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11 Attorneys for Plaintiffs and the Class

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

14 SCOTT KOLLER, CAROLYN BISSONETTE,
15 CECE CASTORO, STEPHEN FREIMAN,
16 DIANE GIBBS, DARLENE WILLIAMS, and
17 ROBERT GLIDEWELL, on behalf of
themselves, the general public and those similarly
situated,

18 Plaintiffs,

19 v.

20 MED FOODS, INC., and DEOLEO USA,
21 INC.

22 Defendants.

CASE NO. 14-cv-2400 (RS)

**DECLARATION OF HASSAN A.
ZAVAREEI IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND APPLICATION
FOR ATTORNEYS' FEES, COSTS AND
INCENTIVE AWARDS**

Date: August 9, 2018

Time: 1:30 p.m.

Dept: Courtroom 3, 17th Floor

Judge: Hon. Richard Seeborg

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1 I, Hassan Zavareei, declare as follows:

2 1. I am a member of this Court and attorney of record for Plaintiffs in this action.

3 2. I am a partner at Tycko & Zavareei LLP (“TZ” or “Firm”), which has been appointed
4 Class Counsel in the above-captioned matter. The information below is stated based on personal
5 knowledge. I am competent to testify to the facts set forth below, and if called as a witness and placed
6 under oath, I would testify to those facts.

7 3. I make this Declaration in support of Plaintiff (1) motion for final approval and (2)
8 application for attorneys’ fees and costs and incentive awards. In that regard, I discuss, in the
9 following order: (a) the history of this litigation, which includes a summary description of the legal
10 services provided by TZ in this litigation to date; (b) the risks borne by TZ; (c) the time, rate,
11 expenses, and other data underlying the application for attorneys’ fees and costs; and (d) TZ’s
12 continuing obligations in this litigation and under the Settlement Agreement.

13 **A. History of the Litigation.**

14 4. Prior to becoming co-counsel with the Gutride Safier firm (“GSLLP”) in this matter,
15 TZ had litigated several matters related to several olive oil brands, including Bertolli, against retailers
16 in Washington, D.C., under the D.C. Consumer Protection Procedures Act (“CPPA”). During the
17 D.C. CPPA litigation, TZ conducted significant investigation relating to both the “extra virgin” and
18 “Imported from Italy” claims at issue in this litigation, including analyzing the standards for extra
19 virgin olive oil set forth by various regulatory bodies including the International Olive Council
20 (“IOC”), Food and Drug Administration (“FDA”) regulations and Customs and Border Patrol
21 (“CBP”) regulations related to country of origin. TZ also conducted research regarding potential
22 federal preemption of Plaintiff’s claims. In that litigation TZ incurred a lodestar (using the Adjusted
23 Laffey Rates) of over \$1.5 million. The resolution of those cases is confidential, but TZ did not—by
24 any means—recoup anywhere close to the amount of fees and expenses that it invested in those cases.

25 5. Throughout this litigation, TZ worked closely with GSLLP to formulate case strategy.
26 Work was divided between the firms to avoid duplication—for example, my firm took approximately
27 half the depositions in this matter, and GSLLP handled most court appearances. Similarly, in
28 connection with legal research and brief writing, one firm was assigned to draft all (or certain sections)

1 of a brief, while the other provided only suggestions and edits. For example, TZ took the lead in
2 drafting the motion for partial summary judgment in September 2017, along with the instant Motion.

3 6. Before GSSLP filed the complaint in this matter, TZ consulted with GSSLP regarding
4 TZ's experience litigating similar olive oil issues in Washington, D.C.

5 7. Defendant filed motions to dismiss both the complaint and amended complaint in this
6 matter. TZ reviewed Defendant's arguments and assisted in preparing the opposition to those
7 motions.

8 8. Throughout this case, TZ participated in the discovery efforts, including drafting and
9 serving some of the discovery requests on Defendant and third parties, reviewing document
10 production and written discovery responses, drafting and serving some of the responses to
11 Defendant's discovery requests. TZ also assisted with meet-and-confer efforts, participating in calls
12 and drafting several meet and confer letters, with Defendant's counsel regarding the scope of
13 discovery, the sufficiency of discovery responses and production, the retention of electronic
14 documents, Defendant's searches for electronically stored information, the terms and scope of a
15 stipulated protective order, and the timing of production. TZ also participated in the researching and
16 drafting for discovery letter briefs which were filed in April of 2015 and January of 2017.

17 9. Defendant produced over 215,000 pages of documents (or separately-numbered
18 electronic files), along with written discovery responses. Together with GSSLP, TZ worked to review
19 the documents produced by Defendant.

20 10. TZ worked to issue subpoenas to third-party witnesses, including other olive oil
21 producers, and companies in possession of third-party sales data. TZ additionally met and conferred
22 with attorneys for the other olive oil suppliers, in efforts to obtain responses to the subpoenas.

23 11. Plaintiff Koller took depositions of five of Defendant's employees, and two of
24 Defendant's expert witnesses. TZ took the lead on deposing witnesses located in foreign countries via
25 videoconference, while GS handled depositions in California and at Defendant's headquarters in
26 Texas.

27 12. TZ participated in conducting research for, drafting, and filing Plaintiff's Motion for
28 Class Certification, which was filed in October of 2015. Upon receiving Defendant's opposition to

1 that motion, TZ participated in the research and drafting of Plaintiff's reply memorandum, which was
2 filed in April of 2017.

3 13. After Defendant filed a motion to stay the case in November 2015, TZ took the lead
4 on researching and drafting a response to the motion, in addition to a motion to lift the stay in
5 September 2016.

6 14. TZ took the lead on researching and drafting for Plaintiff's Motion for Partial
7 Summary Judgment, which was filed on September 19, 2017.

8 15. TZ took the lead on researching for and drafting Plaintiff's opposition to Defendant's
9 request that the 9th Circuit certify this case for appeal under Rule 23(f).

10 16. An attorney from my firm participated in an all-day mediation session before retired
11 Judge Infante in San Francisco in November of 2017.

12 17. Although GSLLP took the lead on settlement negotiations following class certification,
13 TZ consulted on draft of the term sheet and settlement agreement, along with corresponding
14 documents, including claim forms, summary notice, and long form notice.

15 18. During the course of the litigation, TZ was contacted by consumers from additional
16 states with similar claims. These consumers hired TZ to represent them, and in connection with the
17 preliminary approval motion, Plaintiff amended the Complaint to add claims on behalf of these
18 individuals and a nationwide class. TZ conducted research in connection with amending the
19 complaint.

20 19. After the parties entered into the Settlement Agreement, TZ drafted the motion for
21 preliminary approval of the settlement and its supporting documents.

22 20. TZ also drafted the instant motion for final approval of the settlement, and the
23 application for attorneys' fees and costs and incentive award.

24 21. Should any objections to the settlement be filed prior to the hearing on final approval,
25 TZ will research and respond to those objections by, if necessary, filing oppositions to them and/or a
26 reply memorandum in support of the motion for final approval of the settlement.

27 22. After engaging in all of the aforementioned tasks, as a partner with TZ, I am in a
28 unique position to evaluate this Settlement. Indeed, in advising the Representative Plaintiffs whether

1 or not to enter into the Settlement Agreement, I was very cognizant of the risks involved in protracted
2 litigation. I was also cognizant of Defendant's size and financial resources.

3 23. When considering the risks and costs associated with proceeding to trial against the
4 nature of the benefit that was being offered by Defendant, I believe that the Settlement is in the best
5 interests of the class. Indeed, with this Settlement, Plaintiffs have achieved their desired goal in this
6 litigation—i.e., obtaining for class members cash refunds and changes to Defendant's olive oil labeling
7 and handling practices. Based on my evaluation of the facts and legal issues presented, I believe that
8 the settlement is fair, adequate, and reasonable.

9 **B. The Risks Borne By TZ.**

10 24. In accepting this case, TZ bore considerable risk. TZ took this case on a fully
11 contingent basis, meaning that we were not paid for any of our time, and that we paid all costs and out
12 of pocket expenses without any reimbursement to date. From the outset, TZ recognized that it would
13 be contributing a substantial amount of time and advancing significant costs in prosecuting this class
14 action, with no guarantee of compensation or recovery, in the hopes of prevailing against a well-
15 funded defense. During the pendency of the litigation, TZ turned away other work.

16 25. Because Defendant was represented by a large, highly-skilled and well-resourced
17 litigation firm, there was increased risk that Plaintiffs would receive a verdict for the Defense after a
18 prolonged trial.

19 **C. Lodestar and Expenses for TZ**

20 26. A true and correct copy of the firm resume of TZ is attached hereto as Exhibit A.

21 27. Based on the time records of TZ, TZ has spent over 960 hours prosecuting this
22 litigation through the date of this declaration.¹ The total number of hours, as well as the lodestar
23 computed at our 2018 rates, is as shown in the following table:

Attorney (Position)	Hours	Rate	Total
Hassan Zavareei (Partner)	181.40	\$864.00	\$156,729.60
Anna Haac (Partner)	54.50	\$717.00	\$39,076.50

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28 ¹ TZ will update its lodestar and costs in a reply declaration, as necessary.

Attorney (Position)	Hours	Rate	Total
Jeffrey Kaliel (Partner)	3.20	\$717.00	\$2,294.40
David Lawler (Counsel)	125.75	\$717.00	\$90,162.75
Andrew Silver (Associate)	440.50	\$440.00	\$193,820.00
Katherine Aizpuru (Associate)	9.90	\$440.00	\$4,356.00
Lauren Kelleher (Associate)	28.40	\$359.00	\$10,195.60
Michael Brody (Counsel)	52.00	\$440.00	\$22,880.00
Amy Berkowitz (Paralegal)	16.20	\$196.00	\$3,175.20
Christina Parel (Paralegal)	2.20	\$196.00	\$431.20
Sydney Teng (Paralegal)	25.90	\$196.00	\$5,076.40
Melis Coban (Paralegal)	2.10	\$196.00	\$411.60
Nathan Laporte (Paralegal)	17.60	\$196.00	\$3,449.60
Natasha Fletcher (Paralegal)	2.10	\$196.00	\$411.60
Audrey Abate (Paralegal)	5.00	\$196.00	\$980.00
TOTAL	966.75		\$533,450.45

28. The hourly rates shown for the attorneys at T'Z are our 2018 rates charged as delineated by the Laffey Matrix (<http://www.laffeymatrix.com/>), which provides market rates for attorneys working in the Washington, D.C., and Baltimore areas. In a recent decision involving similar litigation regarding olive oil labeling, the Northern District of California found that the hourly rates charged by T'Z, which were determined using the Laffey Matrix, "are reasonable and commensurate with those charged by attorneys with similar experience in the market." *Kumar v. Salov N. Am. Corp.*, No. 14-CV-2411-YGR, 2017 WL 2902898, at *7 (N.D. Cal. July 7, 2017). Although the Laffey Matrix is updated annually, many other courts have awarded attorneys' fees consistent with the Laffey Matrix to my firm in a number of cases. *See, e.g., Brown v. Transurban USA, Inc.*, No. 1:15CV494 (JCC/MSN), 2016 WL 6909683 (E.D. Va. Sept. 29, 2016); *Small v. BOKF, N.A.*, No. 1:13-cv-01125-REB-MJW (D. Colo.); *Soule v. Hilton Worldwide, Inc.*, No. CV 13-00652 ACK-RLP, 2015 WL 12827769 (D. Haw. Aug. 25, 2015); *Beck v. Test Masters Educ. Servs., Inc.*, 73 F. Supp. 3d 12 (D.D.C. 2014). The Ninth Circuit has accepted the Laffey Matrix as evidence of reasonable hourly rates charged by

1 Washington, D.C. attorneys. *Mancini v. Dan P. Plute, Inc.*, 358 F. App'x 886 (9th Cir. 2009). And a
2 court in this District recently awarded Bay Area attorneys Laffey Matrix fees adjusted *upwardly* by nine
3 percent, so, if anything, the Laffey Matrix comes in *below* the market rate for attorneys in this District.
4 *See Brinker v. Normandin's*, No. 14CV03007EJDHRL, 2017 WL 713554 (N.D. Cal. Feb. 23, 2017)
5 (citing *Theme Promotions, Inc. v. News America Marketing FSI, Inc.*, 731 F. Supp. 2d 937, (N.D. Cal. 2010)).

6 29. I am a 1995 graduate of University of California, Berkeley School of Law. Jeffrey
7 Kaliel is a 2005 graduate of Yale Law School, Anna Haac is a 2006 graduate of University of Michigan
8 Law School, Andrew Silver is a 2012 graduate of Boston College Law School, Katherine Aizpuru is a
9 2014 graduate of Harvard Law School, and Lauren Kelleher is a 2016 graduate of Georgetown
10 University Law Center.

11 30. I was previously an attorney at the law firm of Gibson Dunn & Crutcher. It is my
12 understanding that attorneys at that firm in the litigation department with the same number of years
13 of experience as myself are currently billing at hourly rates in excess of \$1,000 for law school
14 graduates from 1995. I believe that my firm's hourly rates are at or below market for attorneys with
15 similar backgrounds and experience.

16 31. Expenses are accounted for and billed separately and are not duplicated in my firm's
17 professional billing rate. TZ has not received reimbursement for expenses incurred in connection with
18 this litigation. As of the date of this declaration, my firm incurred a total of \$47,191.74 in
19 unreimbursed actual third-party expenses in connection with the prosecution of these cases. The
20 actual expenses incurred in the prosecution of these cases are reflected on the computerized
21 accounting records of my firm prepared by bookkeeping staff, based on receipts and check records,
22 and accurately reflect all actual expenses incurred. Attached hereto as Exhibit B is a true and correct
23 copy of a listing of expenses incurred in this case by my firm, for which Class Counsel is now seeking
24 reimbursement.

25 **D. Plaintiffs' Counsel Continuing Obligations to Class Members**

26 32. Following this Court granting preliminary approval to the Settlement, Class Counsel
27 established standardized procedures to ensure that all inquiries from Class Members were timely and
28 accurately handled. I am not aware of any feedback from class members that would suggest that the

1 process is onerous or complicated. Class Counsel also worked the Claim Administrator to assure that
2 settlement website functioned properly, was easy to use and properly designed. Class Counsel also
3 worked with the Claims Administrator to assure that notice was disseminated in accordance with the
4 terms of the Settlement Agreement. I received weekly updates from the Claims Administrator
5 regarding the administration of the settlement. TZ will continue in this capacity should the settlement
6 be finally approved. If the settlement is approved and fees awarded, TZ also will oppose any appeals
7 that may be filed. Based on my experience with class actions, I additionally anticipate that there will be
8 another 50-75 hours of work before this Litigation is entirely complete and an estimated 175-250
9 hours if this Court's judgment is appealed.

10 **E. Class Representatives' Contribution to the Litigation**

11 33. Plaintiff Koller took on substantial risk, most importantly the risk of bearing
12 Defendant's costs. Koller also worked with counsel to provide information throughout the litigation,
13 which has now progressed for over four years. Plaintiff Koller answered interrogatories and requests
14 for production. Plaintiff Koller conducted searches of his personal records, sat for a deposition, and
15 participated in a mediation session. The other named Plaintiffs all provided Class Counsel with
16 sufficient information regarding their experiences and claims to enable them to join this case and
17 represent a nationwide class. And all Plaintiffs remained actively involved in the litigation after the
18 Settlement was reached.

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20 This declaration was executed this 28th day of June, 2018, at Washington, D.C.. I state the
21 foregoing under penalty of perjury under the laws of the United States.

22 /s/ Hassan A. Zavareei
23 Hassan A. Zavareei, Esq.

EXHIBIT A



TYCKO & ZAVAREEI LLP

HISTORY

Our firm was founded in 2002, when Jonathan Tycko and Hassan Zavareei left the large national firm at which they both worked to start a new kind of practice. Since then, a wide range of clients have trusted us with their most difficult problems. Those clients include individuals fighting for their rights, tenants' associations battling to preserve decent and affordable housing, consumers seeking redress for unfair business practices, whistleblowers exposing fraud and corruption, and non-profit entities and businesses facing difficult litigation.

Our practice is focused in a few select areas: consumer class action litigation, employment litigation, appellate litigation, whistleblower *qui tam* litigation, intellectual property litigation, First Amendment litigation, and business litigation.

EXPERIENCE

Our firm's practice focuses on complex litigation. This includes representation of plaintiffs in class action litigation. Since the founding of our firm, we have been plaintiff's counsel in dozens of separate lawsuits brought as class actions. In addition to this work on class actions, our practice also involves representing businesses in unfair competition and antitrust litigation, representing employees in employment litigation, and representing whistleblowers in *qui tam* litigation brought under the False Claims Act and other similar whistleblower statutes.

PRACTICE AREAS

CONSUMER CLASS ACTIONS

Our attorneys have a wealth of experience litigating consumer and other types of class actions. We primarily represent consumers who have been the victims of corporate wrongdoing. Our attorneys bring a unique perspective to such litigation because each of our partners trained at major national law firms where they obtained experience representing corporate defendants in such cases. This unique perspective enables us to anticipate and successfully counter the strategies commonly employed by corporate counsel defending class action litigation.

In addition, because class actions present such high-stakes litigation for corporate defendants, our ability to skillfully oppose motions to dismiss the case at an early stage of the litigation before the class has a chance to have a judge or jury consider the merits of its claims is critical to obtaining relief for our clients. Our attorneys have successfully obtained class certification, the most critical step in winning a class action, and obtained approval of class action settlements with common funds collectively amounting to over \$250 million.

EMPLOYMENT LITIGATION

Our attorneys have substantial experience representing employees and employers in employment disputes. In most of the employment litigation that we handle, however, we represent groups of plaintiffs who are challenging systemic unlawful employment practices. For instance we successfully represented seven women in their claims of systemic discrimination and sexual harassment by Hooters restaurants in West Virginia, and we represented a group of women seeking class treatment of their allegations of sexual discrimination by Ruth's Chris.

APPELLATE

Our attorneys have substantial experience in analyzing, briefing and arguing appeals. We have handled appeals in courts around the country, including the U.S. Supreme Court, the U.S. Circuit Courts, and the District of Columbia Court of Appeals.

QUI TAM AND FALSE CLAIMS ACT

Our firm represents whistleblowers who courageously expose fraud by government contractors, healthcare providers, and other companies doing business with the government through litigation under the False Claims Act. We also represent whistleblowers who expose tax fraud through the IRS Whistleblower Office program, whistleblowers who expose violations of the securities laws through the SEC Whistleblower Office program, and banking industry whistleblowers through the Department of Justice's FIRREA program.

INTELLECTUAL PROPERTY

Our attorneys have substantial experience litigating cutting-edge intellectual property cases in state and federal courts. Proper handling of intellectual property controversies requires substantive knowledge of the relevant body of law, together with strong litigation experience and skill. We bring these elements together to effectively represent our clients in complex trademark and copyright lawsuits.

We have litigated copyright infringement cases on behalf of corporations and associations, including submitting an amicus brief on behalf of three technology companies in the United States Supreme Court on Internet file sharing in the *MGM, et al. v. Grokster, et al.* case. We have also counseled clients on copyright matters, and written and presented on important copyright issues, such as the intersection of technology, copyright and the First Amendment. The firm briefed and argued an appeal to the Fifth Circuit Court of Appeals on a novel issue of law in a dispute over the competing trademark rights of two test preparation companies operating in the same markets, using the same trade name.

FIRST AMENDMENT

Partner Hassan Zavareei represented the plaintiff in one of the most important cases of media defamation handled recently by the courts, namely, the case brought by Dr. Steven Hatfill

against Condé Nast Publications (the publisher of Vanity Fair magazine) and Reader's Digest for articles that falsely accused Dr. Hatfill of perpetrating the Anthrax murders that occurred in the fall of 2001.

Further, our firm has represented a number of employees who have fought back against former employers for defamatory statements. Our lawyers have obtained very substantial settlements on behalf of our clients. Also, our firm has represented businesses seeking to protect their hard-earned reputations against such defamation by their competitors.

Our attorneys also have experience in other types of First Amendment litigation. For example, partner Jonathan Tycko represented a consortium of media clients in a series of lawsuits to gain access to the sealed proceedings in the Independent Counsel investigation of and impeachment proceedings against President Bill Clinton. And partner Hassan Zavareei successfully challenged a district court injunction that violated our client's First Amendment guarantees to free speech and rights to petition the government.

BUSINESS DISPUTES

We represent businesses, large and small, in their most significant business disputes. Indeed, prior to the founding of Tycko & Zavareei LLP, our partners spent many years at a large law firm specialized in representing business interests. We have represented some of the largest, publicly-traded corporations in the world, but also have represented small and medium size businesses.

JONATHAN K. TYCKO
PARTNER

In 2002, Jonathan K. Tycko helped found Tycko & Zavareei LLP. Prior to that, Mr. Tycko was with Gibson, Dunn & Crutcher LLP, one of the nation's top law firms. He received his law degree in 1992 from Columbia University Law School, where he was a Stone Scholar, and earned a B.A. degree, with honors, in 1989 from The Johns Hopkins University.

After graduating from law school, Mr. Tycko served for two years as law clerk to Judge Alexander Harvey, II, of the United States District Court for the District of Maryland.

Mr. Tycko's practice has focused primarily on civil litigation. He has extensive trial and appellate experience in real estate, housing, employment, False Claims Act, environmental, consumer class action, media, and professional malpractice litigation. Mr. Tycko has represented a wide range of clients, including Fortune 500 companies, privately-held business, non-profit associations, and individuals.

In addition, Mr. Tycko has handled many pro bono cases in the area of human rights law, including representation of political refugees seeking asylum, and preparation of amicus briefs on behalf of the Lawyers Committee for Human Rights (now known as Human Rights First) and other organizations and individuals in various appellate matters, including matters before the Supreme Court.

For two years, from 2002 through 2004, Mr. Tycko taught as an Adjunct Professor at the George Washington University Law School.

He is admitted to practice before the courts of the District of Columbia, Maryland and New York, as well as before numerous federal courts, including the Supreme Court, the Circuit Courts for the D.C. Circuit, Third Circuit, Fourth Circuit, Ninth Circuit and Federal Circuit, the District Courts for the District of Columbia, the District of Maryland, the Northern and Southern Districts of New York, and the Court of Federal Claims.

HASSAN A. ZAVAREEI
PARTNER

Hassan Zavareei graduated *cum laude* from Duke University in 1990, with degrees in Comparative Area Studies and Russian. Upon graduation from Duke, Mr. Zavareei worked as a Russian-speaking flight attendant for Delta Air Lines for two years. He later earned his law degree from the University of California, Berkeley School of Law in 1995, where he graduated as a member of the Order of the Coif. After graduation from Berkeley, Mr. Zavareei joined the Washington, D.C. office of Gibson, Dunn & Crutcher LLP. In April of 2002, Mr. Zavareei founded Tycko & Zavareei LLP with his partner, Jonathan Tycko.

Mr. Zavareei has handled numerous trials in state and federal courts across the nation in a wide range of practice areas. In his most recent jury trial, Mr. Zavareei prevailed on behalf of his client after a four month trial in the Los Angeles Superior Court. That jury verdict came after years of hard-fought litigation, including an award of almost \$2 million in sanctions against the opposing party due to revelations of discovery misconduct uncovered through electronic discovery.

Although he is a general litigator, Mr. Zavareei devotes most of his practice to class action litigation. While at Gibson Dunn, Mr. Zavareei managed the defense of a nationwide class action brought against a major insurance carrier. In recent years, Mr. Zavareei's class action practice has focused on the representation of plaintiffs in consumer fraud cases, primarily relating to the financial services industry. For instance, Mr. Zavareei was class counsel in over a dozen cases against banks across the country regarding their practices of charging unlawful overdraft fees for debit card transactions. Those cases have returned hundreds of millions of dollars to consumers. Mr. Zavareei also served as Lead Counsel in Multi-District Litigation against a financial services company that provided debit cards to college students. That case also resulted in the return of millions of dollars to consumers. He is currently lead counsel or co-lead counsel in numerous class actions and putative class actions.

In his civil rights practice, Mr. Zavareei has represented individuals, groups of employees, and tenant associations in employment and fair housing litigation. Mr. Zavareei has obtained substantial judgments and settlements for his civil rights clients.

As a general litigator, Mr. Zavareei has been involved in numerous high profile cases. For example, Mr. Zavareei represented Christian Laettner *pro bono* in a successful battle with investors and rogue business partners to stabilize Mr. Laettner's historic development of downtown Durham, North Carolina. Mr. Zavareei also represented Dr. Steven Hatfill, who was wrongfully accused by the media and the FBI of perpetrating the Anthrax attacks of 2001. Mr. Zavareei successfully represented Dr. Hatfill in defamation litigation against *Vanity Fair and The Reader's Digest*.

Mr. Zavareei is an accomplished appellate lawyer, having argued cases before the D.C. Circuit, the Fifth Circuit, the Fourth Circuit, and the Ohio Court of Appeals.

Mr. Zavareei is married to Dr. Natalie Zavareei and has three daughters, Hayden, Jordan and Isabella. He is a member of the Board of Directors of Public Justice and is the President of Hayden's Journey of Inspiration, a non-profit that provides housing to families of pediatric stem cell transplant recipients.

In his civil rights practice, Mr. Zavareei represents individuals, groups of employees, and tenant associations in employment and fair housing litigation. Since co-founding Tycko & Zavareei LLP in 2002, Mr. Zavareei has obtained substantial judgments and settlements for his civil rights clients.

As part of his environmental and administrative law practice, Mr. Zavareei has obtained significant victories for his municipal and Indian Tribe clients in challenges to federal rulemakings, and negotiated complex settlements in CERCLA cases on behalf of Fortune 500 clients.

Mr. Zavareei is admitted to the Bar of the District of Columbia, Bar of the State of California, the Bar of the State of Maryland, the District of Columbia Court of Appeals, the Maryland Court of Appeals, and the Supreme Court of the United States.

ANDREA R. GOLD
PARTNER

Andrea Gold, a two-time graduate of the University of Michigan, has spent her legal career advocating for consumers, employees, and whistleblowers. Ms. Gold has deftly litigated numerous complex cases, including through trial. Her extensive litigation experience benefits the firm's clients in both national class action cases as well as in qui tam whistleblower litigation.

She has served as trial counsel in two lengthy jury trials. First, she was second-chair in a four month civil jury trial in state court in California. She more recently served as second-chair in a multi-week jury trial in Maryland.

In her class action practice, Ms. Gold has successfully defended dispositive motions, navigated complex discovery, worked closely with leading experts, and obtained contested class certification. Her class action cases have involved, amongst other things, unlawful bank fees, product defects, violations of the Telephone Consumer Protection Act, and deceptive advertising and sales practices. Ms. Gold's tireless efforts have resulted in millions of dollars in recovery for consumers.

Ms. Gold also has significant civil rights experience. She has represented individuals and groups of employees in employment litigation, obtaining substantial recoveries for employees who have faced discrimination, harassment, and other wrongful conduct. In addition, Ms. Gold has appellate experience in both state and federal court.

Prior to joining Tycko & Zavareei, Ms. Gold was a Skadden fellow. The Skadden Fellowship Foundation was created by Skadden, Arps, Slate, Meagher & Flom LLP, one of the nation's top law firms, to support the work of new attorneys at public interest organizations around the country. The Skadden Fellowship Foundation receives hundreds of applications each year, but only a very small number of Skadden fellows are selected. Ms. Gold was awarded this prestigious fellowship in 2004 and, for two years, she represented survivors of domestic violence in family law and employment matters. Ms. Gold also provided legal counsel to clients, members of the legal community, and social service providers regarding the Illinois Victim's Safety and Security Act (VESSA), a state law protecting survivors of abuse from employment discrimination and providing for unpaid leave.

Ms. Gold earned her law degree from the University of Michigan Law School, where she was an associate editor of the Journal of Law Reform, co-President of the Law Students for Reproductive Choice, and a student attorney at the Family Law Project clinical program. Ms. Gold graduated with high distinction from the University of Michigan Ross School of Business in 2001, concentrating her studies in Finance and Marketing.

Ms. Gold is admitted to practice before the courts of the District of Columbia, Illinois, and Maryland, as well as numerous federal courts including the U.S. District Court for the District of Columbia, the U.S. District Court for the District of Maryland, and the U.S. Court of Appeals for the District of Columbia Circuit.

ANNA C. HAAC
PARTNER

Anna C. Haac is a Partner in Tycko & Zavareei's Washington, D.C. office. She focuses her practice on consumer protection class actions and whistleblower litigation. Her prior experience at Covington & Burling LLP, one of the nation's most prestigious defense-side law firms, gives her a unique advantage when representing plaintiffs against large companies in complex cases. Since arriving at Tycko & Zavareei, Ms. Haac has represented consumers in a wide range of practice areas, including product liability, false labeling, deceptive and unfair trade practices, and predatory financial practices. Her whistleblower practice involves claims for fraud on federal and state governments across an equally broad spectrum of industries, including health care fraud, customs fraud, and government contracting fraud.

Ms. Haac has helped secure multimillion dollar relief on behalf of the classes and whistleblowers she represents. In addition, she has been instrumental in securing key appellate victories, including a recent landmark decision by the U.S. Court of Appeals for the Third Circuit, which held as a matter of first impression that the evasion of customs duties for failing to mark imported goods with their foreign country of origin gives rise to a claim under the False Claims Act. Ms. Haac also serves as the D.C. Co-Chair of the National Association of Consumer Advocates and as Co-Chair of the Antitrust and Consumer Law Section Steering Committee of the D.C. Bar.

Ms. Haac earned her law degree cum laude from the University of Michigan Law School in 2006 and went on to clerk for the Honorable Catherine C. Blake of the United States District Court for the District of Maryland. Prior to law school, Ms. Haac graduated with a B.A. in political science with highest distinction from the Honors Program at the University of North Carolina at Chapel Hill.

Ms. Haac is a member of the District of Columbia and Maryland state bars. She is also admitted to the United States Court of Appeals for the Second, Third, and Fourth Circuits and the United States District Courts for the District of Columbia, District of Maryland, and the Eastern District of Michigan.

ANNICK M. PERSINGER
PARTNER

Annick M. Persinger graduated magna cum laude as a member of the Order of the Coif from the University of California, Hastings College of the Law in 2010. While in law school, Ms. Persinger served as a member of Hastings Women's Law Journal, and authored two published articles. In 2008, Ms. Persinger received an award for Best Oral Argument in the first year moot court competition. In 2007, Ms. Persinger graduated cum laude from the University of California, San Diego with a B.A. in Sociology, and minors in Law & Society and Psychology.

Prior to joining Tycko & Zavareei LLP, Ms. Persinger was a litigation associate at Bursor & Fisher, P.A., a prestigious consumer class action firm. During her time at Bursor & Fisher, Ms. Persinger represented classes of purchasers of homeopathic products, mislabeled food products, mislabeled toothpaste products, and purchasers of large appliances that were mislabeled as Energy Star qualified. While working at Bursor & Fisher, Ms. Persinger developed cases for filing, drafted countless successful briefs in support of class certification, and defeated numerous motions to dismiss and motions for summary judgment. Ms. Persinger also routinely appeared in court, and regularly deposed and defended witnesses.

Following law school, Ms. Persinger also worked as a legal research attorney for Judge John E. Munter in Complex Litigation at the San Francisco Superior Court.

Since joining Tycko & Zavareei in 2017, Ms. Persinger has focused her practice on consumer class actions and other complex litigation.

Ms. Persinger has served as an elected board member of the Bay Area Lawyers for Individual Freedom (BALIF) since 2017. The BALIF Board named Ms. Persinger Co-Chair of BALIF in 2018.

Ms. Persinger is admitted to the State Bar of California and the bars of the United States District Courts for the Northern District of California, Central District of California, Eastern District of California, and Southern District of California.

KRISTEN L. SAGAFI
PARTNER

Kristen Law Sagafi is a 2002 graduate of the University of California, Berkeley School of Law, where she served as articles editor for Ecology Law Quarterly and a student law clerk to the Hopi Appellate Court in Keams Canyon, Arizona. After graduating from law school, Ms. Sagafi joined the San Francisco office of Lieff Cabraser Heimann & Bernstein, LLP, one of the nation's premier class action firms. Ms. Sagafi was recognized as a "Rising Star for Northern California" by Super Lawyers every year between 2009 and 2014, before being named as a "Super Lawyer" in 2015.

Ms. Sagafi focuses her practice on consumer fraud cases, including matters involving false advertising and unfair competition. In 2014, Ms. Sagafi drafted and advanced a bill to strengthen the protections afforded to consumers under California's Consumers Legal Remedies Act, an effort that included presenting testimony to the California State Senate Judiciary Committee. Beyond her consumer protection practice, Ms. Sagafi has received more than 40 hours of accredited mediation training and has served as a volunteer mediator at Contra Costa Superior Court, successfully mediating small claims and landlord-tenant cases.

In addition, Ms. Sagafi has been a guest lecturer on class action law at UC Berkeley and law firm management at UC Hastings. Since 2010, she has been co-chair of the Berkeley Consumer Law Alumni Group. Ms. Sagafi currently sits on the Board of the Justice and Diversity Center of the Bar Association of San Francisco, which advances fairness and equality by providing pro bono legal services to low-income people and educational programs that foster diversity in the legal profession. From 2009-2014, Ms. Sagafi served on the Board of Governors of California Women Lawyers, where she was a member of the executive committee and co-chair of the membership committee.

SABITA J. SONEJI
PARTNER

Sabita J. Soneji is a Partner in Tycko & Zavareei's Oakland office. She focuses her practice on consumer protection class actions and whistleblower litigation. Ms. Soneji has extensive experience in litigation and legal policy at both the federal and state level and a passion for fighting consumer fraud.

Ms. Soneji began that work during her time with the United States Department of Justice, as Senior Counsel to the Assistant Attorney General. In that role, she oversaw civil and criminal prosecution of various forms of financial fraud that arose in the wake of the 2008 recession. For that work, Ms. Soneji partnered with other federal agencies, state attorneys' general, and consumer advocacy groups. Beyond that affirmative work, Ms. Soneji worked to defend various federal programs, including the Affordable Care Act in nationwide litigation.

Ms. Soneji has extensive civil litigation experience from her four years with international law firm Baker Botts LLP, her work as an Assistant United States Attorney in the Northern District of California, and her most recent work as Deputy County Counsel for Santa Clara County, handling civil litigation on behalf of the County including regulatory, civil rights, and employment matters. She has successfully argued motions and conducted trials in both state and federal court and negotiated settlements in complex multi-party disputes.

Early in her career, Ms. Soneji clerked for the Honorable Gladys Kessler on the United States District Court for the District of Columbia for three years, during which she assisted the judge in overseeing the largest civil case in American history, *United States v. Phillip Morris, et al.*, a civil RICO case brought against major tobacco manufacturers for fraud in the marketing, sale, and design of cigarettes. The opinion in that case – which is over 1600 pages — paved the way for Congress to authorize FDA regulation of cigarettes.

Ms. Soneji is a graduate of the University of Houston, *summa cum laude*, with degrees in Math and Political Science, and Georgetown University Law Center, *magna cum laude*. After college and before law school, she spent two years living and working in Japan.

In her spare time, Ms. Soneji teaches for National Institute for Trial Advocacy (NITA), coaches a moot court team at Berkeley Law School, and volunteers at a local food bank.

KATHERINE M. AIZPURU
ASSOCIATE

Katherine M. Aizpuru graduated *cum laude* from Harvard Law School in 2014. While in law school, Ms. Aizpuru held positions as Executive Submissions Editor of the *Harvard Journal of Law & Gender* and as a Board Member of Law Students for Reproductive Justice. Ms. Aizpuru graduated with High Honors from Swarthmore College in 2010 with a B.A. in Political Science and a minor in Chinese Language and Literature. She is a member of Phi Beta Kappa.

Ms. Aizpuru joined Tycko & Zavareei in 2017. Prior to joining the firm, Ms. Aizpuru clerked for the Honorable Theodore D. Chuang on the United States District Court for the District of Maryland and the Honorable Catharine F. Easterly on the District of Columbia Court of Appeals. Ms. Aizpuru has practiced law in the Washington, D.C. office of a large international law firm, where she worked on administrative proceedings and civil litigation matters, including several *qui tam* lawsuits. While at that firm, Ms. Aizpuru was recognized for her *pro bono* work on behalf of a domestic violence survivor, a client seeking Social Security disability benefits, and an international nonprofit organization.

While attending Harvard Law School, Ms. Aizpuru worked as a student attorney at the Family Law and Domestic Violence Clinic, where she successfully represented a client in a bench trial and helped secure restraining orders against abusive partners for numerous others. She successfully represented an incarcerated client in a prison disciplinary hearing through the Prison Legal Assistance Program. Ms. Aizpuru interned at the Center for Reproductive Rights and Cambridge & Somerville Legal Services. She also co-produced the Harvard Law School Drama Society's annual Parody performance. Prior to law school, Ms. Aizpuru represented the United States as a Student Ambassador in the USA Pavilion at the 2010 World Expo in Shanghai, People's Republic of China.

Ms. Aizpuru is a member of the District of Columbia, Massachusetts, and New York state bars. She is also admitted to practice before the United States Court of Appeals for the Fourth Circuit and the United States District Court for the District of Maryland.

TANYA S. KOSHY
ASSOCIATE

Tanya Koshy graduated from University of California, Berkeley School of Law in 2010. Ms. Koshy graduated from Wellesley College magna cum laude in 2005 with a Bachelor of Arts degree in Political Science and Africana studies.

Ms. Koshy joined Tycko & Zavareei in 2018. Prior to joining the firm, Ms. Koshy was a staff attorney at the Ninth Circuit Court of Appeals, where she reviewed civil appeals and presented her recommendations as to the disposition of those appeals to monthly panels of circuit judges. Through this position, she was exposed to a wide range of civil litigation matters and consumer protection issues. Prior to working at the Ninth Circuit, Ms. Koshy was a supervising staff attorney at the East Bay Community Law Center in Berkeley, California. While at the East Bay Community Law Center, she worked on administrative proceedings, civil litigation, and direct legal services aimed at removing systemic barriers to employment for people with criminal records. Ms. Koshy was also a clinical supervisor at the University of California, Berkeley School of Law and in that capacity, supervised and trained clinical law students and oversaw a weekly direct legal services clinic in Oakland, California. Prior to law school, Ms. Koshy worked as a paralegal at Neufeld Scheck and Brustin in New York City, a law firm focused on civil rights cases challenging wrongful convictions and police misconduct.

Ms. Koshy is a member of the California, Massachusetts, and New York state bars. She is also admitted to practice before the United States Court of Appeals for the Ninth Circuit.

ANDREW J. SILVER
ASSOCIATE

Andrew J. Silver graduated magna cum laude as a member of the Order of the Coif from Boston College Law School in 2012. While in law school, he was an Articles Editor of the Boston College International & Comparative Law Review, for which he previously served as a Staff Writer. In 2007, Mr. Silver graduated from Tufts University with a B.A. in Economics and a concentration in Communication and Media Studies.

At Tycko & Zavareei LLP, Mr. Silver has worked on all aspects of complex civil litigation matters in federal and state courts, with a focus on consumer class action and qui tam litigation. The substantive issues in these cases have involved financial products, contracts, product labels, privacy, and product defects, and frequently touch on questions of statutory interpretation, federal regulations, and civil procedure. Mr. Silver is experienced in pre-complaint investigations, written discovery, deposition practice, all aspects of motion practice—including dispositive motions, class certification, and appeals—and has worked on multiple matters on which a court has granted a contested motion for class certification.

Prior to joining Tycko & Zavareei, Mr. Silver worked as a student-attorney at the Boston College Legal Assistance Bureau, practicing housing law, family law, and administrative law on behalf of indigent clients. During law school, he spent summers at the Appeals Bureau of the Manhattan District Attorney's Office and as a judicial intern for the Honorable Williams K. Sessions III at the United States District Court for the District of Vermont.

Prior to law school, Mr. Silver worked as a correspondent and desk assistant at The Boston Globe's Sports Department and additionally served as Managing Editor of The Tufts Daily, a daily student newspaper. He also worked as an administrator at Camp Bauercrest, a nonprofit residential camp in Massachusetts.

Mr. Silver is a member of the Massachusetts and District of Columbia bars and is admitted to practice before the United States District Court for the District of Columbia.

DAVID W. LAWLER
OF COUNSEL

David Lawler received his law degree from Creighton University School of law in 1997. Mr. Lawler graduated from the University of California, Berkeley in 1989 with a degree in Political Science.

Mr. Lawler joined Tycko & Zavareei LLP in January 2012. He has over fifteen years of commercial litigation experience, including an expertise in eDiscovery and complex case management. At the firm Mr. Lawler has worked extensively on overdraft fee litigation and *In re Automotive Parts Antitrust litigation*.

Before joining Tycko & Zavareei LLP, Mr. Lawler was an attorney in the litigation departments at McKenna & Cuneo LLP and Swidler Berlin Shereff Friedman LLP.

Among Mr. Lawler's accomplishments include the co-drafting of appellate briefs which resulted in reversal and remand of lower court decision, US Court of Appeals for the Fourth Circuit.

Mr. Lawler is a member of the District of Columbia Bar, as well as numerous federal courts.

EXHIBIT B

Date	Expense Description	Amount
10/1/2014	Westlaw online research	\$43.42
2/1/2015	January 2015 Westlaw online research	\$5.96
4/1/2015	Westlaw online research during March 2014	\$19.77
4/6/2015	Court document retrieval from 1st quarter PACER Service	\$0.60
4/17/2015	Photocopying 176 @ 0.15	\$26.40
5/18/2015	Conference calls	\$8.12
5/19/2015	Photocopies 273 @ 0.15	\$40.95
6/1/2015	Westlaw online research - May 2015	\$11.75
6/17/2015	Photocopies 3327 @ 0.15	\$499.05
6/18/2015	Spanish interpreter for C. Jimenez deposition provided by Capital Reporting invoice 140082	\$1,400.00
6/18/2015	C. Jimenez deposition transcript provided by Capital Reporting invoice 140199	\$820.50
6/22/2015	Uber cabs	\$31.49
6/22/2015	Meal at Au Bon Pain in Washington, DC on 6/11/15	\$30.28
6/22/2015	Travel meals at Brueggers in DC on 6/11/15	\$7.68
6/22/2015	Travel meals at Au Bon Pain in DC on 6/10/15	\$26.92
6/22/2015	Travel meals at Brueggers in DC on 6/10/15	\$7.46
6/22/2015	Conference call	\$4.32
6/22/2015	Conference call	\$4.20
6/29/2015	S. Donnini deposition transcript provided by Capital Reporting invoice 140347	\$800.00
7/1/2015	Westlaw online legal research in June 2015	\$21.30
7/20/2015	Photocopies 92 @ 0.15	\$13.80
8/17/2015	Photocopies 108 @ 0.15	\$16.20
9/17/2015	NJ Business Services research	\$6.25
10/2/2015	Service of process by Capitol Process Services invoice 15-128588 on 9/30/15	\$125.00
10/20/2015	Service of process to Colavita USA by Capitol Process Services invoice 15-128583	\$75.00
10/20/2015	Service of process to ACH Food Companies by Capitol Process Services invoice 15-128580	\$75.00
10/20/2015	Service of process to J. M. Smuckers Co by Capitol Process Services invoice 15-128576	\$225.00
10/20/2015	Service of process to Botticelli Foods by Capitol Process Services invoice 15-128573	\$225.00
10/20/2015	Photocopies 6 @ 0.15	\$0.90
10/30/2015	Economic & Technology expert retainer fee	\$10,500.00
11/9/2015	Service of process by Capitol Process Services invoice 15-128578	\$75.00
11/13/2015	Service of process by Capitol Process Services invoice 15-128575	\$225.00
11/18/2015	Photocopies 557 @ 0.15	\$83.55
12/1/2015	Westlaw online research in November 2015	\$90.12
12/7/2015	Service of process by Capitol Process Services invoice 15-128577	\$225.00
12/8/2015	Service of process by Capitol Process Service invoice 15-128581	\$375.00
12/21/2015	Photocopies 36 @ 0.15	\$5.40
12/30/2015	Professional services provided by Economics & Technology invoice 201706684	\$4,531.25

2/29/2016	Photocopies 4 @ 0.15	\$0.60
9/30/2016	Photocopies 62 @ 0.15	\$9.30
10/1/2016	Westlaw online legal research during the month of September 2016	\$41.28
10/10/2016	Court document retrieval through Pacer 3rd Quarter invoice	\$18.20
10/31/2016	Westlaw online legal research during the month of October 2016	\$53.91
10/31/2016	Photocopies 55 @ 0.15	\$8.25
2/17/2017	Travel meal at Klein Deli on 1/25/14	\$4.50
2/17/2017	Uber cab on 1/25/17	\$22.24
2/17/2017	Z Hotel in Oakland on 1/25/17	\$102.98
2/17/2017	Travel meal at Buttercup Grill in Oakland on 1/24/17	\$24.19
2/17/2017	Travel meal at Desco in Oakland on 1/24/17	\$22.62
2/17/2017	Travel meal at OTG DCA Venture on 1/24/17	\$9.89
2/17/2017	Travel meal at Urban Tortilla in Alameda on 1/24/17	\$9.99
2/17/2017	Travel meal at Bocanova in Oakland on 1/23/17	\$41.29
2/17/2017	Smart taxi on 1/23/17	\$23.20
2/17/2017	In-flight Wi-Fi on 1/23/17	\$4.00
2/17/2017	Uber cab on 1/23/17	\$13.47
2/28/2017	Photocopies 48 @ 0.15	\$7.20
2/28/2017	Professional services provided by Economics & Technology invoice 201706637	\$1,050.00
3/15/2017	Deposition transcript provided by Veritext invoice PA2908884	\$960.00
3/28/2017	Transcript & exhibit management by Veritext Corp invoice PA2922077	\$1,005.70
3/30/2017	One half of expert Australian Oils Research invoice 1186	\$504.00
3/30/2017	Professional services provided by Economics & Technology invoice 201706684	\$12,875.00
4/1/2017	Westlaw online research during the month of March 2017	\$117.93
4/3/2017	Lyft ride in San Francisco on 3/11/17	\$6.40
4/19/2017	Inflight Wi-Fi on 3/29/17	\$7.99
4/30/2017	Mar and April 2017 Photocopies 4901 @ 0.15	\$735.15
3/30/2017	Professional services provided by Economics & Technology invoice 201706684	\$2,756.25
5/16/2017	Deposition transcript provided by Veritext invoice PA2949827	\$1,070.17
5/22/2017	Court document retrieval during the first quarter of 2017	\$6.70
5/31/2017	Photocopies 42 @ 0.15	\$6.30
5/31/2017	Photocopies 42 @ 0.15	\$6.30
6/1/2017	Westlaw online legal research during the month of May 2017	\$182.23
6/27/2017	Transcript fro Debra Pas on 6/17/17	\$27.90
6/28/2017	Photocopies 15 @ 0.15	\$2.25
7/1/2017	Westlaw online research during the month of June 2017	\$10.34
7/26/2017	Federal express delivery on 6/29/17	\$29.41
8/29/2017	Court document retrieval 2nd quarter 2017	\$6.00
8/31/2017	Photocopies 7 @ 0.15	\$1.05
9/25/2017	Postage	\$1.34
9/30/2017	Westlaw online legal reserach during the month of September 2017	\$119.50
10/12/2017	Photocopies 184 @ 0.15	\$27.60
10/27/2017	United airlines on 9/2/17	\$539.40
10/27/2017	Inflight wi-fi on 9/22/17	\$8.00
10/27/2017	Federal express delivery on 9/26/17	\$35.04

11/1/2017	Westlaw online research during the month of October 2017	\$3.90
11/29/2017	Photocopies 441 @ 0.15	\$66.15
11/29/2017	Pacer court document retrieval	\$0.20
11/29/2017	Le Meridian in San Francisco on 11/8/17	\$989.00
11/29/2017	Cab ride on 11/7/17	\$7.57
11/29/2017	Travel meal at Philz Coffe in San Francisco on 11/7/17	\$4.50
11/29/2017	Uber cab on 11/7/17	\$27.80
11/29/2017	Travel meal at Peet's Coffee in San Francisco on 11/6/17	\$3.95
11/29/2017	Smart taxi on 11/6/17	\$87.98
11/29/2017	Travel meal at Potbell in Baltimore on 11/5/17	\$7.26
11/29/2017	Inflight wi-fi on 11/5/17	\$8.00
11/29/2017	Uber cabs on 11/5/17	\$48.82
11/29/2017	American airlines on 10/29/17	\$639.78
12/1/2017	Westlaw online legal research during the month of November 2017	\$39.86
1/22/2018	Deposition in Milan on 3/10/17 performed by L. Conte	\$1,396.40
2/27/2018	Pacer court document retrieval 4th quarter 2017	\$2.60
3/1/2018	Westlaw online legal research during the month of February 2018	\$9.70
4/1/2018	Westlaw online research during the month of March 2018	\$527.24
5/1/2018	Westlaw online legal research during the month of April 2018	\$123.18
5/31/2018	Photocopies 1 @ 0.15	\$0.15
	TOTAL	\$47,191.74