University and 1990 graduate of its law school. He is the recipient of an MBA Degree in finance and international business from George Washington University in 1991, and has a Masters Degree in Trial Advocacy from Temple University Law School.

He is the author of the patented Injury Reporting and Safety System, a database which records and monitors workplace injuries in real time. The safety system is widely credited with reducing repetitive workplace injuries, saving lost time on the job, and most importantly, saving lives.

Mr. Schwarz is a member of the Pennsylvania and New Jersey Bar Associations, the Philadelphia Bar Association, the Pennsylvania and Philadelphia Trial Lawyers Association and the Association of Trial Lawyers of America.



Brian D. Rosenthal **Of Counsel**

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Brian D. Rosenthal, Of Counsel with the firm, is a personal injury attorney who focuses on complex civil rights, medical malpractice, products liability, personal injury, wrongful detention and criminal defense cases.

Mr. Rosenthal's successes have included a \$2.4 million medical malpractice verdict in Montgomery County, Pa., and two civil rights cases involving innocent victims of false arrest.

Mr. Rosenthal graduated magna cum laude and Phi Beta Kappa from the University of Pennsylvania and holds a law degree from Georgetown University Law Center (1977). His invaluable trial experience includes handling homicide prosecutions and other high-profile criminal cases for five years as an assistant district attorney for the City of Philadelphia.

Mr. Rosenthal sits as a judge pro tempore, or temporary judge, for the Philadelphia Court of Common Pleas. He also teaches torts and criminal law as an adjunct professor at Peirce College in Philadelphia. Community Service



Stanley M. Schwarz **Of Counsel**

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Stanley M. Schwarz, Of Counsel to the firm, specializes in representing victims of personal injury, products liability and medical negligence cases. With almost 40 years of experience in private practice, he has a history of earning several million dollar settlements and verdicts in high-profile cases since the 1970s.

An Infantry Officer during the Korean War, Mr. Schwarz is a 1958 graduate of Temple University Law School and is former Managing Editor of the Temple Law Quarterly. He is admitted to practice in Pennsylvania.

Mr. Schwarz' experience in the public sector includes service as a Judicial Law clerk for the Court of Common Pleas No. 6 in Philadelphia County. He is also a former Assistant District Attorney for the City of Philadelphia, serving two years at the request of former District Attorney and present U.S. Senator Arlen Specter.

He is a former member of the Philadelphia Board of Law Examiners also serving as a State Court and Federal Court Arbitrator and as a Master and Judge Pro Tem in the Pennsylvania Court of Common Pleas.

Mr. Schwarz is a member of the Pennsylvania and Philadelphia Bar Associations, the Pennsylvania and Philadelphia Trial Lawyers Associations and the Association of Trial Lawyers of America.



John E. Savoth **Of Counsel**

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John E. Savoth, Of Counsel to Saltz Mongeluzzi Barrett & Bendesky, is a personal injury lawyer. He focuses on cases involving construction accidents, premises liability, medical malpractice, motor vehicle accidents, dram shop (bars and taverns) liquor liability and the Federal Employers Liability Act (FELA) in Philadelphia, Pennsylvania and New Jersey.

Mr. Savoth's million-dollar verdicts include:

- * \$7 million verdict in Philadelphia in a Federal Employers Liability Act (FELA) case
- * \$1 million verdict for a passenger injured in a drunk driving crash in Monroe County, Pa.

Mr. Savoth is a graduate of Dickinson College and holds a law degree from the Widener University School of Law (1985). For two years he then served as a clerk for the late Honorable James T. McDermott of the Supreme Court of Pennsylvania. Mr. Savoth often lectures lawyers on trial practice and the rules of professional conduct.

Mr. Savoth is vice chancellor of the Philadelphia Bar Association and will become the association's chancellor in 2012.



Keith Mecca

Of Counsel

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Keith Mecca is a personal injury attorney who focuses on cases involving catastrophic construction accidents, workplace accidents and medical malpractice in Pennsylvania and New Jersey.

Mr. Mecca is a graduate of Drexel University, where he was a dean's list student and named to the North Atlantic Conference Honor Roll as a member of the men's varsity lacrosse team. He earned his law degree from the Villanova University School of Law (2001), where he was a staff member of the Villanova Sports & Entertainment Law Journal and served as an assistant coach for the Villanova men's varsity lacrosse team.

A native of Scranton, Pa., Mr. Mecca extends the reach of Saltz Mongeluzzi Barrett & Bendesky into Northeastern Pennsylvania, including Lackawanna and Luzerne counties. His interest in serving injured workers was inspired by his grandfather, who was executive director of the Pennsylvania State Council of Public Employees., an affiliate of the American Federation of Labor (now part of the AFL-CIO).

Mr. Mecca also negotiates commercial real estate transactions as a staff member of Professional Realty Advisors in Wayne, Pa.



Catherine E. Margolis

Of Counsel

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Catherine E. Margolis, an associate with the Firm, works with partner Robert Braker, handling motor vehicle and premises liability cases in New Jersey and Pennsylvania. Since 2002, Ms. Margolis has worked on several negligence cases which resulted in settlements in excess of \$1 million.

Born and raised in Connecticut, Ms. Margolis attended Vassar College and obtained her B.A. in Political Science. Upon graduation from college, Ms. Margolis worked as a paralegal for several Connecticut and New York law firms. After receiving her J.D. from Temple University School of Law in 1989, Ms. Margolis made Philadelphia her home and has worked for several Philadelphia law firms, joining the Firm in 2001.

Ms. Margolis is admitted to practice in Pennsylvania, New Jersey, the Eastern District of Pennsylvania and the United States District Court. She is a member of the Philadelphia Bar Association and the Philadelphia Trial Lawyers Association.



Carmen P. Belefonte

Managing Attorney, Delaware County Office

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Carmen Belefonte, the managing attorney of the firm's Delaware County office in Media, Pa., is a personal injury attorney. He focuses on medical malpractice cases, premises liability cases and professional liability cases in Pennsylvania.

With more than 40 years of highly successful and diverse trial experience, Mr. Belefonte has achieved numerous settlements and verdicts in excess of

\$1 million for Saltz Mongeluzzi Barrett & Bendesky clients, including: a \$12 million life care plan settlement for a two-year-old boy who suffered brain damage due to an emergency room misdiagnosis.

Mr. Belefonte is considered one of Pennsylvania's best medical malpractice attorneys and premises liability attorneys. He is a perennial member of Philadelphia magazine's peer-selected, top 5 percent Super Lawyers of Pennsylvania list. Nationally, in 2007 Mr. Belefonte was chosen as one of the top 500 personal injury lawyers in America by an independent survey group and Lawdragon magazine. In 2010 the Pennsylvania Association for Justice honored him with its President's Award.



Mary T. Gidaro

Associate

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Mary T. Gidaro is a personal injury attorney who focuses on medical malpractice liability cases and other complex civil litigation cases in Pennsylvania and New Jersey.

Ms. Gidaro has assisted on several million-dollar medical malpractice liability cases for Saltz Mongeluzzi Barrett & Bendesky clients.

Ms. Gidaro is a graduate of Pennsylvania State University who earned her master's degree from Boston University and her law degree from the Villanova University School of Law (1992). She also is a graduate of the nationally ranked LL.M. (Master's of Law) in Trial Advocacy program at the Temple University Beasley School of Law.

Prior to joining Saltz Mongeluzzi Barrett & Bendesky in 2002, for nearly a decade Ms. Gidaro successfully arbitrated and tried medical malpractice cases as a defense attorney. That different perspective today allows her to anticipate and overcome defense strategies.

Ms. Gidaro also serves as an arbitrator for civil cases for the Philadelphia Court of Common Pleas.



Tracy D. Schwartz

Associate

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Tracy D. Schwartz is a personal injury attorney who focuses on medical malpractice cases and other complex civil litigation cases in Philadelphia, Pennsylvania and New Jersey.

Ms. Schwartz has assisted on several multi-million dollar verdicts and settlements for Saltz Mongeluzzi Barrett & Bendesky clients.

Ms. Schwartz is an Honors College graduate of West Chester University of Pennsylvania and earned her law degree from the Temple University Beasley School of Law (2007), where she received awards for distinguished class performance. During law school she also interned with a law firm where she helped draft entertainment contracts for musicians who achieved platinum recording sales status.

A passionate animal advocate, Ms. Schwartz serves as a member of the Pennsylvania Bar Association Animal Law Committee.



Robert W. Zimmerman

Associate

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Robert W. Zimmerman is a personal injury lawyer who focuses on construction accident, workplace accident, crane tipover, aerial lift tipover, burn injury, electrical accident and product liability cases in Pennsylvania and New Jersey.

Mr. Zimmerman has assisted on a number of multi-million verdicts and settlements for Saltz Mongeluzzi Barrett & Bendesky clients.

Mr. Zimmerman is a graduate of King's College, in Wilkes-Barre, Pa., where he was a member of the Mu Kappa Tau Honor Society and student government, and was the basketball team's lead play-by-play radio broadcaster.

Mr. Zimmerman holds a law degree from the Villanova University School of Law (2008). During law school he served a judicial externship with Philadelphia Court of Common Pleas Judge Frederica Massiah-Jackson. In May 2011 Mr. Zimmerman graduated from the nationally ranked LL.M. (Master's of Law) in Trial Advocacy program at the Temple University Beasley School of Law.



Charles Kocher

Associate

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Charles J. Kocher is a member of the Saltz Mongeluzzi Barrett & Bendesky Class Action Practice Group. Throughout the United States he represents small businesses and other individuals who have been injured by price-fixing conspiracies in violation of antitrust laws and represents investors victimized by Ponzi schemes.

Mr. Kocher has assisted on a number of multi-million class action anti-trust and consumer fraud cases.

Mr. Kocher is a cum laude graduate of Georgetown University and holds a J.D. law degree from the Villanova University School of Law (2004), where he was a managing editor of the Villanova Law Review. Upon graduation from law school, Mr. Kocher served as a clerk for U.S. District Judge Clarence C. Newcomer, a celebrated judge who sat on the federal bench for more than 30 years in the Eastern District of Pennsylvania.

Prior to joining Saltz Mongeluzzi Barrett & Bendesky, Mr. Kocher worked on a wide array of legal matters - from pharmaceutical products liability litigation to white collar matters.



Jeffrey P. Goodman

Associate

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Jeffrey P. Goodman is a personal injury attorney who focuses on catastrophic personal injury cases in Pennsylvania and New Jersey. These personal injuries result from construction accidents, electrical accidents and defective or malfunctioning products.

Mr. Goodman is a graduate of The George Washington University and a graduate of the Temple University Beasley School of Law (2010). Excelling in trial advocacy, he was the first ever first-year law student to compete on Temple's renowned National Trial Team. In trial advocacy competitions he was honored as the individual national champion after winning the "Top Gun" Challenge in Texas and twice was a national quarter-finalist and regional champion. While in law school he also served as president of Temple's Moot Court Honor Society and won both of Temple's moot court championships.

Mr. Goodman interned with the Montgomery County, Pa., District Attorney's Office and the Public Defender Service for the District of Columbia. He also served as a summer clerk for the Hon. Juan R. Sanchez of the U.S. District Court for the Eastern District of Pennsylvania.



David Langsam

Associate

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David J. Langsam is a personal injury attorney who focuses on construction accidents, premises liability and civil rights cases in Pennsylvania and New Jersey.

Mr. Langsam is a dean's list, honors graduate of Lehigh University and earned his law degree from the Villanova University School of Law (2010). While in law school Mr. Langsam excelled in both legal writing and oral advocacy. As a member of the Moot Court Board, Mr. Langsam represented Villanova at the National Evidence Moot Court Competition at Brooklyn Law School and the National Security Law Moot Court Competition at the George Washington University School of Law. During his second year, Mr. Langsam was a semi-finalist in the prestigious Theodore L. Reimel Moot Court Competition.

Mr. Langsam's dedication to plaintiffs' rights has been influenced by his father, a personal injury attorney for more than 30 years. Mr. Langsam joined Saltz Mongeluzzi Barrett & Bendesky as a law clerk in 2009.



Joseph DeAngelo

Associate

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Joseph G. DeAngelo is a personal injury attorney who focuses on complex medical malpractice, premises liability and civil rights cases in Pennsylvania and New Jersey.

Mr. DeAngelo's dedication to plaintiffs' rights was influenced by his work as a registered nurse, which was marked by a passionate advocacy for the rights and care of patients. He brings this same commitment to his work as a plaintiffs' attorney representing the victims of medical malpractice and personal injury.

Mr. DeAngelo received his undergraduate degree in nursing from Philadelphia's LaSalle University before attending Temple University's Beasley School of Law, as a Law Faculty Scholar. While in law school, Mr. DeAngelo earned distinguished marks in trial advocacy.

Mr. DeAngelo joined Saltz, Mongeluzzi, Barrett & Bendesky as a law clerk in 2008. He previously worked with the Montgomery County, Pennsylvania District Attorney's Office.



Benjamin J. Baer

Associate

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Benjamin J. Baer is a personal injury attorney who focuses on catastrophic personal injury cases in Pennsylvania. These personal injuries result from construction accidents, workplace accidents, electrical accidents and defective or malfunctioning products.

Mr. Baer is a graduate of the University of Michigan and a graduate of the University of Pittsburgh School of Law (2007). Mr. Baer graduated from the John P. Gismondi Civil Litigation Certificate Program with a concentration in civil practice. While in law school, Mr. Baer won the Murray S. Love Mock Trial Competition and was recognized as the tournament's top advocate. Additionally, Mr. Baer was recognized with an individual award as the top overall student in Trial Advocacy. Mr. Baer also clerked for the Honorable Ralph J. Cappy, Chief Justice of the Pennsylvania Supreme Court.

Upon graduation from law school, Mr. Baer served as an Assistant District Attorney for the Philadelphia District Attorney's Office. There he tried more than 15 jury trials as lead counsel and was the sole prosecutor on hundreds of other nonjury trials in the Court of Common Pleas and Municipal Court. Mr. Baer prosecuted major felony crimes including attempted murders, aggravated assaults and other violent crimes. Mr. Baer uses his significant trial experience fighting for the victims of crime to better advocate for his current clients at Saltz, Mongeluzzi, Barrett & Bendesky.



Michael A. Budner

Associate

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Michael A. Budner is a personal injury attorney who focuses on catastrophic personal injury cases in Pennsylvania and New Jersey. These personal injury cases result from construction accidents, workplace accidents, electrical accidents, negligently-maintained premises, defective or malfunctioning products, motor vehicle accidents, and medical malpractice.

Mr. Budner is a graduate of Emory University (2009) and earned his law degree from the Temple University Beasley School of Law (2012). While in law school, Mr. Budner excelled in legal research and writing as well as oral advocacy. Mr. Budner served as a staff member of the Temple Political and Civil Rights Law Review.

Mr. Budner interned for the Honorable Joseph D. O'Keefe, Administrative Judge of the Orphans' Court Division of the Philadelphia Court of Common Pleas. While in law school, Mr. Budner joined Saltz, Mongeluzzi, Barrett & Bendesky as a law clerk in 2010. He returned to the firm full-time following his graduation from law school in 2012. Mr. Budner is admitted to practice law before the Supreme Courts of Pennsylvania and New Jersey, as well as the United States District Court for the Eastern District of Pennsylvania. Mr. Budner is a member of the American Association for Justice, the Pennsylvania Association for Justice, the Philadelphia Trial Lawyers Association, and the Philadelphia Bar Association.



Sandra L. Rosenberg

Associate

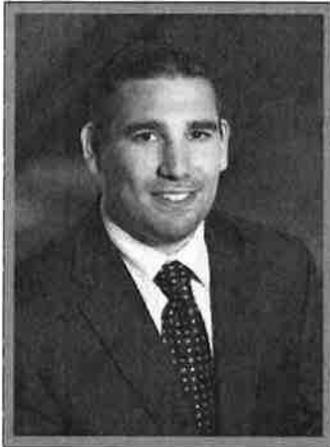
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Sandra Lee Rosenberg is a member of Saltz Mongeluzzi's construction team, and for good reason. Sandy's hands-on construction experience is unmatched in the Philadelphia legal community. For 25 years, she worked alongside the trades on commercial projects in Pennsylvania and New Jersey. She started as a carpenter's helper and assistant superintendent. As a project manager and estimator for general contractors, CMs and building owners, she spent years on construction sites, working closely with field superintendents and trade foremen to get the job done. In the course of completing multi-family housing renovations, schools, offices, hospitals and community centers, she's negotiated multi-million dollar budgets, managed complex project schedules and set up site logistics plans.

Sandy knows how construction project teams function and how site dynamics work. She's well-equipped to analyze all the documents and circumstances that make up a construction injury case. Her unparalleled experience permits her to understand the forces in play on a construction project that impact site safety.

Sandy Rosenberg earned her B.A. at Yale University and her J.D. at the Temple University Beasley School of Law in 2013, where she won the Harry R. Kozart Memorial Prize in Products Liability. She studied construction management and engineering through the GBCA program at Drexel University and is LEED A.P. certified. Clerked on the Saltz Mongeluzzi construction team for 3 years during law school.



Matthew A. Grubman

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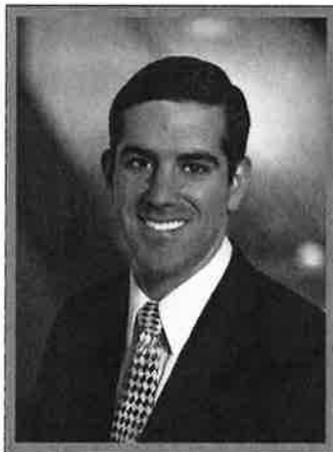
Matthew A. Grubman is a personal injury attorney who focuses on motor vehicle and premises liability cases in Pennsylvania and New Jersey.

Mr. Grubman is a graduate of University of Delaware's Honor's Program (2006) and earned his law degree from the Temple University Beasley School of Law (2011). While in law school, Mr. Grubman worked for the Philadelphia Court of Common Pleas Complex Litigation Center and as an Equal Justice Fellow for

Community Legal Aid Society in Wilmington, Delaware. While at Temple, Mr. Grubman also studied abroad in Tokyo.

Mr. Grubman joined Saltz, Mongeluzzi, Barrett & Bendesky as a law clerk in 2011.

Mr. Grubman is admitted to practice in Pennsylvania and New Jersey.



Drew Heinold

Associate

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Andrew (Drew) Heinold is a personal injury attorney who focuses on catastrophic injury cases in Pennsylvania and New Jersey. These cases result from construction accidents, workplace accidents, electrical accidents, negligently-maintained premises, defective or malfunctioning products, motor vehicle accidents, and medical malpractice.

Mr. Heinold is a graduate of Villanova University (2010), where he was a four year member of the Varsity Men's Soccer team. Following his time at Villanova, Mr. Heinold attended Rutgers School of Law-Camden where he focused his studies on the procedural and substantive issues that he now deals with on a daily basis. In his first year at Rutgers, Mr. Heinold received an award for Excellence in Oral Advocacy. Additionally, he was a finalist in the Rutgers School of Law-Camden Intramural Mock Trial Competition.

During law school, Mr. Heinold gained a valuable understanding of the judicial system through his multiple internships. Mr. Heinold interned for the Honorable Marie E. Lihotz of the New Jersey Superior Court-Appellate Division (2013) and Honorable John E. Harrington of the New Jersey Superior Court-Law Division, Burlington County (2012). Thereafter, Mr. Heinold joined Saltz, Mongeluzzi, Barrett & Bendesky as a law clerk in 2013. During these experiences, Mr. Heinold was able to witness and learn from some of the top litigators in Philadelphia and New Jersey.



CLASS ACTION PRACTICE GROUP RESUME

OUR FIRM

Saltz Mongeluzzi Barrett & Bendesky, P.C. ("SMBB") is widely acknowledged as one of the finest Plaintiffs' law firms on the East Coast, routinely handling the largest and most complex cases over a wide array of practice areas and recovering the largest settlements and verdicts for its clients. The firm employs 26 highly-respected attorneys in its Philadelphia office, all of whom are focused on achieving the best possible result for the firm's clients.

SMBB recently expanded its presence in the field of complex litigation by opening a Class Action Practice Group, headed by Simon B. Paris. The Group focuses on the prosecution of antitrust, consumer, employment, and securities class actions in state and federal courts. The Group's attorneys enjoy a national reputation for legal innovation and integrity, and have the experience and resources to ensure that its clients will receive the finest representation available.

PRACTICE AREAS

Antitrust Class Actions

Federal and state antitrust laws prohibit practices that restrain trade, such as when one or more companies fix prices for products or services, agree not to compete for customers or business, agree to allocate sales in certain markets, boycott a manufacturer or refuse to supply a particular good or service unless another product is also purchased. These laws are intended to ensure lower prices, better quality products and greater choice for consumers by promoting free and open competition and requiring companies to compete on a level playing field. Anti-competitive conduct is most likely when an industry with high barriers to entry is controlled by a few key players who produce commodity products with limited substitutability.

The attorneys in SMBB's Class Action Practice Group have significant experience in antitrust litigation as a result of their participation in the following cases:

- *In Re Aftermarket Filters Antitrust Litigation* (N.D. IL)
- *In re Carbon Fiber Antitrust Litigation* (C.D. CA)
- *In re Chocolate Confectionery Antitrust Litigation* (M.D. PA)
- *In re Cigarette Antitrust Litigation* (N.D. GA)

- *In re Construction Glass Antitrust Litigation* (N.D. IL)
- *In re DRAM Antitrust Litigation* (N.D. CA)
- *In re EPDM Antitrust Litigation* (D. MA)
- *In re Fasteners Antitrust Litigation* (E.D. PA)
- *In re Flat Glass Antitrust Litigation* (W.D. PA)
- *In re Flonase Antitrust Litigation* (E.D. PA)
- *In re Graphite Electrodes Antitrust Litigation* (E.D. PA)
- *In re K-Dur Antitrust Litigation* (D. NJ)
- *In re Linerboard Antitrust Litigation* (E.D. PA)
- *In re LTL Shipping Antitrust Litigation* (N.D. GA)
- *In re Metoprolol Succinate Indirect Purchaser Antitrust Litig.* (D. DE)
- *In re National Football League Antitrust Litigation* (E.D. PA)
- *In re Nylon and Polypropylene Carpet Antitrust Litigation* (N.D. GA)
- *In re Ocean Cabotage Antitrust Litigation* (M.D.L. – Puerto Rico)
- *In re Organic Peroxides Antitrust Litigation* (D. D.C.)
- *In re OSB Antitrust Litigation* (E.D. PA)
- *In re Paxil Antitrust Litigation* (E.D. PA)
- *In re Payment Card Interchange Fee Litigation* (E.D. NY)
- *In re Plastic Additives Antitrust Litigation* (E.D. PA)
- *In re Processed Egg Products Antitrust Litigation* (E.D. PA)
- *In re Rail Freight Fuel Surcharge Antitrust Litigation* (D. D.C.)
- *In re Relafen Antitrust Litigation* (D. MA)
- *Sheet Metal Workers v. Amgen, Inc. (Aranesp)* (E.D. PA)
- *In re Steel Antitrust Litigation* (N.D. IL)
- *In re Tricor Indirect Purchaser Antitrust Litigation* (D. DE)
- *In re Urethane Antitrust Litigation (Polyether Polyols)* (D. KS)
- *In re Vitamins Antitrust Litigation* (D. D.C.)

Consumer Class Actions

Consumer fraud encompasses a wide range of activities in the marketing and sale of goods or services, including when companies overcharge consumers for goods or services, run deceptive advertisements or interpret agreements in an unfair manner. In the case of Taft-Hartley benefit plans or municipal entities, consumer fraud often takes the form of misrepresentations made to gain formulary placement or win preferred payment tier status. With so many businesses involved in the aggressive pursuit of short-term gain, even the most conscientious fund can fall victim to fraud.

The attorneys in SMBB's Class Action Practice Group have significant experience in consumer fraud litigation as a result of their participation in the following cases:

- *Baycol Products Liability Litigation* (D. MN)
- *Blake v. UAG* (D. NJ)
- *Blake v. LifeLock Inc.* (D. AZ)
- *Bridgestone / Firestone Tire Recall Litigation* (PA St. Ct.)
- *Celebrex Consumer Litigation* (State and Federal Courts)
- *Chrysler Airbag Defect Litigation* (PA St. Ct.)
- *Cirulli v. Hyundai Motor Company* (C.D. of CA)
- *Compaq Computer Litigation* (S.D. TX)
- *Deluhery v. Unifiednames, Inc.* (D. NJ)

- *Employers Mutual Casualty Co., et al. v. Cephalon, Inc.* (E.D. PA)
- *Fabian v. Fulmer Helmets, Inc.* (TN Cir. Ct.)
- *Falkenberg v. Alexico, et al.* (D. NJ)
- *Ford Transmission Defect Litigation* (E.D. PA)
- *Francis v. Holman Enterprises, Ltd.* (NJ Sup. Ct.)
- *In re Bayer Corp. Combination Aspirin Products Marketing & Sales Practice Litigation* (D. NJ)
- *GM Advertising Litigation* (D. MN)
- *Hale, et al. v. Stryker Orthopaedics, et al.* (D. NJ)
- *Kaplan v. WASCO* (NJ Sup. Ct.)
- *Klein v. DeSimone* (NJ Sup. Ct.)
- *Lupron Marketing and Sales Practices Litigation* (D. MA)
- *Melman, et al. v. O'Neill Properties, et al.* (PA St. Ct.)
- *Moroz, et al. v. Alexico, et al.* (E.D. PA)
- *Paoli Railroad Yard PCB Litigation* (E.D. PA)
- *Phelan v. Title Insurance Rate Service Association, Inc., et al.* (S.D. NY)
- *Pharmaceutical Industry Average Wholesale Price Litig.* (D. MA)
- *Plumbers & Pipefitters L. 572 v. Biovail Corporation* (E.D. PA)
- *Skin Cap Products Liability Litigation* (S.D. FL)
- *Smith v. Royal Guard LLC* (NJ Sup. Ct.)
- *Synthroid Marketing Litigation* (D. IL)
- *United States, ex rel. Anthony Kite v. Besler Consulting, et al.* (D. NJ)
- *Viagra Insurance Coverage Litigation* (M.D. FL and E.D. NY)
- *Vioxx Consumer Litigation* (State and Federal Courts)
- *In re Vytorin/Zetia Sales Practices and Prod. Liab. Litig.* (D. NJ)
- *Water Heater Products Liability Litigation* (E.D. MO)
- *Weldon v. Cherry Hill Nissan, Inc.* (NJ Sup. Ct.)
- *Zyprexa Payer Litigation* (E.D. NY)

Employment Class Actions

State and Federal wage and hour laws require employers to pay many workers all wages due and owing as well as overtime pay for working more than forty hours in a work week. A variety of federal laws - including Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act, and the Age Discrimination in Employment Act - prohibit employers from firing an employee, refusing to hire an applicant, or changing the terms of employment for reasons related to race, color, sex, national origin, religion, pregnancy, disability or age. Determining if a worker has been properly paid, or has been the subject of discrimination, can involve complex legal issues. At SMBB, our lawyers have the tools to fight for fair treatment in the workplace.

The attorneys in SMBB's Class Action Practice Group have significant experience in employment litigation as a result of their participation in the following cases:

- *Boice v. SEPTA* (PA St. Ct.)

- *Dorofy v. American International Group, Inc.* (D. NJ)
- *El v. SEPTA* (E.D. PA)
- *Heiser v. SEPTA* (PA St. Ct.)
- *Holt v. SEPTA* (PA St. Ct.)
- *Huntley v. Pittsburgh Mercy Health System* (PA St. Ct.)
- *Myers v. Jani-King, Inc.* (E.D. PA)
- *Turner v. Catholic Health East* (PA St. Ct.)
- *Vanston v. Maxis Health System* (PA St. Ct.)

Securities Class Actions

The federal securities laws were designed to promote a level playing field for investors by requiring full and fair disclosure of all material facts about public companies. When a company seeks to inflate the price of its shares by making false or misleading statements to analysts, brokers or investors, or by using improper accounting practices, federal securities fraud claims may lie. Securities laws have been particularly relevant to Taft-Hartley pension and retirement funds since passage of the Private Securities Litigation Reform Act of 1995, which specifically encouraged institutional investors to protect the assets held for their beneficiaries and other investors by serving as lead plaintiffs in securities class actions.

The attorneys in SMBB's Class Action Practice Group have significant experience in the litigation of securities fraud claims as a result of their participation in the following cases:

- *Abbott Securities Litigation* (N.D. IL)
- *AOL Securities Litigation* (D. MN)
- *Initial Public Offering Securities Litigation* (S.D. NY)
- *Oracle Securities Litigation* (N.D. CA)
- *Parmalat Securities Litigation* (S.D. NY)
- *PE Corp. Securities Litigation* (D. CT)
- *PRI Automation, Inc. Securities Litigation* (D. MA)
- *TXU Securities Litigation* (N.D. TX)
- *Tyco Securities Litigation* (NH St. Ct.)
- *VeriSign Securities Litigation* (ND CA)
- *Xcel Securities Litigation* (D. MN)

Shareholder Derivative Actions

Derivative actions are lawsuits brought by shareholders against a company's officers or directors that generally allege a breach of fiduciary duties. Derivative claims can be appropriate where, for example, a company's officers or directors have been engaged in self-dealing or where a company has sold assets to an officer or director for less than fair market value. These are cases that companies should bring but do not, usually because its officers or directors exercise improper influence over the company's affairs. If a derivative action is favorably resolved, the individuals found to have harmed

the company may be required to make monetary payments to the company. Successful derivative actions may also lead to corporate governance changes, so that the conduct complained of will not happen again. Derivative suits will generally benefit shareholders through improved corporate governance and gains in share price.

The attorneys in SMBB's Class Action Practice Group have significant experience in shareholder derivative litigation as a result of their participation in the following cases:

- *Abbott Laboratories Derivative Litigation (N.D. IL)*
- *Bristol-Myers Squibb Derivative Litigation (S.D. NY)*
- *El Paso Derivative Litigation (DE St. Ct.)*
- *Labranche Derivative Litigation (NY St. Ct.)*
- *Tyco Derivative Litigation (NH St. Ct.)*
- *Xcel Derivative Litigation (D. MN)*

SIGNIFICANT RECOVERIES

The attorneys in SMBB's Class Action Practice Group contributed to the following significant recoveries:

- *Abbott Labs Derivative Litigation (N.D. IL) (\$27 Million)*
- *AOL Securities Litigation (D. MN) (\$2.65 Billion)*
- *Baycol Products Liability Litigation (D. MN) (\$350 Million partial settlement)*
- *Bristol-Myers Squibb Securities Litigation (S.D. NY) (\$300 Million)*
- *DRAM Antitrust Litigation (N.D. CA) (partial settlements over \$143 Million)*
- *In re El Paso Corp Shareholder Litigation (DE St. Ct.) (\$285 Million)*
- *Flat Glass Antitrust Litigation (W.D. PA) (\$126 Million)*
- *Initial Public Offering Securities Litigation (S.D. NY) (\$1 Billion partial settlement)*
- *Linerboard Antitrust Litigation (E.D. PA) (\$202 Million)*
- *Lupron Marketing and Sales Practices Litigation (D. MA) (\$150 Million)*
- *In re OSB Antitrust Litigation (E.D. PA) (\$120 Million)*
- *Parmalat Securities Litigation (S.D. NY) (\$50 Million partial settlement)*
- *Paxil Antitrust Litigation (E.D. PA) (\$150 Million)*
- *Relafen Antitrust Litigation (D. MA) (\$175 Million)*
- *In re TXU Securities Litigation (N.D. TX) (\$150 Million)*
- *In re Tyco Securities Litigation (NH St. Ct.) (\$3.2 Billion)*
- *In re VeriSign Securities Litigation (N.D. CA) (\$80 Million)*
- *Vitamins Antitrust Litigation (D. DC) (\$2.4 Billion)*
- *In re Xcel Derivative and Securities Litigation (D. MN) (\$80 Million)*

ATTORNEY BIOGRAPHIES

Simon B. Paris, Esq.

Simon B. Paris, a partner in the firm's Class Action Practice Group, joined SMBB in 2007. Mr. Paris' dedication to finding new ways of identifying and challenging improper business practices has earned him the respect of his

peers and nationwide recognition as a class action innovator.

Mr. Paris' practice focuses on the litigation of complex class actions with specializations in antitrust, consumer protection and securities fraud matters.

Before joining the firm, Mr. Paris worked in the Philadelphia office of Spector Roseman & Kodroff, P.C., where he played an integral role in developing and prosecuting many class action cases, including: *Abbott Laboratories Derivative Litigation* (N.D. Ill.); *AOL Securities Litigation* (D. Minn.); *Blake v. United Auto Group Inc.* (N.J. Super.); *Bristol-Myers Squibb Derivative Litigation* (S.D.N.Y.); *Cosgrove v. Nestle Waters North America, Inc.* (N.J. Super.); *Francis v. Holman Enterprises, Ltd.* (N.J. Super.); *Kaplan v. WASCO* (N.J. Super.); *Klein v. DeSimone* (N.J. Super.); *Linerboard Antitrust Litigation* (E.D. Pa.); *Lynch v. National Prescription Administrators, Inc.* (S.D.N.Y.); *Mercedes-Benz Antitrust Litigation* (D.N.J.); *OSB Antitrust Litigation* (E.D. Pa.); *Tricor Antitrust Litigation* (D. Del.); and *VeriSign Securities Litigation* (N.D. Cal.).

Mr. Paris has also worked as an Assistant State Attorney for the State of Florida, where he was lead counsel in over fifty jury trials; as an attorney with Marshall Dennehey Warner Coleman & Goggin, where he handled construction and complex commercial matters; and as a law clerk for Hon. Irvin J. Snyder and Hon. David G. Eynon of the New Jersey Superior Court.

Mr. Paris is admitted to practice in New Jersey, Florida, the United States Courts of Appeals for the Third Circuit, and the United States District Courts for the District of New Jersey.

A 1993 graduate of Rutgers University, Mr. Paris received his law degree from Widener University School of Law in 1996.

Patrick Howard, Esq.

Patrick Howard joined SMBB in 2007 as an associate in the firm's Class Action Practice Group. Mr. Howard brings with him significant experience in the prosecution of consumer fraud and antitrust cases.

Mr. Howard, together with firm shareholder Robert J. Mongeluzzi, served as Lead Plaintiffs' Counsel in the *In re: Riverwalk Fire Cases*, Master Litigation Docket No. 2008-23265 (Montgomery County). Following the August 13, 2008 fire that destroyed the Conshohocken, PA luxury apartment complex, SMBB led the investigation and prosecution on behalf of all those who suffered damage. After only 14 months, the litigation resulted in a \$36.25 million recovery, including more than \$9 million for the members of the class. Following Mr. Howard's presentation at the December 17, 2009, Final Settlement Approval Hearing, the Honorable S. Gerald Corso complimented Lead Counsels' efforts in resolving the many issues involved in the litigation "in not only expeditious fashion...but also in providing the maximum benefit for the plaintiffs."

Additionally, Mr. Howard's efforts resulted in SMBB's appointment as lead counsel to a class of over 17,000 consumers in *Weldon v. Cherry Hill Nissan, Inc.*, a case arising out of the alleged deceptive sales practices of an automobile dealership. Without a single objection, the Court approved a settlement that provided consumers with the option to receive a cash payment or a discounted future service of their choice.

Together with pursuing the interests of individual consumers, Mr. Howard also represents a number of small and large businesses, together with Taft-Hartley Funds, who seek redress from violations of the nation's antitrust laws. Currently, Mr. Howard is actively involved in the following litigation: *Community Medical Center HealthCare System, et al. v. Lundbeck Inc.*, Civil Action No. 09-cv-1375 (D. Min)(appointed to Plaintiffs' Executive Committee by Court); Steel Antitrust Litigation (*Standard Iron Works, et al. v. Areclormittal, et al.*, 1:08-cv-05214 (N.D. Ill.)); *In re: Rail Freight Fuel Surcharge Antitrust Litigation*, MDL Docket No. 1869 (D. D.C.);, and *In re: Urethane Antitrust Litigation*, MDL Docket No. 1616 (D. Kan.).

In December 2008 and again in May 2011, Mr. Howard was selected from among thousands of attorneys for inclusion in the *Pennsylvania Super Lawyers—Rising Stars*, a listing which includes the top 2.5 percent of attorneys in the state who are 40 years old or younger or who have been practicing less than 10 years.

Mr. Howard also actively participates in the Philadelphia Volunteers for the Indigent Program, providing pro bono legal representation to impoverished individuals. The Philadelphia Court of Common Pleas recognized Mr. Howard in both 2008 and 2009 on the Pro Bono Roll of Honor as an attorney whose pro bono work has been recognized by the judiciary as exemplary.

Mr. Howard is a 1998 graduate of the University of Scranton, where he received a B.S. in both Political Science and History. He received his law degree from the University Of Pittsburgh School Of Law in 2001. While in law school, Mr. Howard received Dean's Honors, was a member of the school's Moot Court Board and participated in the Robert Wagner National Labor and Employment Moot Court Competition. After law school, Mr. Howard served as a judicial clerk for the Honorable Peter Paul Olszewski of the Pennsylvania Superior Court, the state's intermediate appellate court.

Mr. Howard is admitted to practice in the United States Courts of Appeals for the Third Circuit, the United States District Courts for the Eastern District of Pennsylvania and District of New Jersey, the Commonwealth of Pennsylvania and the State of New Jersey. He is a member of the American, Pennsylvania and Philadelphia Bar Associations.

Charles J. Kocher, Esq.

Charles J. Kocher worked on a wide array of legal matters - from pharmaceutical products liability litigation to white collar matters- at one of Philadelphia's largest law firms before joining SMBB in 2010.

He worked with all phases of trial preparation, including witness examinations, developing expert reports, and taking and defending depositions. In one important personal injury case, he successfully argued a summary judgment motion before the esteemed Hon. Jack B. Weinstein in the U.S. District Court for the Eastern District of New York, securing an early victory for his client and eliminating the need for a trial.

At SMBB, Mr. Kocher represents small businesses and other individuals who have been injured by price-fixing conspiracies in violation of the antitrust laws. He also represents injured investors of Ponzi schemes. Mr. Kocher received his undergraduate degree, cum laude, from Georgetown University in 2001, and his law degree from Villanova University School of Law in 2004, where he was a managing editor of the Villanova Law Review.

Upon graduation from law school, Mr. Kocher clerked for U.S. District Judge Clarence C. Newcomer, a celebrated judge who sat on the federal bench for more than thirty years in the Eastern District of Pennsylvania.

Mr. Kocher is admitted to practice in the United States Court of Appeals for the Fifth Circuit, the United States District Court for the Eastern District of Pennsylvania, the United States District Court for the District of New Jersey, the Commonwealth of Pennsylvania and the State of New Jersey.

EXHIBIT 2

FREE RANGE CONTENT, INC., et al. v. GOOGLE INC.

TIME REPORT- THROUGH JUNE 30, 3018

Firm Name: SALTZ MONGELUZZI BARRETT & BENDESKY, PC

Reporting Period: Inception through June 30, 2018

Categories:

- | | | |
|--|---|----------------|
| (1) Investigations, Factual Research | (5) Settlements | (P) Partner |
| (2) Discovery | (6) Litigation Strategy, Analysis and Case Management | (A) Associate |
| (3) Pleadings, Briefs and Pretrial Motions | (7) Class Certification | (LC) Law Clerk |
| (4) Court Appearances and preparation | (8) Trial Preparation and Trial | (PL) Paralegal |

ATTORNEY OR PARALEGAL	1	2	3	4	5	6	7	8	CURRENT HOURS	HOURLY RATE	CURRENT LODESTAR	CUMULATIVE HOURS	CUMULATIVE LODESTAR
Simon Paris (P)			1.70						1.70	\$660.00	\$1,122.00	1.70	\$1,122.00
Charles Kocher (A)			17.30						17.30	\$535.00	\$9,255.50	17.30	\$9,255.50
									0.00		\$0.00		
									0.00		\$0.00		
									0.00		\$0.00		
									0.00		\$0.00		
Attorney Totals	0.00	0.00	19.00	0.00	0.00	0.00	0.00	0.00	19.00		\$10,377.50		\$10,377.50
									0.00		\$0.00		
									0.00		\$0.00		
									0.00		\$0.00		
									0.00		\$0.00		
									0.00		\$0.00		
Non-Attorney Totals	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		\$0.00		
TOTALS:	0.00	0.00	19.00	0.00	0.00	0.00	0.00	0.00	19.00		\$10,377.50	0.00	\$10,377.50

EXHIBIT 3

NAME: SALTZ MONGELUZZI BARRETT & BENDESKY, PC

**FREE RANGE CONTENT, INC., et al. v. GOOGLE INC.
COSTS REPORT THROUGH JUNE 30, 2018**

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Litigation Assessment				\$0.00
Court Costs	Pro Hac Admission for S. Paris and P. Howard		\$610.00	\$610.00
Experts/consultants				\$0.00
Federal Express				\$0.00
Hearing Transcripts				\$0.00
Investigation				\$0.00
Lexis/westlaw				\$0.00
Messenger/delivery				\$0.00
Photocopies - in House				\$0.00
Photocopies - Outside				\$0.00
Postage				\$0.00
Service of Process				\$0.00
Special Supplies				\$0.00
Telephone/telecopier				\$0.00
Travel				\$0.00
Miscellaneous				\$0.00
TOTAL			\$610.00	\$610.00