

Plaintiff Alejandro Medina (“Plaintiff”) alleges the following based upon the investigation of Plaintiff’s counsel, which included a review of United States Securities and Exchange Commission (“SEC”) filings by Tremor Video, Inc. (“Tremor Video” or the “Company”), as well as regulatory filings and reports, securities analysts’ reports and advisories about the Company, press releases and other public statements issued by the Company, and media reports about the Company, and Plaintiff believes that substantial additional evidentiary support will exist for the allegations set forth herein after a reasonable opportunity for discovery.

NATURE OF THE ACTION

1. This is a securities class action on behalf of all purchasers of the common stock of Tremor Video pursuant and/or traceable to the Registration Statement and Prospectus issued in connection with Tremor Video’s June 27, 2013 initial public stock offering (the “IPO”), seeking to pursue remedies under the Securities Act of 1933 (the “Securities Act”).

JURISDICTION AND VENUE

2. The claims asserted herein arise under and pursuant to §§11, 12(a)(2) and 15 of the Securities Act. This Court has jurisdiction of this action pursuant to §22 of the Securities Act [15 U.S.C. §77v] and 28 U.S.C. §1331.

3. Venue is properly laid in this District pursuant to §22 of the Securities Act and 28 U.S.C. §1391(b) and (c). The acts and conduct complained of herein occurred in substantial part in this District, Tremor Video is headquartered in this District and the Underwriter Defendants (defined below) maintain their principal places of business in this District.

4. In connection with the acts alleged in this Complaint, Defendants, directly or indirectly, used the means and instrumentalities of interstate commerce, including, but not limited to, the mails, interstate telephone communications and the facilities of the national securities markets.

PARTIES

5. Plaintiff Alejandro Medina purchased Tremor Video common stock pursuant and/or traceable to the IPO, and was damaged thereby.

6. Defendant Tremor Video is a provider of technology-driven video advertising solutions for advertisers and agencies, and publisher partners in the United States and internationally, headquartered in New York, New York. Following the IPO, Tremor Video stock has traded on the New York Stock Exchange (“NYSE”) under the ticker symbol “TRMR.”

7. Defendant William Day is, and was at the time of the IPO, President, Chief Executive Officer and a director of Tremor Video.

8. Defendant Todd Sloan is, and was at the time of the IPO, Senior Vice President, Chief Financial Officer and Treasurer of Tremor Video.

9. Defendant Laura Desmond is, and was at the time of the IPO, a director of Tremor Video.

10. Defendant Randall Glein is, and was at the time of the IPO, a director of Tremor Video.

11. Defendant Rachel Lam is, and was at the time of the IPO, a director of Tremor Video.

12. Defendant Warren Lee is, and was at the time of the IPO, a director of Tremor Video.

13. Defendant James Rossman is, and was at the time of the IPO, a director of Tremor Video.

14. Defendant Robert Schechter is, and was at the time of the IPO, a director of Tremor Video.

15. The defendants named in ¶¶7-14 are referred to herein as the “Individual Defendants.” The Individual Defendants each signed the Registration Statement.

16. Defendant Credit Suisse Securities (USA) LLC (“Credit Suisse”), based in New York, New York, is a financial services company that advises clients in all aspects of finance, serving companies, institutional clients and high-net-worth private clients worldwide. Credit Suisse acted as an underwriter and joint book-running manager of Tremor Video’s IPO, helping to draft and disseminate the offering documents.

17. Defendant Jefferies LLC (“Jefferies”) is an American global investment bank and institutional securities firm headquartered in New York, New York. Jefferies acted as an underwriter and joint book-running manager of Tremor Video’s IPO, helping to draft and disseminate the offering documents.

18. Defendant Canaccord Genuity Inc. (“Canaccord Genuity”) is a New York, New York-based global, full-service investment bank. Canaccord Genuity acted as an underwriter and joint book-running manager of Tremor Video’s IPO, helping to draft and disseminate the offering documents.

19. Defendant Oppenheimer & Co. Inc. (“Oppenheimer”) is a New York, New York-based investment bank and full-service investment firm that provides financial services and advice to high net worth investors, individuals, businesses and institutions. Oppenheimer acted as an underwriter and joint book-running manager of Tremor Video’s IPO, helping to draft and disseminate the offering documents.

20. The defendants named in ¶¶16-19 are referred to herein as the “Underwriter Defendants.” Pursuant to the Securities Act, the Underwriter Defendants are liable for the false and misleading statements in the Registration Statement as follows:

(a) The Underwriter Defendants are investment banking houses that specialize, *inter alia*, in underwriting public offerings of securities. They served as the underwriters of the IPO

and shared more than \$5.25 million in fees collectively. The Underwriter Defendants determined that in return for their share of the IPO proceeds, they were willing to merchandize Tremor Video stock in the IPO. The Underwriter Defendants arranged a multi-city roadshow prior to the IPO during which they, and representatives from Tremor Video, met with potential investors and presented highly favorable information about the Company, its operation, and its financial prospects;

(b) The Underwriter Defendants also demanded and obtained an agreement from Tremor Video that Tremor Video would indemnify and hold the Underwriter Defendants harmless from any liability under the federal securities laws. They also made certain that Tremor Video had purchased millions of dollars in directors and officers' liability insurance;

(c) Representatives of the Underwriter Defendants also assisted Tremor Video and the Individual Defendants in planning the IPO, and purportedly conducted an adequate and reasonable investigation into the business and operations of Tremor Video, an undertaking known as a "due diligence" investigation. The due diligence investigation was required of the Underwriter Defendants in order to engage in the IPO. During the course of their "due diligence," the Underwriter Defendants had continual access to confidential corporate information concerning Tremor Video's operations and financial prospects;

(d) In addition to availing themselves of virtually unbridled access to internal corporate documents, agents of the Underwriter Defendants met with Tremor Video's lawyers, management and top executives and engaged in "drafting sessions" between at least March 2013 and June 2013. During these sessions, understandings were reached as to: (i) the strategy to best accomplish the IPO; (ii) the terms of the IPO, including the price at which Tremor Video stock would be sold; (iii) the language to be used in the Registration Statement; (iv) what disclosures about Tremor Video would be made in the Registration Statement; and (v) what responses would be made

to the SEC in connection with its review of the Registration Statement. As a result of those constant contacts and communications between the Underwriter Defendants' representatives and Tremor Video management and top executives, the Underwriter Defendants knew, or should have known, of Tremor Video's existing problems as detailed herein; and

(e) The Underwriter Defendants caused the Registration Statement to be filed with the SEC and declared effective in connection with offers and sales thereof, including to Plaintiff and the Class.

SUBSTANTIVE ALLEGATIONS

21. Defendant Tremor Video provides an in-stream video ad network for Internet-connected devices like computers, smartphones and tablets. The Company derives substantially all of its sales revenue by delivering in-stream video advertising on behalf of brand advertisers in the United States through the Tremor Video Network. It also recently began licensing VideoHub technology to advertisers and agencies through a customizable user interface, which it calls VideoHub for Advertisers. The Company was formerly known as Tremor Media, Inc. and changed its name to Tremor Video, Inc. in June 2011. Tremor Video was founded in 2005 and is headquartered in New York, New York.

22. On or about April 3, 2013, Tremor Video filed with the SEC a confidential Registration Statement on Form S-1, which would later be utilized for the IPO following several amendments in response to comments by the SEC. On June 26, 2013, the SEC declared the Registration Statement effective. On or about June 27, 2013, Tremor Video and the Underwriter Defendants priced the IPO and filed the final Prospectus for the IPO, which forms part of the Registration Statement (collectively, the "Registration Statement").

23. The Registration Statement was negligently prepared and, as a result, contained untrue statements of material facts or omitted to state other facts necessary to make the statements

made not misleading and was not prepared in accordance with the rules and regulations governing its preparation.

24. Concerning the purported sales growth then being experienced in the online video industry Tremor Video operates in, the Registration Statement stated, in pertinent part, as follows:

Online video advertising is amongst the fastest growing advertising formats in the United States. According to eMarketer, while overall advertising spend is expected to grow by 3.5% on a compounded annual basis between 2012 and 2016, online video advertising spend is expected to grow by 28.9%. eMarketer estimated total U.S. advertising spend in 2012 to be \$165.8 billion, of which online video advertising spend was \$2.9 billion, or only 1.7%. ***As online audiences continue to spend more time watching videos, online video advertising spend is projected to reach \$8.0 billion in 2016. Within online video advertising, mobile video advertising spend is expected to grow from \$244 million to \$2.1 billion, reflecting a 71.1% compounded annual growth rate from 2012 to 2016.***¹

25. Concerning the Company's purportedly dedicated customer base and demand then being experienced for its services, the Registration Statement stated, in pertinent part, as follows:

We have developed strong relationships with brand advertisers and their agencies, who we believe view us as a strategic and trusted partner with a deep understanding of their industry-specific needs. We have also developed strong relationships with publishers due to our ability to provide consistent yield and monetization for their video content. We continuously evaluate and refine our publisher network to ensure that our advertisers have access to premium video inventory in brand safe environments. ***We believe these relationships have created a network effect whereby advertisers increase their spend with us because of the results we deliver utilizing our proprietary technology and our publishers' premium inventory, which in turn allows us to attract additional high quality publishers and thereby additional advertising spend.***

26. Concerning the purported upward trajectory of the Company's revenues, operating costs and profit trends then being experienced at the time of the IPO, the Registration Statement emphasized, in pertinent part, as follows:

From 2011 to 2012, our revenue increased from \$90.3 million to \$105.2 million. This included an ***increase in revenue derived from the delivery of in-stream video advertising*** from \$75.5 million to \$99.7 million, or 32.1%. Additionally, over this

¹ All emphasis in bold and italics is added, unless otherwise noted.

period, our **gross margin improved** from 35.2% to 41.7%, driven in part by the adoption of our performance-based pricing models, while our net loss has decreased from \$21.0 million to \$16.6 million. For the three months ended March 31, 2013 as compared to the same period of 2012, our **revenue increased** from \$17.3 million to \$24.8 million, or 43.4%, our **gross margin improved** from 31.9% to 44.1% and our net loss decreased from \$9.1 million to \$5.2 million. For the three months ended March 31, 2012 and 2013, our revenue from the delivery of in-stream video advertising increased from \$15.7 million to \$24.0 million, or 52.9%. As a percentage of total revenue, revenue attributable to performance-based pricing for 2011, 2012 and the three months ended March 31, 2013 was 7.9%, 22.7% and 36.1%, respectively.

* * *

We . . . initially . . . delivered both video display and banner ads In 2011, . . . consistent with our focus on being a strategic partner for brand advertisers, we decided to focus our business solely on in-stream video advertising and to move away from in-banner video advertising. In-stream video ads are better suited for brand advertisers because they can be served to viewers immediately prior to or during the publisher's content commanding attention when viewers are most engaged as opposed to in-banner video ads, which are served on the periphery of publisher content where viewers may not direct their attention. ***We believe our market opportunity and growth prospects will be enhanced by our focus on in-stream video ads because such ads are better suited to address advertisers' brand-centric goals.*** As such, we have increased our technology investments and sales focus on our in-stream products and deemphasized investments in and sales of in-banner products. ***As a result of our focus on delivering in-stream advertising coupled with our differentiated optimization technology, we have experienced significant growth in our in-stream video advertising revenue. From 2011 to 2012, our in-stream video advertising revenue grew from \$75.5 million to \$99.7 million, or 32.1%, and for the three months ended March 31, 2012 and 2013, our in-stream video advertising revenue grew from \$15.7 million to \$24.0 million, or 52.9%.***

* * *

As viewers increase time spent viewing video on internet-connected devices such as smartphones and tablets, we expect brand advertisers to devote increasing amounts of advertising spend to these channels. Smartphones and tablets are inherently interactive and we believe that our in-stream advertising capabilities and higher margin CPE pricing model is well suited to address the growing market for mobile video ads. As a percentage of total revenue, revenue attributable to performance-based pricing, such as CPE and CPVC, for 2011 and 2012 was 7.9% and 22.7%, respectively, and for the three months ended March 31, 2012 and 2013, was 14.2% and 36.1% respectively. We intend to continue to increase the sales of video ad campaigns with performance-based pricing to ***drive revenue growth and increased margins.***

* * *

We monitor the key metrics set forth in the table below *to help us evaluate growth trends*, establish budgets, measure the effectiveness of our sales and marketing efforts *and assess our operational efficiencies*.

	Year Ended December		Three Months Ended March	
	31,	31,	31,	31,
	2011	2012	2012	2013
	(dollars in thousands)			
□ Revenue	\$ 90,301	\$ 105,190	\$ 17,272	\$ 24,765
□ Gross margin	35.2%	41.7%	31.9%	44.1%
□ Net loss	\$ (21,025)	\$ (16,644)	\$ (9,127)	\$ (5,159)
□ In-stream advertising revenue	\$ 75,500	\$ 99,678	\$ 15,745	\$ 23,996
□ Adjusted EBITDA	\$ (10,927)	\$ (7,218)	\$ (6,665)	\$ (2,797)

27. Explaining the comparison of the Company’s financial performance in the quarters ended March 31, 2012 and March 31, 2013, the Registration Statement emphasized that *“[t]he increase in revenue from the three months ended March 31, 2012 compared to the three months ended March 31, 2013 was primarily attributable to a \$8.3 million increase in our in-stream video advertising revenue, representing 52.9% growth period-over-period, which included an increased mix of our performance-based ad products compared to our CPM-priced ad products, and a \$0.3 million increase in revenue from licensing solutions.”*

28. Explaining the comparison of the Company’s financial performance in the quarters ended March 31, 2012 and March 31, 2013, the Registration Statement further emphasized that *“[t]he increase in our gross profit from the three months ended March 31, 2012 compared to the three months ended March 31, 2013 was driven by a 43.4% increase in revenue partially offset by a 17.6% increase in our cost of revenue,”* and that *“[h]istorically, our performance-priced ad campaigns have offered higher gross margins than our traditional CPM² priced campaigns. The 12.2 percentage point improvement in our gross margin from 2012 to 2013 was primarily*

² “Cost per mille” – the advertising cost per thousand views.

attributable to the relative mix of our performance-priced ad campaigns compared to our CPM-priced ad campaigns as well as greater operational efficiency.”

29. Purporting to explain the Company’s “Quarterly Trends; Seasonality,” the Registration Statement stated the Company was then on track to report larger third quarter 2013 sales and profit margins, stating, in pertinent part, as follows:

We have experienced rapid growth since our inception. For instance, we migrated our business from in-banner video advertising to in-stream video advertising and placed a greater focus on performance-based pricing over the last two years. *These changes have resulted in substantial growth in our revenue and corresponding increases in operating expenses to support our growth. . . .*

* * *

Our quarterly revenue has increased from \$22.3 million for the quarter ended June 30, 2011 to \$24.8 million for the quarter ended March 31, 2013, and our gross margin has increased from 37.5% to 44.1% over the same period. *Our increase in quarterly revenue was mainly due to an increased number of advertisers using the Tremor Video Network and increased spending from our existing advertisers as well as an increased percentage of our campaigns priced on a performance basis.* We believe revenue for the second and third quarters of 2011 was relatively flat due to a reduction in video advertising spending because of uncertainty and volatility caused by the U.S. budget and European financial crises during the third quarter of 2011. Our increase in gross margin in 2012 has been largely the result of an increased percentage of our campaigns priced on a performance basis. *Our in-stream advertising revenue as a percentage of revenue has increased for each quarter from June 30, 2011 through March 31, 2013, as we shifted our focus away from the delivery of in-banner video ads to in-stream video ads.*

Our revenue also tends to be seasonal in nature, with the third and fourth quarters of each calendar year historically representing the largest percentage of our total revenue for the year and the first quarter of each calendar year historically representing the lowest percentage of our total revenue for the year. Many of the brand advertisers in the verticals we serve spend significant portions of their advertising budgets during the third quarter, in connection with summer, back to school and entertainment events, and in the fourth quarter, in connection with the holiday season. During the first quarter, our brand advertisers generally devote less of their budgets to ad spending, and as a result, our exclusive publishers generally make a larger proportion of their ad inventory available to us. *This combination generally results in lower revenue and gross margins for us during the first quarter of each calendar year.* Our revenue for the first quarter of 2012 was adversely impacted by the level of overall spending in the video advertising industry as well as by the seasonal spending trends in the video advertising industry.

30. The statements referenced above in ¶¶24-29 were inaccurate statements of material fact because they failed to disclose the following material facts which existed at the time of the IPO:

(a) that the online advertising market had materially shifted towards mobile browsing, as opposed to desktop browsing, where the Company was at a significant disadvantage to its competitors; and

(b) that the Company was losing sales to competitors as a result of its inferior mobile browsing capabilities.

31. Under the rules and regulations governing the preparation of the Registration Statement, Tremor Video was required to disclose at the time of the IPO that the online advertising market had materially shifted towards mobile browsing, as opposed to desktop browsing, where the Company was at a significant disadvantage to its competitors and that that the Company was losing sales to competitors as a result of its inferior mobile browsing capabilities. The Registration Statement, however, contained no such disclosures. Pursuant to Item 303 of Regulation S-K [17 C.F.R. §229.303], and the SEC's related interpretive releases thereto, including any known trends, issuers are required to disclose events or uncertainties that have had or are reasonably likely to cause the registrant's financial information not to be indicative of future operating results. At the time of the IPO, Tremor Video's sales growth and profit margins were declining, bringing its profits down. The adverse events and uncertainties associated with these declining trends were reasonably likely to have a material impact on Tremor Video's profitability, and, therefore, were required to be disclosed in the Registration Statement.

32. The IPO was successful for the Company and the Underwriter Defendants, who sold 7.5 million shares of Tremor Video common stock to the public at \$10 per share, raising approximately \$75 million in gross proceeds for the Company (\$66.8 million in net proceeds from

the IPO after deducting underwriting discounts, commissions and offering costs of approximately \$8.2 million).

33. At the time of the filing of this action, Tremor Video stock was trading at approximately \$4 per share, a 60% decline from the IPO price.

CLASS ACTION ALLEGATIONS

34. Plaintiff brings this action as a class action on behalf of a class consisting of all those who purchased Tremor Video common stock pursuant and/or traceable to the Registration Statement issued in connection with the IPO (the “Class”). Excluded from the Class are Defendants and their families, the officers and directors and affiliates of Defendants, at all relevant times, members of their immediate families and their legal representatives, heirs, successors or assigns and any entity in which Defendants have or had a controlling interest.

35. The members of the Class are so numerous that joinder of all members is impracticable. While the exact number of Class members is unknown to Plaintiff at this time and can only be ascertained through appropriate discovery, Plaintiff believes that there are hundreds of members in the proposed Class. Record owners and other members of the Class may be identified from records maintained by Tremor Video or its transfer agent and may be notified of the pendency of this action by mail, using the form of notice similar to that customarily used in securities class actions.

36. Plaintiff’s claims are typical of the claims of the members of the Class as all members of the Class are similarly affected by Defendants’ wrongful conduct in violation of federal law that is complained of herein.

37. Plaintiff will fairly and adequately protect the interests of the members of the Class and has retained counsel competent and experienced in class and securities litigation.

38. Common questions of law and fact exist as to all members of the Class and predominate over any questions solely affecting individual members of the Class. Among the questions of law and fact common to the Class are:

- (a) whether Defendants violated the Securities Act;
- (b) whether the Registration Statement was negligently prepared and contained inaccurate statements of material fact and omitted material information required to be stated therein; and
- (c) to what extent the members of the Class have sustained damages and the proper measure of damages.

39. A class action is superior to all other available methods for the fair and efficient adjudication of this controversy since joinder of all members is impracticable. Furthermore, as the damages suffered by individual Class members may be relatively small, the expense and burden of individual litigation make it impossible for members of the Class to individually redress the wrongs done to them. There will be no difficulty in the management of this action as a class action.

COUNT I

For Violation of §11 of the Securities Act Against All Defendants

40. Plaintiff incorporates ¶¶1-39 by reference.

41. This Cause of Action is brought pursuant to §11 of the Securities Act, 15 U.S.C. §77k, on behalf of the Class, against all Defendants.

42. The Registration Statement for the IPO was inaccurate and misleading, contained untrue statements of material facts, omitted to state other facts necessary to make the statements made not misleading, and omitted to state material facts required to be stated therein.

43. Defendants are strictly liable to Plaintiff and the Class for the misstatements and omissions.

44. None of the Defendants named herein made a reasonable investigation or possessed reasonable grounds for the belief that the statements contained in the Registration Statement were true and without omissions of any material facts and were not misleading.

45. By reason of the conduct herein alleged, each defendant violated, and/or controlled a person who violated, §11 of the Securities Act.

46. Plaintiff acquired Tremor Video common stock traceable to the IPO.

47. Plaintiff and the Class have sustained damages. The value of Tremor Video common stock has declined substantially subsequent to and due to Defendants' violations.

48. At the time of their purchases of Tremor Video common stock, Plaintiff and other members of the Class were without knowledge of the facts concerning the wrongful conduct alleged herein and could not have reasonably discovered those facts prior to the disclosures herein. Less than one year has elapsed from the time that Plaintiff discovered or reasonably could have discovered the facts upon which this Complaint is based to the time that Plaintiff commenced this action. Less than three years has elapsed between the time that the securities upon which this Cause of Action is brought were offered to the public and the time Plaintiff commenced this action.

COUNT II

For Violation of §12(a)(2) of the Securities Act Against All Defendants

49. Plaintiff incorporates ¶¶1-48 by reference.

50. By means of the defective Prospectus, Defendants promoted and sold Tremor Video stock to Plaintiff and other members of the Class.

51. The Prospectus contained untrue statements of material fact, and concealed and failed to disclose material facts, as detailed above. Defendants owed Plaintiff and the other members of the Class who purchased Tremor Video common stock pursuant to the Prospectus the duty to make a reasonable and diligent investigation of the statements contained in the Prospectus to ensure that such statements were true and that there was no omission to state a material fact required to be stated in order to make the statements contained therein not misleading. Defendants, in the exercise of reasonable care, should have known of the misstatements and omissions contained in the Prospectus as set forth above.

52. Plaintiff did not know, nor in the exercise of reasonable diligence could have known, of the untruths and omissions contained in the Prospectus at the time he acquired Tremor Video common stock.

53. By reason of the conduct alleged herein, Defendants violated §12(a)(2) of the Securities Act. As a direct and proximate result of such violations, Plaintiff and the other members of the Class who purchased Tremor Video common stock pursuant to the Prospectus sustained substantial damages in connection with their purchases of the stock. Accordingly, Plaintiff and the other members of the Class who hold the common stock issued pursuant to the Prospectus have the right to rescind and recover the consideration paid for their shares, and hereby tender their common stock to Defendants sued herein. Class members who have sold their common stock seek damages to the extent permitted by law.

COUNT III

For Violation of §15 of the Securities Act Against the Company and the Individual Defendants

54. Plaintiff incorporates ¶¶1-53 by reference.

55. This Cause of Action is brought pursuant to §15 of the Securities Act against the Company and the Individual Defendants.

56. The Individual Defendants each were control persons of Tremor Video by virtue of their positions as directors and/or senior officers of Tremor Video. The Individual Defendants each had a series of direct and/or indirect business and/or personal relationships with other directors and/or officers and/or major shareholders of Tremor Video. The Company controlled the Individual Defendants and all of Tremor Video's employees.

57. The Individual Defendants each were culpable participants in the violations of §11 of the Securities Act alleged in the Cause of Action above, based on their having signed or authorized the signing of the Registration Statement and having otherwise participated in the process which allowed the IPO to be successfully completed.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for relief and judgment, as follows:

A. Determining that this action is a proper class action, designating Plaintiff as Lead Plaintiff and certifying Plaintiff as a Class representative under Rule 23 of the Federal Rules of Civil Procedure and Plaintiff's counsel as Lead Counsel;

B. Awarding compensatory damages in favor of Plaintiff and the other Class members against all Defendants, jointly and severally, for all damages sustained as a result of Defendants' wrongdoing, in an amount to be proven at trial, including interest thereon;

C. Awarding Plaintiff and the Class their reasonable costs and expenses incurred in this action, including counsel fees and expert fees;

D. Awarding rescission or a rescissory measure of damages; and

E. Such equitable/injunctive or other relief as deemed appropriate by the Court.

JURY TRIAL DEMANDED

Plaintiff hereby demands a trial by jury.

DATED: November 21, 2013

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN

SAMUEL H. RUDMAN

58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@rgrdlaw.com

HOLZER HOLZER & FISTEL, LLC
MICHAEL I. FISTEL, JR.
MARSHALL DEES
200 Ashford Center North, Suite 300
Atlanta, Georgia 30338
Telephone: 770/392-0090
770/392-0029 (fax)
mfistel@holzerlaw.com
mdees@holzerlaw.com

Attorneys for Plaintiff