UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF PENNSYLVANIA

In re URBAN OUTFITTERS, INC. SECURITIES LITIGATION This Document Relates To: ALL ACTIONS.	Master File No. 2:13-cv-05978-MAK CLASS ACTION DECLARATION OF DEBORAH R. GROSS FILED ON BEHALF OF KAUFMAN, COREN & RESS, P.C. AND LAW OFFICES BERNARD M. GROSS, P.C. IN SUPPORT OF APPLICATION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES

I, Deborah R. Gross, declare as follows:

1. I am currently a member of Kaufman, Coren & Ress, P.C. ("KCRPC"). I joined KCRPC in October 2015. Up until that point in time, I had been a member of Law Offices Bernard M. Gross, P.C. ("BMGPC"). I am submitting this declaration in support of both firm's application for an award of attorneys' fees and expenses/charges ("expenses") in connection with services rendered in the above-entitled action.

2. KCRPC currently is, and BMGPC was, liaison counsel of record for plaintiff David A. Schwartz.

3. The information in this declaration regarding each firm's time and expenses is taken from time and expense printouts and supporting documentation prepared and/or maintained by both KCRPC and BMGPC in the ordinary course of business. I am the partner who oversaw and/or conducted the day-to-day activities in the litigation and I reviewed these printouts (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. As a result of this review, reductions were made to both time and expenses in the exercise of billing judgment. As a result of this review and the adjustments made, I believe that the time reflected in the firm's lodestar calculation and the expenses for which payment is sought as set forth in this declaration are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

4. After the reductions referred to above, the number of hours spent on this litigation by KCRPC is 119.70 and by BMGPC is 71.25. A breakdown of the lodestar is provided in

Exhibit A. The lodestar amount for attorney time based on KCRPC's current rates and BMGPC's rates as of the time I departed is $100,044.75. The hourly rates shown in Exhibit A are the usual and customary rates set by the firm for each individual.

5. Attorneys from BMGPC worked with and at the direction of Lead Counsel on all pleadings and filings with the Court, assisted in research on the opposition to the Motion to Dismiss and the class certification brief, reviewed all pleadings filed with the Court, communicated with Lead Counsel, communicated with defense counsel, participated in meet and confer discussions, and participated and prepared for and attended court hearings.

6. Attorneys from KCRPC worked with and at the direction of Lead Counsel on all pleadings and filings with the Court, reviewed all pleadings filed with the Court, participated in document discovery and mediation discussions and meetings, reviewed memos about the document review and attended court hearings, and communicated with defense could on numerous matters.

7. I also seek an award of $2,049.69 in expenses in connection with the prosecution of the litigation by KCRPC and BMGPC. These expenses are summarized by category in Exhibit B.

8. The following is additional information regarding certain of these expenses:

(a) Filing, Witness and Other Fees: $600.00. These expenses have been paid to the Court for the filing fees for the complaint and for *pro hac vice* applications. The vendor who was paid for these services is set forth in Exhibit C.

(b) Class Action Notices/Business Wire: $180.00 This expense was necessary under the Private Securities Litigation Reform Act of 1995's "early notice" requirements, which provides, among other things, that "[n]ot later than 20 days after the date on which the complaint is filed, the plaintiff or plaintiffs shall cause to be published, in a widely circulated national

business-oriented publication or wire service, a notice advising members of the purported plaintiff class – (I) of the pendency of the action, the claims asserted therein, and the purported class period; and (II) that, not later than 60 days after the date on which the notice is published, any member of the purported class may move the court to serve as lead plaintiff of the purported class." *See* 15 U.S.C. §78u-4(a)(3)(A)(i).

(c) Transportation, Hotels & Meals: $287.63. In connection with the prosecution of this case, KCRPC paid for travel expenses to attend mediation at JAMS in New York City. The date, destination and purpose of each trip is set forth in Exhibit D.

(d) Court Hearing and Transcripts: $264.00. The vendors who were paid for hearing and deposition transcripts are listed in Exhibit E.

(e) Photocopies: $269.62. All copies were black and white. Each time an in-house copy machine is used, our billing system requires that a case or administrative billing code be entered and that is how the copies were identified as related to this case.

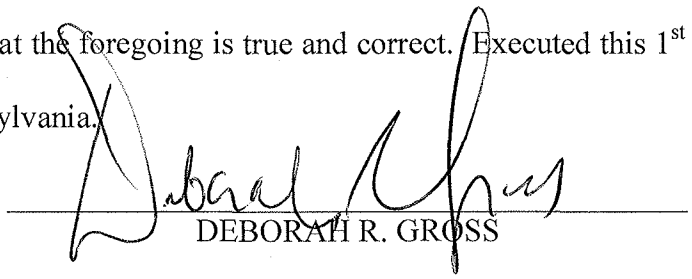
(f) Online Legal Research: $370.68. These included vendors such as LEXIS and Westlaw. These databases were used to obtain access to legal research and for cite-checking of briefs. This expense represents the expense incurred by BMGPC and KCRPC for use of these services in connection with this litigation. The charges for these vendors vary depending upon the type of services requested.

9. The expenses pertaining to this case are reflected in the books and records of KCRPC and BMGPC. These books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses.

10. The identification and background of KCRPC is attached hereto as Exhibit F.

11. The identification and background of BMGPC is attached hereto as Exhibit G.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of August, 2016, at Philadelphia, Pennsylvania.



DEBORAH R. GROSS

EXHIBIT A

EXHIBIT A
LODESTAR

KAUFMAN COREN & RESS, P.C.
October 27, 2015 through June 30, 2016

NAME		*HOURS*	*RATE*	*LODESTAR*
Deborah R. Gross	(P)	51.60	$750.00	$38,700.00
Morgan Birch	(P)	65.40	$185.00	$12,099.00
Janice Daul	(A)	2.70	$185.00	$499.50
TOTAL		***119.70***		***$51,298.50***

(P) Partner
(A) Associate

LAW OFFICES Bernard M. Gross P.C.
Inception - October 27, 2015

NAME		*HOURS*	*RATE*	*LODESTAR*
Bernard M. Gross	(P)	2.00	$795.00	$1,590.00
Deborah R. Gross	(P)	48.00	$750.00	$36,000.00
Susan R. Gross	(P)	21.25	$525.00	$11,156.25
TOTAL		***71.25***		***$48,746.25***

(P) Partner

EXHIBIT B

EXHIBIT B
EXPENSES/CHARGES

Inception to June 30, 2016

CATEGORY	***KCRPC***	***BMGPC***	***TOTAL***
Filing, Witness and Other Fees		$600.00	$600.00
Class Action Notices/Business Wire		$180.00	$180.00
Transportation, Hotels & Meals	$287.63		$287.63
Postage	$0.46	$52.30	$52.76
Court Hearing and Deposition Reporting, and Transcripts	$264.00		$264.00
Photocopies	$106.40	$163.22	$269.62
Online Legal and Financial Research	$180.27	$190.41	$370.68
Miscellaneous – Notary		$25.00	$25.00
TOTAL			***$2,049.69***

EXHIBIT C

EXHIBIT C

Filing, Witness and Other Fees: $600.00.

DATE	***VENDOR***	***PURPOSE***
10/11/2013 03/21/2014 09/16/2014 5/13/2015 6/22/2015	U.S. District Court	Filing of Complaint and *Pro Hac Vice* Applications

EXHIBIT D

EXHIBIT D

Transportation, Hotels & Meals: $287.63.

NAME	*DATE*	*DESTINATION*	*PURPOSE*
Deborah R. Gross	4/18/2016	New York City	JAMS Mediation

EXHIBIT E

EXHIBIT E

Court Hearing and Deposition Reporting, and Transcripts: $264.00.

DATE	***VENDOR***	***PURPOSE***
6/16/2016	Court Reporter – Gail Drummond	Transcript of hearing

EXHIBIT F

KAUFMAN, COREN & RESS, P.C.

Attorneys at Law

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Steven M. Coren
Douglas Evan Ress
Benjamin M. Mather

Of Counsel

Howard J. Kaufman
John W. Morris
James P. Cousounis
Deborah R. Gross

Matthew R. Williams
David M. DeVito
Andrew J. Belli
Evan B. Coren
Morgan Birch
Janice Daul

JANUARY 2016

THE FIRM

With an office in Philadelphia, Pennsylvania, Kaufman, Coren, & Ress, P.C. provides a broad range of legal services to its clients, concentrating in litigation. The Firm's litigation practice consists of a wide variety of cases in both federal and state courts, including commercial, breach of contract, securities, RICO, antitrust, civil rights, intellectual property, unfair competition, employment, construction, insurance coverage, domestic relations, criminal, personal injury (plaintiff and defense) and adversary bankruptcy matters.

The Firm was founded in 1989 by Howard J. Kaufman, Steven M. Coren and Douglas Evan Ress, all of whom were formerly partners in Kittredge, Kaufman & Donley. John Morris became "Of Counsel" to the Firm in 2005, and in 2012, Mr. Kaufman became "Of Counsel" to the Firm as well. As of January 1, 2015, Benjamin M. Mather became a member of the Firm,as of April, 2015, James P. Cousounis became "Of Counsel" to the Firm and as of October, 2015, Deborah R. Gross became "Of Counsel" to the Firm.

The Firm's attorneys are admitted to the particular federal and state courts identified in their individual resumes, and many have handled multi-district litigation matters as well. Various of the attorneys have also tried cases in New York, New Jersey, North Carolina, Massachusetts, Florida, Texas and Oklahoma.

The expertise of the Firm's attorneys is respected throughout the Philadelphia legal community, and the attorneys enjoy the highest professional reputations. Many of the Firm's attorneys previously practiced with well-known, large Philadelphia law firms, and the types of matters handled by the Firm generally parallel those of larger firms.

ATTORNEYS IN THE FIRM

SHAREHOLDERS:

STEVEN M. COREN:
Temple University, B.A. 1977 (*Magna Cum Laude*)
Penn State, The Dickinson School of Law, J.D. 1980 (*Cum Laude*)(Projects Editor, Dickinson Law Review)

Mr. Coren became a founding shareholder of Kaufman, Coren & Ress, P.C. in 1989. For the more than 33 years that have followed his graduation with honors from Penn State, The Dickinson School of Law, Mr. Coren has concentrated his practice on complex civil litigation in

federal and state court. Mr. Coren has settled or tried to verdict numerous multi-million dollar cases resulting in recoveries exceeding $200 million. Mr. Coren has been repeatedly recognized as a Pennsylvania "Super Lawyer" in *Philadelphia Magazine*, has been selected for inclusion in the 2010-2016 editions of The Best Lawyers in America, and is a Fellow of the Litigation Counsel of America, a Trial Lawyer Honorary Society.

Examples of matters handled:

- Recovered more than $150 million on behalf of a Chapter 7 trustee of a failed sub-prime lender in a series of cases arising out of the collapse of the sub-prime mortgage industry and successfully asserted claims against: (a) several Wall Street investment banks that had extended warehouse financing and had served as underwriters for the failed lender's securitization of sub-prime mortgages; (b) the Chapter 7 debtor's former officers and directors; (c) the Chapter 7 debtor's former attorneys; and, (d) the Chapter 7 debtor's former auditor.

- Recovered a $24 million judgment, including a $7 million punitive damage award, against a national bank on lender-liability claims for breach of contract, breach of fiduciary duty, and misrepresentation;

- Represented numerous real estate developers and other businesses in multi-million dollar disputes with banks and other financial institutions;

- Recovered an eight figure verdict in a breach of contract case involving a dispute over programming and other rights with respect to a television station;

- Recovered a fraudulently transferred business and millions of dollars in damages on behalf of two Chapter 7 trustees and prevailed on claims of fraudulent transfer and breach of fiduciary duty against an individual debtor, his wife and various entities;

- Successfully represented law enforcement officials in civil rights claims against their superiors and recovered substantial money damages, along with injunctive relief;

- Successfully defended claims of patent infringement and obtained a declaration invalidating a patent;

- Successfully represented an originator of a television show against a defendant alleged to have misappropriated plaintiff's programing ideas; and,

- Successfully represented a minority family in civil rights claims against police and school officials.

Mr. Coren is admitted to practice in the United States Supreme Court, the United States Court of Appeals for the Third Circuit, the United States Tax Court, the United States District Court for the Eastern District of Pennsylvania, and the Pennsylvania Supreme Court. He is a member of the American, Pennsylvania and Philadelphia Bar Associations and has lectured on areas involving lender-liability and other litigation.

DOUGLAS EVAN RESS:
Queens College, B.A. 1976
Georgetown University Law Center, J.D. 1979

Following his graduation *magna cum laude* from Queens College, where he was its first state finalist for a Rhodes Scholarship and its Scholar Athlete, and his graduation *cum laude* from Georgetown University Law Center, Mr. Ress was an associate for three years at Morgan, Lewis & Bockius handling commercial and other civil litigation. Mr. Ress then associated with Kittredge, Kaufman & Donley, in which he became a partner in 1985. In 1989, Mr. Ress became a founding shareholder of KCR and continued his practice in the area of commercial litigation, personal injury litigation and in a variety of other related litigation matters. Mr. Ress has been continuously selected for inclusion in The Best Lawyers in America for 2007 to 2014 in the field of commercial litigation, as well as for 2015 and 2016 in the fields of bet-the-company litigation and commercial litigation, and has been repeatedly recognized as a Pennsylvania "Super Lawyer" in Philadelphia Magazine. For 2007, Mr. Ress was recognized as one of the Top 100 Super Lawyers in Pennsylvania, and for 2013, Mr. Ress has been recognized as one of the Top 100 Super Lawyers in Philadelphia. Examples of matters handled:

- National coordinating counsel for a beryllium manufacturer in defense of toxic tort individual and class action litigation;
- Numerous representations of Partners, Shareholders or Members in professional business divorce/freeze-out matters;
- Pennsylvania Commerce Court and Delaware Chancery Court litigations involving valuation of companies and/or dissenters' rights, including almost $6 million judgment entered in Delaware Chancery Court for twice the squeeze-out appraisal value offered;
- Representation of self-insured public companies defending premises and products liability actions;
- Claims for injunctive relief in non-competition and trade secret matters;

- Representation of insureds against carriers for an advertising injury; for coverage and bad faith claims on D&O policy; and for over-reserving and/or mishandling claims files on workers compensation policies with retrospectively rated premiums, establishing law on the burden of proof in such cases;

- Defense of $ 5 billion claim against public company for its alleged theft of the idea to build a trash-to-steam plant seeking disgorgement of its operating profits and arbitrage from the related bond issues;

- Civil RICO action for public company involving kickback scheme from product suppliers to company's purchasing agents;

- Fraud case against internet company and its owner for purchasing computer consulting services with checks they knew would be dishonored -- judgment thereafter not avoided in bankruptcy;

- ERISA litigation with issues ranging from the propriety of the denial of benefits by health plans to QDROs (qualified domestic relations orders);

- Personal injury and wrongful death representations of family of brain injured plaintiff who committed suicide after being permitted to self-medicate; of motorist suffering from vertebral artery dissection injury; of estates of decedents killed in single car accidents; and

- Medical malpractice plaintiffs' verdicts in cases involving improper treatment of patient as being HIV-positive and improper catheterization during post-bladder cancer treatment.

Mr. Ress is a member in good standing of the Bars of the Commonwealth of Pennsylvania and the State of New York, and also is admitted to practice law in the United States District Courts for the Eastern District of Pennsylvania and the Southern District of New York, the Third Circuit Court of Appeals and the United States Supreme Court. Mr. Ress served as a Hearing Officer for the Pennsylvania Disciplinary Board from 2002 to 2008, and serves as a Federal Arbitrator for the United States District Court for the Eastern District of Pennsylvania and a Judge Pro Tem in the Dispute Resolution Center of the Philadelphia County Court of Common Pleas. Mr. Ress has also served as an Arbitrator for the American Arbitration Association, and as a member of the Philadelphia Bar Association's Professional Responsibility Committee. He is a member of the American, Pennsylvania and Philadelphia Bar Associations and various trial lawyers' associations, has been a participant in ABA, AAJ and PBI programs, and served as a speaker at the 2008 PBI Bankruptcy Institute on "How to Best Present Testimony of an Expert Witness." He has also served on the Board of Directors of Temple Beth Hillel-Beth El, Wynnewood, Pennsylvania, and served from 1993 to 2008 and again from 2014 to the present as a Trustee of its Endowment Fund. In addition, Mr. Ress has authored articles in his field, including a co-authored article: *Tax-Affecting and Beyond: Dela. Radiology Experts Discuss 'Landmark' Case*, Business Valuation Update, Vol. 13, No. 5, May 2007. As of 2010, Mr. Ress is also a Fellow of the Litigation Counsel of America, a Trial Lawyer Honorary Society, and a contributing author to

its e-journal: *Thoughts From a Road Trip: Exploring What it Takes for Someone to be Truly Great in His or Her Profession*, 4 Litigation Commentary & Rev. 29 (January/February 2011). In 2012, Mr. Ress was inducted as one of nine inaugural Members of the Queens College Athletics Hall of Fame.

BENJAMIN M. MATHER
Kenyon College, B.A. 1997
Loyola University Chicago, J.D. 2002

Ben Mather has experience handling all types of commercial disputes in both federal and state court. Before joining KCR, Ben was a Deputy City Solicitor in the Philadelphia Law Department. While in that role, Mr. Mather was the City's lead attorney on many of its most complex and high-profile cases. Before working at the City, Mr. Mather was associated with the law firm of Pepper Hamilton, LLP. He is admitted to the Bar of the Commonwealth of Pennsylvania and the United States District Court for the Eastern District of Pennsylvania. As of January 1, 2015, Mr. Mather became a Member of KCR.

OF COUNSEL:

HOWARD J. KAUFMAN:
University of Pennsylvania, Wharton School, B.S. 1966
Columbia Law School, J.D. 1969

After receiving a B.S. in Economics with honors from the Wharton School of the University of Pennsylvania and his J.D. with honors from Columbia University School of Law, Mr. Kaufman became associated with Cohen, Shapiro, Polisher, Shiekman & Cohen. Having become a partner in its litigation section in 1974, he was soon responsible for handling complex civil and commercial litigation. In 1981, Mr. Kaufman helped found the law firm of Kittredge, Kaufman & Donley. In 1989, Mr. Kaufman became a founding shareholder of KCR, where he continued his practice in diverse areas of civil litigation. In 2012, Mr. Kaufman became "Of Counsel" to KCR.

Mr. Kaufman's trial experience has covered the entire spectrum of litigation from highly publicized political disputes, to sophisticated commercial litigation, to domestic relations, to white collar criminal defense. Mr. Kaufman has been repeatedly recognized as a Pennsylvania "Super Lawyer" in Philadelphia Magazine. Examples of matters handled:

- Trial counsel for both plaintiffs and defendants in securities class actions and anti-trust actions;
- Representation of employees wrongfully discharged;
- Representation in disputes between business partners, including law firms and individual attorneys in matters involving the break-up of law firms;
- Representation of local unions in disputes with their parent or international bodies and of parties seeking to gain control of organizations, including unions and condo associations;
- Criminal defense in securities litigation and other white collar matters;

- Representation of both plaintiffs and defendants in large professional malpractice cases;
- Representation of both plaintiffs and defendants in complex commercial disputes, including non-compete agreements, confidentiality agreements, and trade secrets;
- Defense counsel representing retailers throughout the state in connection with mass tort litigation; and,
- Representation of charities and potential beneficiaries in will contests and other Orphans Court matters.

Mr. Kaufman has served on the Professional Guidance Committee of the Philadelphia Bar Association, and has been a Hearing Officer for the Pennsylvania Disciplinary Board. Mr. Kaufman also served on the Board of Directors of Nancy's House and the Terlingo Cancer Fund. Mr. Kaufman is admitted to practice in the Commonwealth of Pennsylvania, the United States Court of Appeals for the Third Circuit, and United States District Court for the Eastern District of Pennsylvania.

JOHN W. MORRIS:
Yale University, B.A. 1967
University of Pennsylvania, J.D. 1970

After receiving his bachelors degree in philosophy, earning his law degree, and practicing for three years with the Philadelphia firm of Clark, Ladner, Fortenbaugh & Young, Mr. Morris joined the Philadelphia District Attorney's Office. His four years in that office included service as First Assistant from 1975 through 1977. He then returned to private practice specializing in litigation with the firm of Pierson, Jones and Morris. Since 1982, Mr. Morris has been a sole practitioner with a practice divided between corporate representations and litigation, including white-collar criminal defense and management of national litigation for Reading Entertainment, Inc. (formerly Reading Railroad) and New Piper Aircraft. He joined KCR as Of Counsel in 2005.

Mr. Morris is the referral lawyer of choice of many prominent attorneys in the region. As such, he has tried numerous high-profile criminal and civil cases. As an appellate lawyer, he has argued a wide range of cases in the state and federal systems. He frequently represents attorneys and judges in the disciplinary system.

Mr. Morris has served two terms on the Disciplinary Board of the Supreme Court of Pennsylvania, as Chairman of its Rules Committee, and on the Board of the Pennsylvania Association of Criminal Defense Lawyers. In 1999, he was appointed by the Governor to serve on the Pennsylvania Judicial Conduct Board where he was Chairman from 2001 to 2003. Mr. Morris lectures on trial practice at Temple University and has been a regular instructor in NITA regional and national programs and in programs at Harvard, Emory, and Cardozo law schools. Mr. Morris serves on the Ethics Committee at Thomas Jefferson University Hospital. Mr. Morris has been repeatedly recognized as a Pennsylvania "Super Lawyer" in Philadelphia Magazine. He is a fellow of the American College of Trial Lawyers. In 2008, Mr. Morris was appointed by the Governor to serve as a Judge on the Pennsylvania Court of Judicial Discipline. Mr. Morris served

as President Judge of that Court until the expiration of his term in 2012. Mr. Morris is a fellow of the American College of Trial Lawyers.

JAMES P. COUSOUNIS
Princeton University, B.A. 1981
George Washington University School of Law, J.D. 1984

Mr. Cousounis is a graduate of Princeton University (A.B. History, 1981) and George Washington University Law School (J.D. 1984). He was born and raised in Philadelphia and attended Philadelphia public schools. He is admitted to practice in Pennsylvania and before the Third Circuit Court of Appeals and U.S. District Court for the Eastern District of Pennsylvania.

Before joining KC&R in April 2015, Jim was employed by the City of Philadelphia Law Department for 14 years, starting in 2001. He first served as Deputy City Solicitor, pursuing affirmative recovery litigation for the City. He has also served as Senior Attorney and Divisional Deputy City Solicitor in Commercial Litigation, during which time he primarily handled commercial, complex and mass litigation matters as well as affirmative recovery cases. Appointed Chief Deputy for General Litigation, Jim, and the team of lawyers he formed and managed, defended and/or prosecuted major, high-profile and complex cases for the City. Overall, he represented the City and its officers in substantial number of injunction or declaratory judgment proceedings involving critical public works projects or important governmental interests as well as in cases with significant liability or damage exposure and made several large recoveries for the City.

Before his employment with the City Law Department, Jim was engaged in private practice with several prominent law firms and attorneys in the Philadelphia area for more than 16 years. Nearly all of his practice involved representation of clients in civil matters, primarily involving business, tort, regulatory and constitutional litigation.

Jim has served as co-coordinator and panelist in connection with several prominent continuing legal education seminars. The panels have involved topics such as: False Claims Act/Ordinance cases (2014); Trial Practice in Philadelphia Court of Common Pleas (2011); Class Actions (2010); and City's Affirmative Recovery Program (2006). He has guest lectured at Temple Law School in a Trial Advocacy Course, on the topic of Expert Witnesses (1999). He also presented at Pa. Bar Assn. Annual Meeting (May 1992) on a panel discussion involving legality of Waste Flow Control Laws adopted by state or local governments.

He is a co-founder, manager and adviser of the Dr. Gerry T. Cousounis Memorial Fund, a charitable fund held and maintained by The Philadelphia Foundation. The Doc Cousounis Fund seeks to perpetuate the work and continue the legacy of Jim's uncle and is dedicated to supporting Roxborough-based youth soccer organizations and the development through the game of soccer of the next generation of leaders from Roxborough youth. He has also served on the Board of Governors of the American Hellenic Lawyers Association.

DEBORAH R. GROSS

University of Pennsylvania, Wharton School, B.S. 1982

Boston University School of Law, J.D. 1985

Before becoming Of Counsel to KC&R in October of 2015, Deborah R. Gross, Esq. was a member of the Law Offices of Bernard M. Gross, P.C. She concentrates her practice on plaintiffs' securities fraud, antitrust and consumer class actions litigated throughout the country, and has also has arbitrated a number of cases on behalf of investors who have disputes with their brokers.

She currently serves as Vice Chancellor of the 13,000 member Philadelphia Bar Association, which, founded in 1802, is the oldest association of lawyers in the United States. Deborah has been elected to serve as its Chancellor in the year 2017. Deborah was President of the Philadelphia Bar Foundation for the past two years (2013 and 2014), including during the Foundation's 50th Anniversary celebration. The Foundation's mission is to promote access to justice for all people in the community, particularly those struggling with poverty, abuse and discrimination. The Foundation provides funding to over 30 grantee organizations. She is responsible for the establishment of the Cy Pres Committee of the Foundation which requests courts to award the residual moneys from class action lawsuits. She was previously the Vice President of the Foundation, Chair of its Cy Press Committee and co-chair of two Andrew Hamilton Benefits. She has been a trustee of the Foundation for ten years participating in the Grants Committee, the Finance Committee and the Development Committee. Deborah graduated from the Wharton School of the University of Pennsylvania and Boston University School of Law. Since 1998, Gross has frequently been invited to speak and teach at various legal programs and events all over the country including the Wharton School, the University of Chicago School of Business, and various PBI programs. She is admitted to practice in various federal district and circuit courts throughout the United States and in the Commonwealths of Massachusetts and Pennsylvania. She was also a member of the Third Circuit Judicial Council Bench Bar Relations Committee. She is a member of the Historical Society of the United States District Court for the Eastern District of Pennsylvania, the Brandeis Law Society, the Temple Inn of Courts, the Philadelphia Trial Lawyers Association, and the Lawyers Club of Philadelphia. Gross is also involved in many other nonprofit and educational organizations including Temple Adath Israel where she was a member of the Executive Committee and is currently co-chairing its Hineni Capital Campaign. Previously, she was Vice President of Education, responsible for education at the preschool and religious school. She has also been head of the education committees of the religious school and preschool as well as a member of the Board of Directors. She has also organized a program to bring the third grade students from the William Penn Charter School, where her children attended, to the federal courthouse to observe a naturalization ceremony. She co-chaired and raised moneys for the University of Pennsylvania Class of 1982 25th year reunion which had a record number of attendees and raised a record number of donations. She has supported numerous charitable organizations, both legal and nonlegal. She participated in the first Three Day Walk in Philadelphia to raise moneys for breast cancer. She was a speaker at a JEVS Human Services workshop series entitled, "you've got the job, what's next?" She is the proud mother of three adult children, Adam, Emily and Zachary, and her husband Stuart Kurtz is an attorney and co-founder of his own law firm in Wayne, Pennsylvania.

ASSOCIATES

MATTHEW R. WILLIAMS

Cornell University, B.A. 2000

Villanova University School of Law, J.D. 2003

Mr. Williams graduated from Cornell University in 2000 with a Bachelor of Arts Degree in American Studies. He then attended Villanova University School of Law where he graduated with a Juris Doctor in 2003. While at Villanova, Mr. Williams served as Associate Editor of the Villanova Law Review. Following his graduation from law school, Mr. Williams was associated with Pepper Hamilton LLP, where he worked for ten years in its Philadelphia office, handling a variety of complex commercial litigation. Mr. Williams is admitted to practice in Pennsylvania, as well as before the U.S. District Court for the Eastern District of Pennsylvania and the U.S. Court of Appeals for the First, Third and Fifth Circuits.

DAVID M. DeVITO

New York University, B.A., 2002

University of San Diego, J.D., 2006

Prior to joining KCR, Mr. DeVito was associated with the law frim Greenberg Traurig, LLP, where he practiced in the Litigation and Business Reorganization and Financial Restructuring groups in the Philadelphia and Washington, D.C. offices of the firm. Before entering private practice, Mr. DeVito served as a law clerk for the Honorable Deborah L. Cook of the United States Court of Appeals for the Sixth Circuit, the Honorable Sara Lioi of the United States District Court of the Northern District of Ohio, and the Honorable Arthur S. Weissbrodt of the United States Bankruptcy Court for the Norther District of California. While in law school,

he interned with the Consumer and Environmental Protection Unit of the San Diego City Attorney's Office and worked as a Research Assistant to Professor Frank Partnoy. Mr. DeVito is admitted to practice in Pennsylvania, New Jersey, California and the District of Columbia, as well as before the U.S. District Court for the Eastern District of Pennsylvania and the District of New Jersey and the U.S. Court of Appeals for the Sixth and D.C. Circuits.

ANDREW J. BELLI:

Pennsylvania State University, B.A., 2004

Temple University School of Law, J.D., 2008

Following his graduation *magna cum laude* from Temple University School of Law, Mr. Belli served as a law clerk for the Honorable Franklin S. Van Antwerpen of the United States Court of

Appeals for the Third Circuit. Afterwards, Mr. Belli gained significant litigation experience as an attorney at the City of Philadelphia Law Department, where he represented the City in a number of matters, including contract and bid disputes, construction litigation, real estate litigation, Section 1983 litigation, and attacks on the authority of City officials. Immediately before joining KC&R, Mr. Belli was an associate of Pepper Hamilton LLP, where he focused on antitrust matters and complex commercial litigation.

EVAN B. COREN

University of Chicago, B.A., 2010

Duke University School of Law, J.D., 2013

Mr. Coren graduated Phi Beta Kappa from the University of Chicago in 2010. After receiving his Bachelor of Arts Degree in political science, he attended Duke University School of Law where he graduated with a Juris Doctor in 2013. While at Duke, Mr. Coren served as a member of Duke's appellate litigation clinic. Mr. Coren is admitted to practice in the Commonwealth of Pennsylvania.

MORGAN BIRCH

Temple University, B.A., 2009

Drexel University Thomas R. Kline School of Law, J.D., 2014
Ms. Birch graduated from Temple University in 2009 with a Bachelor of Arts Degree in Strategic and Organizational Communication. After graduation, she immediately put her skills to work as a Special Assistant to Philadelphia Mayor Michael A. Nutter, serving in the Mayor's Office of Education. Among Ms. Birch's responsibilities were the direction of program development, coordination of city-wide outreach campaigns, preparation of press releases and internal briefings, and the leadership of a team focused on compliance with education related legislation.

Ms. Birch left the Mayor's office to attend Drexel University's Thomas R. Kline School of Law, earning her Juris Doctor degree in 2014. While in law school, Ms. Birch completed an internship with the Philadelphia District Attorney's Office in the Insurance Fraud Unit. Ms. Birch also volunteered as a Marshall Brennan Constitutional Law Fellow and was responsible for teaching constitutional law and advocacy skills to Philadelphia high school students. Ms. Birch is admitted to practice in Pennsylvania and New Jersey.

JANICE I. DAUL

University of Mary Washington, B.A., 2010

Drexel University Thomas R. Kline School of Law, J.D., 2014

Ms. Daul graduated *cum laude* from the University of Mary Washington in Fredericksburg, Virginia, in 2010. She then attended the Drexel University Thomas R. Kline School of Law, where she graduated with a Juris Doctor in 2014. While at Drexel, Ms. Daul served as a Notes Advisor and an Associate Editor of the *Drexel Law Review*. Ms. Daul is admitted to practice in Pennsylvania and New Jersey.

EXHIBIT G

Law Offices Bernard M. Gross, P.C. (the "Firm"), is committed to providing professional, efficient, and attentive legal services. We are nationally recognized lawyers concentrating on helping individuals, classes of individuals, hedge funds or businesses who have been injured as a result of violations of the antitrust laws, securities laws, ERISA laws, or consumer protection laws or another's negligence and fraud in federal and state courts throughout the country. The Firm has also represented shareholders in their fight for changes in corporate governance.

We take our cases on a contingent fee basis. Our attorneys are strong believers in the contingent fee as a socially useful, productive, and satisfying basis for compensation of legal services, particularly in litigation. It is not the number of hours that determines our fee, rather it is the result achieved for our clients.

We value practicing in a small environment where professional and personal interaction, among all, is essential for a team approach to cases. The Firm's structure allows for a far greater degree of independence, flexibility, and satisfaction than a large firm environment without sacrificing the quality and sophistication of representation necessary to litigate complex civil actions successfully throughout the United States.

Judges throughout the country have recognized contributions of the Firm in class action cases. In approving an $82.5 million settlement of a securities fraud lawsuit against Aetna, Inc. in the United States District Court for the Eastern District of Pennsylvania, in which the Firm was co-lead counsel, Judge Padova stated:

> "Furthermore, class counsel is of high caliber with extensive experience in similar class action litigation . . . consistently submitted documents of superb quality, and were very diligent in preparing filings in a timely manner under tight deadlines . . . . This Court has made special note of the efficiency and professionalism of counsel in completing discovery and resolving discovery disputes with little court intervention."
>
> I*n re Aetna Inc. Securities Litigation*, MDL No. 1219 (E.D.Pa. January 5, 2001).

Similarly, in approving a settlement of $106 million in the United States District Court for the Eastern District of Pennsylvania, in *In re Automotive Refinishing Paint Antitrust Litigation*, MDL 1426, Judge Surrick commented on Law Offices Bernard M. Gross, P.C., noting:

> I want to commend counsel on both sides of this litigation. I think that the representation on both sides of this litigation is as good as I've ever seen in my entire professional career. Counsel worked together in this case. They frankly made the job of this Court very easy and I commend all of you for what you've done in this litigation.

pp. 18-19 of transcript of August 9, 2007 hearing.

In *Cortese v. Radian*, Civil Action No. 07-3375 (E.D.Pa. January 30, 2008), Judge McLaughlin stated:

"Bernard Gross has been active in securities litigation for 30 years. The Court is familiar with the firm and is confident that it is qualified to serve as liaison counsel."

The Firm is a strong supporter of the Philadelphia Bar Foundation, Philadelphia Museum of Art, having been a corporate sponsor for many years, the Free Library of Philadelphia, Pennsylvania Academy of Fine Arts, the University of Pennsylvania and Central High School, having assisted in raising moneys to build a new library. The Firm has recently donated three Harley Davidson police motorcycles to the City for the Philadelphia Police Highway Patrol.

Bernard M. Gross is a graduate of Central High School of Philadelphia (B.A. 1952), the University of Pennsylvania Wharton School (B.S. 1956), and the University of Pennsylvania School of Law (L.L.B. 1959). He founded the Law Offices Bernard M. Gross, P.C., over fifty years ago. He is a former Assistant City Solicitor in charge of bonds and contracts for the City of Philadelphia (1961-64). He was a member of the Pennsylvania General Assembly from 1967-70. He is admitted to practice before the United States Supreme Court, United States Court of Appeals for the Third Circuit, the United States District Court for the Eastern District of Pennsylvania and the Supreme Court of Pennsylvania. He recently received an award from the Philadelphia Bar Association for "50 years of distinguished service to the community and to the profession in the finest tradition of the Philadelphia Lawyer."

Bernard M. Gross has been an active member of The American Association for Justice since 1960. In 1990, he received the "Stalwart" award from The Association of Trial Lawyers of America. Mr. Gross was a member of the House of Delegates of the Pennsylvania Bar Association (1988-93). He is a former member of the Board of Governors of the Pennsylvania Association for Justice and currently a member of the Legislative Policy Committee of the Pennsylvania Association for Justice. Mr. Gross was a member of the Board of Governors of the Philadelphia Bar Association, a past President of the Philadelphia Trial Lawyers Association, past Chairman of the Philadelphia Bar Association Committee on Judicial Compensation and former Chairman of its Civil Legislative Committee. He is formerly Chancellor of the Tau Epsilon Rho Law Fraternity Philadelphia Graduate Chapter.

Mr. Gross has lectured on behalf of the Philadelphia Trial Lawyers Association and the Pennsylvania Trial Lawyers Association. He has participated in many complex federal and class actions, including antitrust, consumer fraud and corporate securities litigation.

Warren Rubin graduated from Pennsylvania State University (B.S. 1965) and Temple University School of Law (J.D. 1971). From 1966-68, Mr. Rubin was an Officer in the U.S. Army. He served as a law clerk to the Honorable John Morgan Davis U.S. District Court for the Eastern District of Pennsylvania (1971-73). Mr. Rubin is admitted to practice before the Supreme Court of Pennsylvania, the United States Supreme Court, the United States Court of Appeals for the Second, Third, and Fifth Circuits and the United States District Court for the Eastern District of Pennsylvania. Mr. Rubin has specialized in antitrust, securities and complex litigation and has lectured and spoken on the subject before various professional, business and legislative bodies. Mr. Rubin was also an Associate Editor, Yearbook of Franchise Law Review Articles, published by Federal Publications, Washington, D.C. Mr. Rubin tried *Maioco v. Olin Ski Company*, C.A. No. 79-4045 (E.D.Pa.), the first successful vertical price fixing class action case tried before a jury.

Many of the current procedures used by Courts and attorneys throughout the country have been established by Mr. Rubin in cases in which he has been involved throughout his legal career.

Besides litigating cases for almost 40 years, Mr. Rubin has been a world traveler having visited more than 100 countries and all 7 continents. Mr. Rubin also collects antique automobiles, 18th Century American furniture and oriental carpets.

Deborah R. Gross is a graduate of the University of Pennsylvania Wharton School (B.S. 1982) and Boston University School of Law (J.D. 1985). She is a graduate of Cheltenham High School. She is admitted to practice before the Supreme Court of Pennsylvania, the Supreme Court of Massachusetts, the United States District Courts for the Eastern District of Pennsylvania, for the District of Massachusetts, for the District of Colorado, and for the Central District of Illinois, the United States Court of Appeals for the Second, Third and Tenth Circuits, and the United States Supreme Court.

Since 1998, Ms. Gross has been a lecturer in the Federal Securities Law at the PBI Annual Federal Securities Law Forum. She has also taught various Continuing Legal Education seminars including Oral Advocacy in the Federal Courts, Changes to Rule 23 of the Federal Rules of Civil Procedure, Attorney's Fees in Class Actions and current topics in the securities laws. In 2002, Ms. Gross was a guest panelist at the University Of Chicago Graduate School Of Business, 50th Annual Management Conference. She spoke on the topic of "Accounting in Crisis - Who Watches the Watchdogs?" In 2003, Ms. Gross also spoke at The Directors' Conference, a three-day intensive program for directors and senior executives to explore the fundamentals of corporate governance and board service offered by the University Of Chicago Graduate School Of Business, Stanford Law School and the Wharton School of the University of Pennsylvania. She discussed the legal issues surrounding audit committee qualifications, responsibility and content. She spoke at the 2006 ABA Section of Business Law Annual Meeting on Controlling Restatement Chaos. Ms. Gross was on the Attorney Advisory Committee to the Pennsylvania Securities Commission in 2006 and 2007. Ms. Gross was a presenter on Rule 23 Class Actions at the 2010 City of Philadelphia Law Department CLE course. In 2011, Ms. Gross spoke at the Sandpipers Partners LLC Securities and Corporate Law Update held at the University of Pennsylvania Law School and is speaking at the Best Practices in Federal Litigation sponsored by the Pennsylvania Bar Institute. In November 2013, she spoke at the RR Donnelly PBI sponsored 18th Annual Business Lawyers Institute on Merger & Acquisition Litigation Involving Pennsylvania Corporations. She also was panel member for Sandpipers Partners LLC E-Discovery Advocacy Institute Conference in New York at the Yale Club.

Ms. Gross was chair of the Federal Courts Committee of the Philadelphia Bar Association and was responsible for organizing the June 1998 Bench Bar Conference of the Philadelphia Bar Association. She was a member of the Third Circuit Judicial Council Bench Bar Relations Committee. She is a member of the Philadelphia Federal Court Historical Society and chaired the annual dinner where Justice Scirica spoke. She was on the Friends Committee for the 29th Annual Conference of the National Association of Women Judges. On July 18, 2013, Ms. Gross was a speaker on behalf of the Philadelphia Bar Association at the United States District Court of the Eastern District of Pennsylvania Law Day Naturalization Ceremony.

Ms. Gross is the current President of the Philadelphia Bar Foundation. She has been a trustee of the Foundation since 2004. Debbie co-chaired the Foundation's Andrew Hamilton Benefit in 2006 and 2007. The Foundation's mission is to promote access to justice for all people in the community, particularly those struggling with poverty, abuse and discrimination. The Foundation provides funding to over 30 grantee organizations including. She is responsible for the establishment of the Cy Pres Committee of the Foundation which requests courts to award the residual moneys from class action lawsuits.

Ms. Gross is involved in many other nonprofit and educational organizations including Temple Adath Israel where she has been a member of the Executive Committee and is currently co-chairing its Hineni Capital Campaign. Previously, she was Vice President of Education, responsible for education at the preschool and religious school. She has also been head of the education committees of the religious school and preschool as well as a member of the Board of Directors. Her children attend the William Penn Charter School where she is a class parent. She has also organized a program to bring the third and eighth grade students from William Penn Charter to the federal courthouse to observe a naturalization ceremony. She co-chaired and raised moneys for the University of Pennsylvania Class of 1982 25th year reunion which had a record number of attendees and raised a record number of donations. She has supported numerous charitable organizations including Hazon, Jaffa Institute. She participated in the first Three Day Walk in Philadelphia to raise moneys for breast cancer.

Robert P. Frutkin is a 1971 graduate of the University of Rochester and a 1975 *cum laude* graduate of the Temple University School of Law, where he was a member of the Staff of the Temple Law Quarterly. Mr. Frutkin is admitted to practice before the Supreme Court of Pennsylvania, the United States Court of Appeals for the Third, Fourth, Seventh, Eighth, Ninth and Eleventh Circuits, and the United States District Court for the Eastern District of Pennsylvania. Prior to this becoming Of Counsel to the Firm, Mr. Frutkin formed his own firm of Savett Frutkin Podell & Ryan. Prior to the formation of his firm on October 1, 1991, Mr. Frutkin had been a shareholder of Berger & Montague, P.C., in Philadelphia. Mr. Frutkin worked in the Peace Corps.

In *In re U.S. Bioscience Securities Litigation*, 92-CV-678 (E.D. Pa.) (April 14, 1994 Hearing Transcript at pp. 38-39), the Court commented favorably on Mr. Frutkin's performance as co-lead counsel:

> Since I've been down here, the quality of lawyering on both sides, but I'm going to stress now on the plaintiffs' side, simply has not been exceeded in any case and we've had some marvelous counsel appear before us and make superb arguments, but they really don't come any better than...Mr. Frutkin, and the argument we had on the Motion to Dismiss, for example, Motions to Dismiss, both sides were fabulous, but plaintiffs' counsel were as good as they come.

Mr. Frutkin successfully argued before the 7th Circuit Court of Appeals the landmark decision in *In re Abbott Laboratories Deriv. Litig.*, 325 F.3d 795 (7th Cir. 2003), as well as before Delaware Chancery Court, the landmark decision in *In re Netsmart Technologies Inc. Shs. Litig.*, where the Court faulted Netsmart for excluding strategic buyers from its sales process and ordered the company to delay a vote on a proposed acquisition.

Susan R. Gross is a graduate of Hofstra University in Hempstead, New York (B.A. 1985) and Suffolk University School of Law (J.D. 1989). She graduated from Cheltenham High School. She is admitted to practice before the Supreme Court of Pennsylvania, the Supreme Court of Florida, the United States District Court for the Eastern District of Pennsylvania and the United States Court of Appeals for the Third Circuit. She is a member of the Philadelphia Bar Association and Pennsylvania Association for Justice. Ms. Gross also sits as an arbitrator for the Court of Common Pleas, Philadelphia County, First Judicial District.

Besides her involvement in the law and legal community, Ms. Gross is active at the William Penn Charter School in East Falls, Pennsylvania as a class parent. She was formerly Co-Chair of the Temple Adath Israel Parent Teacher Association for three years. Ms. Gross is also an active supporter of the Cystic Fibrosis Foundation, Angelman Syndrome Foundation, Susan B. Komen Breast Cancer Foundation and the Career Wardrobe, a non-profit organization that provides free professional clothing and educational opportunities to women in the Philadelphia region.

She concentrates her practice in securities fraud litigation. Ms. Gross serves in the Firm's lead plaintiff department which involves working with clients, litigation strategy and lead plaintiff issues, as well as in the shareholder relations department.

Tina Moukoulis is a graduate of Ursinus College (B.A. 1993) and Pennsylvania State University at the Dickinson School of Law (J.D. 1998). During law school, Ms. Moukoulis was a member of the *Dickinson Law Review* and served as a Student Attorney representing indigent clients in domestic matters through the Dickinson Family Law Clinic. Ms. Moukoulis also served as a judicial intern in the Superior Court of Pennsylvania (1996). Since joining the Firm in 1998, she concentrates her practice in the area of antitrust and securities fraud litigation.

Ms. Moukoulis is admitted to practice in the Supreme Court of Pennsylvania, the Supreme Court of New Jersey, the United States District Courts for the Eastern District of Pennsylvania and the District of New Jersey, and the United States Court of Appeals for the Third Circuit Court, and is a member of the Pennsylvania Bar Association.

In addition to being an active steward of her parish, Ms. Moukoulis also supports events and organizations focused on promoting medical research for breast cancer as well as the education and social awareness of breast cancer issues. She also supports The Career Wardrobe, a nonprofit organization that provides free professional clothing and educational opportunities to women in the Philadelphia region.

PRACTICE AREAS

SECURITIES FRAUD CLASS ACTION LAWSUITS

The Securities Fraud Class Actions which the Firm prosecutes are designed to recover monies for investors in domestic and foreign publicly traded corporations based primarily on allegations that the corporation, through its officers or directors, disseminated materially false and misleading statements to the investment community concerning the corporation's financial condition or products, services, and business. The materially false and misleading statements resulted in the artificial inflation of the price of the company's stock or bonds. As a result, investors unwittingly paid too much for their stock or bonds. Under federal law, the investors are entitled to compensation. Often these false and misleading statements are disseminated through press releases issued by the company, filings with the SEC, and company annual and quarterly reports.

CURRENT CASES

ADVANTA (2:09cv04730-CMR)(E.D. Pa.) The Firm is local counsel, representing investors who purchased or otherwise acquired the Class A and/or Class B common stock of Advanta Corp. between November 27, 2007 and May 11, 2009, inclusive. The complaint alleges that Advanta and certain of its officers and/or directors issued materially false and misleading statements regarding the Company's business and financial results during the class period in violations of the Securities Exchange Act of 1934 (the "1934 Act").

IN RE DEUTSCHE BANK AG SECURITIES LITIGATION (09cv01714-DAB)(S.D.N.Y.). The Firm is co-lead, representing all persons who purchased or acquired securities issued by Deutsche Bank AG ("DB" or the "Company"), pursuant or traceable to the registration statement, prospectus, and prospectus supplements referred to as the October 2006, May 2007 and June 2007 Offering Materials. The Complaint alleges that the Offering Materials used were false and/or misleading in violation of §§11, 12(a)(2), and 15 of the Securities Act of 1933 (the "Securities Act"), 15 U.S.C. §§77k, 771, and 77o. This action is brought against DB, its senior insiders and the investment banks that underwrote the Offerings (collectively, "defendants").

MARSHALL FREIDUS AND EDWARD P. ZEMPRELLI v. ING GROUP, et al. (09cv1049-LAP)(S.D.N.Y.). The Firm is co-lead counsel, representing investors who acquired the 6.375% ING Perpetual Hybrid Capital Securities ("6.375% Securities"), 7.375% ING Perpetual Hybrid Capital Securities ("7.375% Securities") and the 8.50% ING Perpetual Hybrid Capital Securities ("8.50% Securities") (collectively, the "Securities") of ING Groep N.V. ("ING" or the "Company") pursuant or traceable to a false registration statement and three separate prospectuses (collectively, the "Registration Statements") issued in connection with the Company's June 2007, September 2007 and June 2008 Offerings of the Securities, respectively (the "Offerings"). This action asserts strict liability and negligence claims under the Securities Act of 1933 ("1933 Act") against ING, its senior insiders, the investment banks that underwrote the Offerings, and ING's auditor (collectively, "defendants").

CHEN v. NORTEL, et al., (09cv04691-SAS)(S.D.N.Y.)The Firm is co-lead counsel, representing investors who purchase Nortel securities between May 2, 2008 and September 17, 2008. The claims asserted in the action arise under Section 10(b) and 20(a) of the Exchange Act [15 U.S.C. §§78j(b) and 78t(a)] and Rule 10b-5 promulgated thereunder by the Securities and Exchange Commission ("SEC") [17 C.F.R. § 240.10b-5].

SETTLEMENTS

AETNA (E.D. Pa.) – The Firm was co-lead counsel, representing investors in Aetna Inc. stock that purchased the company's common stock between May 6, 1997 through September 29, 1997. The complaint alleged that defendants, through a series of accounting and actuarial manipulation, called Aetna to falsify its publicly filed financial statement by reporting materially understated medical expenses and artificially inflated operating earnings. A settlement was achieved on behalf of the class for $82.5 million.

ALLEGHENY ENERGY (D. Md.) – The Firm was co-lead counsel on behalf of a class of purchasers of Allegheny Energy Securities between April 23, 2001 and October 8, 2002. The action alleged that defendants concealed a chronic and systematic breakdown of the company's internal accounting controls at Global Energy Markets, the company's newly acquired energy trading subsidiary. A settlement was achieved for $15.05 million.

AMF BOWLING (S.D.N.Y.) - The Firm was co-lead counsel on behalf of purchasers of AMF common stock in the Initial Public Offering on November 19, 1997 through and including February 26, 1999. Plaintiffs alleged that the Registration Statement and Prospectus failed to disclose the serious risks posed by the continuing decline in lead participation at AMF Bowling Centers and the risk that AMF reported financial results were not false and misleading. During the course of the litigation, the company filed for bankruptcy protection. The matter settled for $20 million comprised of two settlements, $12 million from the Investment Bank Defendants and $8 million from the Individual Defendants.

PARKSIDE CAPITAL LLC v. CONSTAR INTERNATIONAL, INC. et al., (2:03cv05020-EL)(E.D. Pa.). The Firm was local counsel, representing investors who purchased Constar common stock shares pursuant or traceable to Constar's November 14, 2002 initial public offering. The Complaint alleges that Constar, certain of its officers and directors, the co-lead underwriters of the IPO, and Constar's former parent company, Crown Holdings, Inc., formerly known as Crown Cork & Seal Company, Inc. violated of Sections 11 and 15 of the Securities Act of 1933 (the "Securities Act"), 15 U.S.C. § 77k and 77o. The case settled for $23.5 million.

COREL CORPORATION (E.D. Pa.) – The Firm was co-lead counsel on behalf of purchasers of Corel common stock between December 7, 1999 and March 20, 2000. Plaintiffs alleged that defendants did not disclose the truth about the company's business prospects and earnings. A settlement was achieved for $7 million.

HUNTSMAN (E.D. Pa.) – The Firm was lead counsel on behalf of all persons or entities who purchased the common stock or call options or sold put options, of Huntsman between May 14, 2008 and June 18, 200. The case concerned defendants' false and misleading statements and omissions of material facts concerning the proposed merger between Hexion and Huntsman ("the Proposed Merger") pursuant a merger agreement, signed on July 12, 2007, between Hexion, as the buyer, and Huntsman, as the seller, in which Hexion would purchase all of the common stock of Huntsman for $28 per share, in cash ("the Merger Agreement"). A settlement was achieved for $18 million.

LEHMAN BROTHERS (S.D.N.Y.) - The Firm served on the executive committee on behalf of a group of institutional investors. The action arose from misstatements and omissions regarding, among other things, Lehman's financial condition and its use of undisclosed "Repo 105" transactions to artificially reduce its reported net leverage ratio in the period leading up to Lehman's unprecedented bankruptcy filing on September 15, 2008, the largest bankruptcy filing in the U.S. history. On May 4, 2012, Judge Lewis Kaplan granted final approval of a $426.2 million settlement with the over 40 offering underwriters, representing 13% of the $3.3 billion in Lehman securities that these defendants underwrote. On May 24, 2012, Judge Kaplan approved an additional $90 million settlement with certain of Lehman's former officers and directors, amounting to the vast majority of the remaining D&O insurance proceeds. In 2013, Judge Kaplan approved a settlement against the accountants, Ernst & Young. This concluded the over 5 year litigation against Lehman Brothers.

MOTOROLA (N.D. Ill.) – The Firm was co-lead counsel on behalf of purchasers of the common stock of Motorola from November 4, 1994 to February 17, 1995 and achieved a $25 million settlement of these claims. The case concerned allegations that defendants knew but did not disclose the material information concerning excess inventory of Motorola cell phones held by Motorola's domestic customers.

NEXTWAVE WIRELESS (S.D. Cal.) - The Firm was co-lead counsel on behalf of all persons who purchased the common stock between November 14, 2006 and August 7, 2008. The case concerned allegations that defendants did not disclose material information concerning the Company's liquidity and future viability as well as its ability to launch its new WiMAX semi-conductor products. A settlement was achieved for $1.4 million.

RAVISENT TECHNOLOGIES INC. (E.D. Pa.) – The Firm was co-lead counsel on behalf of purchasers of Ravisent stock between July 15, 1999 and April 27, 2000 and achieved a settlement of $7 million in cash. Plaintiffs alleged that Ravisent failed to disclose that the company was recognizing revenue from software licensing agreements in violation of its own internal accounting procedures. As a result of the improper revenue recognition, plaintiffs alleged that the company's financial statements contained material overstatements of revenue.

ULTA SALON, COSMETICS & FRAGRANCE, INC. (N. D. Ill.) The Firm was co-lead on behalf of purchasers the common stock between October 25, 2007 and December 10, 2007. Plaintiffs alleged that defendants made misstatements and omissions in the registration statement and prospectus for ULTA's initial public offering of its common stock on October 25, 2007 (the "IPO") concerning: (i) ULTA's selling, general and administrative expenses in the

Third Quarter of 2007, and (ii) the levels of ULTA's merchandise inventories in the Third Quarter of 2007. A settlement was achieved for $3,750,000.

UNIVERSAL ACCESS INC. (E.D. Tx.) – The Firm was co-lead counsel on behalf of purchasers of Universal Access common stock from May 10, 2001 through March 22, 2002. Plaintiffs alleged that defendants made misrepresentations about Universal Access' financial statements. A settlement was achieved for $11 million.

VERISIGN INC. (N.D. Cal.) – The Firm represented investors in Verisign Inc. who purchased their stock between January 25, 2001 and April 25, 2002. The court approved a settlement for a total consideration of $78 million. Plaintiffs alleged that defendants made false and misleading statements about the company's business and financial results.

DERIVATIVE LAWSUITS

The Firm also has aggressively pursued cases brought by shareholders on behalf of publicly traded corporations injured by the breach of fiduciary duty or waste of corporate assets by its officers and directors. As a result, the Firm has recovered on behalf of corporations, settlements which include financial recovery from the individual officers and directors which increases shareholder value. In addition, the Firm has successfully implemented remedial recoveries which also improve shareholder value and prevent corporate future mismanagement, including the adoption of corporate therapeutic measures, corporate governance policies and procedures, and the hiring of audit committee consultants to redress alleged inadequacies.

ABBOTT LABORATORIES (N.D. Ill.) - The Firm, as co-lead counsel, filed a derivative action against Abbott which alleged that the Company violated FDA quality rules dating back to 1993, as well as a consent decree that Abbott entered into with the federal government on November 2, 1999, requiring the Company to pay a $100 million fine and make corrective changes at its manufacturing facilities. A settlement was reached in 2004 which required the Company to implement measures to strengthen the Board of Directors' oversight of regulatory compliance, and to pay $27 million for the new compliance and regulatory measures.

BOEING COMPANY (Dela. and Ill. State Court) – The Firm, as co-lead counsel, filed a derivative action against current and former directors for breach of their fiduciary duties of care, good faith and loyalty by failing to take proper steps to prevent or remedy ethical and legal violations by the company and its employees, thereby exposing the company to substantial fines, liabilities, loss of contracts and other business. A settlement was reached which provided for the adoption and implementation of significant corporate governance and compliance measures and the commitment of substantial treasury funds, in the amount of $29 million above 2004 expenditures, to implement and support those governance and compliance measures and to fund further enhancements to Boeing's ethics and compliance program.

PALL CORPORATION (N.Y. State Court Index No. 11-001339) – The Firm filed a complaint which alleged that the company's directors breached their fiduciary duties in connection with Pall's internal controls and accounting, financial and reporting practices with regard to its income taxation concerning two of Pall's subsidiaries, Medsep Corporation and Pall Netherlands BV and their outstanding intercompany balances which ultimately resulted in the understatement of U.S. income taxes. As a result of the outstanding intercompany balances, plaintiffs contended that Pall violated generally accepted accounting principles ("GAAP") by failing to disclose the potential contingent liabilities, risks and uncertainties associated with the income tax understatement. A settlement was reached in which the company agreed to various Reforms which were specifically designed to provide greater accountability among members of the Board. For instance, per the Reforms, the Company has agreed to, *inter alia*: (1) retain Deloitte & Touche ("Deloitte") as an outside consultant in tax and internal control over financial reporting; (2) conduct a review with Deloitte of Pall's current operations, procedures, budget, personnel and reporting in the tax and treasury functions, including Pall's activity with respect to settlement of intercompany balances and internal control functions; (3) train Audit Committee members over a three year period, to maintain or advance their level of financial literacy,

corporate governance and understanding of tax-related matters; and (4) require the Audit Committee to have at least one member that is generally familiar with international tax matters.

SCHERING-PLOUGH CORP. (D.N.J.) - The Firm, as co-lead counsel, brought litigation against current and former directors alleging that they breached their fiduciary duties with respect to their oversight of Schering's manufacturing and quality control practices, as well as medical marketing and sales practices, certain of which had become issues in two then on-going (and since resolved) investigations by the United States Attorneys' Offices in Boston and Philadelphia. Plaintiffs contended that the alleged wrongdoing in these areas occurred over a period of years, and resulted in financial, operational and reputational damage to the company. A settlement was reached in which the company agreed to change its global compliance and audit functions, fund these changes for five years, enhance communication between the board and management, and change the way board members are elected and paid.

ERISA LAWSUITS

Law Offices Bernard M. Gross, P.C., litigates claims on behalf of employees and/or retirees alleging interference with their interests under the Federal Employee Retirement Income Security Act (ERISA). Among its provisions, ERISA recognizes the pension and 401(K) plan trustees owe fiduciary duties to the participants and beneficiaries in these plans. This duty is sometimes breached, particularly where a company deems investment in its own equities appropriate, despite having access to information that clearly indicates otherwise. This conflict of interest and the resultant losses can be devastating to employees who often depend on their 401(K) accounts as a principal source of retirement income.

CVS CORPORATION (D. Mass.) - The Firm, as co-lead counsel, represented all persons who were participants or beneficiaries in the CVS 401(K) Profit Sharing Plan (the "401(K) Plan), the CVS Corp. and Subsidiaries Employee Stock Ownership Plan (the "CVS ESOP"), and who held, acquired, purchased or had contributed common stock and/or CVS preference stock (collectively "CVS stock") to his or her account in either plan at any time from December 1, 2000 to October 31, 2001 (the "Class Period"). On July 7, 2005, the district court granted preliminary approval of a settlement of the action for total consideration of $3 million.

NUI CORPORATION (D.N.J.) – The Firm, as co-lead counsel, represented individuals who were participants or beneficiaries of the (i) NUI Corp. Savings and Investment Plan and/or (ii) NUI Corp. Savings and Investment Plan for Collective Bargaining Employees during any portion of November 8, 2001 through and including September 26, 2003. On January 22, 2007, the district court preliminarily approved a settlement of the action for total consideration of $850,000.00.

ANTITRUST CLASS ACTION LAWSUITS

The Antitrust Practice of the Firm focuses primarily on the representation of plaintiffs who have been the victims of price fixing, unfair trade practices, or other anti-competitive conduct. The firm has taken a leading role in many of the largest price fixing and price discrimination cases throughout the United States, which have, after either trials or settlements, led to recovery for the injured parties, of hundreds of millions of dollars.

AUTO PAINT REFINISHING (E.D.Pa.) – The Firm served as co-lead counsel for the class in an antitrust action on behalf of direct purchasers of automotive refinishing paint from defendants during the period January 1, 1993 to December 31, 2000. Settlement has been reached with all defendants totaling $106 million. Defendants included PPG Industries, E.I. DuPont de Numours, Sherwin-Williams, BASF and Akzo Nobel Coatings. This was the largest settlement ever achieved in which the federal government empanelled a grand jury and, eventually, closed the investigation without any charges brought against any of the paint manufacturers.

CARBON BRUSHES (N.D.J.) – The Firm served as co-lead counsel for the class in an antitrust action that accused a group of manufacturers of electrical carbon products of engaging in a decade long conspiracy to fix prices. Defendants included Morgan Crucible, Carbone of America Industries, Schunk GmBH and SGL Carbon. A settlement was reached for $21.9 million.

FASTENERS – (E.D.Pa.) This was an antitrust action brought on behalf of direct purchasers of fasteners, alleging that defendants engaged in a conspiracy to fix prices and allocate customers and markets for fasteners. Fasteners include zippers, snaps, hooks and eyes, rivets and other fastening devices used in apparel, garments and footwear. Defendants included leading fasteners manufacturers William Prym GmbH & Co. KG, YKK Corporation, Coats plc, and Scovill Fasteners, Inc. A settlement was reached with Prym, YKK and Coats for $17.55 million. Scovill filed for bankruptcy and was dismissed from the case.

FLAT GLASS - (M.D.L. 1200) (W.D. Pa.) - Horizontal price fixing. This was an antitrust action brought on behalf of purchasers of flat glass products alleging that the principal manufacturers of such products colluded to fix prices at artificially inflated levels. Settlements were reached with four of the five defendants totaling over $60 million.

MEDICAL X-RAY FILM (E.D.N.Y.) – The Firm was co-lead for the class of purchasers from the manufacturers of x-ray film and recovered $24 million on behalf of the class by settlement.

OLIN SKI LITIGATION (E.D. Pa.) – The Firm was co-lead counsel alleging price fixing by Olin Ski Company and its distributors in the United States. The case was tried and the jury returned a verdict in favor of the class. This was the first time that a class action vertical price fixing case was successfully tried before a jury. The case was eventually settled for more than $7 million.

EMPLOYEE WAGE CLAIM CLASS ACTION LAWSUITS

Overtime lawsuits can be pursued by workers who have been denied overtime wages in direct violation of the U.S. Fair Labor Standards Act of 1938. The act is a federal law which governs not only pay practices, but also the minimum wage and child labor practices. The Department of Labor's Employment Standards Administration is responsible for enforcing these labor and compensation laws.

UNFAIR MERGERS

Takeover proposals are often approved by board of directors without these proposals being properly shopped for the best price or providing shareholders with adequate information to make an informed decision.

CONSUMER FRAUD LAWSUITS

Consumer fraud describes a wide range of improper practices that may involve advertising, marketing and/or the sale of goods or services. Consumer fraud class actions are initiated, for example when a company overcharges or improperly charges consumers for goods and services, or runs deceptive or misleading ads for its products. Companies also commit consumer fraud when they interpret a contract or agreement in a manner that unfairly disadvantages consumers. The Firm specializes in litigation on behalf of consumers. These types of class actions have resulted in significant monetary recoveries for consumers and changes in corporate policies on a class-wide basis.

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2016, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 18, 2016.

s/ Ellen Gusikoff Stewart

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)