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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIAN  
SANTIAGO, and SUSAN LYNN HARVEY  
individually and on behalf of all other  
similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688-RS

**DECLARATION OF JOHN YANCHUNIS  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR FEES, COSTS, AND SERVICE  
AWARDS**

Judge: Hon. Richard Seeborg  
Courtroom 3 – 17th Floor

**DECLARATION OF JOHN A. YANCHUNIS**

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I, John A. Yanchunis, declare as follows.

1. I am a partner with the law firm Morgan & Morgan, P.A. (“Morgan & Morgan”), counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of Florida and admitted *pro hac vice* for this case. Dkt. 14. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this declaration in support of Plaintiffs’ Motion for Attorneys’ Fees, Costs, and Service Awards (the “Motion”).

3. The three law firms representing Plaintiffs—BSF, Morgan & Morgan, and Susman Godfrey (collectively, “Counsel”)—were appointed by this Court to serve as Co-Lead Class Counsel in this matter. We have collectively led the Classes’ efforts in this case over the last six years from case inception to judgment.

4. This declaration focuses on facts that bear on the Motion, including among other things providing backgrounds on the expertise of Morgan & Morgan as a firm and the particular Morgan & Morgan attorneys on this case, summarizing our work litigating this case from its inception to judgment, and our continued work on behalf of the Classes.

**MORGAN & MORGAN COMPLEX LITIGATION GROUP QUALIFICATIONS**

5. Morgan and Morgan (“Morgan and Morgan”) is a leading civil trial law firm representing consumers and commercial clients nationwide. With over 1,200 lawyers, Morgan & Morgan is the largest plaintiffs’ firm in the nation. Morgan & Morgan maintains offices throughout the United States, including in this District. Among its lawyers are former state attorney generals and present and former members of various state legislatures.

6. Morgan & Morgan has a dedicated Complex Litigation Group of which the Class Action Department is a part. The Class Action Department is staffed with lawyers, paralegals, and retired FBI agents serving as investigators—committed to representing consumers in complex litigation, MDL proceedings and class action cases throughout the country. It has achieved many remarkable results in class litigation, including the settlement of *In re Black Farmers*

1 *Discrimination Litigation*, no. 08-0511 (D.C. Oct. 27, 2017), where one of its partners served as  
2 co-lead. The case resulted in a settlement with the United States Government in the amount of \$1.2  
3 billion for African American farmers who had been systematically discriminated against on the  
4 basis of race, in violation of the Fifth Amendment to the United States Constitution, the Equal  
5 Credit Opportunity Act, Title VI of the Civil Rights Act, and the Administrative Procedure Act.  
6 The Class Action section is a part of Morgan & Morgan's Complex Litigation group, has  
7 assembled a talented, ethnically diverse team of lawyers. Aside from the lawyers listed below, its  
8 team of lawyers is assisted by a team of lawyers in the shared legal services section of the Complex  
9 Litigation Group. These lawyers are dedicated to document review, deposition preparations and  
10 deposition summaries. It is also assisted by a separate section of more than a dozen lawyers,  
11 comprised of former federal law clerks at the District and Circuit level, who assist the Class Action  
12 section with research and writing support.

13 7. For its work in data privacy litigation, the Morgan & Morgan Complex Litigation  
14 Group was honored in 2025 as the Cybersecurity & Privacy Group of the Year by Law360, and  
15 received similar distinction in 2023 as Litigation Department of the Year in the state of Florida by  
16 ALM/Law.Com. In 2024, the group was a national finalist for Litigation Department of the Year  
17 by The National Law Journal.

18 8. The partners and employees of my firm's Complex Litigation Group who worked  
19 on this matter are as follows:

20 9. ***John A. Yanchunis*** leads the class action section of the law firm. His practice—  
21 which began after completing a two-year clerkship with United States District Judge Carl O. Bue,  
22 Jr., S. D. Tex.—has concentrated on complex litigation and spans over 42 years, including  
23 consumer class actions for more than two-thirds of that time. As a result of his extensive experience  
24 in class litigation, including privacy and data-breach litigation, he regularly lectures nationally and  
25 internationally at seminars and symposiums regarding class litigation and privacy litigation. He is  
26 a member of The State Bar of Texas and The Florida Bar. He has served as lead, co-lead, and class  
27 counsel in numerous national class actions, including multi-district litigation, involving a wide  
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1 range of subjects affecting consumers, including antitrust, defective products, life insurance,  
2 annuities, and deceptive and unfair acts and practices. In 2016 and 2020, he was recognized by the  
3 National Law Journal as a trailblazer in the area of privacy litigation, and in 2019, 2020, 2021,  
4 2023, 2024, and 2025, he was recognized by Law360 as one of a very small number of MVPs in  
5 the United States in the area of privacy and cyber security litigation. For his work in the area of  
6 privacy litigation, he was awarded Lawyer of the Year in the state of Florida by ALM/Law.Com  
7 in 2022, and in 2024, he was named a finalist for Lawyer of the Year in the state of Florida (1 of  
8 3). In 2026, he is again a finalist (1 of 3) for the same recognition. In 2024, he was named a finalist  
9 for Lawyer of Year by The National Law Journal. In 2023, he was also recognized by Law360 as  
10 a Titan of the Plaintiffs' Bar, and Consumer Protection Lawyer of the Year by the Consumer  
11 Protection Committee of The Florida Bar. He received a Lifetime Achievement Award in 2025  
12 from ALM/360.

13 10. He received the Florida Bar Foundation President's Award of Excellence in 2010,  
14 and for his work in representing a class of elderly indigent Floridians on Medicaid in a suit against  
15 the state of Florida, which resulted in an increase in the benefits to class members, he was awarded  
16 The Florida Bar Elder Law Section Chair's Honor Award.

17 11. As a result of his experience in insurance and complex litigation, beginning in 2005,  
18 he was selected by Tom Gallagher, the Chief Financial Officer for the state of Florida and a  
19 member of the Florida Cabinet, to serve as lead counsel for the Florida Department of Financial  
20 Services and the Florida Department of Insurance Regulation (the insurance regulators of Florida)  
21 in their investigations of the insurance industry on issues concerning possible antitrust activity and  
22 other possible unlawful activities regarding the payment of undisclosed compensation to insurance  
23 brokers. He served as lead regulator counsel and worked with a core group of state Attorneys  
24 General from the National Association of Attorneys General, which were selected to conduct the  
25 investigations. The insurance regulator for Florida was the only insurance regulator in the group.  
26 The litigation that was filed and the related investigations netted millions of dollars in restitution  
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1 for Florida consumers and resulted in significant changes in the way commercial insurance is sold  
2 in Florida and across the country.

3 12. During his career, he has tried numerous cases in state and federal courts, including  
4 one of the largest and longest insurance coverage cases in U.S. history, which was filed in 1991  
5 by The Celotex Corporation and its subsidiary, Carey Canada, Inc. During the seventeen years the  
6 case pended, he served as lead counsel for several insurance companies, regarding coverage for  
7 asbestos and environmental claims. The case was tried in three phases over several years beginning  
8 in 1992. He was also lead counsel for these parties in the subsequent appeals that followed a  
9 judgment in favor of his clients.

10 13. Mr. Yanchunis began his work in privacy litigation in 1999 with the filing of *In re*  
11 *DoubleClick Inc. Privacy Litigation*, 154 F. Supp. 2d 497 (S.D.N.Y. 2001), alleging privacy  
12 violations based on the placement of cookies on hard drives of internet users. Beginning in 2003,  
13 he served as co-Lead Counsel in the successful prosecution and settlement of privacy class action  
14 cases involving the protection of privacy rights of more than 200 million consumers under the  
15 Driver's Protection Privacy Act (DPPA) against the world's largest data and information brokers,  
16 including Experian, R.L. Polk, Acxiom, and Reed Elsevier (which owns Lexis/Nexis). *See Fresco*  
17 *v. Automotive Directions, Inc.*, No. 03-61063-JEM (S.D. Fla.), and *Fresco v. R.L. Polk*, No. 07-  
18 *cv-60695-JEM* (S.D. Fla.). Subsequently, He also served as co-Lead Counsel in the DPPA class  
19 cases, *Davis v. Bank of America*, No. 05-cv-80806 (S.D. Fla.) (\$10 million class settlement),  
20 and *Kehoe v. Fidelity Fed. Bank and Trust*, No. 03-cv-80593 (S.D. Fla.) (\$50 million class  
21 settlement).

22 14. He has been appointed and served in leadership positions a number of multidistrict  
23 litigation in the area of privacy and data breaches: *In re: Capital One Consumer Data Sec. Breach*  
24 *Litig.*, No. 1:19-MD-2915-AJT (E.D. Va.) (Co-Lead Counsel) (court approved settlement for  
25 \$190,000,000); *In re Yahoo! Inc. Customer Data Sec. Breach Litig.*, No. 5:16-MD-02752-LHK  
26 (N.D. Cal.) ("Yahoo") (Lead Counsel) (court approved settlement for \$117,500,000 for US and  
27 Israeli citizens); *In re The Home Depot, Inc. Consumer Data Sec. Data Breach Litig.*, No. 1:14-  
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1 md-02583-TWT (N.D. Ga.) (Co-Lead Counsel) (court approved settlement for \$29,025,000); *In*  
2 *Re: Equifax, Inc. Cust. Data Sec. Breach Litig.*, 1:17-md-2800-TWT (N.D. Ga.) (member of the  
3 Plaintiffs’ Steering Committee) (court approved settlement for \$380.5 million); *In re: U.S. Office*  
4 *of Personnel Mgmt. Data Sec. Breach Litig.*, 1:15-mc-01394-ABJ (D.D.C.) (“OPM”) (member of  
5 the Executive Committee) (court approved a settlement of \$60 million); *In re Target Corp.*  
6 *Customer Data Sec. Breach Litig.*, MDL No. 2522 (D. Minn.) (member of the Executive  
7 Committee) (court approved settlement on behalf of a class of approximately 100 million  
8 consumers).

9 15. His court-appointed leadership experience in non-MDL, data breach class actions  
10 extends to dozens of cases which he has litigated and settled, and includes one of the few contested  
11 certifications in a data breach case: *Schmidt, et al., v. Facebook, Inc.*, No. 3:18-cv-05982 (N.D.  
12 Cal.) (Co-Lead Counsel) (“Facebook”) (class certified for 8 million U.S. residents, subsequently  
13 settled the class and approved by the court), and a contested certification in a data privacy case,  
14 *Brown v. Google LLC*, No. 4:20-cv-03664-YGR (N.D. Cal.) (certifying injunctive class relief,  
15 settled on the eve of trial, currently pending appeal).

16 16. His experience in these major privacy cases extends far beyond simply briefing  
17 threshold issues and negotiating settlements. Rather, he has personally deposed dozens  
18 of corporate representatives, software engineers, cyber professionals and CISOs in major data  
19 breach and privacy cases such as Capital One, Yahoo, Kimpton, Facebook, and Brown. In  
20 addition, he has defended experts used in these cases and also deposed defense liability and  
21 damage experts.

22 17. As result of his experience in the area of class litigation and ethics, he has served  
23 as an expert for The Florida Bar on ethical issues arising in class action litigation. He was also  
24 appointed by The Florida Supreme Court to enforce one of its orders for indirect criminal  
25 contempt, which led to the incarceration of the respondent. He is a frequent lecturer on data privacy  
26 and class litigation nationally and internationally, including at international conferences, in Israel,  
27 Mexico, the United Kingdom, the Netherlands, and Portugal, and in the fall of 2026, Spain.

1           18.     He has served in a number of leadership positions in The Florida Bar, having been  
2 elected to two terms in The Young Lawyers Division of The Florida Bar, to two terms to The  
3 Board of Governors of The Florida Bar, and he was appointed by The Florida Supreme Court to  
4 serve a 5 year term as a Member of The Florida Board of Bar Examiners, and today he continues  
5 to serve as an emeritus member. He has been a member of numerous committees of The Florida  
6 Bar, and been appointed chair of many of them. Today he serves on The Florida Bar's recently  
7 formed data privacy and cyber security committee.

8           19.     While at the University of Florida Mr. Yanchunis was a member of Florida Blue  
9 Key and Omicron Delta Kappa. He received his Juris Doctor degree from the South Texas College  
10 of Law in 1980, where he graduated magna cum laude. He attended law school at night and worked  
11 full time during the day. During law school, Mr. Yanchunis was a member of the Order of the  
12 Lytae, Associate Editor-in-Chief and Technical Editor of the South Texas Law Journal.

13           20.     In this case, Mr. Yanchunis routinely participated in strategy meetings, oversaw  
14 Morgan & Morgan's involvement with legal briefing—particularly class certification—as well as  
15 discovery efforts. Mr. Yanchunis regularly attended hearings and had active argument roles at  
16 class certification and the dispositive motions and the final pretrial conference. Mr. Yanchunis was  
17 actively involved in trial preparation, co-leading Morgan & Morgan's efforts for the mock jury  
18 exercises with Mr. McGee and Mr. Keith Mitnik—one of the nation's most prominent trial  
19 attorneys with hundreds of trials to verdict. Finally, Mr. Yanchunis attended each day of trial and  
20 contributed to daily pre- and post-trial strategy sessions.

21           21.     **Michael F. Ram.** Mr. Ram is a consumer class action lawyer with more than 40  
22 years of experience. He graduated cum laude from Harvard Law School in 1982. He has co-tried  
23 several class action trials and frequently lectures on class trials. In 1992 he was a co-recipient of  
24 the Trial Lawyer of the Year Award given by Trial Lawyers for Public Justice for *National*  
25 *Association of Radiation Survivors v. Walters* No. 83-c-1861 (N.D. Cal.) (tried to class-wide  
26 judgment on remand from Supreme Court). From 1993 through 1997, Mr. Ram was a partner with  
27 Lief, Cabraser, Heimann and Bernstein where he represented plaintiffs in several major class  
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1 actions, including: *Cox v. Shell*, Civ. No 18,844 (Obion County Chancery Court, Tenn.) national  
2 class of six million owners of property with defective polybutylene plumbing systems; *In re*  
3 *Louisiana-Pacific Inner-Seal Litigation*, No. 95-cv-879 (D. Oregon) (co-lead counsel) national  
4 class of homeowners with defective siding; *ABS Pipe Litigation*, Cal. Judicial Council  
5 Coordination Proceeding No. 3126 (Contra Costa County) national class of homeowners.

6 22. In 1997, Mr. Ram founded Levy, Ram & Olson which became Ram & Olson and  
7 then Ram, Olson, Cereghino & Kopczynski. He was co-lead counsel in many consumer class  
8 actions including a national class of half a million owners of dangerous glass pane gas fireplaces  
9 in *Keilholtz et al. v. Superior Fireplace Company*, No. 08-cv-00836 (N.D. Cal. 2008). He was co-  
10 lead counsel for plaintiffs in *Chamberlan v. Ford Motor Company*, No. 03-cv-2628 (N.D. Cal.), a  
11 class action involving defective intake manifolds that generated four published opinions, including  
12 one by the Ninth Circuit, 402 F.3d at 950, and settled one court day before the class trial. He was  
13 also co-counsel for plaintiffs in a number of other consumer class actions, including: *In re General*  
14 *Motors Corp. Product Liability Lit.* MDL. No. 1896 (W.D. Wash.) (defective speedometers);  
15 *Richison v. American Cemwood Corp.*, San Joaquin Superior Court Case No. 005532 (defective  
16 Cemwood Shakes); *Williams v. Weyerhaeuser*, San Francisco Superior Court Case No. 995787  
17 (defective hardboard siding); *Naef v. Masonite*, Mobile County, Alabama Circuit Court Case No.  
18 CV-94-4033 (defective hardboard siding on their homes); *Hanlon v. Chrysler Corp.*, 150 F.3d  
19 1011 (9th Cir. 1998) (approving class action settlement); *McAdams v. Monier, Inc.* (2010) 182  
20 Cal. App. 4th 174 (reversing denial of class certification in consumer class action involving roof  
21 tiles); *Gardner v. Stimson Lumber Co.* (King County Wash. No. 2-17633-3-SEA) (defective  
22 siding); *Rosenberg v. U-Haul* (Santa Cruz Superior Ct. No. CV-144045 (certified consumer class  
23 action for false and deceptive conduct; tried successfully to judgment); *In re Google Buzz User*  
24 *Privacy Litigation*, No. 10-cv-00672-JW (N.D. Cal. 2011) (international class action settlement  
25 for false and deceptive conduct); *Whitaker v. Health Net of California, Inc., and International*  
26 *Business Machines Corp*, No. 2:11-cv-0910 KJM DAD (E.D. Cal.) (electronic privacy class action  
27 under the California Confidentiality of Medical Information Act); and *In re Kitec Plumbing System*  
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1 *Products Liab. Litigation MDL No 2098*, N.D. Texas, No. 09-MD-2098 (MDL class action  
2 involving claims concerning defective plumbing systems).

3 23. From 2017 to 2020, Mr. Ram was a partner at Robins Kaplan LLP. In August, 2020,  
4 Mr. Ram joined Morgan & Morgan to open a San Francisco office for them. He is currently co-  
5 lead counsel in numerous consumer class actions, including *Kellman v. Spokeo, Inc.*, N.D. Cal.  
6 No. 3:21-cv-08976-WHO, a certified multistate privacy case involving misappropriation of  
7 likeness, *Gold v. Lumber Liquidators*, N.D. Cal. No. 14-cv-05373-RS, a certified multistate class  
8 action involving bamboo floors, and *Fowler v. Wells Fargo*, N.D. Cal. No. 3:17-cv-02092-HSG,  
9 a class action involving interest charges that settled for \$30 million. He is currently serving on the  
10 Plaintiffs' Steering Committee *In re Philips Recalled CPAP, Bi-Level Pap, And Mechanical*  
11 *Ventilator Products Litigation*, MDL No. 3014, where he is co-chair of the Law and Briefing  
12 Committee. In addition, Mr. Ram is also currently serving on the Plaintiffs' Expert Discovery  
13 Committee *In re Kia Hyundai Vehicle Theft Marketing, Sales Practices, and Products Liability*  
14 *Litigation*, MDL No. 3052.

15 24. In this case, Mr. Ram contributed to the dispositive motions and class certification  
16 briefing, as well as expert reports and related motions practice. Mr. Ram also worked on discovery  
17 and ESI-related issues, regularly interacting with Google's counsel to address and attempt to  
18 resolve related disputes, including Plaintiffs' document productions and Google's preservation  
19 obligations. He regularly supported Morgan & Morgan's involvement with legal briefing and  
20 following related regulatory matters related to the conduct at issue in this case. Mr. Ram also  
21 supported the mock jury exercises to assist with trial preparation, and attended trial and  
22 participated in daily pre- and post-trial strategy sessions.

23 25. **Ryan J. McGee**. Mr. McGee joined Morgan & Morgan's Complex Litigation  
24 Group in March 2018, and has since extensively practiced in the areas of privacy and consumer  
25 protection class action litigation. His work since 2018 resulted in Law360 recognizing him as one  
26 of only three Rising Stars in the area of cybersecurity and privacy for 2023 and the National Law  
27 Journal recognizing him as an Elite Trial Lawyer in 2024. He has substantially supported the  
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1 following representative litigations resulting in the substantial recoveries for the respective class  
2 members: *Brown v. Google LLC*, No. 4:20-cv-03664-YGR (N.D. Cal.); *In re: Capital One*  
3 *Consumer Data Sec. Breach Litig.*, No. 1:19-MD-2915-AJT (E.D. Va.); *In re Morgan Stanley*  
4 *Data Sec. Litig.*, No. 20-cv-5914-AT (S.D.N.Y.); *Adkins v. Facebook, Inc.*, No. 3:18-cv-05982-  
5 WHA (N.D. Cal.); *In Re: Ambry Genetics Data Breach Litig.*, No. 20-cv-00791 (C.D. Cal.);  
6 *Pfeiffer et al. v. RadNet, Inc.*, No. 2:20-cv-09553-RGK (C.D. Cal.); *Ford et al. v. [24]7.ai, Inc.*,  
7 No. 5:18-cv-02770-BLF (N.D. Cal.); *In re Yahoo! Inc. Cust. Data Sec. Breach Litig.*, No. 16-md-  
8 02752-LHK (N.D. Cal.); *In re Equifax, Inc. Cust. Data Sec. Breach Litig.*, No. 1:17-md-02800  
9 (N.D. Ga.); *In re: U.S. Office of Personnel Mgmt. Data Sec. Breach Litig.*, 1:15-mc-01394-ABJ  
10 (D.D.C.); *Henderson v. Kalispell Regional Healthcare*, No. CDV-19-0761 (Montana Eighth  
11 Judicial Court – Cascade County); *Morrow v. Quest*, No. 2:17-cv-0948 (CCC) (JBC) (D.N.J.); *In*  
12 *re Google Plus Profile Litig.*, No. 5:18-cv-06164 EJD (N.D. Cal.); *In re: Lincare Holdings Inc.*  
13 *Data Breach Litig.*, No. 8:22-cv-01472-TPB-AAS (M.D. Fla.); *Stoll et al. v. Musculoskeletal*  
14 *Institute, Chartered d/b/a Florida Orthopaedic Institute*, No. 8:20-cv-01798-CEH (M.D. Fla.); and  
15 *Kuss v. American HomePatient, Inc., et al.*, No. 8:18-cv-02348 (M.D. Fla.).

16 26. His experience in privacy litigation extends well beyond drafting pleadings,  
17 briefing legal disputes, and negotiating settlements. He has personally deposed dozens of corporate  
18 representatives, software engineers, and cyber professionals in major privacy cases not only in this  
19 case, but others such as *Brown v. Google*, *Capital One*, and *Facebook*. He has also deposed defense  
20 liability and damages experts in these (and other) cases, and defended experts in those fields at  
21 deposition and in *Daubert* hearings. His work also extends to the courtroom, where he personally  
22 and routinely handles dispositive motions hearings, science days with experts, class certification,  
23 and other disputes.

24 27. Mr. McGee studied business economics and history at the University of Florida,  
25 where he was a teaching assistant for technology classes in the business school, and received his  
26 law degree from Stetson University College of Law, where he was an editor on the *Stetson Law*  
27 *Review*, a research assistant for antitrust and consumer protection laws, and a teaching assistant  
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1 for Stetson’s trial advocacy program. He began his legal career as a state-appointed prosecutor,  
2 where he tried over 50 jury trials to verdict, mostly felonies, as well as a special prosecutor  
3 appointed to investigate police officers’ deadly use-of-force and corruption within various law  
4 enforcement agencies. Mr. McGee also served as a law clerk for two years for the Honorable  
5 Elizabeth A. Kovachevich, the former Chief United States District Judge, Middle District of  
6 Florida. Before joining Morgan & Morgan, Mr. McGee’s practice involved complex business  
7 disputes, antitrust, trade secret, data security, and class action investigations and defense-side  
8 litigation in state and federal courts across the country. Mr. McGee was admitted to the Florida  
9 Bar in 2009 and is also admitted to practice in the Northern, Middle, and Southern Districts of  
10 Florida; the District of Colorado; and the Third and Ninth Circuit Courts of Appeal.

11 28. In this case, Mr. McGee oversaw Morgan & Morgan’s day-to-day involvement,  
12 working with Mr. Yanchunis and Mr. Ram, to provide input on strategies and implement Morgan  
13 & Morgan’s vast experience in class action and privacy litigation to the factual and legal theories  
14 at issue in this case. Mr. McGee served as Morgan & Morgan’s primary contact for all of the  
15 named Plaintiffs, addressing discovery requests, document productions, and assisting Mr. Lee with  
16 preparation for their depositions. Mr. McGee deposed a number of Google employees, including  
17 Mr. Fair and Mr. Kearns, Google’s financial expert Dr. Ghose, defend and assisted with many  
18 other depositions in this case, including experts. Mr. McGee also assisted with myriad briefs and  
19 hearings at the dispositive, class certification, and summary judgment stages. Mr. McGee was  
20 actively involved in trial preparation, co-leading Morgan & Morgan’s efforts for the mock jury  
21 exercises with Mr. Yanchunis and Mr. Keith Mitnik—one of the nation’s most prominent trial  
22 attorneys with hundreds of trials to verdict—as well as preparing the named plaintiffs for their trial  
23 testimony and other witnesses (both for Plaintiffs and Google) who ultimately did not testify at  
24 trial. Finally, Mr. McGee co-managed the pre-trial and trial evidentiary disputes, and attended  
25 each day of trial and contributed to daily pre- and post-trial strategy sessions.

26 29. **Kenya Reddy.** Ms. Reddy represents consumers in class action litigation. She  
27 graduated from Duke University in 1997 with a degree in political science. In 2000, she received  
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1 her law degree from the University of Virginia School of Law. Prior to joining Morgan & Morgan,  
2 Ms. Reddy was a shareholder at Carlton Fields, P.A., where her primary areas of practice were  
3 antitrust, complex civil litigation, class action defense, and business litigation. She also has  
4 experience in including labor and employment, products litigation, ERISA and employee benefits  
5 law, insurance, healthcare, and securities litigation.

6 30. Ms. Reddy has served as a law clerk for the Honorable Charles R. Wilson, United  
7 States Circuit Court Judge, Court of Appeals for the Eleventh Circuit, the Honorable Anne C.  
8 Conway, former Chief Judge of the United States District Court for the Middle District of Florida,  
9 the Honorable Mary S. Scriven, United States District Judge, Middle District of Florida, and the  
10 Honorable Karla R. Spaulding, United States Magistrate Judge, Middle District of Florida. Ms.  
11 Reddy was a guest speaker in January 2019 at HarrisMartin's Marriott Data Breach Litigation  
12 Conference on the topic of standing in data breach cases. In October 2019, she presented on the  
13 topic of third-party litigation funding at the Mass Torts Made Perfect Conference. Ms. Reddy is  
14 admitted to practice in the Northern, Middle, and Southern Districts of Florida.

15 31. In this case, Ms. Reddy assisted with researching legal issues for dispositive  
16 motions and class certification briefing and discovery disputes. Ms. Reddy devoted substantial  
17 time to trial preparation, including drafting affirmative motions in limine and responses to  
18 Google's motions in limine, jury instruction disputes, legal support for the admission of exhibits,  
19 and other critical trial work product. Ms. Reddy attended each day of trial and contributed to daily  
20 pre- and post-trial strategy sessions, and spearheaded Morgan & Morgan's efforts to oppose  
21 Google's efforts to decertify the classes post-verdict.

22 32. ***Patrick Barthle.*** Mr. Barthle is the second-longest tenured attorney in the Class  
23 Action Department of Morgan & Morgan. He was born and raised in Dade City, Florida. He  
24 attended the University of Florida where he was admitted to the Honors Program and graduated,  
25 *cum laude*, with a double major in History and Criminology in 2009. While at UF, Mr. Barthle  
26 was inducted into the Phi Beta Kappa Honor Society and served as President of the Catholic  
27 Student Center. He attended Washington and Lee University School of Law, graduating *summa*  
28

1 *cum laude* in 2012; where he was a Lead Articles Editor for the Wash. & Lee Law Review, a  
2 member of the Order of the Coif and the Phi Delta Phi Legal Honor Society, and President of the  
3 W&L Law Families organization.

4 33. Before joining Morgan & Morgan in 2015, Mr. Barthle worked at one of the  
5 country's largest law firms, Greenberg Traurig, LLP, and then served as a judicial law clerk for  
6 two years to the Honorable Mary S. Scriven, United States District Judge, Middle District of  
7 Florida. He has extensive privacy and consumer fraud class action experiencing, having actively  
8 participated in the following litigations: *In re: Capital One Consumer Data Security Breach*  
9 *Litigation*, No. 1:19-MD-2915-AJT (E.D. Va.); *In re: U.S. Office of Personnel Management Data*  
10 *Security Breach Litigation*, 1:15-mc-01394-ABJ (D.C.); *Torres v. Wendy's International, LLC*,  
11 No. 6:16-cv-210 (M.D. Fla.); *In Re: Equifax, Inc. Customer Data Security Breach Litigation*, 1:17-  
12 md-2800-TWT (N.D. Ga.); *In re The Home Depot, Inc. Customer Data Security Data Breach*  
13 *Litigation*, No. 1:14-md-02583-TWT (N.D. Ga.); *In re Yahoo! Inc. Customer Data Sec. Breach*  
14 *Litig.*, 16-md-02752-LHK (N.D. Cal.); and *Finerman v. Marriott Ownership Resorts, Inc.*, Case  
15 No.: 3:14-cv-1154-J-32MCR (M.D. Fla.). Mr. Barthle has deep substantive experience in data  
16 breach cases. He has deposed multiple C-suite-level executives, prepared and examined expert  
17 witnesses, as well as briefed and argued motions for class certification and summary judgment in  
18 any number of data breach cases. For example, in *In re: Yahoo! Inc. Customer Data Security*  
19 *Breach Litigation*, Case No. 16-md-2752, (N.D. Cal.), a data breach class action involving  
20 approximately 3 billion Yahoo user accounts, he was deeply involved in discovery, including with  
21 the depositions of multiple Chief Information Security Officers ("CISO") and other cybersecurity  
22 related witness, including the Chief Information Officer ("CIO"); as well as assisting with the  
23 reports, and defending the depositions, of Plaintiffs' cybersecurity and identity theft experts.  
24 Likewise, in the *In re Capital One Customer Data Security Breach Litigation*, Case No.: 1:19-md-  
25 2915 (E.D. Va.) case, Mr. Barthle was heavily involved in all aspects of discovery including  
26 drafting and arguing myriad motions to compel and the taking of various depositions, including  
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1 multiple corporate representative witnesses for both Capital One and Amazon Web Services, as  
2 well as arguing and briefing summary judgment and class certification.

3 34. Mr. Barthle has been appointed as Co-Lead Counsel in multiple pending data  
4 breach class actions, including *Hernandez et al. v. Advance America, Cash Advance Centers, Inc.*  
5 *et al.*, Case No. 7:23-cv-4256 (D. S.C.), and *In re Great Expressions Data Security Incident Litig.*,  
6 Case No. 2:23-cv-11185 (E.D. Mich.). Apart from data privacy cases, he has been appointed as  
7 Class Counsel in other consumer class action cases, including in *Swaney v. Regions*, No. 2:13-cv-  
8 00544-JHE (N.D. Ala.) (TCPA class action, Final Approval entered), *Peterson v. Apria*  
9 *Healthcare Group, Inc.*, No. 6:19-cv-00856 (M.D. Fla.) (TCPA class action, Final Approval  
10 entered), and *Guidry v. Penn Credit*, Case No.: 6:19-cv-1936-Orl41LRH (M.D. Fla.) (TCPA class  
11 action, Final Approval entered); and in *Richards et al. v. Chime Fin., Inc., et al.*, No. 4:19-cv-  
12 06864 (N.D. Cal.), a case involving a payment disruption for certain payment card users. Mr.  
13 Barthle is also no stranger to contested class certifications, having certified nationwide and multi-  
14 state classes in cases such as *Still v. Selene Finance, LP*, Case No. CJ-2013-51 (Okla. Dist. Ct,  
15 Nowata County) (multi-state certified class action concerning property inspections fees related to  
16 HUD-backed mortgages); and *Nolen et al. v. Fairshare Vacation Owners Association*, Case No.  
17 6:20-cv-330-PGB-EJK (M.D. Fla.) (nationwide class certified concerning alleged breaches of  
18 fiduciary duties involving a Wyndham timeshare program).

19 35. Mr. Barthle was selected as a Florida Super Lawyer Rising Star in 2019, 2020, and  
20 2021 in the field of Class Actions. He is also active in speaking on privacy and class action topics,  
21 having spoken in June 2018, October 2022, and March 2023 at the NetDiligence Cyber Risk  
22 Summit on various privacy related topics; in November 2018 at the American Association for  
23 Justice's Advanced 30(b)(6) Seminar, on the topic of 30(b)(6) Depositions in in Data Breach  
24 Cases; in January 2019 at HarrisMartin's Marriott Data Breach Litigation Conference on the topic  
25 of damage models and settlements in data breach cases; and in October 2019 at the Mass Torts  
26 Made Perfect conference on Rule 23(c)(4) classes. Mr. Barthle was admitted to the Florida Bar in  
27 2012 and is also admitted to practice in the Middle District of Florida, the Southern District of  
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1 Florida, the District of Colorado, the Northern District of Illinois, the Eastern District of Michigan,  
2 the Northern District of Oklahoma, the Southern District of Texas, and the Eleventh Circuit Court  
3 of Appeals.

4 36. In this case, Mr. Barthle assisted with discovery efforts, expert preparations, and  
5 class certification strategy.

6 37. **Riya Sharma.** Ms. Sharma is a dual-qualified attorney admitted to the Texas Bar  
7 and the New Delhi Bar, licensed to practice throughout India. After her Juris Doctor/B.A LL.B.  
8 from the Jindal Global Law School, she earned her LL.M. from the University of California,  
9 Berkeley, School of Law, where she graduated with High Honors in Information Privacy Law,  
10 Legal Research and Writing, Contract Law, Fundamentals of U.S. Law, and Legal Ethics and  
11 Compliance. She graduated from Berkeley as the highest performer in Contract Law. At Berkeley,  
12 she furthered her commitment to legal advocacy and served as a Pro-Bono Student Advocate with  
13 the Workers' and Tenants' Rights Clinic and contributed as a member of the Berkely Center for  
14 Law and Technology and the Privacy Lab, and also worked towards advancing the rights of women  
15 in Technology Law. Prior to obtaining her Masters in Law, Ms. Sharma worked as a Judicial Law  
16 Clerk to Justice Abdul S. Nazeer, a Judge of the Supreme Court of India, handling complex federal  
17 matters. Alongside her judicial clerkship, she collaborated with UNICEF to provide e-education  
18 to underprivileged children during the COVID-19 pandemic. Fluent in both English and Hindi,  
19 Ms. Sharma is also certified by the World Intellectual Property Organization for coursework in  
20 U.S Intellectual Property.

21 38. In this case, Ms. Sharma assisted with legal research, including work on jury  
22 instruction disputes and targeted legal research on damages. Ms. Sharma also assisted with mock  
23 jury preparations, expert-related motion work, as well as trial preparations. Ms. Sharma also  
24 assisted with post-verdict research and briefing.

25 39. **Ron Podolny.** Ron Podolny joined the Morgan & Morgan Complex Litigation  
26 Group after practicing for 15 years in Canada, 10 of which were dedicated exclusively to  
27 representing the plaintiffs in class actions and mass torts. At Morgan & Morgan, his practice is  
28

1 focused on representing the plaintiffs in class actions arising out of data breaches, misleading  
2 advertising, defective consumer and pharmaceutical products and other matters.

3 40. Ron has served as an adjunct professor at the University of Toronto, Faculty of Law  
4 and Osgoode Hall Law School, York University. He speaks frequently in professional conferences  
5 on matters relating to class actions and commercial litigation. In particular, Ron has presented  
6 repeatedly on cross-border class actions at the American Association for Justice conferences,  
7 across the U.S. Ron has authored articles on a variety of topics in class actions and commercial  
8 litigation in leading industry and academic publications. His articles have been cited with approval  
9 by the courts, including the Supreme Court of Canada. He has been interviewed on legal matters  
10 in television, radio and print media.

11 41. In 2018, Ron was the recipient of the Precedent Setter Award, which recognizes  
12 lawyers called to the bar in the last 10 years who have shown excellence and leadership in their  
13 practice and their community. In 2019, Ron was the recipient of the “Lexpert Rising Stars Award:  
14 Leading Lawyers Under 40.” In 2022, Ron was awarded the Osgoode Hall Law School Faculty  
15 Teaching and Service Award for his contribution to legal education as an Adjunct Professor. Ron  
16 is called to the bars of New York and Ontario, and practices in the Tampa office.

17 42. In this case, Mr. Podolny assisted with research and briefing the opposition to  
18 Google’s failed bid for summary judgment. Mr. Podolny also assisted with mock jury preparations  
19 as well as trial preparations, with a particular focus on assisting with the preparation of Plaintiffs’  
20 exhibit list.

21 43. **Colin Losey.** Mr. Losey graduated from Rice University with a B.S. in Mechanical  
22 Engineering in 2018. In 2021, he received his law degree from the University of Chicago Law  
23 School, where he received *pro bono* honors and participated extensively in the Mandel Legal Aid  
24 Clinic. During law school, Mr. Losey also completed an internship with the U.S. District Court  
25 for the District of Columbia. Mr. Losey began his legal career clerking on Maryland’s highest  
26 court. Prior to joining Morgan & Morgan, Mr. Losey also clerked on the U.S. District Court for  
27  
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1 the Central District of California. While clerking, Mr. Losey analyzed a wide variety of civil and  
2 criminal motions and appeals.

3 44. Mr. Losey has been a member of the Maryland Bar since 2021 and the California  
4 bar since 2023. He is also admitted to practice in the U.S. District Court for the Central District  
5 of California

6 45. In this case, Mr. Losey supported pre-trial and in-trial preparations, including work  
7 on jury instruction disputes, designations for depositions and counter-designations, and  
8 admissibility of exhibits. Mr. Losey traveled to San Francisco and assisted with in-person prep  
9 before and during trial.

10 46. **Ryan Maxey.** Mr. Maxey during his time with Morgan & Morgan was a partner-  
11 level attorney who litigated class actions. Mr. Maxey grew up in Tampa, Florida. He attended the  
12 University of South Florida, where he obtained Bachelors Degrees in Computer Science and  
13 Philosophy. During and after his undergraduate education, Mr. Maxey developed software and  
14 databases for Amalie Oil Company, an automotive lubricant manufacturer located in the Port of  
15 Tampa. Mr. Maxey later attended law school at the University of Florida, graduating order of the  
16 coif in 2008.

17 47. From 2008 to 2011, Mr. Maxey served as a judicial law clerk to the Honorable  
18 Elizabeth A. Jenkins, United States Magistrate Judge, University of Florida. Mr. Maxey then  
19 worked at one of the country's largest law firms, Greenberg Traurig, for four years. In 2015, Mr.  
20 Maxey joined Morgan & Morgan's Business Trial Group as a lead attorney handling a variety of  
21 business litigation matters. Mr. Maxey later started his own law practice, litigating claims related  
22 to breach of contract, trade secret misappropriation, the FLSA, the FD CPA, and premises liability.

23 48. Mr. Maxey was admitted to the Florida Bar in 2008 and is also admitted to practice  
24 in the Middle District of Florida and the Southern District of Florida.

25 49. During his time at Morgan & Morgan with this case, Mr. Maxey initially managed  
26 Morgan & Morgan's offensive document review efforts, as well as supported technical research  
27 and expert work.

28

1           50.     **Shelby Serig.** Ms. Serig during her time with Morgan & Morgan was a partner-  
2 level attorney who litigated class actions. Ms. Serig is a seasoned, detail-oriented litigator and  
3 legal counselor with over 20 years of professional experience in the development, negotiation and  
4 resolution of complex matters, including national class actions and multi-district litigation. Ms.  
5 Serig graduated with honors from West Virginia University with a B.S. in Journalism in 1999. In  
6 2003, she received her law degree from the University of Pittsburgh School of Law, where she  
7 received the CALI Excellence for the Future Award and was awarded First Place in the American  
8 Bar Association’s Client Counseling Competition for the Mid-Atlantic Region. During law school,  
9 Ms. Serig also completed internships with The Honorable Donetta Ambrose (U.S. District Court  
10 for the Western District of Pennsylvania) and The Honorable John Zottola (Pennsylvania Court of  
11 Common Pleas). Ms. Serig began her legal career at Florida’s largest civil defense firm, where  
12 she was eventually made a partner. There, she provided litigation defense to a wide array of clients  
13 in multiple areas of the law including employment, appellate and commercial litigation. Prior to  
14 joining Morgan & Morgan, Ms. Serig also practiced with an international law firm, focusing on  
15 employment law. Her deep legal experience includes claims investigation, drafting pleadings,  
16 briefing legal disputes, advocacy before trial and appellate courts and settlement negotiation. She  
17 is also experienced in all aspects of discovery and has completed 300+ depositions of lay and  
18 expert witnesses. Ms. Serig has been a member of the Florida Bar since 2004. She is also admitted  
19 to practice in the U.S. District Court for the Middle District of Florida, U.S. District Court for the  
20 Northern District of Florida, the U.S. District Court for the Northern District of Illinois and the  
21 U.S. Court of Appeals for the Sixth Circuit. Ms. Serig is committed to applying her legal skills  
22 outside of the office and courtroom. She serves with Florida’s Guardian ad Litem Program,  
23 advocating for abused, abandoned and neglected children. She also volunteers as a Judge in Clay  
24 County, Florida’s Teen Court program, a nationally-recognized diversion program for juvenile  
25 offenders.

26           51.     During her time at Morgan & Morgan on this case, Ms. Serig assisted with various  
27 legal research projects, and was actively involved in crafting strategy and preparing drafts for  
28

1 dispositive motions and class certification, as well as offensive discovery disputes related to  
2 targeted document requests, search term identifications, and preparations for depositions.

3 52. **Marcio Valladares.** Mr. Valladares during his time with Morgan & Morgan was a  
4 partner-level attorney who litigated class actions. Mr. Valladares was born in Managua, Nicaragua  
5 and immigrated to the United States during Nicaragua's civil war. In 1990, Marcio obtained a  
6 Bachelor of Science degree in psychology from the University of Florida. In 1993, he obtained his  
7 Juris Doctor degree, *magna cum laude*, from Florida State University. He is pursuing a Masters in  
8 Law (LL.M.) degree from Columbia University, focusing on federal and comparative law.

9 53. Mr. Valladares left Morgan & Morgan to rejoin the Department of Justice. Before  
10 joining Morgan & Morgan, Marcio worked in both the public and private sectors. He served as a  
11 judicial law clerk to the Honorable Steven D. Merryday, United States District Judge, Middle  
12 District of Florida, and then served as a judicial law clerk to the Honorable Susan H. Black, United  
13 States Circuit Court Judge, Court of Appeals for the Eleventh Circuit. Marcio served as an  
14 Assistant United States Attorney for the Middle District of Florida. In the private sector, Marcio  
15 practiced commercial litigation and insurance defense at Holland & Knight LLP. Marcio also  
16 worked as in-house counsel for the Mayo Clinic. Marcio is fluent in English and Spanish.

17 54. During his time at Morgan & Morgan on this case, Mr. Valladares assisted with  
18 legal research related to the availability of causes of action and damages, equitable tolling, and  
19 supporting the briefing on dispositive motions.

20 55. **Ra O. Amen.** Mr. Amen during his time with Morgan & Morgan was an attorney  
21 who litigated class actions. Mr. Amen was raised in both the California Bay Area and  
22 Massachusetts. In 2005, Ra graduated from Stanford University with a B.A. in Economics. After  
23 graduating, Ra worked as a Peace Corps volunteer in Morocco teaching English as a second  
24 language and business skills to local artisans. Before entering law school, Ra worked for several  
25 years in education and in business development for a mobile technology startup. In 2017, he  
26 obtained his Juris Doctor degree with Honors from Emory University School of Law. While at  
27 Emory Law, he was a Managing Editor of the Bankruptcy Developments Journal, interned at a  
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1 consumer fraud law practice, and worked in-house with one of the globe’s leading metals  
2 companies assisting in a diverse array of legal issues ranging from corporate restructuring to  
3 international tax and contract disputes. Before joining Morgan & Morgan in 2020, Mr. Amen  
4 worked at one of the nation’s largest defense law firms in the nation where he specialized in  
5 representing clients in complex commercial, administrative, and ecclesiastical disputes. Ra speaks  
6 both English and Spanish, and is an avid guitar player. Ra was admitted to the Georgia Bar in  
7 2017.

8 56. During his time at Morgan & Morgan on this case, Mr. Amen assisted with various  
9 legal research projects, including briefing on dispositive motions and class certification with a  
10 particular focus on damages theories. Mr. Amen also supported efforts to identify potential  
11 custodians and coordinating document review efforts helping with hearing and deposition  
12 preparations. He also supported defensive discovery efforts, including assisting with identifying  
13 potential ESI sources, privilege review, and document production.

14 57. **Antonio Arzola.** Mr. Arzola during his time with Morgan & Morgan was an  
15 attorney who litigated class actions. Mr. Arzola was born and raised in Miami, Florida to first-  
16 generation Cuban-American parents. In 2018, Antonio obtained a Bachelor of Science degree in  
17 Criminal Justice from Florida International University. After graduating, Antonio worked as a  
18 North American Language and Culture Assistant in a primary school in Barxeta, Spain, where he  
19 taught English to primary school Spaniard students for a year. During his teaching assistantship,  
20 Antonio obtained a Bachelor of Arts degree in Portuguese from Florida International University  
21 in 2019. In 2022, he obtained his Juris Doctor degree, *cum laude*, from Florida International  
22 University. While at Florida International University College of Law, he received the “Book  
23 Award” for achieving the highest grade in his Legal Writing III course. Also, he represented  
24 Florida International University in the 2022 Moot Madrid International Arbitration Competition,  
25 where he conducted oral arguments in Spanish in mock arbitration proceedings in Madrid, Spain.  
26 Before joining Morgan & Morgan, Antonio served as a judicial law clerk to the Honorable  
27 Federico A. Moreno, United States District Judge, Southern District of Florida. Antonio is fluent  
28

1 in English, Spanish, and Portuguese and is an avid runner. Antonio was admitted to the Florida  
2 Bar in 2022 and is a Certified Information Privacy Professional (United States).

3 58. During his time at Morgan & Morgan on this case, Mr. Arzola assisted with  
4 discovery efforts, supporting trial witness and evidentiary motions practice (including witness and  
5 designation review for the pretrial conference), and supporting trial preparations and work product.

6 59. **Abraham Barkhordar.** Mr. Barkhordar during his time with Morgan & Morgan  
7 was an attorney who litigated class actions. He was born and raised in Los Angeles, California.  
8 He attended Santa Monica college where he played on the school water polo team before  
9 transferring to UCLA where he was admitted to the Honors Program and graduated, summa cum  
10 laude, with a major in History. While at UCLA, Abraham volunteered with Americorps'  
11 Justicecorps program and also volunteered at a local immigration law firm. Thereafter, Mr.  
12 Barkhordar attended Harvard Law School where he co-founded and served as innagural co-  
13 president of the Harvard Plaintiffs' law association—the first law student organization of its kind  
14 in the country. Since graduating from Harvard, Mr. Barkhordar has joined the San Francisco office  
15 of Morgan & Morgan's Complex Litigation Group where he focuses on consumer class action  
16 litigation.

17 60. During his time at Morgan & Morgan on this case, Mr. Barkhordar assisted with  
18 various legal research projects, including briefing on dispositive motions, class certification, and  
19 challenging Google's privilege designations. Mr. Barkhordar also supported preparations for  
20 depositions.

21 61. **Ross Berlin.** Mr. Berlin during his time with Morgan & Morgan was an attorney  
22 who litigated class actions. Mr. Berlin earned his law degree with honors from the Northwestern  
23 University Pritzker School of Law. After law school, Mr. Berlin completed two judicial clerkships,  
24 first for the Honorable Kevin G. Ross of the Minnesota Court of Appeals and then for Judge Paul  
25 C. Huck of the United States District Court for the Southern District of Florida. Following his  
26 clerkships, Mr. Berlin returned to his hometown of West Palm Beach, Florida, to continue his  
27 public service as an appellate public defender, where he represented indigent defendants on appeal  
28

1 from their criminal convictions. Mr. Berlin's appellate-litigation and clerkship experience attracted  
2 one of the largest law firms in the world, and Mr. Berlin entered private practice. In that role, Mr.  
3 Berlin represented multibillion-dollar corporations in both trial and appellate-level litigation in  
4 federal and state courts in high-stakes matters spanning the entire United States and the world.

5 62. During his time at Morgan & Morgan on this case, Mr. Berlin assisted with  
6 deposition preparations. Mr. Berlin also assisted with mock jury preparations as well as trial  
7 preparations, with a particular focus on supporting Plaintiffs' trial presentation for injunctive relief  
8 through both witness and documentary evidence.

9 63. **Christopher Pollack.** Mr. Pollack during his time with Morgan & Morgan was an  
10 attorney who litigated class actions. Mr. Pollack was born and raised in Florida. Mr. Pollack  
11 studied finance at the University of Central Florida, and then earned his law degree from the  
12 University of Michigan Law School. While in law school, Mr. Pollack worked on the Civil Rights  
13 Litigation Clearinghouse, and he earned Certificates of Merit in both Evidence and Jurisdiction &  
14 Choice of Law.

15 64. Upon graduating, Mr. Pollack spent the first several years of his career as a judicial  
16 clerk, first spending 20 months with the Honorable Jeffrey J. Helmick in the U.S. District Court  
17 for the Northern District of Ohio, and then a year with the Honorable Robin S. Rosenbaum in the  
18 U.S. Court of Appeals for the Eleventh Circuit. Prior to joining Morgan & Morgan's Complex  
19 Litigation Group, Mr. Pollack worked for law firms in D.C. and Michigan, representing businesses  
20 across the country and gaining experience that he now uses to advocate for consumers in class  
21 action litigation. Mr. Pollack is admitted to practice in Illinois, D.C., and Michigan.

22 65. During his time at Morgan & Morgan on this case, Mr. Pollack assisted with legal  
23 research for dispositive motions and class certification, with a particular focus on damages. Mr.  
24 Pollack also assisted with mock jury preparations, expert-related motion work, motions in limine  
25 and pretrial practice, as well as trial preparations. Mr. Pollack traveled to San Francisco and  
26 assisted with in-person prep before and during trial.

1           66.     **Christina Romero.** Ms. Romero during her time with Morgan & Morgan was an  
2 attorney who litigated class actions. Ms. Romero is a 2019 graduate of the University of New  
3 Mexico School of Law. While in law school, she externed at the Sixth District Court of Appeal for  
4 the State of California and clerked at Bay Area Legal Aid and various private firms in New Mexico.  
5 She is a member of the State Bar of California and the United States District Court for the Northern,  
6 Central, Southern, and Eastern Districts of California. Ms. Romero has served as the co-chair of  
7 the Younger Lawyers Division and member of the Executive Committee of the Northern District of  
8 California Chapter of the Federal Bar Association. Ms. Romero also has served in the Advisory  
9 Council of the Women in Leadership, Professional Development Program offered by Regional &  
10 Continuing Education at CSU, Chico.

11           67.     During her time at Morgan & Morgan on this case, Ms. Romero assisted with  
12 various legal research projects, including briefing on dispositive motions and class certification.  
13 Ms. Romero also assisted with gathering information and supporting the Special Master process,  
14 frequently interacting with Plaintiffs and experts to ensure accurate workflows.

15           68.     **Jennifer Cabezas.** Ms. Cabezas is a paralegal with more than 19 years of  
16 experience. She obtained her associate in arts, paralegal studies from Keiser University in 2007  
17 where she was a member of the Phi Theta Kappa Honor Society. She later obtained her bachelor's  
18 in arts in Criminal Justice from Florida International University in Miami, Florida. She assisted  
19 the attorneys with document preparation, court filings, preparing deposition materials, electronic  
20 discovery materials, mediation materials and other clerical tasks. Ms. Cabezas billed at \$350 per  
21 hour. Her billing rate has been approved for paralegals of her experience level by other state and  
22 federal courts.

23           69.     The information for members of the firm's document review team who worked on  
24 this matter is below, and I further address how these attorneys substantively contributed to this  
25 matter beyond routine document review as follows:

26           a.     **Arnold Ashley.** Mr. Ashley graduated Presbyterian College obtaining a Bachelor  
27 of Science, Business Administration. He later attended the University of South  
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1 Carolina School of Law and became a member of the South Carolina State Bar in  
2 1994. He is admitted to practice in the United States Court of Appeals for the Fourth  
3 Circuit, and United States District Court for the District of South Carolina. Mr.  
4 Ashley regularly billed at \$1,141 per hour in other litigation, but his rate has been  
5 reduced to \$675. Mr. Ashley further contributed to this case by also assisting the  
6 mock jury team to identify potential themes and crucial documents and testimony  
7 to be used at the exercises and trial. Mr. Ashley also contributed to deposition (both  
8 expert and lay person) preparations, identifying critical documents after other  
9 reviewers had conducted their initial document review.

10 **b. *Nicolette Best.*** Ms. Best graduated from Southern New Hampshire University with  
11 a Bachelor of Science and later obtained her juris doctorate from Santa Clara  
12 University School of Law. She is a member of the Nevada State Bar since 2019.  
13 Ms. Best is a member of the Nevada Justice Association, and Entertainment Law  
14 Section of the State Bar of Nevada. Ms. Best further contributed to this case by  
15 engaging in targeted review of specific documents for privilege challenges and  
16 developing work product in support thereof.

17 **c. *Jeffrey Davidson.*** Mr. Davidson attended Western Michigan University where he  
18 double majored and earned a Bachelor of Arts, Psychology and Bachelor of Arts,  
19 Political Science. He obtained his juris doctorate from the University of Michigan  
20 and became a member of the Illinois State Bar in 1987. Mr. Davidson regularly  
21 billed at \$1,141 per hour in other litigation, but his rate has been reduced to \$675.  
22 Mr. Davidson further contributed to this case by assisting with deposition  
23 preparations, identifying critical documents after other reviewers had conducted  
24 their initial document review.

25 **d. *Kevin Davis.*** Mr. Davis attended Wayne State University where he obtained a  
26 Bachelor of Science, Industrial/Organizational Psychology, with a Minor in  
27 Communication. He graduated from the University of Detroit Mercy School of Law  
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1 and became a member of the Michigan State Bar in 1987. Mr. Davis regularly billed  
2 at \$1,141 per hour in other litigation, but his rate has been reduced to \$675. Mr.  
3 Davis further contributed to this case by assisting with deposition (both expert and  
4 lay person) preparations, identifying critical documents after other reviewers had  
5 conducted their initial document review, and also supporting the technical work  
6 performed in this case.

7 e. **Scott Davis.** Mr. Davis attended the University of Tennessee at Martin where he  
8 obtained a Bachelor of Science, Political Science / Geology, and graduated cum  
9 laude. He attended the University of Memphis Cecil C. Humphreys School of Law  
10 and became a member of the Tennessee State Bar in 2016. Mr. Davis is a member  
11 of the Phi Sigma Alpha National Political Science Honor Society, Health Law  
12 Society, and Public Action Law Society. Mr. Davis's rate in similar privacy class  
13 actions is \$500 per hour, which is his rate in this case. Mr. Davis further contributed  
14 to this case by assisting with deposition (expert and lay person) preparations,  
15 identifying critical documents after other reviewers had conducted their initial  
16 document review.

17 f. **Justin Galvez.** Mr. Galvez graduated with magna cum laude from George Wythe  
18 College in 2008 and Ave Maria School of Law in 2015. Mr. Galvez's rate in similar  
19 privacy class actions is \$500 per hour, which is his rate in this case. Mr. Galvez  
20 further contributed to this case by also assisting the mock jury team to identify  
21 potential themes and crucial documents and testimony to be used at the exercises  
22 and trial. Mr. Galvez also contributed to deposition (both expert and lay person)  
23 preparations, identifying critical documents after other reviewers had conducted  
24 their initial document review.

25 g. **Stephanie Jackson.** Ms. Jackson obtained a Bachelor of Science in industrial  
26 engineering and her juris doctorate, with honors, from the University of Florida.  
27 Ms. Jackson was admitted to the Florida State Bar in 1994, and previously served  
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1 as a staff attorney for the Hon. John W. Dell of the Fourth Circuit Court of Appeal,  
2 and before joining Morgan & Morgan focused on civil litigation helping individuals  
3 and small businesses. Ms. Jackson regularly billed at \$919 per hour in other  
4 litigation, but her rate has been reduced to \$675. Ms. Jackson further contributed to  
5 this litigation by supporting the technical work performed in this case.

6 **h. *David Morse.*** Mr. Morse obtained a Bachelor of Science, Physics from the  
7 University of California, Los Angeles, and his juris doctorate from Loyola Law  
8 School, Los Angeles. Mr. Morse was admitted to the California State Bar in 2000,  
9 and the Delaware State bar in 2011. Mr. Morse regularly billed at \$1,141 per hour  
10 in other litigation, but his rate has been reduced to \$675. Mr. Morse further  
11 contributed to this case by assisting with deposition (expert and lay person)  
12 preparations, identifying critical documents after other reviewers had conducted  
13 their initial document review, as well as conducting detailed reviews and providing  
14 detailed analysis of Plaintiffs' productions that were used to support Plaintiffs'  
15 preparations for depositions and similar litigation efforts.

16 **i. *Emily Reynolds.*** Ms. Reynolds attended Arkansas Tech University where she  
17 received a Bachelor of Science in Management and Marketing, and a Bachelor of  
18 Science in Economics and Finance. She obtained her Juris Doctorate from the  
19 University of Dayton School of Law and became a member of the Arkansas State  
20 Bar in 2011. She is a Member of Garland County Bar Association, Saline County  
21 Bar Association, Arkansas Bar Association, and American Bar Association. Ms.  
22 Reynolds' rate in similar privacy class actions is \$675 per hour, which is her rate  
23 in this case. Ms. Reynolds further contributed to this case by assisting with  
24 deposition preparations, identifying critical documents after other reviewers had  
25 conducted their initial document review, as well as providing witness summaries  
26 following their respective depositions.

1           j.       **Frederick Strong.** Mr. Strong obtained his Bachelor of Science in computer and  
2           electrical engineering from Northeastern University in 2002, and prior to law  
3           worked as a hardware design engineer in the technology sector. Mr. Strong then  
4           obtained his juris doctorate from New Hampshire Law School in 2008. Mr. Strong  
5           regularly billed at \$764 per hour in other litigation, but his rate has been reduced to  
6           \$675. Mr. Strong further contributed to this case by assisting with deposition  
7           preparations, identifying critical documents after other reviewers had conducted  
8           their initial document review.

9                           **MORGAN & MORGAN’S ATTORNEYS’ FEES RATES**

10           70.       Plaintiffs’ extensive efforts and comprehensive work, which necessitated thousands  
11           of hours and significant expenditures, were essential for the prosecution of this case and to reach  
12           the ensuing settlement.

13           71.       The time pressures in this case were extraordinary. The time necessary to complete  
14           document review and depositions in the time frame provided was complicated because of the  
15           novelty and uncertainty of the legal issues, the substantial size of the class, the highly technical  
16           matters at the core of the case, and other factors that contributed to the magnitude of the  
17           undertaking.

18           72.       Counsel prosecuted this case on a contingent-fee basis with no guarantee of  
19           recovery. Each firm was forced to forgo other employment in order to devote the time necessary  
20           to pursue this litigation. Morgan & Morgan represents only plaintiffs, whether in individual injury  
21           cases, mass actions, class actions, or other cases, and these representations are exclusively on a  
22           contingent fee basis. Morgan & Morgan typically receives one-third to 40% of the gross sum  
23           recovered in its cases, with increases up to 50% depending on the type of case and jurisdiction.  
24           Counsel advanced costs with the understanding that we would be paid a fee and receive  
25           reimbursement for costs only in successful. Based on these inherent risks and contingent nature,  
26           Counsel expected to receive a risk enhancement for their work securing successful classwide relief.  
27           More recent cases where my lawyers have received a risk enhancement include: *Whalen v.*  
28

1 *Gunster, Yoakley & Stewart, PA*, No. 25-CA-000550 (Fla. Cir. Ct. Aug. 13, 2025) (approving fee  
 2 request in data breach settlement with risk enhancement awarded for nature of work) *Bitmouni v.*  
 3 *PaySafe*, Dkt. 103, No. 3:21-cv-641 (N.D. Cal. Feb. 2, 2024) (same); *Hellyer v. Smile Brands Inc.*,  
 4 Dkt. 95, No. 8:21-cv-1886 (C.D. Cal. Jan. 16, 2024) (same); *In re: Lincare Holdings Inc. Data*  
 5 *Breach Litig.*, Dkt. 126 (M.D. Fla. Oct. 6, 2023) (same); *Stoll v. Musculoskeletal Inst. Chartered*,  
 6 No. 8:20-cv-1798 (M.D. Fla. Nov. 14, 2022) (same).

7 73. Time records were kept contemporaneously. For each task performed, timekeepers  
 8 at my firm accounted for their time in 1/10<sup>th</sup> of an hour (six minute) increments and included a  
 9 brief narrative of the work performed.

10 74. The schedule below contains a summary of the time spent by Morgan & Morgan  
 11 attorneys, paralegals, and professional support staff on this case (not including attorneys,  
 12 paralegals, and professional support staff who worked on this matter for fewer than 60 hours), the  
 13 2026 billing rates for each individual, and the firm's lodestar calculation using 2026 billing rates  
 14 or equivalent 2026 billing rates for those who left the firm prior to 2026. This schedule was  
 15 prepared from contemporaneous time records through the end of February 2026, and with any  
 16 reply, I will provide additional lodestar since devoted to this case:

17

Table 1 – Morgan & Morgan Attorneys' Fees					
Timekeeper	Year of Admission	Role	Rate	Time	Total Lodestar
John Yanchunis	1980	Partner	\$2,400	1426.02	\$3,422,448
Mike Ram	1982	Partner	\$2,300	317.95	\$731,285
Kenya Reddy	2001	Partner	\$1,600	635.8	\$1,017,280
Ryan McGee	2009	Partner	\$1,330	2756.2	\$3,665,746
Ronald Podolny	2009	Partner	\$1,250	109.7	\$137,125
Patrick Barthle	2012	Partner	\$1,100	66.8	\$73,480
Riya Sharma	2020*	Attorney	\$650	192.7	\$125,255
Colin Losey	2021	Attorney	\$575	157.2	\$90,390
Staff Attorneys					
Jeffrey Davidson	1987	Attorney	\$500	306.2	\$153,100
Arnold Ashley	1994	Attorney	\$675	735.0	\$496,125
Stephanie Jackson	1994	Attorney	\$675	90.9	\$61,357.50
David Morse	2000	Attorney	\$675	175.3	\$118,327.50

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Frederick Strong	2008	Attorney	\$675	87.7	\$59,197.50
Emily Reynolds	2009	Attorney	\$675	450.9	\$304,357.50
Justin Galvez	2015	Attorney	\$500	728.3	\$364,150
Scott Davis	2016	Attorney	\$500	139.84	\$69,920
Kevin Davis	2016	Attorney	\$675	836.9	\$564,907.50
Nicolette Best	2019	Attorney	\$500	339.2	\$169,600

<b>Former Attorneys</b>					
<b>Timekeeper</b>	<b>Year of Admission</b>	<b>Role</b>	<b>Rate</b>	<b>Time</b>	<b>Total Lodestar</b>
Marcio Valladares	1993	Attorney	\$1,500	99.9	\$149,850
Shelby Serig	2004	Attorney	\$1,250	99.5	\$124,375
Ryan Maxey	2008	Attorney	\$1,250	68.2	\$85,250
Ra Amen	2017	Attorney	\$825	348.2	\$287,265
Ross Berlin	2019	Attorney	\$750	91.4	\$68,550
Christina Romero	2019	Attorney	\$500	74.8	\$37,400
Christopher Pollack	2020	Attorney	\$750	1217.6	\$913,200
Antonio Arzola	2022	Attorney	\$650	98.2	\$63,830
Abraham Barkhordar	2024	Attorney	\$650	134.2	\$87,230
<b>Non-Attorney Staff</b>					
Jennifer Cabezas		Paralegal	\$350.00	232.5	\$81,375
<b>Total</b>				<b>12,017.11</b>	<b>\$13,522,376.50</b>

\* Ms. Sharma was qualified to practice law in India in 2020, and later in Texas in 2023.

75. Morgan and Morgan's rates are the market rates for these timekeepers based on the position and years of experience for each timekeeper. The hourly rates of the professionals in my firm, including my own, reflect experience and accomplishments in the area of class litigation. The rate of \$2,400 per hour which I charge for my time is commensurate with hourly rates charged by my contemporaries around the country, including those rates charged by lawyers with my level of experience who practice in the area of class litigation across the nation. The same is true for Mr. Ram, who bills at the rate of \$2,300 per hour. These rates recognize our specialization in class action litigation and, in particular, privacy class action litigation. Prior to submitting the motion for attorneys' fees, costs, and service awards, I compared and confirmed the hourly rate of the professionals in my firm with lawyers at other law firms whose practice is focused on class litigation. Moreover, as I have been retained as an expert on attorneys' fees in other class cases, and as part of my legal education, I routinely survey hourly rates charged by lawyers around the country in published surveys, and review continuously as part of my continuing education, motions for attorneys' fees and opinions rendered by courts on attorneys' fee requests.

76. Morgan & Morgan deployed a number of document review attorneys in this case who have technical educations and/or technical backgrounds and have practiced law for decades.

1 These document review attorneys have demonstrated technical proficiencies in other litigations  
 2 involving highly technical documents, including *In re Capital One* and other cases that are  
 3 currently being litigated in other courts. In these other litigations, those attorneys also assisted with  
 4 deposition preparation and other non-document-review attorney tasks. We selected these attorneys  
 5 based on their experience and demonstrated proficiency to make sense of Google document  
 6 productions, which were a labyrinth of technical terms, used code words or code names, and  
 7 covered complex data logs and architecture that even experienced engineers could not  
 8 comprehend. They not only reviewed documents, but also helped Class Counsel to quickly prepare  
 9 for depositions, expert development, motions practice, and even trial. Despite these more  
 10 substantive roles in this case, Class Counsel have reduced their rates below their typical hourly  
 11 rates to account for the blended nature of their work (*i.e.*, both document review and assisting  
 12 preparation for depositions, hearings, and trial).

13 77. For time in this case, Class Counsel have split the lodestar in segments, and the  
 14 lodestar for my firm for those segments is as follows:

15 **Table 2 – Morgan & Morgan Attorneys’ Fees by Litigation Phase**

16 Litigation Phase	Hours	Total Lodestar
17 Preparation of Complaint (through July 2020)	1.3	\$2,157.00
18 Motion to Dismiss (Aug. 2020 through May 2021)	599.5	\$834,445.50
19 Fact Discovery (June 2021 through Oct. 2022)	2,934.44	\$2,509,661.50
20 Expert Discovery (Nov. 2022 through July 2023)	1130.8	\$1,325,101.00
21 Class Certification (Aug. 2023 through Oct. 2023)	119.2	\$215,810.00
22 Notice & Summary Judgment (Nov. through July 2024)	1,414.3	\$1,388,613.00
Trial Preparation (Aug. 2024 through July 2025)	3,186.0	\$3,491,673.50
Trial (Aug. 2025 through Sep. 2025)	1,941.32	\$2,670,458.00
Post-Trial Proceedings (Oct. 2025 through Feb. 2026)	690.2	\$1,084,457.00
<b>Total</b>	<b>12,017.11</b>	<b>\$13,522,376.50</b>

23 78. It is important to note that for the segments above, the lodestar and hours have been  
 24 divided by the dates of the time entries. However, substantial work was performed to support  
 25 different aspects of the litigation that may not have fallen directly between certain dates. For  
 26 example, while fact or expert discovery were the main focus of those segments, work was also  
 27 being performed to support Plaintiffs’ and Class Counsel’s efforts for class certification and trial.  
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**MORGAN & MORGAN'S COSTS**

79. Morgan and Morgan is entirely self-funded and incurred \$612,059.48 in unreimbursed case-related costs and expenses in un-reimbursed costs and expenses, without any guarantee of recoupment. These costs were reasonably necessary to litigate this case, and they are the type Morgan & Morgan routinely incurs in litigation. A summary of Morgan and Morgan's costs is as follows:

<b>Morgan &amp; Morgan Costs and Expenses</b>	
<b>Cost Description</b>	<b>Sum of Amount</b>
Airfare	\$66,974.86
Court Costs	\$2,106.00
Court Reporter	\$3,413.80
Epiq Ediscovery Solutions	\$43,408.21
Postage & Shipping	\$384.15
Investigative Services	\$3,450.00
Ground Transportation	\$16,641.59
Hotel (including trial room block)	\$451,362.69
In-House Printing	\$776.95
Meals	\$18,994.41
Notary	\$270.00
PACER	\$2,740.90
Trial Materials	\$1,038.37
Research Publications	\$497.55
<b>Total</b>	<b>\$612,059.48</b>

80. These costs do not include Morgan and Morgan's substantial contributions to Class Counsel's litigation fund, which was administered by Boies Schiller Flexner.

81. The firm has maintained reliable, individual records substantiating these costs, and this schedule was prepared from those records.

82. As my practice is a nationwide one, I routinely travel for court hearings, depositions, and to attend other matters in my cases. As part of this travel, and because these travel costs are recovered from common funds, I am particularly sensitive to the travel costs to ensure that costs and expenses are reasonable and not excessive. For trial in this matter, I reviewed the market rates for hotels that were generally available for trial (both pre-trial preparation and trial),

1 would be flexible given the uncertainty of how long this trial may last, and would provide a group  
2 or bulk rate given the number of attorneys, staff, and witnesses who would be traveling to San  
3 Francisco for this trial. I also considered the space and technology needs for the size of this team.  
4 The group rate we were provided by the Ritz Carlton was reasonable and, on a per-night basis,  
5 demonstrably less than other hotels I and lawyers in my group routinely stay in San Francisco,  
6 California. Given the needs of this case, and my experience with supervising travel costs and  
7 expenses, it is my belief that the Ritz Carlton's rate was reasonable.

8 I declare under penalty of perjury under the laws of the United States of America that the  
9 foregoing is true and correct. Executed this 30th day of March 2026, at Tampa, FL.

10 MORGAN & MORGAN, P.A.

11  
12 Dated: March 30, 2026

By: /s/ John Yanchunis  
John A. Yanchunis

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