

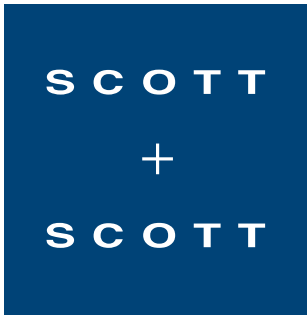
EXHIBIT C

Scott+Scott Attorneys at Law LLP Firm Profile



New York + London + Amsterdam + California + Connecticut + Virginia + Ohio

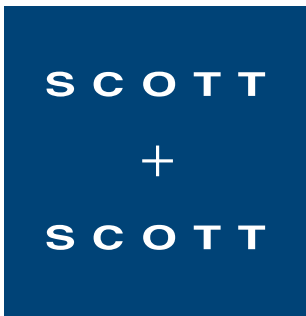
scott-scott.com



MISSION STATEMENT

Founded in 1975, Scott+Scott Attorneys at Law LLP is an internationally recognized law firm with offices located in New York, London, Amsterdam, California, Connecticut, and Ohio. The Firm represents public pension funds, Taft-Hartley funds, Fortune 500 companies, and individuals victimized by securities fraud, anticompetitive conduct, and corporate wrongdoing. The Firm has successfully prosecuted diverse, complex cases and recovered billions of dollars on behalf of its clients — promoting corporate social responsibility while achieving precedent-setting reforms in corporate governance.





ATTORNEYS AT LAW LLP

SPECIALTIES

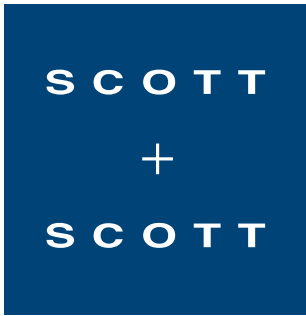
+ ANTITRUST

Scott+Scott Attorneys at Law LLP represents investors, businesses, and consumers in price-fixing, bid-rigging, monopolization, and other restraints of trade cases on both a class-wide and individual basis. The firm's work for its clients helps ensure that markets remain free, open, and competitive.

Scott+Scott has been recognized by the American Antitrust Institute in receiving an Outstanding Antitrust Litigation Achievement in Private Law Practice award in 2018 and an honorable mention in 2014. The firm's success is reflected in the money recovered for its clients. *The 2018 Antitrust Annual Report: Class Action Filings in Federal Court* co-authored by the University of San Francisco School of Law and The Huntington National Bank found that from 2013 to 2018, Scott+Scott ranked second nationally in total value of settlements for antitrust class actions, recovering over \$3.4 billion. Scott+Scott's dedicated team of antitrust partners have built one of the nation's top plaintiffs' firms for antitrust actions. Furthermore, Scott+Scott's opening of offices in Europe reflects its commitment and ability to pursue its clients' claims on a global basis. Scott+Scott stands ready to take on its clients' complex legal problems and prevail.

Representative actions in which Scott+Scott currently serves as a lead counsel include:

- *In re: Foreign Exchange Benchmark Rates Antitrust Litig.*, No. 13-cv-7789 (S.D.N.Y.) (challenging price-fixing of foreign exchange rates (over \$2.3 billion in final-approved settlements)); **The largest antitrust settlement of 2018 according to the American Antitrust Institute;**
- *In re Disposable Contact Lens Antitrust Litig.*, No. 3:15-md-2626 (M.D. Fla.) (class action alleging illegal anticompetitive policies to eliminate discount pricing by the major manufacturers and distributors of disposable contact lenses);
- *In re European Government Bonds Antitrust Litig.*, No. 1:19-cv-2601 (S.D.N.Y.) (challenging manipulation in the market for European Government Bonds); and
- *In re GSE Bonds Antitrust Litig.*, No. 1:19-cv-01704 (S.D.N.Y.) (challenging manipulation in the market for bonds issued by Government-Sponsored Entities, e.g., Freddie Mac and Fannie Mae);
- *In re ICE LIBOR Antitrust Litig.*, No. 1:19-cv-02002 (S.D.N.Y.) (class action alleging anticompetitive conduct in the setting of the ICE LIBOR benchmark rate);
- *Deslandes v. McDonalds USA, LLC*, No. 1:17-cv-04857 (N.D. Ill.) (class action challenging no-hire agreement among McDonald's franchisees);
- *Butler v. Jimmy John's Franchise, LLC*, No. 3:18-cv-00133 (S.D. Ill.) (class action challenging no-hire agreement among Jimmy John's franchisees); and
- *Blanton v. Domino's Pizza Franchising LLC*, No. 2:18-cv-13207 (E.D. Mich.) (class action challenging no-hire agreement among Domino's franchisees).



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Representative cases in which Scott+Scott has previously served as court-appointed co-lead counsel include:

- *Dahl v. Bain Capital Partners, LLC*, No. 07-cv-12388 (D. Mass.) (challenging bid rigging and market allocation of leveraged buyouts by private equity firms (\$590.5 million in settlements));
- *Alaska Electrical Pension Fund v. Bank of America Corp.*, No. 14-cv-7126 (S.D.N.Y.) (challenging price-fixing of the ISDAfix benchmark interest rate (\$504.5 million in settlements)) **The 3rd largest antitrust settlement of 2018 according to the American Antitrust Institute;**
- *In re Korean Air Lines Co., Ltd. Antitrust Litig.*, MDL No. 1891, No. CV 07-06542 (C.D. Cal.) (challenging price-fixing/illegal surcharge of ticket prices (\$86 million in cash and travel voucher settlements)); and
- *Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Limited Co.*, No. 12-cv-03824 (E.D. Pa.) (challenging monopolization in the sale of name-brand pharmaceutical on behalf of indirect purchaser class (\$8 million settlement)).

When not serving as lead counsel, Scott+Scott has aided in the recovery for class members by serving on the executive leadership committees in numerous other class action cases, including:

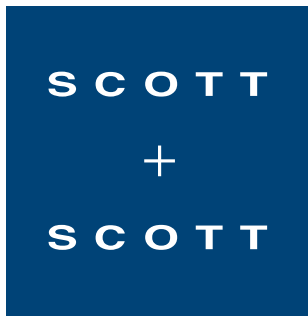
- *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.*, No. 1:05-md-1720 (E.D.N.Y.) (challenging price-fixing in the payment cards industry (\$6.24 billion settlement preliminarily approved));
- *Kleen Products LLC v. Int'l Paper Co.*, No. 1:10-cv-05711 (N.D. Ill.) (challenging price-fixing of containerboard products (over \$376 million in settlements));
- *In re Lithium Ion Batteries Antitrust Litig.*, No. 13-md-2420-YGR (N.D. Cal.) (challenging price-fixing of lithium-ion batteries on behalf of indirect purchaser class (over \$113 million in settlements)); and
- *In re Mexican Government Bonds Antitrust Litig.*, 18-cv-02830 (S.D.N.Y.) (an antitrust class action by eight institutional investors prosecuting 10 global financial institutions for colluding to fix the prices of debt securities issued by the Mexican Government between 2006 and 2017).

When not serving as lead counsel, Scott+Scott has served on the executive leadership committees in numerous class action cases, including:

- *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.*, No. 1:05-md-1720 (E.D.N.Y.) (challenging price-fixing in the payment cards industry (to \$6.24 billion settlement preliminarily approved));
- *Kleen Products LLC v. Int'l Paper Co.*, No. 1:10-cv-05711 (N.D. Ill.) (challenging price-fixing of containerboard products (\$376,400,000 settlement));
- *In re Lithium Ion Batteries Antitrust Litig.*, No. 13-md-2420-YGR (N.D. Cal.) (challenging price-fixing of lithium-ion batteries); and
- *In re Mexican Government Bonds Antitrust Litig.*, 18-cv-02830 (S.D.N.Y.) (an antitrust class action by eight institutional investors prosecuting 10 global financial institutions for colluding to fix the prices of debt securities issued by the Mexican Government between 2006 and 2017).

Scott+Scott's class action antitrust experience includes serving as co-trial counsel in:

- *In re Scrap Metal Antitrust Litig.*, 02-cv-0844 (N.D. Ohio), where it helped obtain a \$34.5 million jury verdict, which was subsequently affirmed by the United States Court of Appeals for the Sixth Circuit (see *In re Scrap Metal Antitrust Litig.*, 527 F.3d 517, 524 (6th Cir. 2008)); and
- *Ross v. Bank of America N.A.*, No. 05-cv-7116, MDL No. 1409 (S.D.N.Y.), and *Ross v. American Express Co.*, No. 04-cv-5723, MDL No. 1409 (S.D.N.Y.) (bench trial involving agreement among payment cards to impose arbitration terms on cardholders).



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In addition to its class action work, Scott+Scott also represents clients in opt-out antitrust litigation. The firm's success in class actions allows it to provide its opt-out clients unique and valuable insights.

Representative clients include Parker Hannifin Corporation, PolyOne Corporation, Eastman Kodak Company, and Fujifilm Manufacturing U.S.A., Inc., in the following matters:

- *In re: Aluminum Warehousing Antitrust Litig.*, MDL No. 2481 (S.D.N.Y.);
- *In re Rubber Chemicals Antitrust Litig.*, MDL No. 1648 (N.D. Cal.);
- *In re Polychloroprene Rubber (CR) Antitrust Litig.*, MDL No. 1642 (D. Conn.); and
- *In re Plastic Additives Antitrust Litigation (No. II)*, MDL No. 1684 (E.D. Pa.).

+ CONSUMER RIGHTS

Scott+Scott and its attorneys have a proven track record of obtaining significant recoveries for consumers in class action cases. Scott+Scott is one of the premier advocates in the area of consumer protection law and has been appointed to a number of prominent leadership positions.

Cases where Scott+Scott has played a leading role in the area of consumer protection litigation include:

- *In re Providian Financial Corp. Credit Card Terms Litig.*, MDL No. 1301 (E.D. Pa.) (\$105 million settlement was achieved on behalf of a class of credit card holders who were charged excessive interest and late charges on their credit cards);
- *In re Prudential Ins. Co. SGLI/VGLI Contract Litig.*, MDL No. 2208 (D. Mass.) (\$40 million settlement was achieved on behalf of a class of military service members and their families who had purchased insurance contracts);
- *In re Target Corp. Customer Data Security Breach Litig.*, MDL No. 2522 (D. Minn.) (\$59 million settlement achieved on behalf of financial institutions involving data breach of personal and financial information of approximately 40 million credit and debit card holders);
- *Greater Chautauqua Federal Credit Union v. Kmart Corp.*, No. 15-cv-02228 (N.D. Ill.) (\$18 million monetary and injunctive relief settlement on behalf of financial institutions involving data breach of credit and debit card information);
- *Winsouth Credit Union v. Mapco Express Inc.*, No. 3:14-cv-1573 (M.D. Tenn.) (largest dollar-per-card settlement obtained on behalf of financial institutions involving data breach of credit and debit card information);
- *Gunther v. Capital One, N.A.*, No. 09-2966 (E.D.N.Y.) (a net settlement resulting in class members receiving 100% of their damages was obtained);
- *In re Pre-Filled Propane Tank Marketing and Sales Practices Litig.*, MDL No. 2086 (W.D. Mo.) (\$37 million settlement obtained on behalf of class of propane purchasers who alleged defendants overcharged the class for under-filled propane tanks);
- *Murr v. Capital One Bank (USA), N.A.*, No. 1:13-cv-1091 (E.D. Va.) (\$7.3 million settlement on behalf of class of consumers who were misled into accepting purportedly 0% interest offers); and
- *Howerton v. Cargill, Inc.*, No. 13-cv-00336 (D. Haw.) (\$6.1 settlement obtained on behalf of a class of consumers who purchased Truvia, purported to be deceptively marketed as "all-natural").



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Moreover, Scott+Scott is currently serving in a leadership capacity in a number of class action consumer protection cases, including:

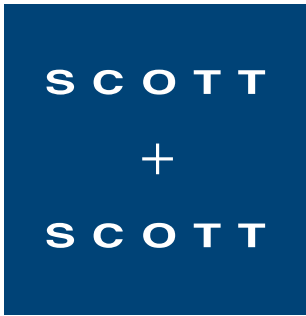
- *In re Equifax, Inc. Customer Data Security Breach Litig.*, MDL No. 2800 (N.D. Ga.) (co-lead counsel on behalf of financial institutions that have been injured because their customers' personal information was compromised when Equifax's systems were breached);
- *In re The Home Depot, Inc., Customer Data Security Breach Litig.*, MDL No. 2583 (N.D. Ga.) (co-lead counsel, \$27.25 million settlement on behalf of financial institutions involving data breach and the theft of the personal and financial information of over 40 million credit and debit card holders);
- *First Choice Federal Credit Union v. The Wendy's Co.*, No. 2:16-cv-00506 (W.D. Pa.) (co-lead counsel, pre-liminary approval of \$50 million settlement on behalf of financial institutions involving data breach of personal and financial information of millions of credit and debit card holders);
- *Negron v. Cigna Corp.*, No. 3:16-cv-1702 (D. Conn.) (Chair of Executive Committee, claims on behalf of plan participants involving overcharge of copayments for prescription drugs); and
- *Midwest America Federal Credit Union v. Arby's Restaurant Group, Inc.*, No. 1:17-cv-00514 (N.D. Ga.) (member of Executive Committee, claims on behalf of financial institutions involving data breach of credit and debit card information).

+ SECURITIES AND CORPORATE GOVERNANCE

Scott+Scott represents individuals and institutional investors that have suffered from stock fraud and corporate malfeasance. Scott+Scott's philosophy is simple – directors and officers should be truthful in their dealings with the public markets and honor their duties to their shareholders. The Firm has successfully prosecuted numerous class actions under the federal securities laws, resulting in the recovery of hundreds of millions of dollars for shareholders.

Representative cases prosecuted by Scott+Scott under the federal securities laws include:

- *In re Priceline.com, Inc. Sec. Litig.*, No. 3:00-cv-01884 (D. Conn. July 19, 2007) (\$80 million settlement);
- *Irvine v. ImClone Sys., Inc.*, No. 1:02-cv-00109 (S.D.N.Y. July 29, 2005) (\$75 million settlement);
- *Cornwell v. Credit Suisse Grp.*, No. 1:08-cv-03758 (S.D.N.Y. July 20, 2011) (\$70 million settlement);
- *Policemen's Annuity & Benefit Fund of the City of Chi. v. Bank of Am., NA*, No. 1:12-cv-02865 (S.D.N.Y. Nov. 10, 2014) (\$69 million settlement);
- *Weston v. RCS Capital Corp.*, No. 1:14-cv-10136 (S.D.N.Y. Dec. 29, 2014) (\$31 million settlement);
- *Schnall v. Annuity & Life Re (Holdings) Ltd.*, No. 3:02-cv-02133 (D. Conn. June 13, 2008) (\$26.5 million settlement);
- *In re: Wash. Mut. Mortg.-Backed Sec. Litig.*, No. 2:09-cv-00037 (W.D. Wash. Jan. 7, 2014) (\$26 million settlement);
- *In re Conn's, Inc. Sec. Litig.*, No. 4:14-cv-00548 (S.D. Tex.) (\$22.5 million settlement);
- *In re King Digital, Entm't plc S'holder Litig.*, No. CGC-15-544770 (Cal. Super. Ct., S.F. Cty. Nov. 8, 2016) (\$18.5 million settlement);



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- *Arkansas Teacher Ret. Sys. v. Insulet Corp.*, No. 1:15-cv-12345 (D. Mass. Apr. 6, 2018) (\$19.5 million settlement);
- *Birmingham Ret. & Relief Sys. v. S.A.C. Capital Advisors LLC*, No. 1:12-cv-09350 (S.D.N.Y. June 17, 2013) (\$10 million settlement);
- *Hamel v. GT Solar Int'l, Inc.*, No. 217-2010-CV-05004 (N.H. Super. Ct., Merrimack Cty. May 10, 2011) (\$10.25 million settlement); and
- *St. Lucie Cty. Fire Dist. Firefighter's Pension Tr. Fund v. Oilsands Quest Inc.*, No. 1:11-cv-01288 (S.D.N.Y. Dec. 6, 2013) (\$10.23 million settlement).

Since its inception, Scott+Scott's securities and corporate governance litigation department has developed and maintained a reputation of excellence and integrity recognized by state and federal courts across the country.

N.Y.U. v. Ariel Fund Ltd., No. 603803/08, slip. op. at 9-10 (N.Y. Sup. Ct. Feb. 22, 2010):

"It is this Court's position that Scott+Scott did a superlative job in its representation, which substantially benefited Ariel...For the record, it should be noted that Scott+Scott has demonstrated a remarkable grasp and handling of the extraordinarily complex matters in this case. . . . They have possessed a knowledge of the issues presented and this knowledge has always been used to the benefit of all investors."

In re Priceline.com, Inc. Sec. Litig., No. 3:00-CV-01884(AVC), 2007 WL 2115592, at *5 (D. Conn. July 20, 2007):

"The quality of representation here is demonstrated, in part, by the result achieved for the class. Further, it has been this court's experience, throughout the ongoing litigation of this matter, that counsel have conducted themselves with the utmost professionalism and respect for the court and the judicial process."

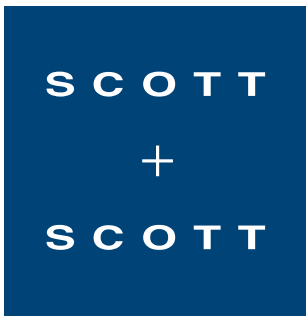
In addition to prosecuting federal securities class actions, Scott+Scott has a proven track record of handling corporate governance matters through its extensive experience litigating shareholder derivative actions.

Scott+Scott has been singularly successful in its shareholder derivative appellate practice, and as a result, has been instrumental in fashioning the standards in this area of law. Examples of this include:

- *W.moreland Cty. Emp. Ret. Sys. v. Parkinson*, No. 12-3342 (7th Cir. Aug. 16, 2013): the Seventh Circuit clarified the parameters of demand futility in those instances where a majority of directors of a corporation are alleged to have breached the fiduciary duty of loyalty by consciously disregarding positive law;
- *Cottrell v. Duke*, No. 12-3871 (8th Cir. Dec. 28, 2013): the Eighth Circuit, in a case of first impression, clarified that the Colorado River stay is virtually never appropriate where there are exclusive federal claims; and
- *King v. Verifone Holdings, Inc.*, No. 330, 2010 (Del. Jan. 28, 2011): the Supreme Court of Delaware has clarified the availability of the Delaware Corporate Code §220 "books and records" demands to a shareholder whose original plenary action was dismissed without prejudice in a federal district court.

Representative shareholder derivative actions prosecuted by Scott+Scott include:

- *In re DaVita Healthcare Partners Derivative Litig.*, No. 1:12-cv-02074 (D. Colo. Jan. 8, 2015) (corporate governance reforms valued at \$100 million);
- *Buffalo Grove Police Pension Fund v. Diefenderfer*, No. 2:19-cv-00062 (E.D. Pa. Jan. 23, 2019) (settlement of derivative claims against Navient Corporation and its officers and directors providing for corporate governance reforms valued at \$139 million);



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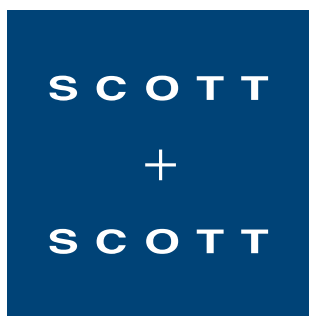
- *Tharp v. Acacia Commc'ns, Inc.*, No. 1:17-cv-11504 (D. Mass. Sept. 17, 2018) (settlement of derivative claims against Acacia Communications, Inc. and its officers and directors providing for corporate governance reforms valued at \$57 million to \$71 million);
- *N. Miami Beach Gen. Emps. Ret. Fund v. Parkinson*, No. 1:10-cv-06514 (N.D. Ill. Nov. 26, 2014) (corporate governance reforms valued between \$50 million and \$60 million);
- *In re: Marvell Tech. Grp. Ltd. Derivative Litig.*, No. 5:06-cv-03894 (RS) (N.D. Cal. May 21, 2009) (\$54.9 million settlement and corporate governance reforms);
- *In re Qwest Commc'ns Int'l, Inc.*, No. 1:01-cv-01451 (D. Colo. June 15, 2004) (\$25 million settlement and corporate governance reforms);
- *Plymouth Cty. Contributory Ret. Fund v. Hassan*, No. 2:08-cv-01022 (D.N.J. Jan. 10, 2012) (settlement of derivative claims against Merck Schering Plough and its officers and directors providing for corporate governance reforms valued between \$50 million and \$75 million);
- *Carfagno v. Schnitzer*, No. 1:08-cv-00912 (S.D.N.Y. May 18, 2009) (modification of terms of preferred securities issued to insiders valued at \$8 million); and
- *Garcia v. Carrion*, No. 3:09-cv-01507 (D.P.R. July 8, 2011) (settlement of derivative claims against Popular, Inc. and its officers and directors providing for corporate governance reforms valued between \$10.05 million and \$15.49 million).

+ CIVIL RIGHTS LITIGATION

Scott+Scott has also successfully litigated cases to enforce its clients' civil rights.

In The Vulcan Society, Inc. v. The City of New York, No. 07-cv-2067 (E.D.N.Y.), Scott+Scott was part of a team of lawyers representing a class of black applicants who were denied or delayed employment as New York City firefighters due to decades of racial discriminatory conduct. The district court certified the class in a post-*Walmart v. Dukes* decision, granted summary judgment against the City on both intentional discrimination and disparate impact claims, and after trial ordered broad injunctive relief, including a new examination, revision of the application procedure, and continued monitoring by a court-appointed monitor for at least 10 years. The back pay and compensatory damage award will be determined in a subsequent ruling.

In Hohider v. United Parcel Services, Inc., No. 2:04-cv-00363 (W.D. Penn.), Scott+Scott obtained significant structural changes to UPS's Americans with Disabilities Act compliance policies and monetary awards for some individual employees in settlement of a ground-breaking case seeking nationwide class certification of UPS employees who were barred from reemployment after suffering injuries on the job.



ATTORNEY BACKGROUND/ EXPERIENCE

KRISTEN M. ANDERSON

PRACTICE EMPHASIS

Kristen M. Anderson's practice focuses on class action litigation with an emphasis on antitrust cases within the financial services industry.

ADMISSIONS

States of California and New York; the District of Columbia; United States Court of Appeals: Second Circuit

EDUCATION

University of California, Hastings College of the Law (J.D., 2006);
St. Louis University (B.A., Philosophy, summa cum laude, 2003)

HIGHLIGHTS

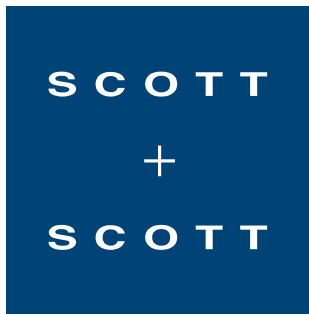
Ms. Anderson is a partner in the firm's New York office and is recognized as a Rising Star in the 2014-19 editions of Super Lawyers.

Currently, Ms. Anderson represents plaintiff-investors in *In re Foreign Exchange Benchmark Rates Antitrust Litig.*, No. 13-cv-7789 (S.D.N.Y.) (\$2.3 billion settlement) and *Axiom Investment Advisors, LLC, by and through its Trustees, Gildor Management LLC v. Barclays Bank PLC*, No. 15-cv-9323 (S.D.N.Y.) (\$50 million settlement), cases alleging misconduct in the foreign exchange market by global financial institutions. She also represented pension funds and individual investors in *Dahl v. Bain Capital Partners, LLC*, No. 07-cv-12388 (D. Mass.) (\$590.5 million settlement), an antitrust action alleging collusion in the buyouts of large publicly traded companies by private equity firms. In addition, she served on the trial team representing certified classes of cardholders in antitrust cases challenging class action-banning arbitration clauses in credit card agreements as restraints of trade in *Ross v. Bank of America N.A.*, No. 05-cv-7116, MDL No. 1409 (S.D.N.Y.) and *Ross v. American Express Co.*, No. 04-cv-5723, MDL No. 1409 (S.D.N.Y.). Ms. Anderson also has an active pro bono immigration practice.

Ms. Anderson is an active member of the American Bar Association's Antitrust Section. She served as Vice Chair of the Antitrust Section's Trial Practice Committee and was an editor of the Committee's newsletter, *Trying Antitrust*. She also served as a Vice Chair of the Antitrust Section's Books & Treatises Committee. She has been a contributing author to the Antitrust Section's Proof of Conspiracy Under Federal Antitrust Laws (3d. ed.), Antitrust Discovery Handbook (2d ed.), Joint Venture Handbook (2d ed.), and the 2010 Annual Review of Antitrust Law Developments.

In addition, Ms. Anderson served as an editor for Model Jury Instructions in Civil Antitrust Cases (2016 ed.). Ms. Anderson was a co-author of an article appearing in the Fall 2014 edition of Competition: Journal of the Antitrust and Unfair Competition Section of the State Bar of California, titled *The Misapplication of Associated General Contractors to Cartwright Act Claims*, 23 COMPETITION: J. ANTI. & UNFAIR COMP. L. SEC. ST. B. CAL. 120 (2014). Ms. Anderson is also a frequent speaker on women in the law and antitrust topics through the American Bar Association and other organizations.

During law school, Ms. Anderson served as an extern at the U.S. Department of Justice, Antitrust Division, in San Francisco and as an extern to Justice Kathryn Mickle Werdegar of the Supreme Court of California. She was also a research assistant to Professor James R. McCall in the areas of antitrust and comparative antitrust law.



ATTORNEY BACKGROUND/ EXPERIENCE

JUSTIN W. BATTEN

PRACTICE EMPHASIS

Mr. Batten's practice focuses primarily on antitrust litigation and other aspects of competition law.

ADMISSIONS

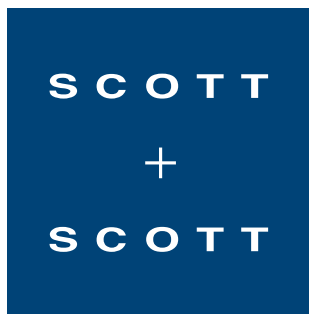
State of New York

EDUCATION

HIGHLIGHTS

Mr. Batten is an associate in the firm's New York office. Prior to joining Scott+Scott, Mr. Batten served as an Assistant Attorney General in the New York Attorney General's Antitrust Bureau.

Mr. Batten is an active member of the New York State Bar Association's Antitrust Section. He serves as the Young Lawyer Liaison to the Antitrust Section's Executive Committee, and is a member of the Donnelly Act Revision Committee. While at NYU, Mr. Batten served as an intern with the Georgia Attorney General's Office and Texas RioGrande Legal Aid, assisted clients in a clinic with employment law matters, and was a Teaching Assistant to Professor Mark Geistfeld for a first-year torts course. Mr. Batten also served as an articles editor for NYU's *Journal of Law & Liberty*.



ATTORNEY BACKGROUND/ EXPERIENCE

THOMAS K. BOARDMAN

PRACTICE EMPHASIS

Thomas K. Boardman's practice focuses on antitrust litigation.

ADMISSIONS

States of New York and California; United States Court of Appeals: Second and Ninth Circuits; United States District Court: Southern District of New York, Northern and Central Districts of California

EDUCATION

University of California, Hastings College of the Law (J.D. 2009); Vassar College (B.A., Political Science and Film Studies, 2004)

HIGHLIGHTS

Mr. Boardman is an associate in the firm's New York office and represents plaintiff-investors in *In re Foreign Exchange Benchmark Rates Antitrust Litigation* and represents opt-out plaintiffs in *Mag Instrument Inc v. The Goldman Sachs Group Inc.* Mr. Boardman also represents indirect purchaser plaintiffs in *In re Lithium Ion Batteries Antitrust Litigation*.

While attending law school, he was a member of the Hastings Science and Technology Law Journal and worked as a research assistant to professors Geoffrey C. Hazard, Jr. and Rory K. Little.

At his prior firm, Mr. Boardman was a member of the trial team in *In re TFT-LCD (Flat Panel) Antitrust Litigation*. For his work on that case, Mr. Boardman was nominated by Consumer Attorneys of California as a finalist for Consumer Attorney of the Year. Mr. Boardman was also an instrumental part of the lead counsel team in *In re Potash Antitrust Litigation (II)*, a case that featured a unanimous victory before an *en banc* panel of the Seventh Circuit, resulting in one of the most influential antitrust appellate opinions in recent memory. The case ended in \$90 million in settlements.

Mr. Boardman has co-authored the following articles: *Reverse Engineering Your Antitrust Case: Plan for Trial Even Before You File Your Case*, ANTITRUST MAGAZINE, Spring 2014, Vol. 28, No. 2, with Bruce L. Simon; and *Class Action for Health Professionals*, chapter from *Advocacy Strategies for Health and Mental Health Professionals*, Springer Publishing Co., 2011, with Bruce L. Simon, Stuart L. Lustig, Editor. Prior to joining Scott+Scott, Mr. Boardman worked at Pearson, Simon & Warshaw, LLP in San Francisco and served as a judicial law clerk to the Hon. Christina Reiss in United States District Court, District of Vermont.

Mr. Boardman holds memberships in the ABA Antitrust Section – Model Jury Instruction Revision Task Force, ABA Antitrust Section – Young Lawyers Division – Litigation Committee, ABA Antitrust Section – Young Lawyers Division – Civil Practice and Procedure Committee, New York State Bar Association – Antitrust Section, Bar Association of San Francisco, and Public Justice Foundation. He also enjoys running and regularly does so for charity – including several races to fundraise for various causes, including the New York City Marathon (National Multiple Sclerosis Foundation) and the Boston Marathon (Cystic Fibrosis Foundation).

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ATTORNEY BACKGROUND/ EXPERIENCE

CHRISTOPHER M. BURKE

PRACTICE EMPHASIS

Christopher M. Burke chairs Scott+Scott's competition practice and sets the firm's litigation standards.

ADMISSIONS

State Supreme Courts: California, New York, and Wisconsin, and numerous United States District Courts and Court of Appeals.

EDUCATION

University of Wisconsin (M.A. 1989; J.D. 1993; Ph.D. 1996); William & Mary (M.A. 1988);
The Ohio State University (B.A. 1984)

HIGHLIGHTS

Mr. Burke currently sits as a partner in the firm's San Diego and New York offices with a principal practice in complex antitrust litigation, particularly in the financial services industry. He has served as lead counsel in some of the world's largest financial services antitrust matters. Currently, he is co-lead counsel in *In re Foreign Exchange Benchmark Rates Antitrust Litig.*, 13-cv-7789 (S.D.N.Y.) (\$2.3 billion settlement); *In re Disposable Contact Lens Antitrust Litig.*, No. 3:15-md-2626 (M.D. Fla.); and *In re GSE Bonds Antitrust Litig.*, No. 1:19-cv-01704 (S.D.N.Y.).

He has served as co-lead counsel in *Dahl v. Bain Capital Partners*, 07-cv-12388 (D. Mass.) (\$590.5 million settlement); *Alaska Electrical Pension Fund v. Bank of America Corp.*, 14-cv-7126 (S.D.N.Y.) (ISDAfix litigation) (\$504.5 million settlement); *Axiom Investment Advisors, LLC, by and through its Trustee, Gildor Management LLC v. Barclays Bank PLC*, 15-cv-09323 (S.D.N.Y.) (\$50 million settlement); *In re Currency Conversion Antitrust Litig.*, MDL No. 1409 (S.D.N.Y.) (\$336 million settlement); *In re Payment Card Interchange Fee & Merchant Discount Antitrust Litig.*, MDL No. 1720 (E.D.N.Y.) (subsequently as an executive committee member after joining Scott+Scott) (up to \$6.24 billion settlement); *LiPuma v. American Express Co.*, No. 1:04-cv-20314 (S.D. Fla.) (\$90 million settlement); and was one of the trial counsel in *Schwartz v. Visa*, No. 822505-4 (Alameda Cty. Super. Ct.) (\$780 million plaintiff's judgment after six months of trial); and *In re Disposable Contact Lens Antitrust Litig.*, MDL No. 1030 (M.D. Fla.) (\$90 million settlement with final settlements occurring during trial). Mr. Burke was one of the original lawyers in the *Wholesale Elec. Antitrust cases in California*, which settled for over \$1 billion.

Further, Mr. Burke was trial counsel in *Ross v. Bank of America N.A.*, No. 05-cv-7116, MDL No. 1409 (S.D.N.Y.) and *Ross v. American Express Co.*, No. 04-cv-5723, MDL No. 1409 (S.D.N.Y.). He was also co-lead counsel for indirect purchasers in *In re Korean Air Lines Co., Ltd. Antitrust Litig.*, MDL No. 1891 (C.D. Cal.) (\$86 million settlement), and *In re Prudential Ins. Co. of America SGLI/VGLI Contract Litig.*, No. 11-md-2208 (D. Mass.) (\$40 million settlement). Mr. Burke also investigated and filed the first complaint in *In re Credit Default Swaps Antitrust Litig.*, 13-md-2476 (S.D.N.Y.).

Mr. Burke frequently lectures at professional conferences and CLEs on competition matters, including litigation surrounding financial benchmarks, class-barring arbitration clauses, the effects of *Twombly* in 12(b)(6) motions, and the increasing use of experts at class certification and trial. The American Antitrust Institute ("AAI") honored Christopher Burke and Scott+Scott Attorneys at Law with an Outstanding Antitrust Litigation Achievement in Private Law Practice award at their 2018 Antitrust Enforcement Awards for efforts in the ISDAfix litigation. In 2014, he was also recognized for his exemplary work in the *Dahl v. Bain Capital Partners* matter by the AAI and has regularly been designated as a Super Lawyer by Thomson Reuters.



ATTORNEY BACKGROUND/ EXPERIENCE

Mr. Burke has also served as an Assistant Attorney General at the Wisconsin Department of Justice and has lectured on law-related topics, including constitutional law, law and politics, and civil rights at the State University of New York at Buffalo and at the University of Wisconsin. Mr. Burke's book, *The Appearance of Equality: Racial Gerrymandering, Redistricting, and the Supreme Court* (Greenwood, 1999), examines conflicts over voting rights and political representation within the competing rhetoric of communitarian and liberal strategies of justification.



ATTORNEY BACKGROUND/ EXPERIENCE

MICHELLE CONSTON

PRACTICE EMPHASIS

Michelle Conston's practice focuses on antitrust litigation.

ADMISSIONS

States of New York, New Jersey and Florida; United States District Court: Southern District of New York;

EDUCATION

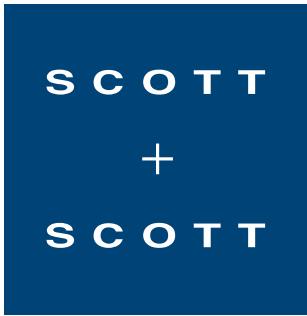
Marist College (B.A. Journalism, magna cum laude, 2010); University of Miami School of Law (J.D., magna cum laude, 2013)

HIGHLIGHTS

Ms. Conston is an associate in Scott+Scott's New York office and devotes much of her time representing investors in cases involving the manipulation of financial benchmarks by numerous major banks, including *In re Foreign Exchange Benchmark Rates Antitrust Litig.*, No. 13-cv-7789 (S.D.N.Y) and *Alaska Elec. Pension Fund v. Bank of America Corp.*, No. 14-cv-7126 (S.D.N.Y).

During law school, Ms. Conston served as a judicial intern for the Honorable Stephen T. Brown, the Chief Magistrate Judge of the United States District Court for the Southern District of Florida. Ms. Conston also served as a certified legal intern for the United States Attorney's Office for the Southern District of Florida.

Prior to joining Scott+Scott, Ms. Conston represented institutional investors, hedge funds, and individual investors in complex class action litigation arising under the Commodity Exchange Act, Sherman Act, RICO Act, and common law. She was heavily involved in litigating actions alleging the manipulation of the London Interbank Offered Rate ("LIBOR") for several currencies by large financial institutions (e.g., *Laydon v. Mizuho Bank, Ltd.*, No. 12-cv-3419 (S.D.N.Y.) and *Sullivan v. Barclays plc*, No. 13-cv-00281 (S.D.N.Y.), as well as an action alleging manipulation of the daily London Silver Fixing by the Fixing Banks and several other financial institutions (*In re London Silver Fixing, Ltd., Antitrust Litig.*, No. 14-md-02573 (S.D.N.Y.)).



ATTORNEYS AT LAW LLP

JOSEPH P. GUGLIELMO

PRACTICE EMPHASIS

Joseph P. Guglielmo represents institutional and individual clients in securities, antitrust, and consumer litigation in federal and state courts throughout the United States

ADMISSIONS

States of New York and Massachusetts; District of Columbia; United States Supreme Court; United States Court of Appeals: First, Second, Third, Eighth and Ninth Circuits; United States District Court: Southern and Eastern Districts of New York, Districts of Massachusetts, Connecticut, and Colorado, Northern district of Illinois, Eastern District of Wisconsin

EDUCATION

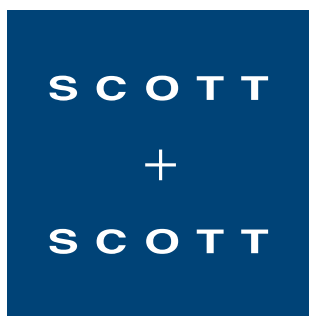
Catholic University of America (J.D., 1995; B.A., cum laude, 1992; Certificate of Public Policy)

HIGHLIGHTS

Mr. Guglielmo is a partner in the firm's New York office and was recognized for his efforts representing New York University in obtaining a monumental temporary restraining order of over \$200 million from a Bernard Madoff feeder fund. Specifically, New York State Supreme Court Justice Richard B. Lowe III stated, "Scott+Scott has demonstrated a remarkable grasp and handling of the extraordinarily complex matters in this case. The extremely professional and thorough means by which NYU's counsel has litigated this matter has not been overlooked by this Court."

Mr. Guglielmo serves in a leadership capacity in a number of complex antitrust and consumer actions, including: *In Equifax, Inc. Customer Data Security Breach Litig.*, No. 1:17-md-2800 (N.D. Ga.), co-lead counsel, claims on behalf of financial institutions involving data breach of personal and financial information of approximately 150 million consumers, *In Re: American Airlines Federal Credit Union v Sonic Corp.*, Case No., CIV-19-208G (N.D. Ohio.), Plaintiffs' Executive Committee, claims on behalf of financial institutions involving data breach of financial information of approximately five million consumers and *Arkansas Federal Credit Union v. Hudson Bay*, 1:19-cv-4492-PKC (S.D.N.Y.), Lead Counsel, claims on behalf of financial institutions arising of data breach involving over five million payment cards. *In Re: Disposable Contact Lens Antitrust Litig.*, No. 3:15-md-2626 (M.D. Fla.), co-lead counsel, claims on behalf of a class of contact lens purchasers alleging violations of the antitrust laws, *Forth v. Walgreen Co, Inc.*, No. 1:17-cv-02246 (N.D. Ill.), lead counsel, asserting claims on behalf of class of consumers alleging overcharge for medically necessary, covered prescription drugs. Mr. Guglielmo is also actively involved in *In re Foreign Exchange Benchmark Rates Antitrust Litig.*, No. 1:13-cv-07789-LGS (S.D.N.Y), which involves claims on behalf of purchasers of foreign exchange instruments alleging violations of federal antitrust laws.

Mr. Guglielmo has achieved significant victories and obtained numerous settlements for his clients. Mr. Guglielmo was co-lead counsel in *In re The Home Depot, Inc., Customer Data Security Breach Litig.*, MDL No. 2583 (N.D. Ga.), where a \$27.25 million settlement was obtained on behalf of financial institutions involving a data breach and the theft of the personal and financial information of over 40 million credit and debit card holders. Mr. Guglielmo is counsel in *First Choice Federal Credit Union v. The Wendy's Company*, No. 16-cv-00506 (W.D. Pa.), where a \$50 million settlement was obtained. He is also co-lead counsel in *Veridian Credit Union v. Eddie Bauer LLC*, Case No. 2:17-CV-00356-JLR (W.D. Wa.), where a settlement valued at approximately \$9.8 million was recently obtained. Previously, Mr. Guglielmo also a member of the Plaintiffs' Steering Committee in *In re Target Corporation Customer Data Security Breach Litig.*, MDL No. 2522 (D. Minn.), where a \$59 million settlement was obtained on behalf of financial institutions involving data breach of personal and financial information of approximately 110 million credit and debit cardholders. Mr. Guglielmo was also lead counsel in *Winsouth Credit Union v. Mapco Express Inc.*, No.: 3:14-cv-1573 (M.D. Tenn.), which achieved the largest dollar-per-card recovery on behalf of financial institutions



ATTORNEY BACKGROUND/ EXPERIENCE

involving data breach of credit and debit card information. Mr. Guglielmo was one of the principals involved in the litigation and settlement of *In re Managed Care Litig.*, MDL No. 1334 (S.D. Fla.), which included settlements with Aetna, CIGNA, Prudential, Health Net, Humana, and WellPoint, providing monetary and injunctive benefits exceeding \$1 billion.

Additional cases Mr. Guglielmo played a leading role and obtained substantial recoveries for his clients include: *Love v. Blue Cross and Blue Shield Ass'n*, No. 03-cv-21296 (S.D. Fla.), which resulted in settlements of approximately \$130 million and injunctive benefits valued in excess of \$2 billion; *In re Insurance Brokerage Antitrust Litig.*, MDL No. 1897 (D.N.J.), settlements in excess of \$180 million; *Valle v. Popular Community Bank*, No. 653936/2012 (N.Y. Supreme Ct.), \$5.2 million settlement on behalf of consumers, *In re Pre-Filled Propane Tank Marketing and Sales Practices Litig.*, MDL No. 2086 (W.D. Mo.), consumer settlements in excess of \$40 million; *Bassman v. Union Pacific Corp.*, No. 97-cv-02819 (N.D. Tex.), \$35.5 million securities class action settlement; *Garcia v. Carrion*, No. CV. 11-1801 (D. P.R.), substantial corporate governance reforms; *Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass-Through Certificates*, No. 09-cv-00037 (W.D. Wash.), \$26 million securities class action settlement, *Murr v. Capital One Bank (USA)*, N.A., No. 13-cv-1091 (E.D. Va.), \$7.3 million settlement pending on behalf of class of consumers who were misled into accepting purportedly 0% interest offers, and *Howerton v. Cargill, Inc.*, No. 13-cv-00336 (D. Haw.), \$6.1 million settlement obtained on behalf of class of consumers who purchased Truvia, purported to be deceptively marketed as "all-natural." Mr. Guglielmo was the principle litigator and obtained a significant opinion from the Hawaii Supreme Court in *Hawaii Medical Association v. Hawaii Medical Service Association*, 113 Hawaii 77 (Haw. 2006), reversing the trial court's dismissal and clarifying rights for consumers under the state's unfair competition law.

Mr. Guglielmo lectures on electronic discovery and was a member of the Steering Committee of Working Group 1 of the Sedona Conference®, an organization devoted to providing guidance and information concerning issues such as discovery and production issues, as well as areas focusing on antitrust law, complex litigation, and intellectual property. He is a frequent speaker on electronic discovery issues at the Sedona Conference as well as the Advanced eDiscovery Institute at Georgetown University Law Center. Mr. Guglielmo was also recognized for his achievements in litigation by his selection to The National Law Journal's "Plaintiffs' Hot List." In 2019, Mr. Guglielmo was recognized by Super Lawyers as a top Antitrust lawyer in the New York metro area, was named by Who's Who Legal Litigation: Leading Practitioner-E-Discovery (2019), and was named by Lawdragon as one of the 500 Leading Plaintiff Financial Lawyers.

Mr. Guglielmo is also a member of the following associations: District of Columbia Bar Association, New York State Bar Association, American Bar Association, The Sedona Conference®, and a Board Member on the Advanced eDiscovery Institute at Georgetown University Law Center.



ATTORNEY BACKGROUND/ EXPERIENCE

WALTER W. NOSS

PRACTICE EMPHASIS

Walter N. Noss practices complex federal litigation with an emphasis on prosecuting antitrust actions on both a class-wide and individual, opt-out basis.

ADMISSIONS

Member of the California, New York, and Ohio Bars; **United States Court of Appeals:** Sixth, Ninth, and Eleventh Circuits; **United States District Court:** Northern, Central, and Southern Districts of California, the Southern District of New York, and the Northern and Southern Districts of Ohio

EDUCATION

The Ohio State University College of Law (J.D., with honors, 2000); University of Toledo (B.A. in Economics, magna cum laude, 1997)

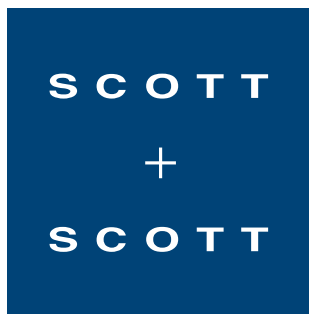
HIGHLIGHTS

Mr. Noss serves as the managing partner for Scott+Scott's San Diego office and currently, represents class plaintiffs in *In re Foreign Exchange Benchmark Rates Antitrust Litig.*, No. 1:13-cv-07789 (S.D.N.Y.), an action challenging collusion regarding foreign exchange rates, and *Alaska Electrical Pension Fund v. Bank of America Corp.*, No. 1:14-cv-07126 (S.D.N.Y.), an action challenging collusion regarding the setting of the ISDAfix benchmark interest rate.

Mr. Noss represented class plaintiffs in *Dahl v. Bain Capital Partners LLC*, No. 1:07-cv-12388 (D. Mass.), a case challenging collusion among private equity firms. In *Dahl*, Mr. Noss served as one of the primary litigation counsel prosecuting the case, including deposing key managing directors, drafting dispositive motions, and arguing in court in opposition to defendants' summary judgment motions. The defendants in *Dahl* settled for \$590.5 million.

Mr. Noss represented the indirect purchaser class plaintiffs in *Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Limited Company*, No. 2:12-cv-03824 (E.D. Pa.), a case challenging monopolistic conduct known as "product hopping" by the defendants. In *Mylan*, he was appointed sole lead counsel for the indirect class, and directed their prosecution and eventual settlement of the case for \$8 million. He also represents corporate opt-out clients in *In re: Aluminum Warehousing Antitrust Litig.*, MDL No. 2481 (S.D.N.Y.), a case challenging collusion regarding the spot metal price of physically-delivered aluminum. He has previously represented out-out clients in *In re Rubber Chemicals Antitrust Litig.*, MDL No. 1648 (N.D. Cal.); *In re Polychloroprene Rubber (CR) Antitrust Litig.*, MDL No. 1642 (D. Conn.); and *In re Plastics Additives (No. II) Antitrust Litig.*, MDL No. 1684 (E.D. Pa.), which were cases involving price-fixing by horizontal competitors in the synthetic rubber industry.

In addition, Walter has experience successfully litigating in federal civil jury trials. In April 2011, Mr. Noss served as lead trial counsel in *Novak v. Gray*, No. 8:09-cv-00880 (M.D. Fla.), winning a \$4.1 million jury verdict for breach of oral contract and fraudulent inducement. In December 2009, Mr. Noss served as plaintiffs' local counsel at trial in *Lederman v. Popovich*, No. 1:07-cv-00845 (N.D. Ohio), resulting in a \$1.8 million jury verdict for plaintiffs on claims of breach of fiduciary duties, conversion, and unjust enrichment. In January and February 2006, Mr. Noss assisted the trial team for *In re Scrap Metal Antitrust Litig.*, No. 1:02-cv-0844 (N.D. Ohio 2006), resulting in a \$34.5 million class action plaintiffs' verdict. Prior to joining Scott+Scott in April 2004, he was an associate in the Cleveland, Ohio office of Jones Day.



ATTORNEY BACKGROUND/ EXPERIENCE

DAVID R. SCOTT

PRACTICE EMPHASIS

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

ADMISSIONS

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

EDUCATION

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

HIGHLIGHTS

Mr. Scott is the Managing Partner of Scott+Scott Attorneys at Law LLP, Scott+Scott Europe LLP, and Scott+Scott Europe BV with offices in New York, Amsterdam, London, California, Connecticut, and Ohio.

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

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

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

Mr. Scott has received widespread recognition for his antitrust and competition law work. He has been elected to Who's Who Legal: Competition 2015- 2019, which lists the world's top antitrust and competition law lawyers, selected based on comprehensive, independent survey work with both general counsel and lawyers in private practice around the world. He has also received a highly recommended ranking by Benchmark Litigation for each of the years 2013-2015.

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

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