

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION**

EDWARD HUYER, et al.,

Plaintiffs,

v.

WELLS FARGO & CO., and
WELLS FARGO BANK, N.A.,

Defendants.

Case No. 4:08-cv-00507-RP-CFB

Judge: Hon. Robert W. Pratt

**DECLARATION OF TODD S. GARBER FILED ON BEHALF OF
FINKELSTEIN, BLANKINSHIP, FREI-PEARSON & GARBER, LLP IN SUPPORT OF
APPLICATION FOR AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF
EXPENSES**

I, TODD S. GARBER declare as follows:

1. I am Todd S. Garber and I submit this declaration in support of my firm's application for an award of attorneys' fees and for a reimbursement of expenses in the above-captioned litigation (the "Action").

2. The statements and information that follow are, in part, based on information collected from Finkelstein, Blankinship, Frei-Pearson & Garber, LLP's books and records, and from information provided to me from employees working under my supervision and control.

3. In this Action, Finkelstein, Blankinship, Frei-Pearson & Garber, LLP is counsel of record for the Plaintiffs and the Class.

4. The firm's résumé is attached to this declaration as Exhibit A.

5. Finkelstein, Blankinship, Frei-Pearson & Garber, LLP has spent 624.90 hours litigating this Action and its lodestar, as set forth below, is based on its current hourly rates, which are usual and customary in an Action of this type. The lodestar totals \$322,867.50.

<i>Name</i>	<i>Total Hours</i>	<i>Hourly Rate</i>	<i>Total Lodestar</i>
Greg D. Blankinship	20.60	\$700.00	\$14,420.00
Todd S. Garber	268.50	\$700.00	\$187,950.00
Jeremiah Frei-Pearson	8.80	\$700.00	\$6,160.00
Total Partners	297.90		\$208,530.00
Associates			
Nadia Niazi	276.50	\$325.00	\$89,862.50
Antonino B. Roman	44.50	\$550.00	\$24,475.00
Total Associates	327.00		\$114,337.50
TOTALS	624.90		\$322,867.50

6. Finkelstein, Blankinship, Frei-Pearson & Garber, LLP has incurred expenses in this Action that total \$8,719.21. The expenses are as follows:

<i>EXPENSE</i>	<i>TOTAL</i>
Mediation	\$2,500.00
On-Line Research	\$1,186.94
Travel (Meals, Hotels & Transportation)	\$5,032.27
<i>TOTAL</i>	\$8,719.21

7. All of the time and expense incurred in the Action are reflected in the books and records of Finkelstein, Blankinship, Frei-Pearson & Garber, LLP, except for the time and expense to attend the Court's Final Approval Hearing on January 21, 2016, which was estimated. Except for the Final Approval Hearing, the expenses in this Action are supported by vouchers, checks, time records, and other documents, contained in the books and records of Finkelstein, Blankinship, Frei-Pearson & Garber, LLP.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd day of December, 2015, at White Plains, NY.



Todd S. Garber

EXHIBIT A

FBFG | Finkelstein, Blankinship,
Frei-Pearson & Garber, LLP

FIRM RESUME

Finkelstein, Blankinship, Frei-Pearson & Garber, LLP

The lawyers of Finkelstein, Blankinship, Frei-Pearson & Garber, LLP (“FBFG”)¹ have successfully litigated complex class actions in federal and state courts across the country, and have obtained successful results for clients against some of the world’s largest corporations. A sampling of the Firm’s more significant cases includes:

- *Wise v. Energy Plus Holdings, LLC*, No. 1:11-cv-07345 (S.D.N.Y.). Nationwide class action alleging that Energy Plus falsely claimed to offer competitive electricity rates when its prices are substantially higher than market rates in violation of New York Gen. Bus. L. § 349 and other consumer protection laws. On September 17, 2013, the Court certified the class, appointed the lawyers of FBFG as lead class counsel, and approved the settlement valued at over \$11 million.
- *Quinn v. Walgreen*, No. 12-8187 (S.D.N.Y.). Nationwide settlement valued at \$2.8 million to resolve Plaintiffs’ claim that Defendant’s glucosamine products did not perform as represented. On March 24, 2015, the Court certified the class, appointed FBFG lawyers as Co-Lead Class Counsel and approved a nationwide \$2.8 million settlement.
- *Goldemberg v. Johnson & Johnson Consumer Companies, Inc.*, No. 13-3073 (S.D.N.Y.). Class action alleging deceptive labeling in connection with Defendant’s Aveeno Naturals brand of personal care products. Plaintiff defeated Defendant’s motion to dismiss, and the parties are conducting discovery. On June 26, 2014, the Court appointed FBFG lawyers as Interim Co-Lead Class Counsel.
- *Chen v. HikoEnergy, LLC*, No. 14-cv-01771 (S.D.N.Y.). State-wide class action alleging that Hiko charged deceptively high electricity and natural gas rates. On August 8, 2014, the Court appointed FBFG lawyers as Interim Co-Lead Class Counsel.
- *In Re Michaels Stores, Inc. Zip Code Litigation*, No. 11-cv-10920 (D. Mass.). State-wide class action alleging that Michaels Stores unlawfully collected consumers’ personal identification information. After securing a groundbreaking decision by the Massachusetts Supreme Judicial Court, establishing that consumers whose privacy has been violated may bring consumer protection claims against companies that unlawfully collect personal identification information, the lawyers of FBFG were appointed as co-lead class counsel.
- *Miller v. J. Crew Group, Inc.*, No. 13-11487 (D. Mass.). State-wide class action alleging that J. Crew unlawfully collected consumers’ personal identification information. On October 15, 2014, the Court granted final approval to a settlement and appointed the lawyers of FBFG as co-lead class counsel.

¹ Three of the founding partners of FBFG were formerly partners in the firm of Meiselman, Packman, Nealon, Scialabba & Baker, P.C. (“MPNSB”). References in this resume to “lawyers of FBFG” includes instances involving current FBFG lawyers while they were at MPNSB.

- *Brenner v. Kohl's Corporation*, No. 13-cv-10935 (D. Mass.). State-wide class action alleging that Kohl's unlawfully collected consumers' personal identification information. On March 12, 2014, the Court granted final approval to a settlement and appointed the lawyers of FBFG as class counsel.
- *Brenner v. J.C. Penney Company, Inc.*, No. 13-cv-11212 (D. Mass.). State-wide class action alleging that J.C. Penney unlawfully collected consumers' personal identification information. On October 10, 2013, the Court granted final approval to a settlement valued at \$3.56 million and appointed the lawyers of FBFG class counsel.
- *Saint Joseph Health System Medical Information Cases*, JCCP No. 4716 (Cal. Sup. Ct.). Complex class action on behalf of approximately 31,800 patients who were victimized by Saint Joseph's violation of the California Confidentiality of Medical Information. The lawyers of FBFG have been co-lead class counsel. The Court denied Saint Joseph's demurrer and the Court of Appeals upheld that ruling. The Court certified class and denied Saint Joseph's summary judgment motion; the Court of Appeals recently upheld those rulings as well.

FBFG is also counsel of record in numerous consumer fraud class actions throughout the country, including cases pending in United States District Courts in New York, Massachusetts, California, Florida, Pennsylvania, Nevada, and Connecticut, as well as actions pending in the state courts of California, Florida, Maryland, Massachusetts, New Jersey and New York.

Attorney Profiles

Todd S. Garber

Todd S. Garber is a founding partner in the Firm. Mr. Garber is an experienced litigator, who practices in state and federal courts. His areas of experience include class actions, consumer fraud, securities fraud, complex commercial disputes, business torts, antitrust, and general litigation. Mr. Garber was designated a New York Super Lawyer in 2013 and 2014, a distinction earned by only five percent of the lawyers in the New York metro area.

Prior to joining the Firm, Mr. Garber worked at Lowey Dannenberg Cohen & Hart, P.C., where he prosecuted and defended complex commercial litigation matters and class actions.

Mr. Garber's career achievements include:

- Appointed Co-Lead Class Counsel in *Quinn v. Walgreen*, No. 12-8187 (S.D.N.Y.). Nationwide settlement valued at \$2.8 million to resolve Plaintiffs' claim that Defendant's glucosamine products did not perform as represented. On August 1, 2014, the Court granted preliminary approval of the settlement.
- Appointed Interim Co-Lead Class Counsel in *Chen v. HikoEnergy, LLC*, No. 14-cv-01771 (S.D.N.Y.). State-wide class action alleging that Hiko charged deceptively high electricity and natural gas rates.

- Appointed Interim Co-Lead Class Counsel in *Goldemberg v. Johnson & Johnson Consumer Companies, Inc.*, No. 13-3073 (S.D.N.Y.). Class action alleging deceptive labeling in connection with Defendant's Aveeno Naturals brand of personal care products. Plaintiff defeated Defendant's motion to dismiss, and the parties are conducting discovery.
- Counsel in *Wise v. Energy Plus Holdings LLC*, No. 11-7345 (S.D.N.Y.). Plaintiffs alleged that Energy Plus, an independent electricity supplier, misrepresented that its rates were reflective of the market when they were much higher. The Court granted final approval of a settlement covering more than 400,000 consumers in eight states and valued at more than \$11,000,000.
- Counsel in *Paulino v. Conopco, Inc.*, No. 14-CV-5145, 2015 WL 4895234 (E.D.N.Y. Aug. 17, 2015). Class action alleging deceptive labeling related to Defendant's use of the representation "NATURALS" despite the fact that products contained unnatural and synthetic ingredients. Plaintiffs defeated Defendant's motion to dismiss for failure to state a claim.
- Counsel in *Koenig v. Boulder Brands, Inc.*, 995 F. Supp. 2d 274 (S.D.N.Y. 2014). Class action alleging Defendant deceptively marketed certain milk products as "fat free" that actually contained one gram of fat per serving. Plaintiffs asserted claims under New York state law including violations of General Business Law Section 349, breach of express warranty, and unjust enrichment. Plaintiffs defeated Defendant's motion to dismiss for failure to state a claim and based on Federal preemption.
- Counsel in *Dean v. Colgate-Palmolive Co.*, No. 15-0107, 2015 WL 3999313 (C.D. Cal. June 17, 2015). Class action alleging Defendant misrepresented the ability of its peroxide based toothpaste to "deep whiten" teeth. Plaintiff asserted several claims including breach of express warranty, breach of implied warranty for a particular purpose, violation of California Consumer Legal Remedies Act, violation of California' False Advertising Law, and violation of California Unfair Competition Law. The Court denied Defendant's motion to dismiss finding that plaintiff's claims were not preempted by federal law, should not be dismissed pursuant to the primary jurisdiction doctrine, that plaintiff sufficiently plead her claims, and that a motion to strike the nationwide class premature.
- Counsel in *Aguilar v. Boulder Brands*, No. 12-1862, 2013 WL 2481549 (S.D. Cal. June 10, 2013). Class action alleging that Defendants engaged in false and misleading advertising related to labeling of their butter products. Plaintiff alleged that Defendants' labels made claims that their products help block cholesterol in butter, when in fact the products produced no clinically meaningful health benefits. The Court denied Defendant's motion to dismiss.
- As counsel for the New York City Pension Funds, Lead Plaintiff in *In re Juniper Networks, Inc. Sec. Litig.*, No. C-06-04327 JW (N.D. Cal 2010), helped achieve a settlement of \$169.5 million, one of the largest settlements in an options backdating case, after more than three years of hard-fought litigation.

- Appointed Class Counsel in *Brenner v. J.C. Penney Company, Inc.*, No. 13-11212 (D. Mass.). Plaintiff alleged that J.C. Penney requested and recorded customers' ZIP codes, which it then used to identify consumers' mailing addresses to send them junk mail, in violation of Massachusetts law. The Court granted final approval of a settlement valued at more than \$3.5 million.
- Appointed Class Counsel in *Brenner v. Kohl's Corporation*, No. 13-cv-10935 (D. Mass.). State-wide class action alleging that Kohl's unlawfully collected consumers' personal identification information. On December 5, 2013, the Court granted preliminary approval to a settlement valued at \$435,000 and appointed lawyers of FBFG class counsel.
- Involvement in the prosecution of a number of high-profile cases, which have resulted in hundreds of millions of dollars in recoveries for investors, including *In re WorldCom Securities Litigation*, *In re HealthSouth Securities Litigation*, *In re DaimlerChrysler AG Securities Litigation*, and *In re Bayer AG Securities Litigation*.
- Representation of institutional investors in stockholder voting rights and corporate governance cases, including *Gabelli Global Multimedia v. Western Investment LLC*, 700 F. Supp. 2d 748 (D. Md. 2010); *Delcath Systems, Inc. v. Ladd*, 466 F.3d 257 (2d. Cir. 2006); *Salomon Brothers Mun. Partners Fund, Inc. v. Thornton*, 410 F. Supp. 2d 330 (S.D.N.Y. 2006); *meVC Draper Fisher Jurvetson Fund I, Inc. v. Millennium Partners*, 260 F. Supp. 2d 616 (S.D.N.Y. 2003); and *Millenco L.P. v. meVC Draper Fisher Jurvetson Fund I, Inc.*, 824 A.2d 11 (Del. Ch. 2002).

Mr. Garber received his B.A. from Cornell University in 1999 and his J.D. from the Benjamin N. Cardozo School of Law in 2002, where he was articles editor for the Cardozo Journal of International and Comparative Law, and was competitively selected to work for the New York City Law Department's Corporation Counsel in its Appellate Division.

Mr. Garber co-authored "*Morrison v. National Australia Bank: The Potential Impact on Public Pension Fund Fiduciaries*," The NAPPA Report, Vol. 24, Number 3, August 2010, and "*Loss Causation in the Ninth Circuit*," New York Law Journal, September 2, 2008.

Mr. Garber is admitted to practice in New York and Connecticut and is a member of the bars of the U.S. District Courts for the Eastern, Western and Southern Districts of New York and the Second Circuit Court of Appeals.

Andrew Finkelstein

Andrew Finkelstein is the Managing Partner of Finkelstein, Blankinship, Frei-Pearson & Garber, LLP. He has become a noted consumer activist through his representation of injured individuals against corporate wrong doers and other irresponsible parties.

Mr. Finkelstein served as Captain of the 9/11 Victim Compensation Fund in a pro bono capacity, where he helped obtain over \$10 million for victims and waived all legal fees associated with this representation. Mr. Finkelstein is also the Chairman of the Plaintiff Personal Injury Steering

committee for the Neurontin Liability Multi District Litigation in Boston, Massachusetts. He has worked closely with the FDA regarding the adverse effects associated with Neurontin, having filed a Citizens Petition seeking enhanced warning of the side effects of this drug, specifically increased suicidal tendencies. Additionally, Mr. Finkelstein is a member of the Executive Steering Committee of the Hormone Replacement Therapy Multi District Litigation in both Philadelphia, Pennsylvania and Little Rock, Arkansas. He is a member of the Plaintiff Steering Committee of the Ortho Evra Birth Control Patch New Jersey Coordinated Litigation, and the Plaintiff Steering Committee of the Viagra Multi District Litigation in Minneapolis, Minnesota.

Mr. Finkelstein is a frequent lecturer at Continuing Legal Education courses. His topics include “Science in the Courtroom”, “Technology in the Courtroom”, “Prosecution of a Pharmaceutical Case”, “The Ethics of On-line Advertising”, and “Structured Settlements and the Personal Injury Settlement.”

In addition to these presentations, Mr. Finkelstein volunteers his time to present his “Commit to Quit Texting While Driving” seminar to area high school students.

Greg Blankinship

Greg Blankinship is a founding partner of FBF&G, and he specializes in class actions in state and federal courts. Mr. Blankinship has worked on substantial class action matters representing both defendants and plaintiffs in numerous state, federal, and multi-district class actions, including wage and hour and consumer fraud matters. Mr. Blankinship has been named class counsel by numerous courts. Mr. Blankinship was designated a New York Super Lawyer in 2014 and 2015, a distinction earned by only five percent of the lawyers in the New York metro area.

Prior to joining the Firm, Mr. Blankinship was an associate with Skadden, Arps, Slate, Meagher & Flom LLP and Greenberg Traurig, LLP. Mr. Blankinship received his B.A. from Emory University in 1991 and his M.A. from the University of North Carolina in 1995. He attended law school at the University of Washington, where he earned his J.D. in 2003. While in law school, Mr. Blankinship was a member of the University of Washington Law Review.

A sampling of Mr. Blankinship’s successful cases includes:

- Counsel in *Wise v. Energy Plus Holdings LLC*, No. 11-7345 (S.D.N.Y.). Plaintiffs alleged that Energy Plus, an independent electricity supplier, misrepresented that its rates were reflective of the market when they were much higher. The Court granted final approval of a settlement covering more than 400,000 consumers in eight states and valued at more than \$11,000,000.
- Appointed Co-Lead Class Counsel in *In Re Michaels Stores, Inc. Zip Code Litigation*, No. 11-cv-10920 (D. Mass.). Plaintiff alleged that Michaels unlawfully collected consumers’ personal identification information. Final approval of a class-wide settlement was granted but for attorneys’ fees.
- Appointed Class Counsel in *Brenner v. J.C. Penney Company, Inc.*, No. 13-11212 (D. Mass.). Plaintiff alleged that J.C. Penney requested and recorded customers’ ZIP codes, which it then used to identify consumers’ mailing addresses to send

them junk mail, in violation of Massachusetts law. The Court granted final approval of a settlement valued at more than \$3.5 million.

- Appointed Class Counsel in *Brenner v. Kohl's Corporation*, No. 13-cv-10935 (D. Mass). State-wide class action alleging that Kohl's unlawfully collected consumers' personal identification information. On December 5, 2013, the Court granted preliminary approval to a settlement valued at \$435,000 and appointed lawyers of FBFG class counsel.
- Appointed Interim Co-Lead Class Counsel in *Chen v. HikoEnergy, LLC*, No. 14-cv-01771 (S.D.N.Y.). State-wide class action alleging that Hiko charged deceptively high electricity and natural gas rates.
- Appointed Interim Co-Lead Class Counsel in *Goldemberg v. Johnson & Johnson Consumer Companies, Inc.*, No. 13-3073 (S.D.N.Y.). Class action alleging deceptive labeling in connection with Defendant's Aveeno Naturals brand of personal care products. Plaintiff defeated Defendant's motion to dismiss, and the parties are conducting discovery.

Mr. Blankinship has also prosecuted numerous class actions on behalf of consumers in Massachusetts and nationwide, including claims brought against a prominent video game manufacturer for allegedly intentionally disabling valuable game console features it had previously and prominently advertised, claims brought against a chewing gum manufacturer for alleged false advertising concerning unsubstantiated health benefits, claims brought against a national retail chain for overcharging its customers for their prescriptions, and claims brought against internet marketers for alleged unauthorized credit charges. Mr. Blankinship's broad experience as a litigator has also exposed him to a wide variety of substantive business and consumer issues. He also has substantial experience with the issues and procedural aspects of large class action and complex cases.

Mr. Blankinship is admitted to practice in New York and Massachusetts and is a member of the bars of the U.S. District Courts for the Eastern, Western and Southern Districts of New York, the District of Connecticut, the District of Massachusetts, and the First and Second Circuit Courts of Appeals.

Jeremiah Frei-Pearson

Jeremiah Frei-Pearson is a founding partner of Finkelstein, Blankinship, Frei-Pearson & Garber. He is a passionate advocate and an experienced litigator who represents consumers and employees in complex cases against corporate wrongdoers. As a result of the victories he has won for his clients, the National Trial Lawyers Association selected Mr. Frei-Pearson as a member of the Top 100 Trial Lawyers in 2014 and 2015. Mr. Frei-Pearson is a member of the Best Attorneys of America, which is limited to the top 100 attorneys in New York and he is also designated as Super Lawyer, a distinction awarded to only 5% of the New York Metro Area. Mr. Frei-Pearson practices in federal and state courts throughout the country and his areas of expertise include class actions, employment law, consumer fraud, privacy, and civil rights.

Prior to joining the Firm, Mr. Frei-Pearson was an associate with Kaye Scholer LLP, a multinational law firm, and a staff attorney with Children's Rights, a national public interest law firm representing children in foster care. Mr. Frei-Pearson received his B.A. from Skidmore College, Magna Cum Laude, Phi Beta Kappa in 2000 and he earned his J.D. in 2003 from Stanford Law School. While in law school, Mr. Frei-Pearson was a Public Interest Fellow and served as Senior Symposium Editor of the Stanford Law & Policy Review.

A sampling of Mr. Frei-Pearson's significant cases includes:

- Appointed class counsel in *Hanna v. CFL Pizza, LLC*, No. 05-2011-CA-52949m (Fl. Cir. Court). On September 3, 2013, the Court granted final approval of a settlement that created a substantial settlement fund for pizza delivery drivers who alleged violations of the Florida Minimum Wage Act.
- Appointed co-class counsel in *Saint Joseph Health System Medical Information Cases*, JCCP No. 4716 (Cal. Sup. Ct.). The Court denied Saint Joseph's demurrer and the Court of Appeals upheld that ruling. After more than two years of litigation, the Court granted Plaintiffs' motion to certify a class of 31,802 data breach victims. On January 14, 2015, the Court denied Saint Joseph's motion for summary judgment and ordered a July 6, 2015 trial date.
- Appointed co-class counsel in *Zellagui v. MCD Pizza, LLC*, No. 14-cv-1475 (E.D. Pa.). The Court certified a Pennsylvania state law class and conditionally certified a FLSA class of pizza delivery drivers who alleged minimum wage violations. The Court then entered judgment of \$4.5 million for the delivery drivers. Defendant's motion to lift the judgment is pending.
- Appointed co-class counsel in *Bellaspica v. PJPA, LLC*, No. 13-3014 (E.D. Pa.). The Court denied defendant's motion to dismiss and granted conditional certification of an FLSA class of pizza delivery drivers who alleged minimum wage violations.
- Counsel to the Plaintiffs and putative class in *Barkley v. Pizza Hut of America, Inc.*, No. 14-cv-376 (M.D. Fla.). The Court denied defendant's motion to compel arbitration. This is a very significant victory for employees who seek to vindicate their rights in court rather than in individual arbitrations.
- Appointed co-class counsel in *Miller v. Patagonia*, No. 14-0888 (Suffolk Cty.). State-wide class action alleging that Patagonia unlawfully collected consumers' personal identification information. On February 9, 2015 the Court certified a class and granted final approval to a settlement.
- Counsel to the Plaintiffs in *D.G. ex rel. Stricklin v. Henry*, No. 08-cv-074 (N.D. Okl.). In this class action to reform Oklahoma's foster care system, the Court certified a statewide class of Oklahoma's foster children (an opinion that was affirmed by the Tenth Circuit). As a result of this litigation, Oklahoma has committed to restructuring its state foster care agency to eliminate dangerous

practices (such as an unsafe shelter where babies in state custody disproportionately suffered fractured skulls), and improve measurable outcomes for children in state custody.

- As counsel in *Charlie and Nadine H. v. Christie*, No. 99-3678 (D.N.J.), worked with the state agencies, a federally appointed monitor, and the Court to help ensure implementation of a consent decree to reform New Jersey's foster care system. Among many other significant achievements under the consent decree, New Jersey broke a record for adoptions achieved, significantly reformed supervision procedures that were inadequate, and substantially increased the percentage of foster children who subsequently attended college. Mr. Frei-Pearson continues to be involved in this litigation in a *pro bono* capacity.

Mr. Frei-Pearson has received numerous awards for his legal work, including the New York City Bar Association's Thurgood Marshall Award for his work on death penalty cases, a citation from the New York City Council for his child advocacy work, and the 2010 Palomountain Award from Skidmore College.

Mr. Frei-Pearson is admitted to practice in New York and is a member of the bars of the U.S. District Courts for the Eastern, Western and Southern Districts of New York.

Difie Osborne

Difie Osborne is an associate at FBFG, where she specializes in class actions in state and federal courts. Prior to joining the firm in 2015, Ms. Osborne worked as a fellow at the Federal Communications Commission in Washington, D.C. where she focused on telecommunications law and policy.

Ms. Osborne received her B.A. from the University of Virginia and her J.D. from the Marshall-Wythe School of Law at the College of William & Mary. During law school, Ms. Osborne served as a member of the W&M Business Law Review and as a Regional Board Member for the Mid-Atlantic Black Law Students Association. She also served as a student attorney for William & Mary's Elder Law and Domestic Violence clinics.

Ms. Osborne is admitted to practice in New York and New Jersey. She is a member of the New York State Bar Association and the National Bar Association.

Antonino B. Roman

Mr. Roman is an associate at FBFG, where he specializes in class actions in state and federal courts. His past experience includes representing plaintiffs and corporate defendants in complex litigation matters. He has participated in all phases of discovery and appeared in federal and state courts, and drafted federal and state briefs and pleadings, including winning summary judgment motions and federal appellate and trial briefs.

As an attorney at boutique litigation firms in New York City, he assisted in the prosecution of *In re: Initial Public Offering Securities Litigation*, a class action against issuers and underwriters of

securities, and *In re: Wilmington Trust Securities Litigation*, a class action involving loan loss accounting issues. He was also an associate at Wilson Elser Moskowitz Edelman & Dicker LLP, where his team served as lead defense counsel in *In re: Fashion Model Antitrust Litigation*, a horizontal price-fixing class action, and at Kaye Scholer LLP, where he oversaw the implementation of multi-district pretrial discovery in *In re: Rezulin Products Liability Litigation*. He also practiced law at Angara Abello Concepcion Regala & Cruz Law Offices, a top-tier litigation firm in the Philippines based on *Asia-Pacific Legal 500*'s annual rankings.

Mr. Roman is admitted to practice in New York, the Philippines, and the U.S. District Courts for the Northern, Southern and Eastern Districts of New York. He is a graduate of Columbia University School of Law, where he obtained his LL.M. and served as an editor for the Columbia Journal of Transnational Law and Columbia Journal of Asian Law. He obtained his J.D. and B.A. in Economics from Ateneo de Manila University, a Jesuit-run institution in the Philippines. His numerous articles and commentaries on U.S. and Philippine legal issues have been published in the Columbia Journal of Asian Law, the Integrated Bar of the Philippines Law Journal, the Philippine Bar Association Newsletter, and the New York Law Journal.