

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 ANDREA R. GOLD IN SUPPORT OF PLAINTIFFS' UNOPPOSED
MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND
MOTION FOR AWARD OF ATTORNEYS' FEES AND COSTS AND SERVICE
AWARDS**

I, Andrea R. Gold, declare under penalty of perjury of the laws of the United States as follows:

1. I am a Partner at the law firm of Tycko & Zavareei LLP, counsel of record for Plaintiffs, and proposed Class Counsel in the above-captioned case. I submit this declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement and Motion for an Award of Attorneys' Fees, Expenses, and Service Awards.

2. On December 16, 2025, this Court preliminary appointed Tycko & Zavareei LLP, along with my co-counsel Timoney Knox, LLP and Kagan Stern Marinello & Beard LLC as Class Counsel for the Settlement Class. In so doing, the Court concluded that Class Counsel has "significant experience handling complex civil litigation and/or federal class action matters. These

attorneys have also ably represented the Plaintiffs in this case for more than four years.” ECF No. 113 at 14 (citation omitted).

3. After several rounds of arms-length negotiations and settlement discussions, including informal negotiations and a full-day mediation session with mediator the Honorable Benson Legg (Ret.), Plaintiffs and Defendants entered into a Settlement Agreement in this matter. The Parties entered into the Settlement Agreement and Releases, a true and correct copy of which is attached as Exhibit 1 to the Memorandum of Law in Support of Unopposed Motion for Final Approval of Class Action Settlement.

4. 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.

5. I was first admitted to practice law in 2004 in Illinois (Bar No. 6282969). I was also admitted in Washington, D.C. in 2007 (Bar No. 502607) and Maryland in 2013 (Registration No. 201306100006). I am admitted to practice in a number of federal courts, including the District Court for the District of Maryland.

6. I am a graduate of University of Michigan Law School (J.D., 2004) and University of Michigan Business School (B.B.A., 2001).

7. I have been in private practice since 2006, and a large portion of my practice has involved litigation on behalf of consumers, representing individuals and classes injured by predatory banking practices, unlawful insurance practices, violations of the Telephone Consumer Protection Act, and other unfair and deceptive business practices.

8. Over the past nearly 20 years, I have gained substantial experience handling complex civil litigation and class action litigation. With co-counsel, I have taken two cases to trial, including jury trials that have lasted several months.

9. Attached as **Exhibit A** is a true and correct copy of Class Counsel Tycko & Zavareei LLP's firm resume. This firm resume is updated from the version attached to the Joint Declaration of Counsel in Support of Plaintiffs' Motion for Preliminary Approval (the "Joint Declaration"). See ECF No. 110-2 at Exhibit A.

10. As set forth in the Joint Declaration of Proposed Settlement Class Counsel in Support of Plaintiffs' Motion for Preliminary Approval, I have been named class counsel or settlement class counsel in over 20 cases. See ECF No. 110-2 at ¶ 17 (collecting cases). Of these cases, many have obtained final approval. For example, the *Tabak* litigation resulted in a \$35 million settlement against Apple, Inc. that has received final approval. *Tabak v. Apple, Inc.*, No. 19-cv-02455-JST (N.D. Cal.). The *Jacobs* litigation resulted in a \$15,975,000 settlement that has received final approval. *Jacobs v. FirstMerit Corporation, et. al.*, No. 11 CV000090 (Ct. Common Pleas, Lake County, Ohio). The litigation against Uber Technologies, Inc. resulted in a \$20 million settlement that has been finally approved. *Maria Vergara v. Uber Technologies, Inc.*, No. 1:15-CV-06942 (N.D. Ill.). The litigation against UPS resulted in a \$995,000 settlement that has been finally approved. *Szafarz v. United Parcel Service, Inc.*, No. SUCV2016-2094-BLS2 (Superior Court, Commonwealth of Massachusetts). The *Lloyd* litigation resulted in a \$24.5 million settlement that has received final approval. *Jenna Lloyd, et al. v. Navy Federal Credit Union*, Case No. 3:17-cv-01280 (S.D. Cal.). The *Harris* litigation resulted in a \$15 million settlement that has received final approval. *Harris v. Farmers Ins. Exchange*, BC579498 (Cal. Super. Ct., L.A. Cnty. Aug. 30, 2020). The *Lambert* litigation resulted in a \$16 million settlement that has received final

approval. The *Hamm* litigation resulted in a class settlement valued at up to \$114 million by Plaintiffs' expert. *Hamm, et al. v. Sharp Electronics Corp.*, No. 5:19-cv-00488-JSM-PRK (M.D. Fla. Jan. 7, 2021). The *Roy* litigation resulted in a \$1.7 million class settlement that received final approval. *Roy v. ESL Federal Credit Union*, No. 6:19-cv-06122-FPG-MJP (W.D.N.Y.). The *Glass* litigation resulted in a class settlement valued at \$2,825,502 that has received final approval. *Glass et al. v. Delta Community Credit Union*, No. 2019CV317322 (Super. Ct. of Fulton Cty., GA). The *Marino* litigation resulted in a class settlement including, *inter alia*, over \$4.5 million of direct relief that received final approval. *Marino, et al. v. Coach, Inc.* No. 1:16-cv-01122-VEC (S.D.N.Y.). The *Webb* litigation resulted in a \$3.25 million class settlement that received final approval. *Webb, et al. v. The City of Maplewood, Missouri*, No. 4:16-CV-1703-CDP (E.D.Mo.). The *Clark* litigation resulted in a \$740,000 class settlement that received final approval. *Clark v. Hills Bank and Trust Company*, No. LACV080753 (Iowa District Court for Johnson County, Iowa).

11. As set forth in the Joint Declaration of Proposed Settlement Class Counsel in Support of Plaintiffs' Motion for Preliminary Approval, attorneys from Tycko & Zavareei, including associate Gemma Seidita who is counsel of record on this case, have been named as class counsel or settlement class counsel in many cases. *See, e.g.*, ECF No. 110-2 at ¶¶ 20-21.

12. As can be seen from Tycko & Zavareei LLP's firm resume, I have substantial experience in the litigation, certification, trial, and settlement of nationwide class actions. Based on our experience, Defendants' Counsel are also highly experienced in this type of litigation. It is thus our considered opinion that counsel for each side has fully evaluated the strengths, weaknesses, and equities of the Parties' respective positions and believe that the proposed Settlement is fair, reasonable, and adequate and should be approved.

13. Tycko & Zavareei has maintained contemporaneous time records in this case. Since 2021, partners and associates at Tycko & Zavareei spent 1,001.20 hours litigating this case. In addition, paralegals spent 82.90 hours providing necessary case support. In my opinion, the time spent by attorneys and staff of Tycko & Zavareei was reasonable and necessary. Indeed, by prosecuting this case purely on a contingency basis and not being paid by the hour, Tycko & Zavareei attorneys and staff worked efficiently and avoided unnecessary work.

14. The total number of hours is based only on the hours reasonably expended to achieve an excellent result for the Class. 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.

15. Along with my colleagues, I investigated 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. This investigation included review of the Consent Order and underlying background information made available via a Public Information Act request as well as review of the applicable Code of Maryland Regulations. We communicated with individuals at the MIA regarding Public Information Act request to ensure the proper documents were supplied and obtained. Further, we interviewed potential clients as well as reviewed client documentation to verify the Late Fee charge. We reviewed and analyzed other MIA Consent Orders. We 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.

16. Over nearly four years of litigation prior to reaching settlement, we defended three rounds of motion to dismiss briefing, which the Tycko & Zavareei team took the lead on researching and drafting. 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. Tycko & Zavareei, along with co-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. Tycko & Zavareei team members assisted co-counsel with preparations for the oral argument before Judge Messitte and attended the argument as well.

17. Following decision on Defendants' second motion to dismiss, the Parties likewise began discovery. Tycko & Zavareei attorneys, myself included, assisted in the exchange and review of written discovery requests and production and efforts to meet and confer regarding the same. On August 16, 2024, Plaintiffs served Defendants with their first set of written discovery requests, including requests for production and interrogatories. Over the course of discovery, the Parties ultimately exchanged 16 interrogatories and 57 requests for production resulting in the production of more than 12,000 pages of documents.

18. During this time period, Tycko & Zavareei, along with co-counsel, vetted potential economic experts and ultimately retained an expert with extensive experience in financial and forensic investigation, including evaluating multiple damages models relating to financial

institutions. This expert advised Plaintiffs' counsel as to the range of possible recoveries for the claims asserted in this action.

19. After concluding substantial discovery, the Parties prepared substantive mediation statements including expert calculations. To prepare for the mediation, Class Counsel analyzed the damages and/or restitution at issue in this case and spent a significant amount of time analyzing the data that Defendants produced as well while working on classwide damages and/or restitution methodologies and calculations.

20. Tycko & Zavareei split responsibility for drafting this mediation statement with co-counsel of record. The Parties then 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. Tycko & Zavareei was actively involved in this process and I took the lead in the majority of the settlement communications with Judge Legg prior to and following in-person mediation. Despite the Parties' best efforts, the Action did not settle on the date of the in-person mediation, leading the Parties to continue litigating.

21. Attorneys from Tycko & Zavareei interviewed and vetted other individuals who were interested in joining the lawsuit and timely filed a First Amended Complaint adding Keith Barr, Wayne Best, and David Fant, Sr. on March 24, 2025. These individuals contracted with the Defendant entities with whom Plaintiff Black was not in contractual privity. Defendants moved to dismiss the First Amended Complaint, and attorneys from Tycko & Zavareei researched and primarily drafted the brief opposing Defendants' third motion to dismiss.

22. In April 2025, following the Parties' initial round of written discovery, Plaintiffs served Defendants with three deposition notices. Attorneys from Tycko & Zavareei assisted in the

preparation for the depositions of Defendants' corporate representatives, which included Compliance Professional Yolanda Rodriguez, Executive Director of Auto and Umbrella Modernization Brett Shudak, and Associate General Counsel Eileen Ziemke. I prepared for and took the deposition of Eileen Ziemke. Together, the depositions of Defendants' corporate representatives resulted in nearly 20 hours' worth of testimony.

23. Prior to the Court's decision on Defendants' third motion to dismiss, the Parties—who had continued to be in regular communications with Judge Legg regarding the ongoing litigation developments as well as regarding settlement negotiations—accepted a mediator's proposal by Judge Legg and notified the Court that they had reached an agreement on key terms of a class action settlement on June 4, 2025.

24. Class Counsel then drafted the full Settlement Agreement, its exhibits and notice documents, coordinated with the Settlement Administrator, and drafted the preliminary approval documents. Attorneys from Tycko & Zavareei took the lead on these efforts.

25. Following the filing of the preliminary approval motion, the Court held a hearing on November 19, 2025, where I appeared and argued for preliminary approval on behalf of Plaintiffs. Following the hearing, the Court issued an order granting preliminary approval of the proposed settlement. Soon after, Tycko & Zavareei attorneys began coordinating with the Settlement Administrator regarding the Notice Plan.

26. Class Counsel worked diligently with the Settlement Administrator to implement the Notice Plan and to ensure that inquiries from Settlement Class members were addressed and that the Class Notice was timely and effectively disseminated.

27. Class Counsel further worked with the Defendants to ensure that the Settlement Administrator had the information needed to implement the Notice Program.

28. Class Counsel likewise drafted this Motion for Attorney's Fees and Service Awards and Motion for Final Approval of the Proposed Settlement. Tycko & Zavareei attorneys took the lead on these efforts.

29. Tycko & Zavareei attorneys will continue to incur fees in preparing for and appearing at the Final Fairness Hearing set for April 28, 2026.

SETTLEMENT TERMS AND BASES FOR FINAL APPROVAL

30. The \$5,000,000.00 Settlement Fund represents approximately 69.44% of the most likely best case scenario of recoverable damages at trial (valued at approximately \$7,200,000.00) based on Defendants' refund without interest or other gains on the unlawful Late Fees. Should litigation have continued, Defendants intended to argue that Plaintiffs and the Settlement Class were not entitled to any additional damages. Defendants' agreement to separately pay administration costs, estimated at \$125,000.00 is an added benefit to the Settlement Class and is part of the value of the Settlement. In light of the inherent litigation risks, Plaintiffs and proposed Class Counsel believe it is a fair, adequate, and reasonable recovery. Class Counsel weighed a number of factors before deciding to settle. First, Class Counsel considered the fact that the MIA, when addressing Defendants' charge of the Late Fees, did not require Defendants to refund any interest and/or gains made from their retention of the same. Class Counsel considered the possibility that, under consideration of the same applicable facts, the jury could likewise arrive at the same conclusion. Second, Class Counsel considered the possibility that the Court would deny class certification, or rule adversely in subsequent motions for summary judgment. Indeed, there are few suits with analogous facts under only claims for unjust enrichment and money had and received without any statutory or contractual claims. Third, Class Counsel's damages model depended on the ability to trace the discrete gains Defendants made on the Late Fees which counsel

for Defendants maintained would be impossible based on the nature of the records at issue. Finally, in reaching the conclusion that the Settlement Fund in this Action is adequate, Class Counsel considered that the Settlement Class is receiving real money without having to take the step of submitting a claim or waiting years for a trial and potential appeals to be adjudicated. This was particularly important in light of the nature of this lawsuit and the harm that happens when money is in the wrong hands for prolonged periods of time.

31. With the Court's preliminary approval, the Settlement Administrator implemented each facet of the Notice Program and will administer the Settlement following Final Approval. The Notice Program was designed to provide the best notice practicable and tailored to take advantage of the information Defendants had available about members of the Settlement Class. As the Settlement Administrator confirms in its own declaration, the Notice Program was designed to and did reach a high percentage of the settlement Class by sending direct mail and email notices to the Settlement Class and exceeds the requirements of constitutional due process. The Notice Program was reasonably calculated to apprise the Settlement Class of a description of the material terms of the Settlement; a deadline by which Settlement Class Members may opt-out of the Settlement Class; a deadline by which Settlement Class Members may object to the Settlement and/or the Application for Attorneys' Fees, Costs, and Service Awards; the Final Approval Hearing, location, date, and time; and the Settlement Website address at which Settlement Class Members can access the Settlement Agreement and other key documents and information. The Notices and Notice Program are sufficient notice to all persons entitled to notice and satisfies all applicable requirements of law, including, but not limited to, Fed. R. Civ. P. 23 and constitutional due process.

32. As set forth in detail in the Joint Declaration, the Settlement is the product of intensive, arm's length negotiations facilitated by Judge Legg who was familiar with class action litigation and the legal and factual issues in this Action after a full day mediation, reviewing several submissions from the Parties before and after mediation, and staying in contact with the parties for several months following the mediation up and until the Parties accepted his proposal.

33. The Parties' negotiations were principled, with each side basing settlement positions off of applicable case law, review of information produced in discovery, and an assessment of the potential recovery available at trial. In addition, the negotiations were based on the Parties' respective assessments of the strengths and weaknesses of their positions, and interpretations of the law relative to those positions. Plaintiff believes the claims asserted are meritorious and that they would have prevailed if this matter proceeded to trial. Defendants argue Plaintiffs already received refund of the Late Fees, deny any potential liability, and, up to the point of Settlement, has indicated a willingness to litigate vigorously. Plaintiffs' ultimate success would require them to prevail on Defendants' pending motion to dismiss the First Amended Complaint, class certification, summary judgment, opposing *Daubert* motions, and at trial, whereas Defendants' success at any one of these steps could have spelled defeat for Plaintiffs and the Settlement Class. The Parties concluded the benefits outweigh the risk and uncertainties of continued litigation, as well as the attendant time and expenses associated with further contested proceedings.

34. On the basis of our investigation into this case and experience with and knowledge of the law and procedure governing the claims of Plaintiffs and the Settlement Class, it is our belief that it is in the best interests of the Settlement Class to enter into this Settlement. Indeed, in light of the risks, uncertainties, and delays associated with continued litigation, the Settlement

represents a significant achievement by providing guaranteed benefits to Settlement Class Members in the form of direct compensation.

35. Prior to settlement, Defendants filed a motion to dismiss Plaintiffs' First Amended Complaint. While Plaintiffs strongly disagree with Defendants' arguments for dismissal, Defendants raised defenses that could threaten the viability of the Action. Among other things, Defendants contend that Plaintiffs Barr, Best, and Fant did not timely file their claims against Defendants Garrison, USAA, and USAA GIC, and that Plaintiff Black whose claims were timely filed could not maintain claims against those Defendants. Should the Court have founded for Defendants on any of these arguments, that would have significantly decreased the potential recovery for the Settlement Class.

36. Class Counsel is confident in the strength of Plaintiffs' claims as to both the challenged conduct and related legal arguments, but are also pragmatic regarding the risks in continuing this litigation, including the possibility that the Court would have granted Defendants' motion to dismiss, denied class certification or granted summary judgment, or that Plaintiffs and Class Counsel would not prevail at trial. Defendants continue to dispute that they did anything wrong and that the Settlement Class is entitled anything beyond the already-issued Late Fee refunds. In this context, the Settlement represents an excellent recovery for the Settlement Class without further delay and eliminating a substantial risk that Settlement Class members could receive nothing at all.

37. Moreover, even if Plaintiff prevailed at trial, any recovery could be delayed by an appeal. Thus, even in the best case, it could take yes to get relief for class members. The Settlement provides substantial relief to the Settlement Class without further delay.

SETTLEMENT CLASS CERTIFICATION

38. In granting preliminary approval, the Court already evaluated the elements for certification of the Settlement Class and determined it was likely to grant certification at the final approval stage. Nothing has changed since the Court entered its Preliminary Approval Order that would effect the Court granting final certification of the Settlement Class.

39. Numerosity is satisfied as Defendants' records confirm there are approximately 127,742 Settlement Class members, such that joinder of all persons is impracticable.

40. Commonality is satisfied as questions of law and fact common to the Settlement Class substantially outweigh any individual issues. These questions center on Defendants' uniform conduct in withholding any interest and/or other gains accrued on the unlawfully charged Late Fees, injured members of the Settlement Class in the same way, and would generate common question with common answers should the Action proceed to trial.

41. Plaintiffs' claims are typical of the Settlement Class members because they were subjected to the same conduct, suffered the same injuries, and will benefit equally from the relief provided by the Settlement.

42. Plaintiffs are adequate Settlement Class Representatives whose interests are coextensive with, and not antagonistic to the interests of the Settlement Class. Plaintiffs' claims and the relief they seek are identical to those pursued for the Settlement Class. Plaintiffs understand their role is to remain informed regarding the lawsuit and assist Class Counsel in the best interest of the Settlement Class, and each Plaintiff has already demonstrated their willingness to serve the Settlement Class's interest by filing and pursuing this Action to vindicate their interests, actively participating in the prosecution since inception, including by effectively communicating with Class Counsel and assisting with discovery.

43. Plaintiffs are represented by qualified and competent Class Counsel who have extensive experience and expertise prosecuting complex civil actions, including consumer class actions similar to the instant case. Class Counsel have devoted substantial time and resources to this Action and will vigorously protect the interests of the Settlement Class. They have the resources necessary to prosecute this Action to conclusion, like they have done by recovering hundreds of millions of dollars for classes they previously represented.

ATTORNEYS' FEES, COSTS AND SERVICE AWARDS

44. As part of the Settlement, Defendants have agreed Plaintiffs are entitled to seek attorneys' fees, costs, and service awards for each Class Representative so long as the combined total of these amounts does not exceed \$2,000,000.000.

45. I understand that this District's Local Rules recognize the Fitzpatrick Matrix as a guideline for reasonable hourly rates for attorneys, which are the rates we seek to use for the lodestar cross-check in this case. These hourly rates result in a significantly lower lodestar for Tycko & Zavareei than the rates we regularly use, which are those set forth in the "LSI Adjusted Laffey Matrix" (<http://www.laffeymatrix.com/>).

46. Courts throughout the country have used the Adjusted Laffey Rates when awarding fees in class action cases, including to Tycko & Zavareei LLP in particular. *See, e.g., CASA de Maryland, Inc. v. Arbor Realty Trust, Inc.*, 2024 WL 1051120, at *9 (D. Md. Mar. 11, 2024) (granting fee motion where plaintiffs' counsel employed adjusted Laffey Matrix, or offered in the alternative the Appendix B guidelines with a multiplier within an acceptable range amounting to a similar value); *Brown v. Transurban USA, Inc.*, 318 F.R.D. 560, 575-76 (E.D. Va. 2016) (recognizing the Laffey Matrix and Adjusted Laffey Matrix as used within the Fourth Circuit to evaluate the reasonableness of a requested fee award in approving fees to class counsel including

Tycko & Zavareei LLP attorneys); *Kumar v. Salov N. Am. Corp.*, No. 14-CV-2411-YGR, 2017 WL 2902898 (N.D. Cal. July 7, 2017) (specifically finding that the hourly rates charged by Tycko & Zavareei LLP, which were determined using the Adjusted Laffey Matrix, “are reasonable and commensurate with those charged by attorneys with similar experience in the market”); *Meta v. Target Corp.*, No. 14-cv-0832 (N.D. Ohio Aug. 7, 2018), ECF No. 179; *In re Think Finance, LLC*, No. 17-bk-33964 (Bankr. N.D. Tex.); *Brown v. Transurban USA, Inc.*, No. 1:15CV494 (JCC/MSN), 2016 WL 6909683 (E.D. Va. Sept. 29, 2016) (approving of Adjusted Laffey rates for purposes of calculating the reasonable hourly rate for Tycko & Zavareei attorneys, as well as other Class Counsel); *Smith v. Fifth Third Bank*, No. 1:18-cv-00464-DRC-SKB (S.D. Ohio Aug. 31, 2021); *Small v. BOKF, N.A.*, No. 1:13-cv-01125-REB-MJW (D. Colo.) (approving fees in case against Bank of Oklahoma submitted with lodestar cross-check based on Adjusted Laffey Rates); *Soule v. Hilton Worldwide, Inc.*, No. CV 13-00652 ACK-RLP, 2015 WL 12827769 (D. Haw. Aug. 25, 2015); *Beck v. Test Masters Educ. Servs., Inc.*, 73 F. Supp. 3d 12 (D.D.C. 2014); *Harris v. Farmers Ins. Exchange*, BC579498 (Cal. Super. Ct., L.A. Cty. Aug. 30, 2020) (accepting Adjusted Laffey Matrix as evidence of reasonable hourly rates charged by Washington, D.C. attorneys); *Roberts v. Capital One Financial Corp.* 1:16-cv-04841 (S.D. NY Dec. 2, 2020); *Hamm, et al. v. Sharp Electronics Corp.*, No. 5:19-cv-00488-JSM-PRK (M.D. Fla. Jan. 7, 2021); *Juan Quintanilla Vazquez et al. v. Libre by Nexus, Inc.*, No. 17-cv-00755 CW (N.D. Cal. Feb. 8, 2021); *Silveira v. M&T Bank*, No. 2:19-cv-06958-ODW-KS (C.D. Cal. Jan. 20, 2022); *Jette v. Bank of America, N.A.*, No. 20-cv-6791-LDW (D.N.J. Nov. 17, 2021); *Gupta v. Aeries Software*, No. 8:20-cv-00995-FMO-ADS (C.D. Cal. Mar. 3, 2023); *Wang v. StubHub, Inc.*, No. CGC-18-564120 (Cal. Super. Ct. S.F. Cty. Aug. 8, 2022); *Lash Boost Cases* No. CJC-18-004981 (Cal. Super. Ct. S.F. Cty. Sept. 28, 2022).

47. The reasonableness of the hourly rates sought by Tycko & Zavareei LLP, the other 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.

48. The hours and lodestar for the timekeepers at Tycko & Zavareei LLP who worked on this action are outlined in the following chart. By way of comparison, this chart shows Tycko & Zavareei LLP's regular Adjusted Laffey Rates and lodestar compared to the Fitzpatrick Matrix lodestar:

Timekeeper	Professional status/ Law School Grad Yr.	Hours	Ordinary Lodestar	Fitzpatrick Matrix Lodestar
Andrea Gold	Partner/ 2004	402.9	\$494,538.30	\$349,717.20
Gemma Seidita	Associate/ 2018	442.80	\$276,750.00	\$305,974.80
Mallory Morales	Associate/ 2018	103.60	\$39,471.60	\$49,106.40
Em Cooper	Associate/ 2023	8.00	\$4,064.00	\$4,648.00
Robin Bleiweis	Associate/ 2024	2.90	\$1,473.20	\$1,684.90
Lavanya Prabhakar	Associate/ 2024	23.50	\$11,938.00	\$13,653.50
Troy Brown	Associate/ 2025	17.50	\$8,890.00	\$9,817.50
Allegra Lubar	Paralegal	49.10	\$13,600.70	\$12,520.50
Stephanie Ricker	Paralegal	10.30	\$2,317.50	\$2,266.00
James Morrison	Paralegal	9.10	\$2,047.50	\$2,002.00
Alicia Linthicum-Amos	Paralegal	4.80	\$1,329.60	\$1,224.00
Genna Wolinsky	Paralegal	7.20	\$1,857.60	\$1,699.20
Nicole Porzenheim	Paralegal	0.9	\$187.20	\$180.00
Emma Bass	Paralegal	0.8	\$206.40	\$204.00

Aaron McReynolds	Paralegal	0.4	\$83.20	\$82.80
Adam Cardona	Paralegal	0.3	\$277.00	\$70.80
Tycko & Zavareei total		1,084.10	\$858,657.90	\$754,857.30

49. Likewise hours for all Tycko & Zavareei timekeepers by litigation phase are set forth in **Exhibit B**.

50. My firm advanced substantial costs to prosecute this case on behalf of Plaintiffs and the putative class—taking a substantial risk to do so. Below is an itemized list of the unreimbursed expenses that the firm incurred in furtherance of prosecuting this litigation. These expenses are reflected in the firm’s books and records that are regularly maintained in the ordinary course of the firm’s business, and are based on the receipts and other records maintained by the firm. Notably, this does not include the legal research costs incurred in preparing the Motions for Final Approval and for Award of Attorneys’ Fees and Costs, and Service Awards, nor will it include costs associated with the Final Approval Hearing.

Expense Category	Amount Incurred
Copying/ Printing	\$11.25
Court Fees and PACER (Filing fees, pro hac vice applications)	\$100.70
Legal Research	\$2,144.04
Postage	\$44.87
Depositions	\$7,320.65
Travel	\$41.99
Expert and Consultant Fees	\$4,862.50
Mediation	\$3,958.30

Misc.	
Total	\$18,383.60

51. 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. Moreover, the hours noted above do not include all of the time to be devoted to preparing for and appearing at the final approval hearing or dealing with post-hearing matters.

52. With respect to Plaintiff Black, he has been actively engaged in the litigation for nearly five years. Among other things, Plaintiff Black assisted counsel with gathering applicable statements, providing facts material to assist us in prosecuting the case, staying informed on developments in the case despite the procedural complexities, attended the hearing on Defendants' Second Motion to Dismiss, and by responding to written discovery requests. Plaintiff Black also reviewed numerous court documents and authorized their filings, regularly requested and received status updates concerning the litigation and settlement negotiations, and he considered various proposed terms of the settlement and ultimately authorized Class Counsel to accept the mediator's proposal. Pursuant to the Settlement Agreement, Defendants have agreed that Plaintiffs are entitled to request that the Court approve a Service Award in the amount of \$7,500.00 for Plaintiff Black.

53. With respect to Plaintiffs Barr, Best, and Fant, all three Plaintiffs have devoted significant time to prosecuting the case, including by assisting counsel with gathering applicable statements, providing facts material to assist us in prosecuting the case, and by staying informed on developments in the case. These Plaintiffs also received status updates concerning the litigation and settlement negotiations, and considered various proposed terms of the settlement and ultimately each authorized Class Counsel to accept Defendants' offer of settlement. Defendants have agreed that Plaintiffs are entitled to request that the Court approve Service Awards in the amount of \$3,500.00 each for Plaintiff Barr, Best, and Fant.

54. To date, Class Counsel are not aware of any objections to the proposed Settlement.

55. Class Counsel are unaware of any claims related to those asserted by Plaintiffs in this case that have been asserted by other classes or other claimants.

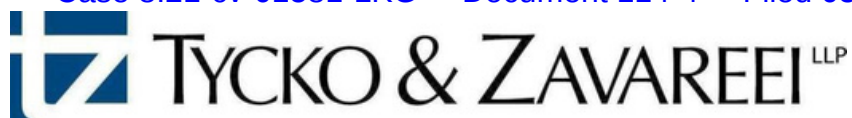
56. Finally, Class Counsel was retained by the Plaintiffs on a contingent fee basis. In the event of no recovery, Class Counsel is not entitled to any payment from the Plaintiffs. Thus, Class Counsel has not been paid for any of their work to date and took on considerable risk in litigating the case.

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

Respectfully submitted,

/s/Andrea R. Gold
Andrea R. Gold

EXHIBIT A



Firm Resume

Jonathan Tycko and Hassan Zavareei founded Tycko & Zavareei LLP in 2002 when they left a large national firm to form a private public interest law firm. Since then, a wide range of clients have trusted the firm with their most difficult problems. Those clients include individuals fighting for their rights, tenants' associations battling to preserve decent and affordable housing, consumers seeking redress for unfair business practices, whistleblowers exposing fraud and corruption, and non-profit entities and businesses facing difficult litigation.

The firm's practice focuses on complex litigation, with a particular emphasis on consumer and other types of class actions, and *qui tam* and False Claims Act litigation. In its class action practice, the firm represent consumers who have been victims of corporate wrongdoing. The firm's attorneys bring a unique perspective to such litigation because many of them trained at major national defense firms where they obtained experience representing corporate defendants in such cases. This unique perspective enables the firm to anticipate and successfully counter the strategies commonly employed by corporate counsel defending class action litigation. Tycko & Zavareei LLP's attorneys have successfully obtained class certification, been appointed class counsel, and obtained approval of class action settlements with common funds totaling over \$500 million.

Tycko & Zavareei LLP's twenty attorneys graduated from some of the nation's finest law schools, including Harvard Law School, Columbia Law School, Duke University School of Law, UC Berkeley School of Law, UC Hastings College of the Law, Georgetown Law, the University of Michigan Law School, and the University of Miami School of Law. They have served in prestigious clerkships for federal and state trial and appellate judges and have worked for low-income clients through competitive public interest fellowships. The firm's diversity makes it a leader amongst its peers, and the firm actively and successfully recruits attorneys who are women, people of color, and LGBTQ. To support its mission of litigating in the public interest, Tycko & Zavareei LLP offers a unique public interest fellowship for recent law graduates. Tycko & Zavareei LLP's attorneys practice in state and federal courts across the nation.

Representative Cases

U.S. ex rel. Thompson v. Acadia Healthcare Company Inc., et al., **Case No. 2:18-cv-543-FtM-38CM (MDFL)**. Tycko & Zavareei LLP represented one of the whistleblowers/relators in this case under the False Claims Act which led to a nearly \$20 million settlement against Acadia Healthcare Company, Inc., and a 19% reward to the whistleblowers.

Lisa Tabak, et al. v. Apple, Inc., **No. 19-cv-02455-JST (N.D. Cal)**. TZ, as Co-Class Counsel, represented plaintiffs claiming that an alleged audio defect impacted the functionality of the audio systems in iPhone 7 and iPhone 7 Plus models achieving a \$35 million settlement.

Andrea Stevenson v. Allstate Insurance Co et al., **No. 4:15-cv-04788-YGR (N.D. Cal)**. TZ and co-counsel secured a win for over 1.2 million California insurance customers with the approval of a \$25 million class action settlement involving Allstate Insurance Company.

Harris, et al. v. Farmers Insurance Exchange and Mid-Century Insurance Company, **Case No.: BC579498 (Sup. Ct. Cal., Los Angeles Cty.)**. TZ successfully represented plaintiffs in this class action lawsuit against Farmers Insurance Exchange and Mid-Century Insurance Company for the use of price optimization and elasticity of demand methodologies resulting in a \$15 million settlement.

Alexander v. Carrington Mortgage Services, LLC, **Case No.: 1:20-cv-02369-RDB in the United States (D. Md.)** Carrington Mortgage Services, LLC came to a settlement with borrowers, ending its "pay to pay" practices and agreeing to provide cash payments to members of the class action.

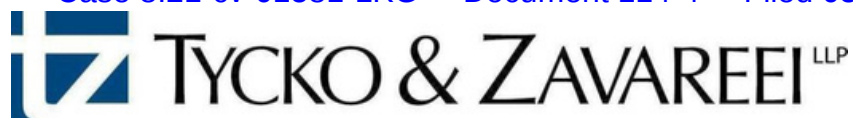
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Susan Wang, et al. v. Stub Hub, Inc., **Case No.: CGC-18-564120 (Sup. Ct. Cal. San Francisco Cnty.)** StubHub agreed to pay \$2.5 million in cash and provide \$20 million in credit to resolve claims it deceived consumers by falsely advertising low ticket prices.

Lundy et al. v. Meta Platforms, Inc., **Case No.: 3:18-CV-06793-JD (N.D. Cal.)**. This \$37.5 million settlement addresses claims that Meta unlawfully collected and inferred precise location information.

Vergara v. Uber Technologies, Inc., **No. 1:15-cv-06972 (N.D. Ill.)**. Tycko & Zavareei LLP served as Co-Lead Counsel in this case under the Telephone Consumer Protection Act, obtaining a class settlement of \$20 million.

Farrell v. Bank of America, N.A., **No. 16-cv-000492 (S.D. Cal.)**. As Co-Lead Counsel, Tycko & Zavareei LLP obtained a settlement valued at \$66.6 million plus injunctive relief valued at \$1.2 billion.

In re TD Bank, N.A. Debit Card Overdraft Fee Litigation, **No. 15-mn-02613 (D.S.C.)**. Tycko & Zavareei LLP serves on the Plaintiffs Executive Committee in this case challenging TD Bank's overdraft fee practices. Tycko & Zavareei LLP assisted in obtaining a \$70 million class settlement.

In re Higher One Account Marketing & Sales Practices Litigation, **No. 12-md-02407 (D. Conn.)**. As Lead Counsel, Tycko & Zavareei LLP helped secure a \$15 million common fund settlement with significant changes to business practices for illegal debit card fees.

Duval v. Citizens Financial Group, Inc., **No. 10-cv-21080 (S.D. Fla.)**. Tycko & Zavareei LLP was appointed Class Counsel and obtained a common fund settlement of \$137.5 million.

In re American Psychological Association Assessment Fee Litigation, **No. 12-md-02407 (D. Conn.)**. As Lead Counsel, Tycko & Zavareei LLP helped secure a \$15 million common fund settlement with significant changes to business practices for illegal debit card fees.

Lloyd v. Navy Federal Credit Union, **No. 17-cv-1280 (S.D. Cal.)**. As Co-Lead Counsel, Tycko & Zavareei LLP helped secure a \$24.5 million common fund settlement on behalf of a class of NFCU customers harmed by the credit union's overdraft fee practices.

Morgan v. Apple, Inc., **No. 17-cv-5277 (N.D. Cal.)**, *Simmons v. Apple Inc.*, **No. 17CV312251 (Sup. Ct. Ca., Santa Clara Cnty.)**. Tycko & Zavareei LLP is currently serving as Lead Counsel in this class action challenging Apple's deceptive marketing of Powerbeats headphones and secured a \$9.75 million settlement for the class.

Wallace v. Wells Fargo Bank, N.A., **No. 17CV31775 (Sup. Ct. Ca., Santa Clara Cty.)**. Tycko & Zavareei LLP serve as Co-Lead Counsel in this case against Wells Fargo's overdraft fee practices. Tycko & Zavareei LLP helped secure a \$10.5 million common fund class settlement.

Roberts v. Capital One Financial Corporation, **No. 16-cv-04841 (S.D.N.Y.)**. As Co-Lead Counsel, Tycko & Zavareei LLP helped secure a \$17 million settlement for Capital One customers forced to pay excessive overdraft fees.

Hamm v. Sharp Electronics Corp., **No. 19-cv-488 (M.D. Fla.)**. Tycko & Zavareei LLP was appointed Co-Lead Counsel and was instrumental in providing relief valued at \$109 million for class members exposed to a product defect in certain Sharp Microwave Drawer Ovens.

Mascaro v. TD Bank, N.A., **No. 10-cv-21117 (S.D. Fla.)**. Tycko & Zavareei LLP was appointed Class Counsel and was instrumental in obtaining a \$62 million common fund on behalf of the class.

Bodnar v. Bank of America, N.A., **No. 5:14-cv-03224 (E.D. Pa.)**, Tycko & Zavareei LLP served as lead Counsel and obtained a \$27.5 million class settlement and significant injunctive relief.

In Re JUUL Labs, Inc. Marketing, Sales Practices, and Products Liability Litigation, **No.: 19-md-02913-WHO (N.D. Cal.)**, Tycko & Zavareei LLP served on the Plaintiffs Steering Committee obtaining a \$300 million class settlement.

In re: T-Mobile Customer Data Security Breach Litigation, **MDL No. 3019, No. 4:21-MD-03019-BCW (W.D. Mo.)**, Tycko & Zavareei LLP was named leadership in this MDL, challenging T-Mobile's failure to keep confidential the PII for millions of its customers securing a \$350 million settlement.

LaBella et al v. Apple Inc, **No. 5:24-cv-07588-NW (N.D. Cal.)**, Tycko & Zavareei LLP was named leadership in this class action lawsuit against Apple for selling defective Gen. 1 AirPods Pros to consumers.

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Our Diversity

Tycko & Zavareei LLP is committed to fostering an equitable, diverse, and inclusive work environment. We believe that a diverse team significantly improves our work product and ability to innovate, enhances our ability to serve our clients, and strengthens our ability to attract talented individuals. We strive to maintain a culture that celebrates the strengths of every team member. The firm engages in ongoing efforts to foster a culture of mutual respect and attract, retain, and promote outstanding lawyers and staff from all backgrounds, perspectives, and abilities.

Our team was honored with the 2022 Diversity Initiative Award from The National Law Journal's Elite Trial Lawyers recognition program.

Tycko & Zavareei LLP's Firm Breakdown:

Attorneys

- **50%** of attorneys identify as women
- **75%** partners identify as women
- **36%** of attorneys identify as persons of color
- **27%** of attorneys identify as LGBTQIA+

Attorneys and Staff

- **82%** identify as women
- **36%** identify as persons of color
- **36%** identify as LGBTQIA+



Hassan A. Zavareei

Partner

202.973.0900
hzavareei@tzlegal.com

Mr. Zavareei has devoted the last two decades to recovering hundreds of millions of dollars on behalf of consumers and workers. He has served in leadership roles in dozens of class action cases and has been appointed Class Counsel on behalf of numerous litigation and settlement classes. An accomplished and experienced attorney, Mr. Zavareei has litigated in state and federal courts across the nation in a wide range of practice areas; tried several cases to verdict; and successfully argued numerous appeals, including in the D.C. Circuit, the Fourth Circuit, and the Fifth Circuit. He also recently argued before the United States Supreme Court.

After graduating from UC Berkeley School of Law, Mr. Zavareei joined the Washington, D.C. office of Gibson, Dunn & Crutcher LLP. There, he managed the defense of a nationwide class action brought against a major insurance carrier, along with other complex civil matters. In 2002, Mr. Zavareei founded Tycko & Zavareei LLP with his partner Jonathan Tycko.

Mr. Zavareei has served as lead counsel or co-counsel in dozens of class actions involving deceptive business practices, defective products, and/or privacy. He has been appointed to leadership roles in multiple cases. As Lead Counsel in an MDL against a financial services company that provided predatory debit cards to college students, Mr. Zavareei spearheaded a fifteen-million-dollar recovery for class members. He is currently serving as Co-Lead Counsel in consolidated proceedings against Fifth Third Bank, and on the Plaintiffs' Executive Committee in MDL litigation against TD Bank.

As Co-Lead Counsel in *Farrell v. Bank of America*, a case challenging Bank of America's punitive overdraft fees, Mr. Zavareei secured a class settlement valued at \$66.6 million in cash and debt relief, together with injunctive relief forcing the bank to change a practice that will save millions of low-income consumers approximately \$1.2 billion in overdraft fees. In his Order granting final approval, Judge Lorenz of the U.S. District Court for the Southern District of California described the outcome as a "remarkable" accomplishment achieved through "tenacity and great skill."

Mr. Zavareei is a highly sought after speaker on class action litigation and has taught numerous CLE courses across the country.



Education

UC Berkeley School of Law, 1995,
Order of the Coif
Duke University, 1990, *cum laude*

Bar Admissions

California
District of Columbia
Maryland
Supreme Court of the United States

Leadership

Public Justice, Emeritus Board
NCLC, Partners Council

Awards

2025 Chambers USA, Band 1
2023 Chambers USA, Band 1
2022 Law360 Titan of Plaintiffs Bar
2021 Law360 Class Action MVP
Selected to 2012-2024 Washington, D.C.
Super Lawyers List

Presentations & Publications

Witness Before the Subcommittee on
the Constitution and Civil Justice,
115th Congress
Witness Before the Civil Rules
Advisory Committee, 2018, 2019
Editor, Duke Law School Center for
Judicial Studies, Guidance on New
Rule 23 Settlement Provisions

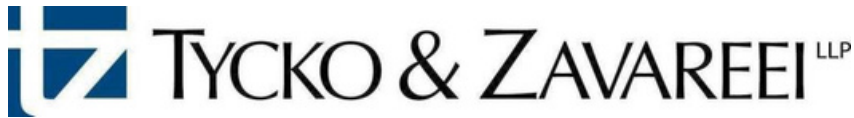
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Andrea R. Gold

Partner

202.973.0900
agold@tzlegal.com



Andrea Gold has spent her legal career advocating for consumers, employees, and whistleblowers. Ms. Gold has litigated numerous complex cases, including through trial. Her extensive litigation experience benefits the firm's clients in both national class action cases as well as in qui tam whistleblower litigation. She has served as trial counsel in two lengthy jury trials.

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

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

Prior to joining Tycko & Zavareei LLP, Ms. Gold was a Skadden fellow. The Skadden Fellowship Foundation was created by Skadden, Arps, Slate, Meagher & Flom LLP, one of the nation's top law firms, to support the work of new attorneys at public interest organizations around the country. Ms. Gold earned her law degree from the University of Michigan Law School, where she was an associate editor of the Journal of Law Reform, co-President of the Law Students for Reproductive Choice, and a student attorney at the Family Law Project clinical program. Ms. Gold graduated with high distinction from the University of Michigan Ross School of Business in 2001, concentrating her studies in Finance and Marketing.

Education

University of Michigan Law School,
2004
University of Michigan, Ross School
of Business, 2001

Bar Admissions

District of Columbia
Illinois
Maryland
Supreme Court of the United States

Memberships

American Association for Justice
National Associate of Consumer
Advocates
National Employment Lawyers
Association
Public Justice
Taxpayers Against Fraud Education
Fund

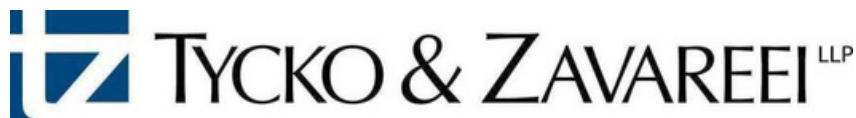
Awards

Selected to 2022, 2023, and 2024
Washington, D.C. Super Lawyers List

National Trial Lawyers, Top 100 Civil
Plaintiff Lawyers, 2020

Selected to 2013 & 2014 Washington,
D.C. Super Lawyers Rising Stars List

Skadden Fellow, Skadden Arps Slate
Meagher & Flom LLP, 2004-2006



Jonathan Tycko

Partner

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In his 29 years of practice, Jonathan Tycko has represented a wide range of clients, including individuals, Fortune 500 companies, privately held business, and non-profit associations, in both trial and appellate courts around the country. Although he continues to handle a variety of cases, his current practice is focused primarily on helping whistleblowers expose fraud and corruption through *qui tam* litigation under the False Claims Act and other similar whistleblower statutes. Mr. Tycko's whistleblower clients have brought to light hundreds of millions of dollars in fraud in cases involving healthcare, government contracts, and customs duties, banking, and tax. He is a frequent author and speaker on issues relating to whistleblower cases.

Prior to founding Tycko & Zavareei LLP in 2002, Mr. Tycko was with Gibson, Dunn & Crutcher LLP, one of the nation's top law firms. He received his law degree in 1992 from Columbia University Law School, and earned a B.A. degree, with honors, in 1989 from The Johns Hopkins University. After graduating from law school, Mr. Tycko served for two years as law clerk to Judge Alexander Harvey, II, of the United States District Court for the District of Maryland.

In addition to his private practice, Mr. Tycko is an active participant in other law-related and community activities. He has served as Co-Chair of the Education Committee of the Taxpayers Against Fraud Education Fund, charged with planning the premier annual conference of whistleblower attorneys and their counterparts at the United States Department of Justice and other government agencies. He has taught as an Adjunct Professor at the George Washington University Law School. He is a former member and Chairperson of the Rules of Professional Conduct Review Committee of the District of Columbia Bar, where he helped draft the ethics rules governing members of the bar. And Mr. Tycko was a long-time member of the Board of Trustees of Studio Theatre, one of the D.C. area's top non-profit theaters. Mr. Tycko is admitted to practice before the courts of the District of Columbia, Maryland, and New York, as well as before numerous federal courts around the country.

Education

Columbia University Law School,
1992
The Johns Hopkins University, 1989,
with Honors

Bar Admissions

Colorado
District of Columbia
Maryland
New York
Supreme Court of the United States

Memberships

Law360 Government Contracts
Editorial Board Member
American Association for Justice
Public Justice
Taxpayers Against Fraud Education
Fund (TAFEF)

Awards and Honors

2020 National Law Review Go-To
Thought Leader Award for False Claims
Act
Super Lawyers, 2012-current
Member of the D.C. Bar Leadership
Academy
Stone Scholar (all three years), Columbia
Law School Thomas E. Dewey Prize for
Best Brief, Harlan Fiske Stone Moot
Court Competition, Columbia Law
School



Annick M. Persinger

Partner

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apersinger@tzlegal.com



Annick M. Persinger leads Tycko & Zavareei LLP's California offices as California's Managing Partner. While at Tycko & Zavareei LLP, Ms. Persinger has dedicated her practice to utilizing California's prohibitions against unfair competition and false advertising to advocate for consumers. Ms. Persinger has taken on financial institutions, companies that take advantage of consumers with deceptive advertising, tech companies that disregard user privacy, companies that sell defective products, and mortgage loan servicers. Ms. Persinger also represents whistleblowers who expose their employer's fraudulent practices.

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

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

Ms. Persinger served as an elected board member of the Bay Area Lawyers for Individual Freedom (BALIF) from 2017 to 2019, and as Co-Chair of BALIF from 2018 to 2019. During her term on the BALIF Board of Directors, Ms. Persinger advocated for LGBTQI community members with intersectional identities, and promoted anti-racism and anti-genderism. Ms. Persinger now serves as a Steering Committee member for the Cambridge Forum on Plaintiffs Food Fraud Litigation.

Education

University of California College of the Law, San Francisco, 2010, *magna cum laude*, Order of the Coif
University of California San Diego, 2007, *cum laude*

Bar Admissions

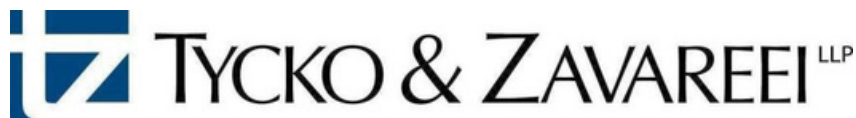
California

Memberships

American Association for Justice
Plaintiffs Food Fraud Litigation,
2020 Steering Committee Member
Public Justice

Awards

Elite Women of the Plaintiffs Bar
(2022)
Super Lawyer, Rising Star 2020
University of California College of
the Law, San Francisco, Best Oral
Argument 2008



Sabita J. Soneji

Partner

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ssoneji@tzlegal.com



In 23 years of practice, Sabita J. Soneji has developed extensive experience in litigation and legal policy at both the federal and state level and a passion for fighting consumer fraud. Now a Partner in Tycko & Zavareei LLP's Oakland office, she focuses on consumer protection class actions and whistleblower litigation. In addition to her success leading cases involving payday loans and predatory student lending products and cases against crypto currency platforms that fail to protect customer funds, Ms. Soneji served in leadership and helped settle multi-district litigation against Juul, for its manufacture and marketing to youth of an addictive nicotine product. Ms. Soneji has achieved significant results for consumers harmed by massive data breaches and corporate practices that collect and monetize user data without consent. She serves as head of the firm's Privacy and Data Breach Group.

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

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

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

Ms. Soneji is a graduate of the University of Houston, *summa cum laude*, with degrees in Math and Political Science, and Georgetown University Law Center, *magna cum laude*.

Education

Georgetown University Law Center, 2002
magna cum laude
University of Houston, 1997, *summa cum laude*

Bar Admissions

District of Columbia
California
Supreme Court of the United States

Memberships

Ninth Circuit Judicial Council Lawyer
Representative for the Northern
District of California, 2023-2025
Law360 Diversity & Inclusion Editorial
Advisory Board Member, 2022-2023
American Association for Justice
Public Justice, 2022-2024 Exec Member
of the Board of Directors
Impact Fund
Taxpayers Against Fraud Education
Fund (TAFEF)

Awards

Attorney General's Award 2014

Presentations & Publications

"FTC investigation of ChatGPT a win
for consumers", *The Daily Journal*
(July 24, 2023)

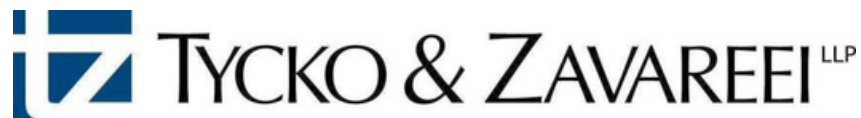
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Renée Brooker

Partner

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Bringing 30 years of practice, knowledge, and expertise as a former prosecutor in a senior leadership position at the United States Department of Justice, Renée Brooker is now representing whistleblowers. While at the Department of Justice for over two decades, Ms. Brooker was responsible for billions of dollars in recoveries under whistleblower laws. As an accomplished and experienced attorney, Ms. Brooker has advised and represented whistleblowers under the False Claims Act (FCA), the Anti-Kickback Statute and Stark Law, FIRREA (bank fraud, mail, and wire fraud), the Financial Institutions Anti-Fraud Enforcement Act (FIAFE), and the Whistleblower Programs of the SEC, the CFTC, and the IRS.

As Assistant Director within the Civil Division of the United States Department of Justice, Ms. Brooker was responsible for sizeable recoveries and successful judgments under the False Claims Act, FIRREA, and civil RICO in almost every industry: pharmaceutical, health care, defense, financial services, government procurement, small business, insurance, tobacco products, and higher education.

Ms. Brooker received her law degree in 1990 from Georgetown University Law Center, and a B.S. degree in 1987 from Temple University. After graduating from Georgetown, Ms. Brooker served as a Law Clerk to Judge Noël Kramer in the District of Columbia for one year before joining the United States Department of Education as an attorney. Ms. Brooker was hired as part of the enforcement response to Congressional investigations of fraud in federal student aid programs affecting consumers and taxpayers. Prior to joining Tycko & Zavareei LLP in 2020, Ms. Brooker worked at another prominent whistleblower firm where she advised and represented whistleblowers while expanding the firm's whistleblower practice. Ms. Brooker also served as a member of the United States Department of Justice-appointed Independent Corporate Compliance Monitor and Auditor for Volkswagen under its Plea Agreement and Consent Decree with the United States Department of Justice.

Education

Georgetown University Law Center, 1990
Temple University, 1987

Bar Admissions

District of Columbia
Pennsylvania

Memberships

Taxpayers Against Fraud Education Fund (TAFEF)

Board Member, Federal Bar Association
Qui Tam Section

National Employment Lawyers Association (NELA)

Awards

Selected to 2023 and 2024 Washington, D.C. Super Lawyers List

Department of Justice Commendation Award for recovering billions of dollars under the Big Lender Initiative, 2016

Council of the Inspectors General on Integrity and Efficiency Award for Excellence for \$1.2 billion False Claims Act settlement with Wells Fargo, 2016

Department of Justice Award for a record of outstanding actions and accomplishments, 2015

Attorney General's Award for Fraud Prevention, 2011

Department of Justice Award for prosecuting Big Tobacco under RICO, 2005

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Eva Gunasekera

Partner

202.417.3655
eva@tzlegal.com

Bringing 16 years of complex litigation experience practice, Eva Gunasekera, the former Senior Counsel for Health Care Fraud at the United States Department of Justice, is now representing whistleblowers. Ms. Gunasekera has spent the better part of her career enforcing the False Claims Act and the Stark and Anti-Kickback laws.

Highly strategic, Ms. Gunasekera has many notable successes under her belt, sizeable recoveries under the False Claims Act, and has held companies accountable for fraudulent conduct that harmed important government programs such as Medicare and Medicaid. With deep health care fraud expertise, she has investigated, litigated, and settled cases involving all federal health care programs (Medicare, Medicaid, TRICARE, FEHB). Ms. Gunasekera is an expert on analyzing complex health care data sets, including Medicare and Medicaid payment data and trends, to identify potentially fraudulent practices. She has enforced anti-fraud laws and represented whistleblowers across industries: pharmaceutical manufacturers, health care providers, hospitals, physicians, physician groups, laboratories, managed care, pharmacies, hospice and nursing home providers, financial institutions, government suppliers, automotive, small businesses, and defense contractors. Many of her investigations involved parallel criminal proceedings and compliance and whistleblower programs of health care organizations, including those subjected to Corporate Integrity Agreements and oversight by Independent Review Organizations, as required by the U.S. Department of Health and Human Services, Office of Inspector General (HHS-OIG).

After graduating with her Master's in Public Administration from Ohio University, and from Georgetown University Law Center, Ms. Gunasekera practiced law at two international law firms. She acted as second chair during administrative trials and handled complex commercial litigation. Ms. Gunasekera also played a significant role on the team that represented the Enron Creditors Recovery Corp in the bankruptcy proceeding, successfully returning billions of dollars to creditors in the wake of the Enron scandal. Further, Ms. Gunasekera represented clients in pro bono matters, including the successful defense of an individual seeking asylum and as guardian ad litem for three children.



Education

Georgetown University Law Center, 2004
Ohio University, M.A., 2001
Ohio University, B.A., 2000

Bar Admissions

District of Columbia
Ohio

Memberships

Taxpayers Against Fraud Education
Fund (TAFEF)
Federal Bar Association Qui Tam
Section

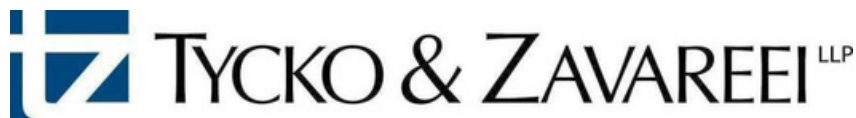
Presentations & Publications

Quoted in, "They Entered Treatment. Drugs, Overdoses and Deaths Followed," The New York Times (December 20, 2024)

New Fraud in America (TAF Coalition): Blowing the Whistle to Protect Vulnerable Patients (2024)

Quoted in: They Lost Their Legs. Doctors and Health Care Giants Profited, The New York Times (July 15, 2023)

Whistleblower Rewards 101" – Scottsdale (Arizona) Bar Association (March 9, 2021)



Katherine M. Aizpuru

Partner

202.973.0900
kaizpuru@tzlegal.com



Katherine M. Aizpuru is a Partner in Tycko & Zavareei LLP's Washington, D.C. office. Her practice focuses on protecting consumers and whistleblowers from fraudulent and unfair practices. Ms. Aizpuru has fought predatory financial institutions and mortgage servicers that wrongfully took money from consumers, service providers that snuck junk fees into their invoices, and tech companies that violated user privacy. She has also represented whistleblowers who exposed illegal practices in the healthcare industry. Ms. Aizpuru has taken on some of the world's most prominent corporations and financial institutions and has recovered millions of dollars for consumers.

Before joining Tycko & Zavareei LLP as a partner in 2024, Ms. Aizpuru litigated on behalf of consumers in the Federal Trade Commission's Division of Financial Practices. There, she led the FTC's first ever case against a cryptocurrency company and its former executives. She also secured settlements that shut down a pair of student debt relief scams, required the defendants to turn over their assets including personal bank accounts, vehicles, and properties for consumer redress, and banned the principals from working in the debt relief industry. Ms. Aizpuru's other work at the FTC included investigations involving fair lending, dark patterns, and unfair and deceptive practices in the fintech and auto sales industries. Ms. Aizpuru also served as a trial attorney at the Department of Justice, where she represented federal agencies, such as the U.S. Section of the International Boundary and Water Commission, the Kennedy Center for the Performing Arts, and the Defense Health Agency, in complex litigation and bankruptcy proceedings.

Ms. Aizpuru was an associate at Tycko & Zavareei LLP from 2017 to 2021. She earned her law degree cum laude from Harvard Law School and clerked for the Honorable Catharine F. Easterly on the District of Columbia Court of Appeals and the Honorable Theodore D. Chuang on the U.S. District Court for the District of Maryland. Prior to law school, Ms. Aizpuru graduated with a Bachelor of Arts with High Honors from Swarthmore College.

Education

Harvard Law School, *cum laude*, 2014
Swarthmore College, 2010, High Honors

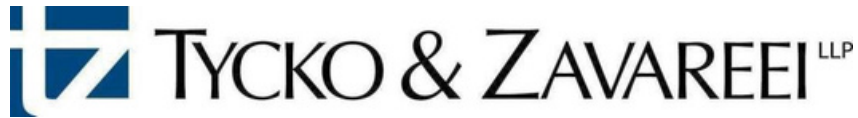
Bar Admissions

District of Columbia
Massachusetts
New York
U.S. District Courts for the Districts of Colorado, D.C., Maryland, Massachusetts, Eastern District of New York, Southern District of New York
U.S. Courts of Appeals for the Fourth, Second, and Seventh Circuits

Awards

2023 Director's Award, Federal Trade Commission, Bureau of Consumer Protection, in recognition of outstanding contributions to the Bureau.

Selected to 2020, 2021, and 2025 Washington, D.C. Super Lawyers Rising Stars List.



Gemma Seidita

Associate

202.973.0900

gseidita@tzlegal.com



Gemma Seidita is an associate in the Washington, D.C. office where she focuses on civil rights cases and advocating for whistleblowers and consumers.

Prior to joining Tycko & Zavareei LLP in 2022, Ms. Seidita was an associate in the Washington, D.C. office of Cooley LLP, where she represented clients in complex commercial litigation and investigations, including cases involving securities, trade secret, and unfair competition claims. At Cooley, Ms. Seidita maintained an active pro bono practice in civil rights and immigration areas. Ms. Seidita was a member of the trial team in the historic federal *Sines v. Kessler* litigation where white supremacists were put on trial for their conspiratorial actions in planning and committing violence at the Unite the Right rally in Charlottesville, Virginia.

Ms. Seidita graduated from Duke University School of Law in 2018 where she earned a J.D. and an LLM in international and comparative law. While in law school, she served as a Research Editor for the Duke Environmental Law and Policy Forum. Ms. Seidita received her Bachelor of Arts in Foreign Affairs from the University of Virginia in 2015.

Education

Duke University School of Law, 2018,
cum laude
University of Virginia, 2015, with
Distinction

Bar Admissions

California
District of Columbia
Massachusetts

Memberships

Public Justice



Robert Devling

Associate

202.769.4991
rdevling@tzlegal.com

Robert (Rob) Devling is an Associate in the Washington, D.C. office. Rob holds a JD from Washington University School of Law, graduating in 2021 with honors.

Prior to joining TZ, Rob worked at the DC office of Squire Patton Boggs where he was an associate in the firm's litigation practice group, focusing on complex litigation matters including consumer protection class actions.

Prior to joining Squire, Rob served as a judicial clerk to the Hon. Eric Clay of the U.S. Court of Appeals for the Sixth Circuit. During law school he completed legal internships with a class action litigation firm, the Federal Public Defender for the Southern District of Illinois, the St. Louis City Public Defenders Office, as well as the Housing Partnership Equity Trust in DC. Prior to law school, Rob interned at the U.S. Supreme Court, in the Office of Sen. Chuck Schumer, and in the DOJ, and received his B.A. in Politics, *magna cum laude*, from NYU.



Education

Washington University School of Law,
2021, with honors

New York University, 2017, *magna cum laude*

Bar Admissions

District of Columbia

Memberships

Public Justice



Tyler Ritchie

Associate

202.796.4344
tritchie@tzlegal.com

Prior to joining Tycko & Zavareei LLP, Tyler Ritchie was a legal fellow at the National Student Legal Defense Network, where he represented students in class action litigation stemming from universities' false advertising. He also litigated cases under the Administrative Procedures Act and Freedom of Information Act.

Tyler graduated with honors from Columbia Law School in 2023, where he was a Berger Public Interest/Public Service Fellow. While in law school, Tyler served as Design & Layout Editor of the Columbia Journal of Law & Social Problems. He interned at the Consumer Protection Bureau of the Federal Trade Commission and the Civil Rights Division of the U.S. Department of Justice.

Prior to law school, Tyler was a high school teacher for eight years, teaching U.S. history and U.S. government. He received a Bachelor of Arts *summa cum laude* in history from Vanderbilt University and a Master of Arts in history from Brandeis University.



Education

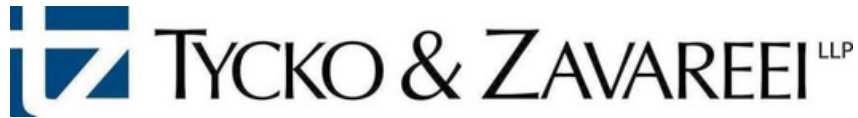
Columbia Law School, 2023, with honors
Brandeis University, M.A., 2012
Vanderbilt University, B.A., 2008, *summa cum laude*

Bar Admissions

District of Columbia

Memberships

Public Justice



Travis Stoller

Associate

202.935.6280
tstoller@tzlegal.com

Travis Stoller works as an associate in the Washington, D.C. office, who is passionate about defending consumer interests.

Prior to joining Tycko & Zavareei LLP in 2025, Travis served as a judicial law clerk, first for the Honorable Judge Moxila A. Upadhyaya at the U.S. District Court for the District of Columbia and then for the Honorable Chief Judge Anna Blackburne-Rigsby at the District of Columbia Court of Appeals. Prior to serving as a judicial law clerk, Travis was an associate at a large law firm in Washington, D.C., where he focused on a variety of litigation, regulatory, policy, and pro bono matters.

Travis graduated from the George Washington University Law School in 2020 and received a J.D. with honors. While in law school, Travis interned with the Federal Communications Commission and the House Committee on Oversight and Reform. Travis also served as an associate on The George Washington Law Review and as a writing fellow.

Prior to law school, Travis graduated from the University of Miami in 2017, receiving a Bachelor of Arts magna cum laude in Communication Studies-Public Advocacy and Political Science.



Education

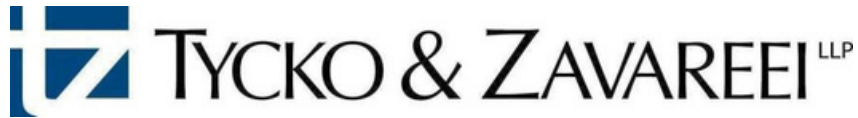
The George Washington University
School of Law
University of Miami

Bar Admissions

District of Columbia

Memberships

Public Justice



Christian Whitmer

Staff Attorney

202.935.6335
cwhitmer@tzlegal.com



Christian Whitmer is a staff attorney in the Washington, D.C. office dedicated to protecting and advancing consumer rights.

After graduating from Georgetown University Law Center in 2023, Christian Whitmer worked for the Office of the Attorney General for the District of Columbia, enforcing the District's wage and hour laws and investigating violations of the District of Columbia's False Claims Act. During his time at the Attorney General, Christian was involved in cases that recovered millions of dollars for aggrieved workers and the District.

Prior to law school, Christian worked on affordable housing policy for a national non-profit, focusing on outreach to Presidential candidates in advance of the 2020 election. During law school, Christian continued his work in the housing space, serving as a clerk for a legal aid organization that defends tenants who are facing eviction.

Education

Georgetown University Law Center, 2023
Brown University, 2016

Bar Admissions

District of Columbia

Memberships

Public Justice

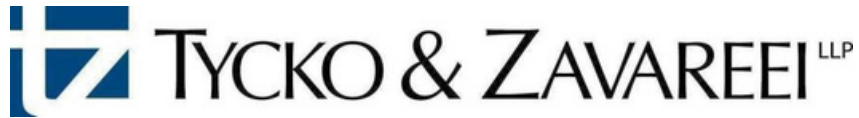
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Ivey Best

Staff Attorney

202.417.3665
ibest@tzlegal.com

Since her graduation from law school in 2020, Ivey's practice has been dedicated to representing individuals from all walks of life in civil rights cases. Prior to joining Tycko & Zavareei, Ivey represented hundreds of employees in discrimination, sexual harassment, and wage and hour cases. Ivey has extensive experience in state and federal court litigation and prioritizes authentic client storytelling in her work.



Education

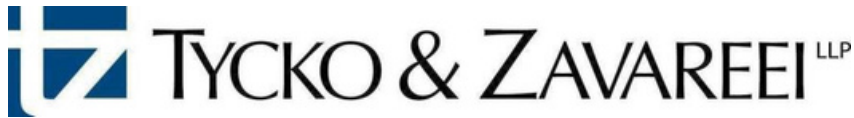
Georgetown University Law Center, 2023
Brown University, 2016

Bar Admissions

District of Columbia
United States District Court for the
District of Columbia

Memberships

Public Justice



David W. Lawler

Of Counsel

202.973.0900
dlawler@tzlegal.com



Mr. Lawler earned his degrees from the University of California, Berkeley, and Creighton University Law School. With over 25 years of legal experience, he has handled every stage of litigation, from pre-filing investigations to trial.

Since joining Tycko & Zavareei in 2012, Mr. Lawler has represented consumers across diverse practice areas, including product liability, false advertising, deceptive and unfair trade practices, data breaches, and antitrust class action litigation. He is an active member of the District of Columbia Bar.

Among Mr. Lawler's career achievements include the co-drafting of appellate briefs which resulted in rare reversal and entry of judgment in favor of client, US Court of Appeals for the Fourth Circuit. Mr. Lawler is a member of the District of Columbia Bar, as well as numerous federal courts.

Education

Creighton University School of Law,
1997

University of California, Berkeley,
1989

Bar Admissions

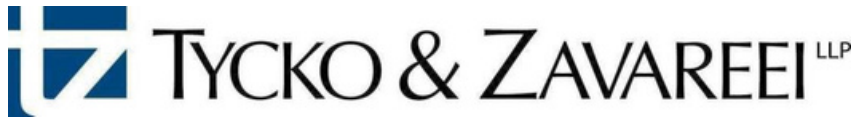
District of Columbia

Awards

Selected to 2025 Washington, D.C.
Super Lawyers List

Memberships

American Association for Justice
Public Justice



F. Peter Silva II

Of Counsel

202.973.0900

psilva@tzlegal.com



Peter Silva is a zealous advocate for consumers, workers, and individuals whose rights have been violated by the government, employers, and financial institutions. Over the last decade, Peter has successfully represented clients in civil rights, consumer protection, and foreclosure defense cases in negotiations, mediations, arbitrations, and at trial in state and federal courts and before various administrative agencies.

Prior to joining Tycko & Zavareei LLP, Peter represented individuals and small businesses as a Partner with Gowen Silva & Winograd, PLLC. Peter's work on behalf of Maryland, D.C., and Virginia homeowners has prevented dozens of foreclosures through loan modifications, settlements, and litigation. Peter not only defends foreclosures but countersues for violations of state and federal lending and servicing laws. Peter has successfully brought and defended lawsuits against America's biggest banks and mortgage servicers including Wells Fargo, Bank of America, U.S. Bank, Fannie Mae, Freddie Mac, Mr. Cooper/Nationstar Mortgage, Bayview Loan Servicing, and Ocwen Loan Servicing.

Through aggressive litigation and creative settlement solutions, Peter has obtained millions of dollars in damages and savings for his clients including principal and interest reductions, write-downs, and deficiency waivers. Peter's extensive knowledge of the foreclosure and loan modification processes, mortgage servicing industry and applicable state and federal laws including the Real Estate Settlement Procedures Act (RESPA) and Truth-in-Lending (TILA) allows him to provide clients with upfront and straightforward assessments of their options so that they can make an informed decision.

Peter has worked with local, state, and federal governments and non-profit entities to strengthen legal protections of consumers. Peter is a member of the National Association of Consumer Advocates.

At the beginning of his legal career, Peter worked extensively in the civil rights field as an attorney fellow for the Washington Lawyers Committee for Civil Rights and Urban Affairs, and a law clerk with the Equal Employment Opportunity Commission and the civil rights interest group, People for the American Way.

Education

University of Miami, School of Law, 2010

San Diego State University, 2007

Bar Admissions

California

District of Columbia

Maryland

Virginia

Supreme Court of the United States

Memberships

National Association of Consumer Advocates

Public Justice

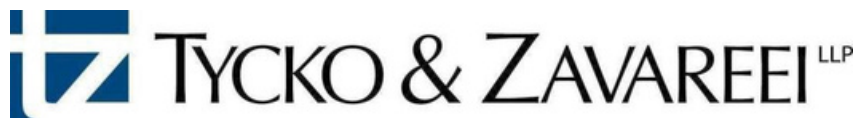
Awards

Selected to 2023 & 2024 Washington, D.C. Super Lawyers Rising Stars List

Presentations

The Tactical Deployment of Regulation X: Loss Mitigation in Judicial, Quasi-Judicial, and Non-judicial States, National Association Consumer Advocates (February 11, 2021)

Foreclosures: What You Don't Know Will Hurt You! National Association for the Advancement of Colored People



Frank Bartela

Of Counsel

202.973.0900
fbartela@tzlegal.com



Through his work in class action and business litigation, Frank Bartela strives to protect the interests of consumers and taxpayers by holding corporations and government agencies accountable. His practice is focused on litigating complex civil actions including consumer class actions and wage and hour lawsuits. In this capacity, Mr. Bartela fights for the interests and protects the rights of his clients both in Ohio and across the country. Currently, his work deals with cases regarding unlawful conduct committed by government agencies, manufacturers, retailers, and employers.

Additionally, Mr. Bartela has served as class counsel in actions across the country and has found success in representing individuals while holding defendants accountable:

- Successfully certified both a multi-state and national class of consumers in snake oil cases against two well-known national manufacturers;
- Negotiated a favorable settlement for a class of individuals who had been over charged for their title insurance policies by a regional title insurance company;
- Negotiated a favorable settlement for a class of employees of a Cleveland based restaurant who were not properly paid for all overtime hours worked;
- Served as Special Counsel to the Ohio Attorney General in an investigation against a national broadband internet provider related to allegations that the provider was “throttling” internet speeds delivered to consumers;
- Worked on trial teams for multiple wage and hour class actions and collective actions brought by plaintiffs that alleged they were improperly classified or were not paid the required minimum or overtime wages;
- Served on the Law and Briefing Committee in the In re East Palestine Train Derailment matter (N.D. Ohio); and
- Defeated dispositive motions by retailers in actions alleging unlawful advertising and marketing practices.

Frank graduated magna cum laude from the State University of New York at Buffalo (SUNY Buffalo) in 2007 with a double major in History and Political Science. While at SUNY Buffalo, he was inducted into Phi Beta Kappa one of America’s most prestigious honor societies. He then graduated cum laude from Case Western Reserve University School of Law in 2011. During law school, Frank served as an articles editor for Case Western’s Journal of International Law and served as a research assistant to Professor Lewis Katz where he helped research and update portions of Ohio Arrest, Search and Seizure.

Education

Case Western Reserve University School of Law,
2011
State University of New York at Buffalo,
2007

Bar Admissions

Ohio
Northern District of Ohio
Southern District of Ohio
Northern District of Illinois
Southern District of New York
U.S. Court of Appeals for the Sixth
Circuit

Memberships

Public Justice

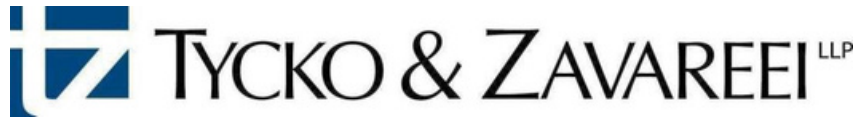
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Los Angeles, CA 90024
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Cleveland, OH 44113
216.423.6599



Patrick Brickman

Of Counsel

202.973.0900
pbrickman@tzlegal.com



Attorney Patrick Brickman's work focuses on class actions and complex litigation. His cases primarily deal with unlawful conduct committed by government agencies, manufacturers, retailers, and employers. Mr. Brickman's work covers numerous areas of law, including consumer law, real estate law, insurance law, commercial law, constitutional law, tax law, advertising law, wage & hour law, benefits law, and more.

Mr. Brickman attended the University of Dayton for his undergraduate studies and the University of Akron School of Law where he was an advocate on the moot court team and an associate editor for the Akron Law Review.

Mr. Brickman has a passion for holding corporations and governments accountable to consumers, small businesses, and taxpayers.

Education

University of Akron School of Law,
2011

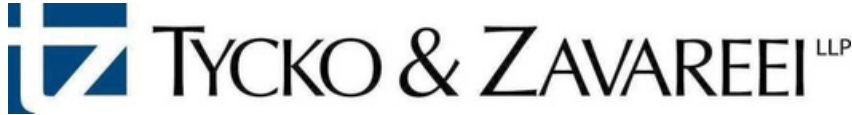
University of Dayton,
2007

Bar Admissions

Ohio
Northern District of Ohio
Southern District of Ohio
U.S. Court of Appeals for the
Sixth Circuit

Memberships

Public Justice



Lavanya Prabhakar

Fellow

510.254.6808

lprabhakar@tzlegal.com



Lavanya Prabhakar is a Public Interest Fellow in the Oakland, CA office. Lavanya received her J.D. from Northwestern Pritzker School of Law in 2024.

Lavanya spent her time at Northwestern dedicated to civil rights, voting rights, and the power of community organizing. As a student attorney in Northwestern's Bluhm Legal Clinic, she worked on multiple prison class actions, advocating for the proper enforcement of parole and mandatory prison release laws in the Deep South. She also helped represent community organizers dedicated to ensuring the safety of Chicago's Black and brown young people. As the Deputy Editor-in-Chief of Northwestern's Journal of Law and Social Policy, Lavanya sought to foster community on campus through accessible and inclusive programming that involved community members from both Northwestern and the larger Chicago community.

Inspired by her clinical work and classwork, much of Lavanya's legal research focused on the intersection of movement lawyering and voting rights, which culminated in her published note, "Applying Movement Lawyering Principles to the Redistricting Movement." During her summers, Lavanya worked on Capitol Hill on judicial nominations and legislative policy, and at a plaintiffs' firm focused on civil rights class actions and environmental citizen suits.

Lavanya received her B.A. in International Relations and Economics from Boston University in 2019. Prior to law school, she worked in political research on political campaigns and in private industry.

Education

Northwestern Pritzker School of Law,
2024

Boston University, 2019

Bar Admissions

California

Memberships

Public Justice

Presentations & Publications

Applying Movement Lawyering Principles to the Redistricting Movement, 19 NW. J. L. & SOC. POL'Y. 303 (2024).

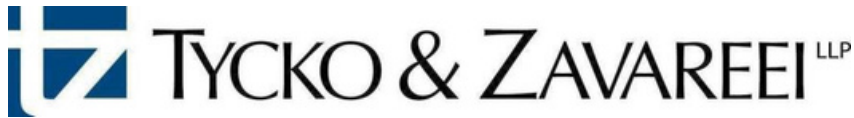
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Robin Bleiweis

Fellow

202.973.0900
rbleiweis@tzlegal.com



Robin Bleiweis is a Public Interest Fellow in the Washington, D.C. office. Robin received her J.D. with honors from the University of North Carolina School of Law in 2024. While at UNC, she embraced experiential learning opportunities both inside and outside of the classroom. She provided over 100 hours of pro bono legal services including work with the Carolina Abortion Fund helping minors secure a judicial bypass to obtain abortion care without parental consent and with the Compass Center for Women & Families, counseling a client experiencing domestic violence about her divorce and property division options.

Robin spent her 3L year as a clinical law student in UNC Law's Civil Legal Assistance Clinic. She argued and won the first case in North Carolina state court seeking the transfer of an incarcerated intersex woman from a men's prison to a women's prison. Robin also represented two workers experiencing wage theft and successfully negotiated with their employer to secure a confession of judgment and payment plan.

During her summers, Robin clerked for a supervisory Administrative Judge with the Equal Employment Opportunity Commission and interned with a firm representing federal employees in employment discrimination and whistleblower cases.

Prior to law school, Robin worked as a securities paralegal for Cohen Milstein Sellers & Toll PLLC. She then worked for the Center for American Progress as a Research Associate for Women's Economic Security.

Robin received her B.A. *magna cum laude* from Wake Forest University in 2015, where she studied sociology and psychology.

Education

University of North Carolina School of Law, 2024, with honors

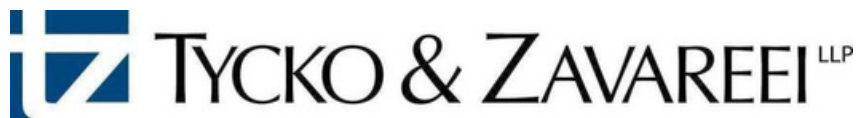
Wake Forest University, 2015, *magna cum laude*

Bar Admissions

District of Columbia

Memberships

Public Justice



Katelyn Donaldson

Fellow

kdonaldson@tzlegal.com
510.250.3316



Katelyn A. Donaldson is a Public Interest Fellow in the Oakland, CA office. Katelyn received her J.D. from American University Washington College of Law in 2025.

While attending American University, Katelyn took advantage of many academic and hands-on experiences. As a Student Attorney in the International Human Rights Law Clinic, Katelyn represented Guatemalan nationals in affirmative asylum proceedings and strategized with federal public defenders to mitigate a death row inmate's sentence. Katelyn was also a Senior Staffer on American University Law Review. Katelyn's comment, "Captured Without Consent: Reckoning with Non-Volitional Disclosures Around the Home in Long-Term Pole Camera Cases," was published by American University Law Review in 2024. Additionally, Katelyn was a Constitutional Law Teaching Assistant and did research for Professor Maya Manian on the impacts of abortion restrictions on prenatal genetic counseling post-Dobbs.

While in Washington, D.C., Katelyn gained further rewarding experiences off-campus. Katelyn drafted two memorandum opinions resolving dispositive motions as a Judicial Intern at the U.S. District Court for the District of Columbia. Additionally, Katelyn interned at the U.S. Department of Labor, where she drafted an appellate brief and analyzed foreign laws and enforcement efforts for compliance with international child labor conventions. Katelyn also spent a year interning for Levy Firestone Muse LLP, where she helped draft motions, produce legal memoranda, and develop facts for several civil cases.

Prior to her legal career, Katelyn was a caseworker at the Franklin County Child Support Enforcement Agency in Columbus, Ohio. Katelyn received her B.A. in English with a minor in Human Rights from The Ohio State University in 2020.

Education

American University Washington College of Law, 2025

The Ohio State University, 2020

Bar Admissions

California

Memberships

Public Justice



Troy Brown

Fellow

202.769.4991
tbrown@tzlegal.com



Troy Brown is a Public Interest Fellow in the Washington, D.C. office. A graduate of Harvard Law School, Troy received his J.D. in 2025. During law school, Troy provided nearly 1,000 hours of pro bono legal services, representing consumers, workers, and advocacy organizations fighting against corporate wrongdoing across all levels of the state and federal judiciaries.

During his summers, Troy worked at a plaintiffs'-side appellate firm and a legal non-profit. From successfully representing workers fighting wrongful termination or wage theft in the Federal Courts of Appeals to developing novel legal theories for holding powerful corporate actors to account, Troy's work centered around fighting for economic justice for workers and consumers across the country.

Before law school, Troy worked as a paralegal in the Massachusetts Attorney General's Office, where he worked on consumer protection litigation that has resulted in judgments and settlements requiring the payment of tens of millions of dollars in restitution for consumers. Troy also maintained a policy portfolio that centered racial and economic justice in health care.

A first-generation college graduate, Troy received his B.A. from Columbia University where he studied Political Science.

Education

Harvard Law School, 2025
Columbia University, 2019

Bar Admissions

District of Columbia

Memberships

Public Justice

EXHIBIT B

	Andrea Gold	Mallory Morales	Gemma Seidita	Robin Bleiweis	Troy Brown	Em Cooper	Lavanya Prabhakar	Emma Bass	Adam Cardona	Alicia Linthicum-Amos	Allegra Lubar	Aaron McReynolds	James Morrison	Nicole Porzenheim	Stephanie Ricker	Genna Wolinsky
ADR	67.30	0.00	61.10	0.00	0.00	0.00	2.10	0.00	0.00	0.20	2.90	0.00	0.00	0.00	0.00	0.00
Attending court hearings	22.80	0.00	8.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Case development, background investigation and case administration	26.50	5.90	9.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11.60	0.00	8.00	0.70	0.00	1.70
Depositions	19.80	0.00	3.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5.50	0.00	0.00	0.00	0.00	0.00
Fee petition preparation	12.20	0.00	46.20	2.90	0.10	0.00	0.00	0.00	0.00	4.60	4.50	0.00	0.00	0.00	0.00	0.00
Interrogatories, document production, and written discovery	61.00	0.00	42.60	0.00	0.00	0.00	0.00	0.80	0.00	0.00	0.40	0.00	0.00	0.00	0.00	0.70
Motion practice	118.00	49.90	243.70	0.00	16.40	8.00	21.40	0.00	0.00	0.00	14.40	0.40	1.10	0.20	10.30	1.60
Pleadings	75.30	47.80	27.90	0.00	0.00	0.00	0.00	0.00	0.30	0.00	9.80	0.00	0.00	0.00	0.00	3.20
Total	402.90	103.60	442.80	2.90	16.50	8.00	23.50	0.80	0.30	4.80	49.10	0.40	9.10	0.90	10.30	7.20