UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

WALTER BLACK III, KEITH BARR, WAYNE BEST, and DAVID FANT SR., individually and on behalf of all others similarly situated, *Plaintiffs,* v. USAA GENERAL INDEMNITY COMPANY, GARRISON PROPERTY AND CASUALTY INSURANCE COMPANY, UNITED SERVICES AUTOMOBILE ASSOCIATION, USAA CASUALTY INSURANCE COMPANY, *Defendants.*	Case No. 8:21-CV-01581-LKG

DECLARATION OF JONATHAN SHUB IN SUPPORT OF PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES AND COSTS AND SERVICE AWARDS

I, Jonathan Shub, declare under penalty of perjury of the laws of the United States as follows:

1. I am a partner at the law firm Shub Johns & Holbrook LLP. I am co-counsel of record for Plaintiffs in the above-captioned case. I submit this declaration in support of Plaintiffs' Motion for an Award of Attorneys' Fees, Expenses, and Service Awards.

2. On December 16, 2025, this Court preliminary appointed my co-counsel Kagan Stern Marinello & Beard LLC, Tycko & Zavareei LLP, and Timoney Knox, LLP, as Class Counsel for the Settlement Class. While I was not included as Settlement Class Counsel, I still contributed crucial time to this case that materially contributed to the settlement on behalf of the Settlement Class.

3. I make this declaration based on my personal knowledge and the records of my law firm. If called upon to do so under oath, I could and would testify competently to the matters set forth herein.

4. I was first admitted to practice law in the Commonwealth of Pennsylvania in 1988. I am also licensed to practice in New Jersey, New York, California and the District of Columbia,

5. I am a graduate of Delaware Law School of Widener University (now known as Widener University School of Law) (J.D., 1988) and of American University (B.A., 1983). Following graduation from law school, I entered into private practice.

6. I have been in private practice since 1988, and a large portion of my practice has involved litigation on behalf of consumers, representing individuals and classes injured by deceptive practices and advertising, privacy violations, and defective products, especially those cases involving defective consumer electronics and computer hardware.

7. Over the past 35 years, I have gained substantial experience handling complex civil litigation and class action litigation.

8. Attached as **Exhibit A** is a true and correct copy of Shub Johns & Holbrook LLP's firm resume.

9. I have been named class counsel or settlement class counsel in class actions including:

- *Pugh et al. v. CHHS Hospital Company, LLC et al.*, No. 01768 (Phila. Ct. Common Pl.), (attorney's fees, including to Shub Johns & Holbrook LLP, awarded in the amount of $650,000.00);
- *Hasbrook v. EP Global Production Solutions, LLC, et al.*, Case No. 23STCV19711 (Cal. Super. Ct.), (attorney's fees, including to Shub Johns & Holbrook LLP, awarded in the amount of $3,166,666.67);
- *Lesher v. Erie Insurance Exchange,* No. 2015-05471 (Bucks Cty. Common Pl.), (attorney's fees, including to Shub Johns & Holbrook LLP, awarded in the amount of $3,035,403.72);

- *Stockdale v. Allstate Fire and Casualty Insurance Company,* No. 2:19-cv-845 (E.D. Pa. Aug. 16, 2022), (attorney's fees, including to Shub Johns & Holbrook LLP, awarded in the amount of $750,000.00)

10. Shub Johns & Holbrook LLP has maintained contemporaneous time records in this case. Since 2021, I have spent 51.5 hours litigating this case. In my opinion, the time I spent was reasonable and necessary. Indeed, by prosecuting this case purely on a contingency basis and not being paid by the hour, the Shub Johns & Holbrook attorneys and staff worked efficiently and avoided unnecessary work.

11. The total number of hours is based only on the hours reasonably expended to achieve an excellent result for the Classes. Our firm coordinated our efforts in the litigation of this case with our co-counsel to ensure that there was no duplicative or unnecessary work. Because our firm is experienced in litigating actions of this type, we were able to efficiently divide tasks based on expertise.

12. Shub Johns & Holbrook LLP assisted in the investigation of the publicly available information concerning the Maryland Insurance Administration's (MIA) market conduct investigation into the Late Fees charged by Defendants, and investigated the facts underlying the claims and liability in this action. We reviewed and analyzed other MIA Consent Orders and researched applicable causes of action along with the application of the Code of Maryland Regulations to the language of the Consent Order. The substantial case vetting including the research and document review described herein, was followed by the drafting of the Complaint.

13. Over nearly four years of litigation, we defended three rounds of motion to dismiss briefing. During the pendency of Defendants' Initial motion to dismiss, Judge Messitte *sua sponte* Issued a Letter Order staying this Action pending confirmation that the MIA's administrative jurisdiction had been exhausted. ECF No. 47. Class Counsel researched the MIA's applicable procedures and drafted an administrative complaint on behalf of Plaintiff Black and others

similarly situated. Following an exchange of letters with the MIA, it was confirmed that the MIA had exhausted its jurisdiction, so the Parties jointly moved to lift the stay and Defendants filed a renewed motion to dismiss that still included complicated arguments regarding concurrent jurisdiction and contractual privity, amongst others. I attended the hearing along with other counsel of record.

14. After concluding substantial discovery, the Parties prepared substantive mediation statements including expert calculations. My Firm participated in a full day mediation before the Honorable Benson E. Legg (Ret). While the Parties did not reach an agreement to settle on the date of mediation, they continued working with Judge Legg by providing further written submissions and meeting with him regarding their positions.

15. I reviewed and assisted in preparing this Motion for Attorney's Fees and Service Awards and Motion for Final Approval of the Proposed Settlement.

16. The hourly rates used to calculate the fees sought for Shub Johns & Holbrook LLP are those set forth in the Fitzpatrick Matrix. I understand that this District's Local Rules recognize these rates as a guideline for reasonable hourly rates. These rates are lower than our regularly used rates. Courts throughout the country have used our regular rates when awarding fees in class action cases, including to Shub Johns & Holbrook LLP in particular. *See*, *e.g.*, *Heath, et al. v. Keenan & Associates*, 24STCV03018 (Cal. Super. Ct.) (attorney's fees awarded in the amount of $4,666,200.00); *Bianucci v. Rite Aid Corp.*, No. 2:24-cv-03356-HB (E.D. Pa.) (attorney's fees awarded in the amount of $2,380,000.00); *Salinas et al. v. Southwest Louisiana Hospital Association, d/b/a Lake Charles Memorial Health System*, No. 20213-0090 D (La. J. D. Ct.) (attorney's fees awarded in the amount of $666,666.66); and *Gravley, Sr. v. Fresenius Vascular Care, Inc.*, No. 2:24-cv-1148 (E.D. Pa) (attorney's fees awarded in the amount of $787,500.00).

17. The reasonableness of the hourly rates sought by my firm, the Class Counsel law firms, and the other Plaintiffs' firms are supported by the rates charged by other firms with similar experience and expertise in the area of complex and class action litigation.

18. The hours and rates of the timekeepers at Shub Johns & Holbrook LLP who worked on this action are outlined in the following chart:

Timekeeper	**Professional status/ Law School Grad Yr.**	**Hours**	**Ordinary Lodestar**	**Fitzpatrick Matrix Lodestar**[1]
Jonathan Shub	Sr. Partner/1988	51.50	$59,225.00	$48,049.50
Shub Johns & Holbrook Total		51.50	$59,225.00	$48,049.50

19. Likewise, hours for all Shub Johns & Holbrook timekeepers by litigation phase are set forth in the following chart:

Category	**Jonathan Shub**
Case development, background investigation and case administration	24.50
Pleadings	15.0
Interrogatories, document production, and written discovery	
Depositions	
Motion practice	
Attending court hearings	
Trial preparation and post-trial motions	
Attending trial	
ADR	12
Fee petition preparation	
Total	51.50

20. In my opinion, the time expended and expenses incurred in prosecuting this action were reasonable and necessary for the diligent litigation and fair resolution of this matter.

[1] As the Court will note, the use of the Fitzpatrick Matrix results in a lower attorney fee figure.

The foregoing is true and correct to the best of my knowledge and belief. Executed on March 16, 2026 in Aurora, Colorado.

Respectfully submitted,

/s/ Jonathan Shub
Jonathan Shub

EXHIBIT A

SHUB JOHNS & Holbrook LLP

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Jonathan Shub is a co-founder of Shub Johns & Holbrook LLP. Mr. Shub graduated from American University (Washington, D.C.), B.A., in 1983 and Delaware Law School of Widener University (now Widener University Delaware School of Law), cum laude, in 1988. While enrolled in Delaware Law School of Widener University, he served as the Law Review Articles Editor. Jon was a Wolcott Fellow Law Clerk to the Hon. Joseph T. Walsh, Delaware Supreme Court in 1988. He is a member of the American Association of Justice (past chairman of class action litigation section), the American Bar Association and the Consumer Attorneys of California. Jon was named a Pennsylvania SuperLawyer from 2005-2009 and 2012-2024. Jon is also an active member of his local synagogue and an avid political fundraiser.

Jonathan Shub is the founder of Shub Johns & Holbrook LLP. He is recognized as one of the nation's leading class action consumer rights lawyers, based on his 30+ years representing classes of individuals and businesses in a vast array of matters involving unlawful conduct. He has gained notable attention in the area of defective consumer electronics and computer hardware as a result of many leadership positions in federal and state cases against companies such as Hewlett-Packard, Maytag, IBM and Palm. In fact, Maximum PC Magazine, a leading industry publication, said years back that "Shub is becoming renowned for orchestrating suits that have simultaneously benefited consumers and exposed buggy hardware." He also has vast experience in mass tort class actions such as Vioxx, light tobacco litigation, and in consumer class actions such as energy deregulation.

Jon was an editor of his school's law review and launched his career in the Washington office of Fried, Frank, Harris, Shriver & Jacobson, where he worked on complex commercial matters including corporate investigations and securities litigation. He then moved into a practice of consumer protection and advocacy, and was a partner in two prominent class actions firms (Seeger Weiss and Kohn, Swift & Graf) before launching his firm in 2020. He is a frequent lecturer on cutting edge class action issues, and is a past chairman of the Class Action Litigation Group of the American Association for Justice. Jon regularly appears in state and federal courts nationwide, and in many high profile consumer protection cases. Jon's leadership roles require him to develop the theories of liability for the entire class as well as the overall trial strategy for the cases. Jon was co-lead and co-trial counsel in a case in a federal court case against municipality for violation of a state privacy law. The trial resulted in a jury award of approximately $68,000,000 to the Class. Most recently, he is co-lead counsel of a certified class against a hospital in Philadelphia for violating Philadelphia's Ban the Box law.

Jon's experience in class action litigation includes the following leadership positions:

- *Pugh et al. v. CHHS Hospital Company, LLC et al.*, No. 01768 (Phila. Ct. Common Pl.) (court certifies class of impacted individuals and grants preliminary approval of settlement in this class action alleging violation of the "Ban the Box Law." The Court's order appoints Jonathan Shub as co-lead Settlement Class Counsel);

- *Hasbrook v. EP Global Production Solutions, LLC, et al*., Case No. 23STCV19711 (Cal. Super. Ct.) (Shub Johns & Holbrook LLP appointed as Co-lead Settlement

Class Counsel in a consumer class action data breach litigation in California);

- *Mercado v. Verde Energy USA, Inc.*, No. 18-cv-2068 (N.D. Ill. Aug. 18, 2021) (ECF No. 136) (court approved a settlement involving all individual residential consumers who enrolled in Verde Energy's variable rate electricity plan in connection with properties located in New York, Massachusetts, Illinois, New Jersey, Ohio or Pennsylvania arising out of allegations of deceptive advertising of residential energy practices);

- *Taha v. Bucks County.,* N0. 12-6867 (E.D. Pa. Apr. 29, 2019) (appointed as co-lead counsel in a national class action alleging the illegal publication of arrest records for thousands of individuals);

- *In re: AZEK Building Products Inc. Marketing and Sales Practices Litigation*, MDL No. 2506, Civil Action No. 2:12-cv-06627-MCA-MAH, (D.N.J.) (ECF 219) (appointed as co-lead class counsel in settled national litigation against CPG International for deceptive advertising in connections with deceptive advertising of AZEK-branded decking products);

- *Tennille v. Western Union Company,* No. 09-cv-00938 (D. Colo.) (ECF No. 175) (appointed as part of the executive committee counsel in settled national litigation against Western Union for deceptive practices in connection with money transfers);

- *In re Facebook PPC Advertising Litig.*, No. 09-cv-3043 (N.D. Cal.) (ECF No. 56) (appointed as co-lead class counsel and as a member of the Plaintiffs' Executive Committee in litigation against Facebook for deceptive advertising practices);

- *In re: Palm Treo 600 and 650 Litig.,* No. 05-cv-3774 (N.D. Cal.) (ECF No. 18) (appointed as co-lead counsel in a national class action involving defective smart phones); and

- *Austin v. Kiwi Energy NY, LLC,* Index No. 515350/2017 (N.Y. Super. Kings Cty.) (ECF No. 66) (preliminarily approving class action settlement against KIWI Energy LLC for deceptive advertising of residential energy prices and appointing Mr. Shub as Class Counsel).

Publications and Presentations:

- Moderator, Class Actions, Annual Meeting of American Association of Justice, 2015, 2016
- Speaker, Class Actions, Annual Meeting of American Association of Justice, 2015, 2016
- Speaker, "Finding the Right Class Action", New Jersey Association of Justice, June, 2016
- Speaker, "Nuts and Bolts of MDL Practice", Class Action Symposium, Chicago, Illinois, June, 2016
- Speaker, Computer Technology and Consumer Products Class Actions", Consumer Attorneys of California 46th Annual Convention, November 2007
- Frequent speaker, American Association for Justice (formerly ATLA)
- Author, Distinguishing Individual from Derivative Claims in the Context of Battles for Corporate Control", 13 Del. J. Corp. L 579 (1998)

- Author, "Shareholder Rights Plans? Do They Render Shareholders Defenseless Against Their Own Management", 12 Del J. Corp, L. 991 (1997)
- Co-author, "Once Again, the Court Fails to Rein in RICO", Legal Times (April 27, 1992)
- Co-author, "Failed One-Share, One Vote Rule Let SEC Intrude in Boardroom", National LawJournal (October 8, 1990).

Benjamin F. Johns, a co-founding partner at Shub Johns & Holbrook LLP, is a consumer protection advocate with two decades of litigation experience. He is admitted to practice in all of the state and federal courts in Pennsylvania and New Jersey, and has personally argued in the Third Circuit, D.C. Circuit, PA Supreme Court, and PA Commonwealth Court. Over the course of his career, Mr. Johns has taken and defended hundreds of depositions, argued and won dispositive motions (including contested motions for class certification), and been appointed to leadership positions by various courts across the country. He was recently described by the legal publication Law360 as being a "data breach specialist." He was the lead litigator at his prior firm in a case against Apple which resulted in a $50 million settlement and was the No. 1 ranked Consumer Fraud settlement in California for 2022 by TopVerdict.com.

Mr. Johns is currently serving as court-appointed co-lead counsel in several consumer data breach class actions, including *Hall v. Healthcare Services Group,* No. 2:25-cv-04908-JDW (E.D. Pa.); *Heath, et al. v. Keenan & Associates*, 24STCV03018 (Cal. Super. Ct.) ($14 million settlement pending final approval); *In re Geisinger Health Data Security Incident Litig.,* No. 4:24-cv-01071-MWB (M.D. Pa.) ($5 million settlement pending final approval); *Drugich v. McLaren Health Care Corp*, No. 23-CV-12520 (E.D. Mich.) ($14 million settlement pending final approval); *Figueroa v. CDHA Management, LLC,* et al., No. 5:25-cv-02453-WB (E.D. Pa.); *Keene v. Tekni-Plex, Inc.,* No. 2:25-cv-05584 (E.D. Pa.); *Jay Kay Collision Center, Inc. v. CDK Global, LLC*, No. 1:24-cv-05313 (N.D. Ill.); *Dimoff v. Allegheny Health Network*, 2:25-cv-00125-NR (W.D. Pa.); *Rullo v. Pittsburgh Gastroenterology Associates*, No. GD-25-009036 (Pa. Com. Pl. Allegheny Cty.); *Leuch et al., v. Greater Pittsburgh Orthopaedic Associates, Inc*., No. GD-25-009211 (Pa. Com. Pl. Allegheny Cty.) and *Salinas et al. v. Southwest Louisiana Hospital Association, d/b/a Lake Charles Memorial Health System,* No. 20213-0090 D (La. J. D. Ct.) ($2 million settlement pending final approval). He is also interim co-lead counsel in *Zeiders v. Volkswagen Group of Am., Inc.*, No. 2:24-cv-11197-BRM-JSA (D.N.J.) and *Duffy v. Mazda Motor of Am.,* No. 3:24-CV-388-BJB (W.D. Ky.), two automobile defect class actions.

Over the course of his career, Mr. Johns has provided substantial assistance in the prosecution and resolution of the following cases:

- *Heath, et al. v. Keenan & Associates*, 24STCV03018 (Cal. Super. Ct.) (Mr. Johns served as co-lead counsel in this data breach class action that asserted claims under the California Consumer Privacy Act, and which settled for a $14 million common fund);

- *Hasbrook v. EP Global Production Solutions, LLC, et al*., Case No. 23STCV19711 (Cal. Super. Ct.) (Shub Johns & Holbrook LLP served as co-lead counsel in this class action that asserted claims under the California Consumer Privacy Act, and which settled for $9.5 million);

- *Bianucci v. Rite Aid Corp.*, No. 2:24-cv-03356-HB (E.D. Pa.) (Mr. Johns served as co-lead counsel in this data breach class action that settled for $6.8 million. The district court's order granting final approval to the settlement remarked that lead counsel's work on the case was "admirable," and that "counsel could not have secured a better outcome for the class.")

- *In re CorrectCare Data Breach Litig.,* No. 5:22-319-DCR (E.D. Ky.) (Mr. Johns served as co-lead counsel in this case regarding a data breach at an entity that manages medical claims at certain correctional facilities, which ultimately resulted in a $6.49 million settlement)

- *Nelson v. Connexin Software Inc. d/b/a Office Practicum,* No. 2:22-cv-04676-JDW (E.D. Pa.) (Mr. Johns served as co-lead counsel in this data breach class action brought by pediatric patients against an electronic medical records vendor, which resulted in a $4 million settlement)

- *Gravley, Sr. v. Fresenius Vascular Care, Inc.,* No. 2:24-cv-1148 (E.D. Pa) (Mr. Johns served as co-lead counsel; in granting final approval to a $3.15 million settlement, the court said "[c]lass counsel has extensive experience litigating these data breach class actions, particularly within this district…")

- *In re Wright & Filippis, LLC Data Security Breach Litigation,* No. 2:22-cv-12908 (E.D. Mich.) (Mr. Johns served as co-lead counsel in this case involving a cyber security incident at a prosthetics and orthotics provider, which resulted in a $2.9 million settlement)

- *In re NCB Management Services, Inc. Data Breach Litig.*, No. 2:23-cv-1236-KNS (E.D. Pa.) (Mr. Johns served as co-lead counsel in this case involving a cyber security incident at a debt collection agency, which resulted in a $2.625 million settlement)

- *Guarnaschelli et al. v. East River Medical Imaging, P.C.,* Index No. 656099/2023 (N.Y. Sup. Ct.) (Mr. Johns was designated co-lead counsel in this data breach case impacting consumer personal identifiable and private health information, resulting in a settlement valued at $1.85 million)

- *In re R&B Corporation of Virginia d/b/a Credit Control Corporation, Data Security Breach Litig.,* No. 4:23-CV-66 (E.D. Va.) (Mr. Johns served as co-lead counsel in this data breach class action against a debt collection agency which resulted in a $1.6 million settlement)

- *In re Hope Coll. Data Sec. Breach Litig.,* No. 1:22-CV-01224-PLM (W.D. Mich.) (Mr. Johns was designated lead counsel in this data breach case against a private college in Michigan which resulted in a $1.5 million settlement)
- *Johnson v. One Brooklyn Health System, Inc.*, Index No. 512485/2023 (N.Y. Sup. Ct.) (Mr. Johns served as co-lead class counsel in this data breach that impacted current and former patients of some hospitals and clinics located in New York's borough of Brooklyn. The case resulted in a $1.5 million common settlement fund)
- *In re Lansing Community College Data Breach Litigation*, No. 1:23-cv-0738 (W.D. Mich.) (Mr. Johns served as co-lead class counsel in this data breach that impacted current and former students and applicants of the Michigan-based college. The case resulted in a $1.45 million settlement)
- *In re Onix Group, LLC Data Breach Litig.,* No. 23-2288-KSM (E.D. Pa.) (Mr. Johns was designated co-lead counsel in this data breach case impacting consumer personal identifiable and private health information, resulting in a settlement valued at $1.25 million)
- *In re Macbook Keyboard Litig.*, No. 5:18-cv-02813-EJD (N.D. Cal.) (Mr. Johns took and defended numerous depositions and successfully argued two motions to dismiss and co-argued plaintiffs' motion for class certification in this widely-covered case against Apple which ultimately settled for a $50 million common fund. In granting final approval to the settlement, the district court wrote that plaintiffs' counsel "achieved excellent results for the class.")
- *Kostka v. Dickey's Barbecue Restaurants Inc.,* No. 3:20-CV-03424-K (N.D. Tex.) (Mr. Johns served as co-lead counsel in this consumer data breach case which resulted in a $2.35 million common fund settlement)
- *Udeen v. Subaru of Am., Inc.,* No. 18-17334 (RBK/JS) (D.N.J.) (Mr. Johns was co-lead counsel in this consumer class action involving allegedly defective infotainment systems in certain Subaru automobiles, which resulted a settlement valued at $6.25 million. At the hearing granting final approval of the settlement, the district court commented that the plaintiffs' team "are very skilled and very efficient lawyers…They've done a nice job.")
- *Breneman v. Keystone Health*, Case No. 2023-618 (Pa. Ct. Com. Pl.) (Mr. Johns was co-lead counsel in this medical data breach class action which resulted in a $900,000 common fund settlement)
- *In re Nexus 6P Product Liability Litig.*, No. 5:17-cv-02185-BLF (N.D. Cal.) (Mr. Johns served as co-lead counsel – and argued two of the motions to dismiss – in this defective smartphone class action. The case resulted in a settlement valued at $9.75 million, which Judge Beth Labson Freeman described as "substantial" and an "excellent resolution of the case.")

- *In re MyFord Touch Consumer Litig*., No. 13-cv-03072-EMC (N.D. Cal.) (Mr. Johns served as court-appointed co-lead counsel in this consumer class action concerning allegedly defective MyFord Touch infotainment systems, which settled for $17 million shortly before trial.)
- *Weeks v. Google LLC*, 5:18-cv-00801-NC, 2019 U.S. Dist. LEXIS 215943, at *8-9 (N.D. Cal. Dec. 13, 2019) (Mr. Johns was co-lead counsel – and successfully argued against a motion to dismiss – in this defective smartphone class action. A $7.25 million settlement was reached, which Magistrate Judge Nathanael M. Cousins described as being an "excellent result.")
- *Gordon v. Chipotle Mexican Grill, Inc.*, No. 17-cv-01415-CMA-SKC (D. Colo.) (Mr. Johns served as co-lead counsel of behalf of a class of millions of cardholders who were impacted by a data breach at Chipotle restaurants. After largely defeating a motion to dismiss filed by Chipotle, the case resulted in a favorable settlement for affected consumers. At the final approval of the settlement, the district court noted that class counsel has "extensive experience in class action litigation, and are very familiar with claims, remedies, and defenses at issue in this case.")
- *Hughes v. UGI Storage Co.,* 263 A.3d 1144 (Pa. 2021) (Mr. Johns argued this precedent-setting *de facto* takings matter before the Pennsylvania Supreme Court in October of 2021, which resulted in a 6-0 reversal of the underlying Commonwealth Court decision that had affirmed the trial court's dismissal of the case)
- *Bray et al. v. GameStop Corp.,* 1:17-cv-01365-JEJ (D. Del.) (Mr. Johns served as co-lead counsel for consumers affected by a data breach at GameStop. After largely defeating a motion to dismiss, the case was resolved on favorable terms that provided significant relief to GameStop customers. At the final approval hearing, the District Judge found the settlement to be "so comprehensive that really there's nothing else that I need developed further," that "the settlement is fair," "reasonable," and "that under the circumstances it is good for the members of the class under the circumstances of the claim.")
- *In re: Elk Cross Timbers Decking Marketing, Sales Practices and Products Liability Litig.*, No. 15-cv-18-JLL-JAD (D.N.J.) (Mr. Johns served on the Plaintiffs' Steering Committee in this MDL proceeding, which involved allegedly defective wood-composite decking, and which ultimately resulted in a $20 million settlement.)
- *In re Checking Account Overdraft Litig.,* No. 1:09-MD-02036-JLK (S.D. Fla.) (Mr. Johns was actively involved in these Multidistrict Litigation proceedings, which involve allegations that dozens of banks reorder and manipulate the posting order of debit transactions. Settlements collectively in excess of $1 billion were reached with several banks. Mr. Johns was actively involved in prosecuting the actions against U.S. Bank ($55 million settlement) and Comerica Bank ($14.5 million settlement).)
- *Physicians of Winter Haven LLC, d/b/a Day Surgery Center v. STERIS Corporation,* No. 1:10-cv-00264-CAB (N.D. Ohio) (Mr. Johns was the primary associate working on this

case which resulted in a $20 million settlement on behalf of hospitals and surgery centers that purchased a sterilization device that allegedly did not receive the required pre-sale authorization from the FDA.)

- *West v. ExamSoft Worldwide, Inc.,* No. 14-cv-22950-UU (S.D. Fla.) (Mr. Johns was co-lead counsel in this case which resulted in a $2.1 million settlement on behalf of July 2014 bar exam applicants in several states who paid to use software for the written portion of the exam which allegedly failed to function properly)
- *Henderson v. Volvo Cars of North America, LLC,* No. 2:09-cv-04146-CCC-JAD (D. N.J.) (provided substantial assistance in this consumer automobile case that settled after the plaintiffs prevailed, in large part, on a motion to dismiss)
- *In re Marine Hose Antitrust Litig.,* No. 08-MDL-1888 (S.D. Fla.) (settlements totaling nearly $32 million on behalf of purchasers of marine hose.)
- *In re Philips/Magnavox Television Litig.,* No. 2:09-cv-03072-CCC-JAD (D. N.J.) (settlement in excess of $4 million on behalf of consumers whose flat screen televisions failed due to an alleged design defect. Mr. Johns argued against one of the motions to dismiss.)
- *Allison, et al. v. The GEO Group*, No. 2:08-cv-467-JD (E.D. Pa.), and *Kurian v. County of Lancaster*, No. 2:07-cv-03482-PD (E.D. Pa.) (settlements totaling $5.4 million in two civil rights class action lawsuits involving allegedly unconstitutional strip searches at prisons)

Mr. Johns was elected by fellow members of the Philadelphia Bar Association to serve a three-year term on the Executive Committee of the organization's Young Lawyers Division. He also served on the Editorial Board of the Philadelphia Bar Reporter and the Board of Directors for the Dickinson School of Law Alumni Society. Mr. Johns has been published in the Philadelphia Lawyer magazine and the Philadelphia Bar Reporter. While in college, Mr. Johns was on the varsity basketball team and spent a semester studying abroad in Osaka, Japan. He graduated from Harriton High School in 1998 as the then all-time leading scorer in the history of the boys' basketball program. Ben has been named a "Lawyer on the Fast Track" by The Legal Intelligencer, a "Top 40 Under 40" attorney by The National Trial Lawyers, and a Pennsylvania "Rising Star"/"Super Lawyer."

Education

- Penn State Dickinson School of Law, J.D., 2005 – Woolsack Honor Society
- Penn State Harrisburg, M.B.A., 2004 – Beta Gamma Sigma Honor Society
- Washington and Lee University, B.S., 2002 – *cum laude*
- Kansai Gaidai University, Osaka Prefecture, Japan (studied abroad during 2000-2001 semester)
- Executive Committee, Young Lawyers Division of the Philadelphia Bar Association
- Board Member, The Dickinson School of Law Alumni Society

- Editorial Board, Philadelphia Bar Reporter 2013-16
- Former Member, Washington and Lee Alumni Admissions Program

Admissions

- United States Court of Appeals for the Third Circuit
- United States Court of Appeals for the Fifth Circuit
- United States Court of Appeals for the Sixth Circuit
- United States Court of Appeals for the Ninth Circuit
- United States Court of Appeals for the District of Columbia Circuit
- United States District Court for the Eastern District of Pennsylvania
- United States District Court for the Middle District of Pennsylvania
- United States District Court for the Western District of Pennsylvania
- United States District Court for the District of New Jersey
- United States District Court for the District of Colorado
- United States District Court for the Northern District of Illinois
- United States District Court for the Central District of Illinois
- United States District Court for the Eastern District of Michigan
- United States District Court for the Western District of Michigan
- United States District Court for the Eastern District of Wisconsin
- United States Court of Federal Claims
- Supreme Court of Pennsylvania
- Supreme Court of New Jersey

Memberships and Associations

- Named a "Lawyer on the Fast Track" by *The Legal Intelligencer*
- Named to the Pennsylvania "Rising Stars" List from Super Lawyers: 2010-Present
- Recognized as a "Top 40 Under 40" lawyer by The National Trial Lawyers
- Member of the Delaware County Bar Association

Samantha E. Holbrook, a co-founding partner of Shub Johns & Holbrook LLP, has extensive experience in consumer protection class action litigation. Prior to joining the firm, Ms. Holbrook practiced at two different national class action law firms where she represented consumers and investors in nationwide class actions. Ms. Holbrook has experience handling and litigating all aspects of the prosecution of national class action litigation asserting claims under state and federal law challenging predatory lending practices, product defects, breach of fiduciary duty, antitrust claims, consumer fraud and unfair and deceptive acts and practices in federal courts throughout the country.

Ms. Holbrook has also obtained favorable recoveries on behalf of multiple nationwide classes of borrowers whose insurance was force-placed by their mortgage services.

Ms. Holbrook received her law degree from Temple University Beasley School of Law. While in law school, she served as the President of the Moot Court Honor Society and President of the Student Animal Legal Defense Fund. She was also a member of Temple's nationally recognized Trial Team. Upon graduating, she served as an adjunct professor for Temple coaching its Trial Team from 2013-2018. Ms. Holbrook received her undergraduate degrees from the Pennsylvania State University in Political Science and Spanish. While in college, Ms. Holbrook spent a semester studying abroad in Sevilla, Spain. She is proficient in Spanish. Ms. Holbrook also currently serves as the Board President for Citizens for a No-Kill Philadelphia, a Philadelphia-based animal welfare advocacy organization, and serves on the Board of Directors of City of Elderly Love, a senior-focused animal rescue organization.

Ms. Holbrook has been recognized by Pennsylvania Super Lawyers as a Rising Star for each year from 2020-2024. She has also been recognized as a Top Young Rising Attorney in Pennsylvania in 2020, and a Pennsylvania & Delaware Top Attorneys Rising Stars in 2021. She is admitted to practice in all federal and state courts in Pennsylvania and New Jersey.

Over the course of her career, Ms. Holbrook has provided substantial assistance in the prosecution of the following cases:

- *Woytach et al., v. Drug And Alcohol Treatment Services, Inc*., No. 2025-CV-03681 (Lack. Cty. Ct. Com. Pl) (appointed as Interim Co-Lead Counsel in the consolidated data breach class action pending in the Pennsylvania Court of Common Pleas).
- *In re HealthEquity,Inc. Data Security Incident Litigation*, No. 2:2024-cv-00528 (D. Utah.) (appointed to serve on Plaintiff's Executive Committee in a consumer class action medical data breach litigation pending in Utah);
- *Reichbart v. Financial Business and Consumer Solutions, Inc*., No. 24-cv-1876 (E.D. Pa.) (ECF No. 23) (appointing Ms. Holbrook as Liaison Counsel in data breach class action);

- *In re F21 OPCO LLC Data Breach Litigation*, No. 2:2023-cv-07390 (C.D. Ca.) (appointed as Plaintiffs' Co-lead Counsel in a consumer class action data breach litigation pending in California);
- *Lockhart et al., v. El Centro Del Barrio d/b/a CentroMed*, No. 5:23-cv-01156 (W.D. Tx.) (appointed as Plaintiff's Interim Co-Lead Counsel in a consumer class action medical data breach litigation pending in Texas);
- *Krenk v. Murfreesboro Medical Clinic, P.A. D/B/A Murfreesboro Medical Clinic & Surgicenter*, Case No. 75CC1-2023-CV-81005 (Rutherford Cir. Ct.) (appointed to the Plaintiffs' Steering Committee in a consumer class action medical data breach litigation pending in Tennessee);
- *Doe v. Highmark, Inc*., No. 2:23-cv-00250 (W.D. Pa.) (provisionally appointed as a member of the Plaintiffs' Executive Committee in this medical data breach litigation pending in Pennsylvania);
- *Suarez v. Nissan North America*, No. 3:21-cv-00393 (M.D. Tenn.) (appointed lead class counsel in a consumer class action alleging defective headlamps in Nissan Altima vehicles which reached a settlement valued at over $50 million that provides reimbursements, free repairs, and an extended warranty);
- *Kostka v. Dickey's Barbecue Restaurants, Inc.*, No. 3:20-cv-03424-K (N.D. Tex.) (appointed as additional interim class counsel on behalf of consumers whose sensitive payment card information was exposed in a data breach at Dickey's restaurant chains);
- *In re Wawa, Inc. Data Security Litig.*, No. 2:19-cv-06019-GEKP (E.D. Pa.) (achieved $12 million settlement on behalf of consumers whose sensitive payment card information was exposed to criminals as part of a highly-publicized data breach);
- *Lacher et al v. Aramark Corp., 2:19-cv-00687* (E.D. Pa. 2019) (represented a class of Aramark's current and former managers alleging that Aramark breached its employment contracts by failing to pay bonuses and restricted stock unit compensation to managers nationwide);
- *Turner v. Sony Interactive Entertainment LLC*, No. 4:21-cv-02454-DMR (N.D. Cal.) (class action lawsuit alleging that Sony's PlayStation 5 DualSense Controller suffers from a "drift defect" that results in character or gameplay moving on the screen without user command or manual operation of the controller thereby compromising its core functionality);
- *Board of Trustees of the AFTRA Retirement Fund, et al. v. JPMorgan Chase Bank, N.A.,* 09-CV-686 (SAS), 2012 WL 2064907 (S.D.N.Y. June 7, 2012) (approving $150 million settlement); and
- *In re 2008 Fannie Mae ERISA Litigation*, Case No. 09-cv-1350 (S.D.N.Y.) ($9 million settlement on behalf of participants in the Federal National Mortgage Association Employee Stock Ownership Plan).

Deirdre Mulligan joined Shub Johns & Holbrook as an associate attorney in December 2025. Prior to joining the firm, she represented plaintiffs in class action pharmaceutical antitrust litigation such as *In re QVAR Antitrust Litigation* (D. Mass.), *In re Actos Antitrust Litigation* (S.D.N.Y.), *In re Glumetza Antitrust Litigation* (N.D. Cal.), *In re HIV Antitrust Litigation* (N.D. Cal.), and *In re Suboxone Antitrust Litigation* (E.D. Pa.). She also specialized in international human rights cases, representing the Government of Mexico in gun-trafficking case *Estados Unidos Mexicanos v. Diamondback Shooting Sports et al.* (D. Ariz.), "Hotel Rwanda" hero and kidnapping victim Paul Rusesabagina in *Rusesabagina v. Gainjet* (W.D. Tex.), and the families of cross-border shooting victims of U.S. Border Patrol in *Family Members of Sergio Adrián Hernández Güereca, et. al., v. United States of America* (IACHR).

Ms. Mulligan is a graduate of Drexel University Thomas R. Kline School of Law where she received CALI Awards in Antitrust Law and Legal Methods, interned with an Am Law 100 pro bono department assisting asylum seekers, and volunteered with an immigration non-profit. She earned her B.A. at Cornell University College of Arts and Sciences, where she double majored in History and Feminist, Gender & Sexuality Studies and served as Sergeant at Arms for Alpha Phi Omega National Service Fraternity.

Admissions:

- United States District Court for the Eastern District of Pennsylvania
- Supreme Court of Pennsylvania

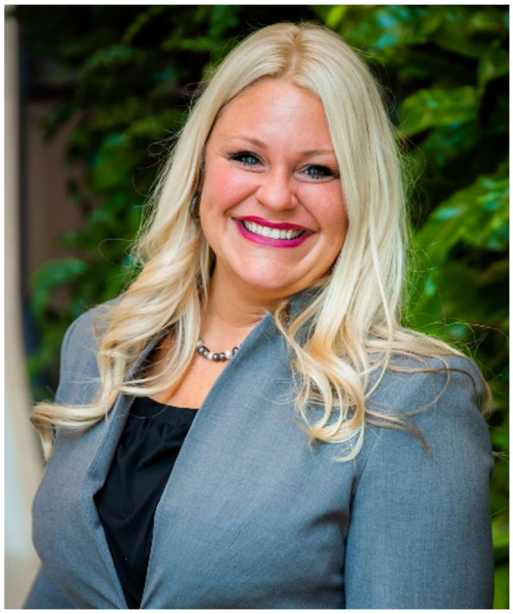
Education:

- Drexel University Thomas R. Kline School of Law, J.D., 2021
- Cornell University, B.A. in History and Feminist, Gender & Sexuality Studies, 2011

Damian Gomez joined Shub Johns & Holbrook LLP in March 2022 and is currently positioned as a **Legal Assistant** and **Consumer Communications Specialist**. Damian graduated from the University of Texas at Austin in 2021 with a B.A. in History with a focus on Classical Studies, as well as a Certificate in Creative Writing.

Damian's current responsibilities include conducting widespread investigations and initial research into potential class action and consumer protection cases, interviewing and vetting potential clients and class representatives –along with being the primary connection between clients and the firm– and assisting in legal projects as necessary. Aside from legal assistance, Damian manages Shub Johns & Holbrook's Marketing and Outreach ventures, writes for and oversees the Shub Johns & Holbrook's website content, and runs Shub Johns & Holbrook's social media accounts.

Christine Powers is a **Senior Paralegal** with Shub Johns & Holbrook LLP. She has over 25 years of legal experience supporting attorneys in all aspects of the litigation process in jurisdictions nationwide. Before joining Shub Johns & Holbrook in September 2024, Christine worked on complex litigation matters, including areas of corporate governance and mergers and acquisitions, for over 15 years at a large plaintiffs' class action law firm. Christine graduated with a bachelor's degree in communications from LaSalle University.



Dawn Tormey is the **Office Manager & Bookkeeper** at Shub Johns & Holbrook LLP. Dawn joined the SJ&H team in February 2023. Dawn has over 20 years of experience working in service-based law firms with a focus on consumer protection.

Her extensive background supports her role in overseeing the general day-to-day operation of the firm, which includes administrative tasks, benefits administration, bookkeeping, payroll, and banking.

Mary Murphy is currently positioned as a **Law Clerk** with Shub Johns & Holbrook LLP. She is a J.D. Candidate at Penn State Dickinson Law School where she serves as the Executive Book Review Editor at the Dickinson Law Review. Mary also tutored Criminal Law and received CALI awards in both Criminal Law and Torts.

Mary joined the Shub Johns & Holbrook team in late May 2025 following the completion of her second year at Dickinson Law School. Mary has always had a particular interest in civil rights law and was interested in gaining experience in the plaintiff's side of civil litigation.

Prior to law school, Mary received her B.A. in Media and Communication, and Minors in Sociology and Global International Studies, from Penn State Behrend.