

SEEGER WEISS LLP
CHRISTOPHER A. SEEGER
JENNIFER R. SCULLION
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: 212/584-0700
212/584-0799 (fax)

Local Counsel

ROBBINS GELLER RUDMAN
& DOWD LLP
JAMES E. BARZ
FRANK A. RICHTER
200 South Wacker Drive, 31st Floor
Chicago, IL 60606
Telephone: 312/674-4674
312/674-4676 (fax)

Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

<p>In re VALEANT PHARMACEUTICALS) INTERNATIONAL, INC. SECURITIES) LITIGATION) _____)</p>	<p>Master No. 3:15-cv-07658-MAS-LHG) <u>CLASS ACTION</u>) Judge Michael A. Shipp) Magistrate Judge Lois H. Goodman)</p>
<p>This Document Relates To:) ALL ACTIONS.) _____)</p>	<p>DECLARATION OF JENNIFER) SCULLION FILED ON BEHALF OF) SEEGER WEISS LLP IN SUPPORT) OF APPLICATION FOR AWARD) OF ATTORNEYS' FEES AND) EXPENSES)</p>

I, Jennifer Scullion, declare as follows:

1. I am an attorney admitted to practice in this court. I am a partner with Seeger Weiss LLP (“Seeger Weiss”), local counsel of record for Lead Plaintiff TIAA (“Lead Plaintiff”). I make this declaration in support of my firm’s application for an award of attorneys’ fees and expenses in connection with services rendered in the above-entitled action. Unless otherwise stated, I make this declaration based on personal knowledge and the business records of our firm. By making this declaration, I do not intend, am not authorized, to waive the attorney-client privilege or any applicable work product protections.

2. I am one of the partners who oversees and conducts the day-to-day activities in the litigation.

3. The information in this declaration regarding the firm’s time and expenses is taken from time and expense records and supporting documentation prepared and maintained by our firm in the ordinary course of its business. I reviewed the firm’s time and expense records (and supporting documentation, where necessary) in connection with the preparation of this declaration to confirm the accuracy of the records, as well as the necessity for, and reasonableness of, the time and expenses committed to this litigation. As a result of this review, certain 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 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 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 total number of hours spent on this litigation by my firm's legal and paralegal staff is 824.05. A breakdown of the time is provided in **Exhibit A**. The lodestar amount for that time is \$476,676.75. The lodestar is calculated using the firm's current rates (or, in the case of individuals who no longer work with our firm, using their rate as of the date they last worked for the firm). The hourly rates shown in Exhibit A are (or, in the case of former employees, were as of the date they last worked for the firm) the usual and customary rates set by the firm for each individual.

5. My firm also seeks an award of \$13,989.77 in expenses and charges in connection with the prosecution of the litigation. Those expenses and charges are summarized by category in **Exhibit B**.

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

(a) Court Fees: \$600. These expenses have been paid to the Court in connection with the *pro hac vice* admission of certain counsel for the Lead Plaintiff.

(b) Transportation & Meals: \$2,355.82. In connection with the prosecution of this case, the firm has paid for travel (\$2,318.94) to, among other things, attend court hearings, meet with potential witnesses, and meet with mediators and opposing counsel. The date, nature, and purpose of each trip is set forth in **Exhibit C**. The firm also incurred meal expenses of \$36.88.

(c) Court Hearing and Deposition Reporting, and Transcripts: \$581.36.

(d) In-House Photocopies & Printing: \$6,731. In connection with this case, the firm printed or copied 26,924 pages, charging \$0.25 per page. Each time an in-house printer or copy machine is used, the user is asked to enter a case billing code. Our billing system uses those code to track the number of pages printed or copied that were identified as related to this case.

(e) Outside copying: \$1,086.01. Our firm also paid \$1,086.01 to an outside copy vendor (US Legal) for printing, copying, and binding materials for this matter.

(f) Online Legal and Case Research: \$1,760.94. This category includes services such as Westlaw and PACER that were used for legal research and

docket management. When a user uses one of these services, he or she identifies by billing code or name the case for which the service is being used. These expenses reflect the prorated amount of time charges for the service (Westlaw) or the document access charges (PACER) based on the case codes or names. The charges for these vendors vary depending upon the type of services requested.

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

8. A resume summarizing our firm's experience is attached hereto as **Exhibit D**, along with biographical summaries for each of the partners whose time is included in the lodestar in Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct.
Executed this 21st day of April, 2020, at Jersey City, New Jersey.

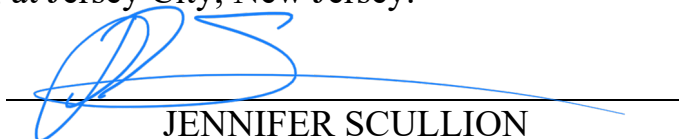

JENNIFER SCULLION

EXHIBIT A

Exhibit A
Seeger Weiss Time by Timekeeper

Professional	Professional Type	Total hours	Rate	Lodestar
Christopher A. Seeger	Partner	169.00	985	166,465.00
Christopher Ayers	Partner	29.50	875	25,812.50
David Buchanan	Partner	9.40	975	9,165.00
Jennifer Scullion	Partner	100.80	950	95,760.00
Parvin K. Aminolroaya	Partner	2.70	875	2,362.50
Denise Stewart	Associate	2.50	660	1,650.00
Kseniya Lezhnev	Associate	137.90	495	68,260.50
Max Kelly	Associate	0.50	575	287.50
Elina Rakhlin	Law Clerk	122.00	375	45,750.00
Darryl Bailey	Paralegal	6.70	215	1,440.50
Donald Sparks	Paralegal	18.00	250	4,500.00
Isaac Rojer	Paralegal	4.50	215	967.50
Michael Sheridan	Paralegal	115.30	250	28,825.00
Sabrina Tyjer	Paralegal	6.20	250	1,550.00
Scott Siegel	Paralegal	23.50	325	7,637.50
Antoine Barzey	Paralegal Temp	10.80	215	2,322.00
Richard McCrae	Paralegal Temp	64.75	215	13,921.25
		824.05		476,676.75

EXHIBIT B

Exhibit B
Seeger Weiss Expenses & Charges

Component Description	Amount
Black and White Printing - 26676 Pages	\$6,669.00
In-House Copying - 248 Pages	\$62.00
Outside Copying	\$1,086.01
Federal Express	\$874.64
Court Filing Fees	\$600.00
Meals - Attorney	\$36.88
Research	\$1,760.94
Transcript	\$581.36
Travel and Local Transportation	\$2,318.94
TOTAL	\$13,989.77

EXHIBIT C

Exhibit C
Seeger Weiss Travel Expenses

Date	Purpose	Amount
04/04/2017	Taxi from office for after-hours case work by paralegal.	\$83.91
04/04/2017	Taxi from office for after-hours case work by paralegal.	\$112.79
04/10/2017	Travel (Scullion) to attend Court Hearing in Trenton.	\$41.43
04/10/2017	Travel (Lezhnev) to attend Court Hearing in Trenton.	\$33.50
05/23/2017	Taxi from office for after-hours case work by paralegal.	\$72.72
09/07/2017	Travel (Scullion) to attend meeting with potential expert witness in Philadelphia.	\$370.00
09/07/2017	Travel (Scullion) to attend meeting with potential expert witness in Philadelphia.	\$58.59
10/12/2017	Travel (Scullion) to attend Court Hearing in Trenton.	\$92.00
10/16/2019	Travel (Seeger) to attend status conference with Special Master Cavanaugh.	\$532.00
11/06/2019	Travel (Seeger) to attend mediation with Special Master Eric Green and meeting with co-counsel.	\$922.00
	TOTAL	\$2,318.94

EXHIBIT D

SEEGERWEISS LLP

COMPLEX LITIGATION | SIMPLE JUSTICE

Firm Overview

Seeger Weiss is one of the preeminent trial law firms in the nation, known for its high-stakes, landmark verdicts and settlements in multidistrict and class action litigation on behalf of consumers, municipalities, investors, and other injured parties. Headquartered in Ridgefield Park, New Jersey, the firm has led and tried some of the most complex and high-profile litigations in the U.S. in both state and federal courts since its founding in 1999.

Professionals

Managing Partner(s): Christopher A. Seeger, Stephen A. Weiss, David R. Buchanan

Additional partners and lawyers: 25

Offices

55 Challenger Road, Suite 600
Ridgefield Park, New Jersey 07660

77 Water Street, Suite 800
New York, New York 10005

1515 Market Street, Suite 1380
Philadelphia, Pennsylvania 19102

Selected Representative Matters

Securities

- *In re Pfizer Inc. Securities Litigation*, (S.D.N.Y.). Class and science counsel, lead counsel for class plaintiffs in *Daubert* hearing, and designated trial counsel. Case resolved with a \$486 million cash settlement fund for the aggrieved investors.
- *In re Novo Nordisk Securities Litigation* (D. N.J.): Co-Liaison Counsel and Member of Executive Committee in securities fraud class action.
- *In re 3M Company Securities Litigation* (D. N.J.): Class Liaison Counsel for Lead Plaintiff in securities fraud class action.
- *City of Sterling Heights Police & Fire Retirement System v. Reckitt Benckiser Group PLC, et al* (D.N.J.): Local Counsel for Lead Plaintiff in securities fraud class action.
- *Tanaskovic v. Realogy Holdings Corp et al* (D. N.J.): Local Counsel for Lead Plaintiff in securities fraud class action.
- *In re Ascena Retail Group Inc. Securities Litigation* (D. N.J.): Local Counsel for Lead Plaintiff in securities fraud class action.

Antitrust:

- *In re Liquid Aluminum Sulfate Antitrust Litig.* (D. N.J.): Plaintiffs' Steering Committee in antitrust class action on behalf of water treatment chemical purchasers. Class settlements in excess of \$100 million.
- *In re Polyurethane Foam Antitrust Litig.* (N.D. Ohio): Executive Committee. Approximately \$428 million settlement on behalf of plaintiffs.
- *In re German Automotive Mfrs. Antitrust Litig.* (N.D. Cal.): Plaintiffs' Steering Committee prosecuting consumer antitrust claims.
- *In re Humira (Adalimumab) Antitrust Litigation* (N.D. Ill.): Executive Committee for proposed End-Payer Class.

Consumer Protection/Product Liability:

- *In re 3M Combat Arms Earplug Prods. Liab. Litig.* (E.D. Fla.): Co-Lead Counsel prosecuting product liability claims arising from medical product.
- *In re Intel Corp. CPU Mktg., Sales Practices and Prods. Liab. Litig.* (D. Or.): Co-Lead Counsel prosecuting consumer fraud, product defect and related claims.
- *In re American Medical Collection Agency, Inc. Customer Data Security Breach Litigation* (D. N.J.): Co-Lead Counsel for Quest Track.
- *In re National Prescription Opiate Litigation* (N.D. Ohio): Member of Plaintiffs' Executive Committee, Settlement Committee, Manufacturers' Committee, and Law & Briefing Committee in multi-district litigation prosecuting RICO, public nuisance and related claims on behalf of local governments. Co-Lead Counsel for Negotiation Class.
- *In re Davol, Inc./C.R. Bard Inc. Polypropylene Hernia Mesh. Prods. Liab. Litig.* (S.D. Ohio): Executive Committee prosecuting product liability claims arising from medical product.
- *Volkswagen "Clean Diesel" Marketing, Sales Practices and Prods. Liab. Litig.* (N.D. Cal.): Steering Committee. Over \$20 billion settlement on behalf of over 500,000 plaintiffs in action alleging RICO, consumer fraud, and related claims arising from diesel emissions cheating.
- *In re Mercedes-Benz Emissions Litig.* (D. N.J.): Co-Counsel prosecuting class action alleging RICO, consumer fraud, and related claims arising from diesel emissions cheating.
- *In re Syngenta AG MIR 162 Corn Litig.* (D. Kan.): Member of Plaintiffs' Executive Committee and Member of Plaintiffs' Settlement Negotiating Committee & principal negotiator. \$1.51 billion nationwide settlement.
- *Chinese-Manufactured Drywall Prods. Liab. Litig.* (E.D. La): Lead trial counsel & Trial Committee chair. Over \$1 billion settlement on behalf of nearly 5,000 plaintiffs.
- *Depuy Orthopaedics, Inc. ASR Hip Implant Prods. Multidistrict Litig.* (N.D. Ohio): Executive Committee. \$2.5 billion settlement.

Catastrophic Injury:

- *In re NFL Players' Concussion Injury Litig.* (E.D. Pa.): Co-lead counsel & chief negotiator. Over \$1 billion uncapped settlement fund plus medical testing program on behalf of over 20,000 plaintiffs.
- *Wildcats Bus Crash Litig.* (New York Supreme Court, Livingston County): Lead counsel. \$2.25 million verdict followed by \$36 million settlement on behalf of 11 plaintiffs.

Drug Injury:

- *In re Proton-Pump Inhibitor Prods. Liab. Litig. (No. II)* (D. N.J.): Co-Lead Counsel representing individuals injured by gastric acid reduction medication.
- *In re Testosterone Replacement Therapy Prods. Liab. Litig.* (N.D. Ill.): Co-lead counsel & lead trial counsel representing individuals injured by testosterone medication.
- *In re Invokana Prods. Liab. Litig.* (D. N.J.): Co-lead counsel representing individuals injured by diabetes medication.
- *Vioxx Prods. Liab. Litig.* (E.D. La): Co-lead counsel. \$4.85 billion global settlement on behalf of more than 45,000 plaintiffs in approximately 27,000 claims.
- *Zyprexa Prods. Liab. Litig.* (E.D.N.Y.): Liaison counsel. \$700 million first-round settlement and \$500 million second-round settlement.



CHRISTOPHER A. SEEGER

A founding partner of Seeger Weiss LLP, Christopher Seeger is widely admired as one of the nation's most innovative, versatile and accomplished plaintiffs' attorneys.

Since founding his firm in 1999, Chris has led many of the most complex, groundbreaking and high-profile litigations in the United States. Though chiefly known for multidistrict mass torts and class actions involving drug and medical device, toxic, neurocognitive and other personal injuries, Chris's practice transcends a broad range of legal disciplines, including insurance and securities fraud; product liability; property damage; consumer; antitrust; and third-party payer litigation in both state and federal courts nationwide.

Since joining the plaintiffs' bar two decades ago, Chris has earned the trust and respect of courts throughout the United States, as reflected in his repeated appointments to serve as Lead, Co-Lead Counsel, Liaison Counsel, or member of the Plaintiffs' Executive or Steering Committee in dozens of the most complex and nationally-impactful multidistrict proceedings in the United States. By virtue of his seasoned leadership and skillful legal acumen demonstrated throughout these proceedings, Chris has also earned the trust of his peers and adversaries alike.

Reflecting his uniquely experienced and nuanced views on a wide variety of legal matters, Chris is regularly sought out by the press as an authority in his field, including the *New York Times*, *Wall Street Journal*, *Chicago Tribune*, *Los Angeles Times*, *Bloomberg*, *CBS*, *CNBC*, *USA Today*, *Daily News*, *ESPN*, and *HBO Sports*.

He is consistently ranked as one of the best attorneys in America. The National Association of Distinguished Counsel has honored him as one of the "Nation's Top One Percent" and the prestigious *Chambers* guide has ranked him a Band 1 lawyer. *Lawdragon* has called him a "battling titan" and a "legend" and the *National Law Journal* has called him a "trailblazer and pioneer" who has "changed the practice of litigation."

Chris began his career as a corporate defense lawyer representing Fortune 500 companies in a variety of transactional matters. Struck by the imbalance of power and influence between corporations and the disenfranchised individuals victimized by their misconduct, he left Big Law to become a plaintiffs' attorney, establishing his own firm over 25 years ago which was the predecessor to Seeger Weiss.

Today, whether leading a class action involving hundreds of thousands of people seeking to avenge harms caused by a multinational conglomerate, representing a governmental entity that has suffered economic loss due to corporate fraud or misconduct, or an individual victimized by the illicit actions of another, Chris approaches all conflicts with the same vigor, discipline, character and conviction learned throughout his life and career. As the son of a union carpenter

who worked his way through school, a former amateur boxer and a current Brazilian Jiu Jitsu black belt and Pan America Games gold medalist, Chris has dedicated his career to leveling the litigation playing field for his clients and delivering a quality of representation unequaled in the plaintiffs' bar.

SELECTED REPRESENTATIONS

- *In re Volkswagen "Clean Diesel" Marketing, Sales Practices and Products Liability Litigation*, MDL No. 2672 (N.D. Ca.). Appointed to Plaintiffs' Steering Committee by the Hon. Charles R. Breyer, representing individuals affected by the **Volkswagen** diesel emissions controversy. Served on the Settlement Committee and was one of the lead negotiators of a **\$21 billion settlement** which includes a massive buyback program for consumers and billions of dollars for environmental remediation.
- *In re National Football League Players' Concussion Injury Litig.*, MDL No. 2323 (E.D. Pa.). Appointed Co-Lead Class Counsel by the Hon. Anita Brody, serving as chief negotiator on behalf of plaintiffs in the highly visible and contentious multidistrict litigation against the **National Football League**. There, Chris faced significant legal and procedural challenges, including those associated with federal preemption, causation and sub-classing. Ultimately, he was able to surmount these hurdles and lead settlement negotiations under the auspices of a mediator, and in coordination with subclass counsel. The results achieved there—an **uncapped settlement fund valued at approximately \$1 billion** and a medical testing program—were overwhelmingly supported by the class and received unprecedented media attention. This settlement was approved by the Third Circuit Court of Appeals and certification of appeal was recently denied by the United States Supreme Court.
- *In re Syngenta AG MIR 162 Corn Litigation*, MDL No. 14-md-2591 (D. Kan.). Appointed to the Plaintiffs' Settlement Negotiating Committee by the Hon. John W. Lungstrum, serving as Lead Negotiator in representing nationwide corn producers harmed as a result of Swiss agrochemical giant **Syngenta AG's** premature commercialization of genetically modified strains of corn known as Agrisure Viptera and Duracade resulting in **court-approved nationwide settlement of \$1.51 billion**.
- *In re Testosterone Replacement Therapy Prods. Liab. Litig.*, MDL No. 2545 (N.D. Ill.) Appointed Co-Lead Counsel by the Hon. Matthew Kennelly, representing the interests of individuals who were injured by testosterone medications. Served as Lead Negotiator achieving a **nationwide settlement valued at approximately \$330 million**.
- *In re National Prescription Opiate Litig.*, MDL No. 2804 (N.D. Ohio). Appointed to the Executive and Settlement Committees by the Hon. Dan A. Polster, leading numerous lawsuits, many filed by local governments, against pharmaceutical manufacturers and distributors over the alleged improper and misleading marketing and widespread diversion of prescription painkillers into states, counties and cities across the nation, leading to the current opioid addiction crisis.

- *In re Intel Corp. CPU Marketing, Sales Practices and Prods. Liab. Litig.*, MDL No. 2828 (JPML). Appointed Interim Co-Lead Counsel in the nationwide lawsuit against Intel Corp., prosecuting fraud, product defect, and related claims on behalf of consumers who purchased computers and other devices containing flawed computer chips.
- *In re: Proton-Pump Inhibitor Products Liability Litigation*, MDL No. 2789 (D. N.J.). Appointed Co-Lead Counsel on behalf of thousands of plaintiffs in a complex litigation involving multiple defendant manufacturers of proton-pump inhibitors, which have been alleged to have caused serious kidney injuries.
- *In re Fresenius Granuflo/Naturalyte Dialysate Prods. Liab. Litig.*, MDL No. 2428 (D. Mass.). Appointed to the Plaintiffs' Executive Committee by the Hon. Douglas P. Woodlock. Served as chief negotiator of **nationwide settlement \$250 million**.
- *In re Zyprexa Prods. Liab. Litig.*, MDL No. 1596 (E.D.N.Y.). Appointed as Liaison Counsel by the Hon. Jack B. Weinstein, serving as one of the chief negotiators in connection with a national **\$700 million settlement** with **Eli Lilly** for over 8,000 claims that **Zyprexa** caused diabetes-related injuries. This was followed by a **\$500 million second-round settlement**. Chris was the first to conceive of and use a global lien resolution administrator in the class or mass action context to resolve government and/or third party liens, resulting in significant savings and quicker payments to class members.
- *In re Depuy Orthopaedics, Inc. ASR Hip Implant Prods. Multidistrict Litig.*, MDL No. 2197 (N.D. Ohio). Appointed to the Plaintiffs' Executive and Settlement Committees by the Hon. David A. Katz, involved in negotiating an **almost \$3 billion settlement**.
- *In re Yasmin and YAZ Marketing, Sales Practices and Prods. Liab. Litig.*, MDL No. 2100 (S.D. Ill.). Appointed to the Plaintiffs' Steering Committee by the Hon. David R. Herndon. Was the first to settle own clients' cases, which ultimately led to the creation of nationwide settlement program **exceeding \$2 billion**.
- *In re Vioxx Prods. Liab. Litig.*, MDL No. 1657 (E.D. La.). Unanimously selected by the plaintiffs' lawyers as Co-Lead Counsel and appointed by the Hon. Eldon E. Fallo. Developed the overall litigation strategy for the approximately 27,000 separate cases against **Merck & Co.**, securing a settlement for **\$4.85 billion** following five years of intense litigation, but mere months after obtaining a **jury verdict of \$47.5 million** in a client's bellwether trial (*Humeston v. Merck & Co., Inc.*, case no. ATL-L-2272-03, N.J. Super. Ct. Atlantic County). Conceived and used a global lien resolution administrator, resulting in significant savings and quicker payments to class members.
- *In re Chinese-Manufactured Drywall Prods. Liab. Litig.*, MDL No. 2047 (E.D. La.). Appointed as Chair of the Plaintiffs' Trial Committee by the Hon. Eldon E. Fallon, serving as lead trial counsel in obtaining successful verdicts in a succession of bellwether liability and damages trials on behalf close to 5,000 property owners who used the allegedly toxic drywall, many in rebuilding homes destroyed by Hurricane Katrina. These verdicts served as the precursor to a national settlement valued at approximately **\$1 billion** with worldwide drywall distributor **Knauf Plasterboard Tianjin (KPT)** in 2011.

- *In re Invokana (Canagliflozin) Prods. Liab. Litig.*, MDL No. 2750 (D.N.J.). Appointed by the Hon. Brian R. Martinotti as Co-Lead Counsel of the Plaintiffs' Steering Committee on January 24, 2017, representing plaintiffs against **Johnson & Johnson Co.** and **Janssen Pharmaceuticals, Inc.**, claiming injuries including diabetic ketoacidosis, acute kidney failure and amputations as a result of taking the drug Invokana. Case pending.
- *In re Actos (Pioglitazone) Prods. Liab. Litig.*, Case no. 6:11-md-2299 (W.D. La.). Appointed by the Hon. Rebecca F. Doherty to the Plaintiffs' Steering Committee of the consolidated MDL, obtaining a jury verdict of **\$9 billion** in punitive damages, the seventh-largest verdict in US history (later reduced to **\$36.8 million**), against **Takeda Pharmaceutical Co.**, Asia's largest drug maker, and marketing partner **Eli Lilly & Co.**, on behalf of plaintiffs who developed bladder cancer resulting from their Actos diabetes drug.
- *In re Phenylpropanolamine (PPA) Prods. Liab. Litig.*, MDL No. 1407 (W.D. Wash.). Served as principal negotiator and Co-Lead Counsel in the nationwide settlement of all PPA (phenylpropanolamine)-related injuries resulting from the ingestion of weight loss product **Dexatrim**. Was involved in the litigation against numerous other manufacturers of pharmaceuticals containing PPA, serving on the MDL Plaintiffs' Steering Committee in the Western District of Washington and as Liaison Counsel in the New York state court litigation. Plaintiffs were awarded over **\$41.5 million**.

ADMISSIONS & EDUCATION

Bar Admissions

New York

New Jersey

U.S. District Courts of the Eastern District of New York, Southern District of New York, District of New Jersey, District of Colorado

Education

Benjamin N. Cardozo School of Law, J.D., *magna cum laude*, 1990

Hunter College of the City University of New York, B.A., *summa cum laude*, 1987

Cardozo Law Alumnus of the Year Award, 2009

Managing Editor of the *Cardozo Law Review*

Hunter College Distinguished Alumni Lawyer Award, 2013

Hunter College Alumni Hall of Fame, 2007

MEMBERSHIPS & ASSOCIATIONS

American Bar Association

The Association of the Bar of the City of New York

New Jersey State Bar Association

New York State Trial Lawyers Association

International Society of Barristers

American Bar Foundation

American Association for Justice
Trial Lawyers for Public Justice
Elected Member, American Law Institute
Advisory Board, RAND Center for Catastrophic Risk Management and Compensation
Advisory Board, Center on Civil Justice at New York University School of Law
Advisory Council, BOLCH Judicial Institute
Dean's Advisory Counsel, Benjamin N. Cardozo School of Law
Board of Trustees, Hunter College Foundation
Pre-Law Advisory Board, Hunter College
Co-General Counsel, Badge of Honor Memorial Foundation, 2008 – present

Pro Bono

Human Rights First
Hunter College
Benjamin N. Cardozo School of Law
New York State Trial Lawyers Association (NYSTLA)
Badge of Honor Memorial Foundation

PUBLICATIONS & PRESENTATIONS

Teaching

Former Adjunct Professor, Trial Advocacy and Complex Litigation (advanced level), Benjamin N. Cardozo School of Law.

Lectures & Panels

“Contemporary Issues in Complex Litigation”
The Role of the Trial in Modern Complex Litigation
Northwestern Pritzker School of Law
Chicago, IL, November 28, 2018

“ABA Current Issues in Pharmaceutical, Medical Device, and Biotech Litigation Regional CLE Program”
The ABCs of Settling Mass Torts Panel
North Wales, PA, November 9, 2018

“Conference on Third Party Litigation Finance at the George Washington University Law School”
TPLF of Attorneys in Traditional and Complex Litigation
George Washington University Law School
Washington, D.C., November 2, 2018

“2018 Transferee Judges’ Conference”
NFL Players’ Concussion Injury Litigation
West Palm Beach, FL, October 30, 2018

“The Diagnosis, Treatment, and Prevention of Concussion Symposium”
The NFL Concussion Litigation: The Impact of Traumatic Brain Injury on America’s Most

Popular Sport
Fordham Law School
New York, NY, October 17, 2018

“MDL at 50”
Theory of Aggregation: Class Actions, MDLs, Bankruptcies, and more
NYU School of Law
New York, NY, October 12, 2018

“2018 FBA Annual Meeting & Convention”
FBA: Perspectives on Class Action and Multi District Litigation
New York, NY, September 13, 2018

“Duke Law’s Documenting and Seeking Solutions to Mass-Tort MDL Problems Conference”
Impact of Critical Transferee Judge Decisions Not Subject to Review or Appeal
Atlanta, GA, April 26, 2018

“FJC’s Managing Multidistrict and Other Complex Litigation Workshop”
How Does it End – Settlement, Trial, or Remand
Washington, D.C., March 15, 2018

“Posner Symposium”
NFL Concussion Case Study
Columbia Law School
New York, NY, March 2, 2018

“Current Issues in the Trial of Complex Matters”
Northwestern: Contemporary Issues in Complex Litigation Conference
Northwestern Pritzker School of Law
Chicago, IL, November 30, 2017

“Mass Tort Trends – 1,000 Claimants to 100 Million”
Perrin Conferences: Mass Tort Global Settlement Architecture Conference
The Willard Hotel
Washington, D.C., October 26, 2017

“Exceptional Training Opportunity for Young Associates by Leading Judges and Practitioners”
Bridge Program Conference
Emory University School of Law
Atlanta, GA, September 14, 2017

“The Aggregation of Claims: Pros and Cons”
Emerging Trends in Compensation for Widespread Losses
RAND Center for Catastrophic Risk Management and Compensation Conference
Arlington, VA, May 19, 2017

“Limits on Judicial Participation in and Approval of Non-class Settlements”
Multi-district Litigation Roundtable
George Washington University Law School
Washington, D.C., April 27, 2017

“Case Management Techniques: What Helps, What Backfires, and How to Get to Efficient Resolution”

FJC/JPML Conference

Emory Law: The Institute for Complex Litigation and Mass Claims

Atlanta, GA, December 14, 2016

“There’s No Place like Home: The Pros and Cons of Lexecon Waivers and Bellwether Trials in the Modern MDL”

“Bellwether Trials? Purpose, Including Whether to Eliminate Them Altogether, Selection, and Early Dismissal”

Emerging Issues in Mass-Tort MDLs Conference (Invitation Only)

Duke Law Center for Judicial Studies

Washington, D.C., October 28, 2016

“NFL – The challenges and rewards of serving as lead counsel in one of the most highly publicized class actions in history”

Cutting-Edge Bet the Company Mega Class Action CLE

Oregon Law Institute of Lewis & Clark Law School

Portland, OR, February 16, 2016

“Trials & Error: The NFL Concussion Settlement”

The Forum on Law, Culture & Society (FOLCS)

NYU School of Law

New York, NY, February 2, 2016

“Volkswagen Diesel Emissions Fraud: Arguments for Potential Transfer Venues”

Plaintiff-Only Hot Topics and Trends Litigation Seminar

American Association for Justice (AAJ)

New Orleans, LA, December 2, 2015

“Common Benefit Fund”

Second Multidistrict Litigation Institute Conference

Duke Law Center for Judicial Studies

Washington, D.C., November 9, 2015

“Common Benefit Fund/Attorney Fees”

Future of Multidistrict Litigation Conference

Duke Law Center for Judicial Studies

Washington, D.C., May 2, 2013

AWARDS

- *Chambers USA*, Tier 1 Nationwide in Product Liability: Plaintiffs, 2013, 2017–2018
- Nation’s Top One Percent, National Association of Distinguished Counsel, 2015-2018
- *Best Lawyers in America*, Mass Tort Litigation/Class Actions – Plaintiffs and Medical Malpractice Law – Plaintiffs, 2006-2019
- *Law360 Titan of the Plaintiffs Bar*, 2017

- *Lawdragon* 3000 Leading Lawyers in America, 2010
- *Lawdragon* 500 Leading Lawyers in America, 2007-2018
- *Lawdragon* Legends – 50 lawyers who made the *Lawdragon* 500 list 10 consecutive years, 2015
- *The Trial Lawyer* RoundTable: Top 50 Most Influential Trial Lawyers, 2016
- *National Law Journal*, Elite Boutique Trailblazers, 2018
- *National Law Journal*, Top 50 Litigation Trailblazers and Pioneers, 2014
- Martindale-Hubbell AV Preeminent since 2012
- Martindale-Hubbell Distinguished since 2012
- *New York Super Lawyers*, 2006-2018
- *New Jersey Super Lawyers*, 2006-2018
- *New Jersey Law Journal* Top 20 Personal Injury Awards of the Year, 2007
- National Trial Lawyers: Top 100 Trial Lawyers, 2016-2018
- Million Dollar Advocates Forum
- Multi-Million Dollar Advocates Forum
- Cardozo Law Alumnus of the Year, 2009
- Hunter College Alumni Hall of Fame, 2007
- Hunter College Distinguished Alumni Lawyer Award, 2013

Chambers

“Extraordinarily knowledgeable.”

“Held in high regard for his expert handling of large-scale product liability actions.”

“A good negotiator who has earned the trust of other counsel and courts.”

Lawdragon

“Battling titan”

Legal 500

“A renowned trial lawyer.”

“A determined trial lawyer.”

“Highly regarded.”

National Law Journal

“Changed the practice of litigation through the use of innovative legal strategies.”

The National Trial Lawyers

“One of the nation’s most versatile, respected and accomplished attorneys in cases related to drug and toxic injury, as well as in the area of personal injury litigation.”

“Mr. Seeger has served as lead attorney and in other significant leadership roles in many of the country’s most newsworthy and groundbreaking federal and state actions involving consumer fraud and negligence.”

“Mr. Seeger approaches each case with compassion, knowing that each plaintiff, whether as an

individual or as part of a large group, has suffered immensely and needs an effective partner to get through what is inevitably a difficult and emotional time. His success in the courtroom and at the settlement table have helped many injured people recover financial awards.”



DAVID R. BUCHANAN

A senior partner at Seeger Weiss, Dave represents individual and corporate plaintiffs in state and federal courts throughout the country. His practice focuses on litigating and trying complex commercial and product liability matters.

Dave's docket involves a wide variety of cases, including pharmaceutical injury, product liability claims, commercial disputes, securities and investment fraud, pension challenges, and consumer claims. Though the scope of his cases is broad, they are usually large, national, high-stakes cases, generally destined for trial. By their nature, they are often centered in federal multi-district proceedings or analogous state coordinated proceedings, where Dave is often selected by his co-counsel or appointed by the courts to lead them as liaison counsel, lead counsel, or a member of plaintiffs' executive/steering committee.

Dave's scientific background is a ready asset in the technical and pharmaceutical cases in which he often focuses. He is likewise known for his extensive experience in the discovery and preservation of electronic information, and has served as a consultant in this capacity for many other law firms. Dave is frequently invited to speak to litigators, attorneys, judges, students, and professional organizations on issues concerning trial practice, discovery, MDL practice, and complex and products liability litigation.

SELECTED REPRESENTATIONS

- *In re Testosterone Replacement Therapy Prods. Liab. Litig.*, MDL No. 2545 (N.D. Ill.). Trial counsel in first three bellwether trials in this multi-district litigation concerning cardiovascular injuries suffered by men following their use of prescription testosterone products. Highlights: Lead Trial Counsel in *Konrad v. AbbVie Inc.*, No. 1:15-cv-00966 (N.D. Ill.), which resulted in a \$140+ million verdict for a 49-year old Tennessee man who used AndroGel for two months and suffered a heart attack. Trial counsel for 49 year-old Oregon man who suffered a heart attack following use of AndroGel (*Mitchell et al. v. AbbVie Inc. et al.*, No. 1:14-cv-09178 (N.D. Ill.)) – \$150+ million verdict for Mr. Mitchell in the first trial; \$3.2 million verdict for plaintiff on re-trial.
- *In re National Football League Players' Concussion Injury Litig.*, MDL No. 2323 (E.D. Pa.). Appointed to the Plaintiffs' Executive Committee by the Honorable Anita Brody. Co-lead negotiations on behalf of plaintiffs in this highly visible and contentious multidistrict litigation on behalf of retired players against the National Football League. Helped negotiate settlement resulting in substantial monetary awards for injured players (up to \$5 million per player for the most severe injuries) and a medical testing program. The settlement, valued at

more than \$1 billion, was overwhelmingly supported by the class, and thereafter approved by Judge Brody and affirmed by the U.S. Court of Appeals for the Third Circuit; the United States Supreme Court declined further review.

- *In re Vioxx Prods. Liab. Litig.*, MDL No. 1657 (E.D. La.); *In re Vioxx Prods. Liab. Litig.*, No. 619 (N.J. Super. Ct. Atlantic Cty). Served as Court-appointed Liaison Counsel (New Jersey proceedings), co-chair of discovery (MDL proceedings), and trial counsel in several bellwether trials against Merck & Co. concerning heart attacks caused by its arthritis drug, Vioxx. Through his role in both the New Jersey and MDL proceedings, Dave helped develop and lead the overall litigation strategy for the approximately 27,000 separate cases pending against Merck & Co., and, together with partner Christopher Seeger, successfully co-tried the bellwether case, *Humeston v. Merck & Co., Inc.*, case no. ATL-L-2272-03, N.J. Super. Ct. Atlantic County, which resulted in a \$47.5 million verdict for the Humestons for his Vioxx-related heart attack. Months later, Dave joined with the negotiating committee to help secure the \$4.85 billion settlement from Merck for the many people injured by the drug.
- *In re Pfizer Inc. Securities Litig.*, No. 04-cv-9866 (S.D.N.Y.). Served as class and science counsel in this federal securities fraud action against Pfizer on behalf of investors relating to misrepresentations and omissions concerning Pfizer's drugs, Bextra and Celebrex. Dave played a leading role in developing the expert slate to overcome Pfizer's early science challenge, led with partner Christopher Seeger plaintiff's presentation and examinations during the seven day *Daubert* hearing, and was later designated as trial counsel for the trial of the case. Following pre-trial motion practice and ensuing appeals, the case settled, resulting in a \$486,000,000 cash settlement fund for the class of aggrieved investors.
- *In re Accutane Litigation*, No. 271 (N.J. Super. Ct. Atlantic Cty). Since 2005, Dave has served as Liaison Counsel and trial counsel for plaintiffs suffering from ulcerative colitis and Crohn's disease as a result of their use of Roche's acne medicine, Accutane. Several bellwether trials in the multi-county coordinated proceedings have occurred among the several thousand pending cases, thus providing important harbingers to the parties for the broader litigation, e.g.: *McCarrell v. Hoffmann La Roche, Inc.*, No. A-4481-12T1 (N.J.) (trial counsel for Alabama man developing ulcerative colitis shortly after stopping Accutane; \$2.5 million verdict in first trial; \$25.5 million jury verdict in re-trial); *Kendall v. Hoffman La Roche Inc.*, No. 36 A. 3d 541 (N.J.) (trial counsel for Utah woman who developed ulcerative colitis after stopping Accutane; \$10.4 million verdict in first trial; \$1.4 million verdict in re-trial); *Rossitto & Wilkinson v. Hoffmannn La Roche, Inc.*, Nos. L-7481-10 and L-1311-08 (N.J.) (lead trial counsel in consolidated trial for this New Jersey woman (Ms. Rossitto) and Utah man (Mr. Wilkinson) concerning their development of ulcerative colitis and resulting complications following the use of Accutane; \$18 million verdict for plaintiffs; verdicts vacated on appeal, with further appellate proceedings pending). These contentious proceedings have similarly resulted in several landmark decisions from the New Jersey Supreme Court and the New Jersey Appellate Division—in which Dave has served as appellate counsel—on legal issues of wide import, including choice of law, the discovery rule applicable in products liability claims, the presumptions afforded under the New Jersey Products Liability Act, and the admissibility of expert scientific testimony.

- *Zylon Corp. et al. v. Medtronic, Inc. et al.*, No. 650523/2008 (N.Y. Supreme). Represented inventor, Zylon Corp. and its principal, in theft of trade secret and unfair competition case against Medtronic, Inc. in New York Supreme Court, Commercial Part. Plaintiffs’ contention: through a series of agreements designed to provide Medtronic an opportunity to evaluate Zylon’s proprietary technology, Medtronic accessed, misappropriated, commercialized, and, later, claimed as its own Zylon’s proprietary process for making “zero fold”—or extremely low profile—angioplasty balloons. Following protracted and contentious proceedings, Dave served as trial counsel with partner Terrienne Benedetto and co-counsel of behalf of the inventor in the multi-week trial. The parties resolved the litigation on the eve of closing statements.
- *In re Depuy ASR Hip Implants Litig.*, MDL 2197 (N.D. Ohio); *In re Depuy ASR Hip Implants Litig.*, No. 293 (N.J. Super. Ct. Bergen Cty). Appointed Lead Counsel by the Hon. Brian R. Martinotti for the coordinated New Jersey proceedings against Johnson & Johnson and subsidiary Depuy Orthopaedics on behalf of thousands of victims who received Depuy’s defective ASR hip replacement, which resulted in revision/replacement surgeries, infections, and further complications. Dave led discovery in the state proceedings, while likewise assisting with MDL discovery, and was selected as co-lead and lead counsel for the first MDL and state bellwether trials, respectively. Plaintiffs reached a global settlement—now estimated at approximately \$3 billion—as Dave’s first New Jersey bellwether trial was set to commence.
- *In re Stryker Rejuvenate & ABG II Modular Hip Implant Litig.*, No. 296 (N.J. Super. Ct. Bergen Cty). Appointed to the Plaintiffs’ Steering Committee by the Hon. Brian R. Martinotti in claims against Stryker Corporation and its subsidiary Howmedica Osteonics Corp. related to its defective Rejuvenate and ABG II hip replacement system. The plaintiff-patients suffered severe injuries and complications following their hip replacement surgeries, in many cases, resulting in revision surgeries and related or ensuing complications. The litigation resolved favorably (and on an expedited basis) through an innovative bellwether mediation program, from which a global resolution followed valued at more than \$1 billion.
- *In re Gadolinium-Based Contrast Agents Prods. Liab. Litig.*, MDL 1909 (N.D. Ohio); *In re Gadolinium Contrast Agents Litig.*, No. 279 (N.J. Super. Ct. Middlesex Cty). Represented numerous injured patients in mass tort litigation against GE Healthcare, Bayer Healthcare Pharmaceuticals, Mallinckrodt, and others, concerning harm caused from exposure to their Gadolinium-based contrast dyes used in medical imaging. The plaintiff-patients developed a severe, disfiguring, debilitating—and in many cases, fatal—condition known as Nephrogenic Systemic Fibrosis, or Nephrogenic Fibrosing Dermopathy (NSF/NFD)—following routine imaging exams that employed Galolinium-based imaging agents. Dave was appointed Federal-State Court Liaison by the Hon. Daniel Polster for the MDL proceedings, and Liaison Counsel, by the Hon. Jamie D. Happas, for the New Jersey coordinated proceedings. Following extensive discovery, the litigation resolved by settlement on favorable terms for plaintiffs’ injured by defendants’ products.
- *In re Rezulin Prods. Liability Litig.*, MDL No. 1348 (S.D.N.Y.). Member of discovery team in MDL and coordinated state-court proceedings against Warner Lambert and Pfizer for liver

injury claims suffered by hundreds of consumers due to the withdrawn diabetes drug, Rezulin. Served as bellwether trial counsel in *Morgado v. Warner Lambert, Pfizer, et al.*, No. 403243/01 (N.Y. Supreme), which resulted in \$2 million verdict for Mrs. Morgado, and set the stage for global resolution of the broader claims in the litigation.

PUBLICATIONS

“Confidentiality in Mass Torts: New Rules, New Issues, New Perspectives”
New Jersey Lawyer, August 2011

“Rules 33 and 34: Defining E-Documents and the Form of Production”
(With Adam I. Cohen, James C. Francis IV, and Paul M. Robertson)
Fordham Law Review, 73 *Fordham L. Rev.* 33 (2004)

AWARDS & RECOGNITION

Martindale-Hubbell US “AV Preeminent,” 2013-present

Chambers USA, Nationwide in Product Liability: Plaintiffs

“‘Dave is a formidable opponent,’ and ‘one of the best plaintiffs’ lawyers practicing in terms of his all-around skill set.’” (Tier 3, 2017)

“The ‘exceptionally talented’ David Buchanan of Seeger Weiss LLP wins widespread praise for his product liability work, which includes representing plaintiffs in both individual cases and class actions. ‘He is one of the most strategic lawyers and toughest adversaries I know,’ says one source. Another comment: ‘He’s a rare attorney who is both an excellent trial and appellate lawyer.’” (Tier 2, 2018)

“David Buchanan is ‘very strong - he’s able to take the case and really present it in a compelling way,’ report interviewees. He brings high-value claims for plaintiffs in complex product liability disputes, and is described as ‘a great strategist who can visualize a case from start to finish.’” (Tier 2, 2019)

Best Lawyers in America, 2007-2011, 2016-present

Best Lawyers, “Lawyer of the Year” 2014 & 2020
(awarded to one lawyer in each practice and region)

The AmLaw Litigation Daily “Litigator of the Week” 10/12/2017

The Trial Lawyer “RoundTable: America’s 50 Most Influential Trial Lawyers,” 2017

National Trial Lawyers: Top 100 Trial Lawyers, 2017-present

The Legal 500 US, 2007-2017

“Achieved several notable victories.” (2010)

“Terrific rising star.” (2011)

“‘Excellent’ in discovery and the preservation of electronic information.” (2013)

“Well regarded...has a particular expertise in electronic discovery.” (2016)

National Law Journal Top 100 verdicts of 2017 (2 categories)

New York Super Lawyers, 2007-present

New Jersey Super Lawyers, 2009-2014, 2016-present

MEMBERSHIPS & ASSOCIATIONS

International Society of Barristers, 2016 – present

Summit Council, 2013 – present

New York State Trial Lawyers (NYSTLA), Board of Governors, 2007 – 2016;
member 2000 – present

New Jersey Association for Justice (NJAJ), Board of Governors, 2010 – 2011, 2018 – present;
member 2003 – present

American Association for Justice (AAJ), member, 2000 – present;
Litigation Group Chair, various years

The National Trial Lawyers, member, 2010 – present

American Bar Association, Litigation Section

EDUCATION & ADMISSIONS

Education

Benjamin N. Cardozo School of Law, J.D., *magna cum laude*, 1993

-- *Cardozo Law Review*, Editor, 1992-1993

-- Samuel Belkin Scholar, 1991-1993

University of Delaware, B.S., 1990, Chemistry and Biology

-- U of D Fightin’ Blue Hens Football, Offensive MVP, 1989

Bar Admissions

New Jersey

New York

Pennsylvania

United States District Courts for the Southern and Eastern Districts of New York,
and District of New Jersey

United States Court of Appeals for the Second and Third Circuits

Various Federal Courts around the country, via specific and *pro hac vice* applications



JENNIFER SCULLION

Jennifer is a Partner with Seeger Weiss. For over twenty years, Jennifer has led complex litigations, arbitrations, and appeals for U.S. and multinational clients in a wide array of areas, including antitrust, consumer fraud, communications, civil rights, and international bondholder disputes. Her experience includes multidistrict litigations, class actions, and federal regulatory proceedings. A prolific author, regularly Jennifer contributes articles to the *National Law Review*, *Law360*, and is a co-author of numerous PLC Practice Notes. She has also contributed two chapters on international civil litigation to the ABA's deskbook "International Aspects of U.S. Litigation," published in 2017.

With a passion for community involvement, Jennifer has an active pro bono practice that focuses on election law, voting rights, and amateur sports issues. She is a Board Member for the Lawyers' Committee for Civil Rights Under Law and Treasurer of the Three and a Half Acres Yoga Foundation. Jennifer also established a fund at her alma mater, Boston University, to assist students with emergency financial needs.

Prior to joining Seeger Weiss in 2016, Jennifer was a litigation partner in the New York office of Proskauer Rose, following positions with Solomon, Zauderer, Ellenhorn, Frischer & Sharp (New York) and Munger, Tolles & Olson (Los Angeles).

SELECTED REPRESENTATIONS

- *In re Novo Nordisk Securities Litigation*, No. 3:17-cv-00209-BRMLHG (D.N.J.). Member of the Seeger Weiss team appointed Co-Lead Counsel and to the Plaintiffs' Executive Committee by the Honorable Michael A. Shipp, in a class action representing several public and private pension funds and retirement systems who invested in global healthcare and drug company Novo Nordisk Inc. Novo allegedly mislead investors by falsely presenting financial information, engaging in a kickback scheme with health insurers middlemen, and conspiring to fix pricing. Case Pending.
- *In re National Prescription Opiate Litigation*, MDL 2804 (N.D. Ohio). Member of Law & Briefing Committee and member of Seeger Weiss team designated to lead discovery of leading pharmaceutical manufacturers in multi-district litigation on behalf of entities seeking remedies under federal and state law arising from unlawful sale, promotion, distribution, and dispensing of prescription opioids throughout the United States.
- *In re Liquid Aluminum Sulfate Antitrust Litigation*, 2:16-md-02687-MCA-MAH (D.N.J.). Member of Seeger Weiss team in antitrust class action on behalf of water treatment chemical purchasers. Class settlements in excess of \$100 million.

- *In re German Automotive Manufacturers Antitrust Litigation*, MDL 2796 (N.D. Cal.). Member of the Seeger Weiss team appointed to the Plaintiffs' Steering Committee by the U.S. Judicial Panel on Multidistrict Litigation, representing car buyers accusing German luxury-car makers BMW AG, Volkswagen AG, Audi AG, Porsche AG, Daimler AG and their U.S. affiliates of a decades-long antitrust conspiracy.
- Direct purchaser class action claiming damages from a bid-rigging and customer allocation cartel among water treatment chemical manufacturers.
- Federal jury trial for an international sports league concerning claims that restructuring of the league violated U.S. antitrust laws, resulting in a defense verdict on all federal antitrust and state law claims.
- Arbitration and FCC appeals for a U.S. cable operator resulting in a complete victory in a proceeding to determine fair market value of a carriage agreement with a regional sports network.
- Representation of a professional sports league in consumer antitrust class action challenging league video distribution rules and agreements.
- Bench trial for U.S. investors resulting in an order protecting them against discrimination in an Argentine law restructuring of a media group.
- Federal class litigation for sovereign bondholders against the Republic of Argentina resulting in certification of eight classes representing millions of dollars in holdings.
- Successful representation of an international video programmer on Most Favored Nation, breach of contract, and related claims in excess of \$75 million.
- Representation of an international sports organization in civil RICO and antitrust claims.
- Representation and advice to multiple U.S. programmers and distributors in connection with federal litigation, arbitrations, mediation, and FCC proceedings.
- Representation of multiple generic pharmaceutical manufacturers challenging collusive lock-up of raw materials and unlawful use of Orange Book listing and Hatch-Waxman claims.
- Arbitration for a U.S. cable operator concerning Most Favored Nations clauses.

EDUCATION

University of California, Los Angeles, School of Law, J.D., 1995, *Order of the Coif*

Boston University, B.A., *summa cum laude*, 1991, Trustee Scholar, Phi Beta Kappa

BAR ADMISSIONS

- California
- New York
- New Jersey
- U.S. District Court, Central District of California
- U.S. District Court, Southern District of New York
- U.S. District Court, District of New Jersey
- U.S. District Court, Eastern District of Michigan
- U.S. Court of Appeals, Second Circuit
- U.S. Court of Appeals, Federal Circuit
- U.S. Court of Appeals, Sixth Circuit



PARVIN K. AMINOLROAYA

Parvin is a Partner whose focuses on class action, mass tort and complex commercial litigation involving consumer protection, investment fraud, and antitrust and pharmaceutical injury.

Bar Admissions

- New York
- New Jersey
- United States District Court, Southern and Eastern Districts of New York, District of New Jersey
- United States Court of Appeals for the Second Circuit

Education

- J.D., Benjamin N. Cardozo School of Law, 2008 (Editorial Board Member of the Moot Court Honor Society)
- B.A., Fordham University, 2004
- Languages
- Conversational Spanish
- Conversational Persian (Farsi)

Selected Representations

- Representing plaintiffs as part of the Steering Committee and Science Committee in multidistrict litigation (MDL) against Johnson & Johnson subsidiary Janssen Pharmaceuticals, claiming that Invokana, the type-2 diabetes drug, caused injuries such as diabetic ketoacidosis and kidney damage.
- Member of trial team representing Oregon plaintiff as part of an MDL against pharmaceutical giant AbbVie, for fraudulently marketing testosterone drug AndroGel; the plaintiff was awarded \$150 million in punitive damages by a federal jury in Chicago. Involvement included preparing former FDA Commissioner for testimony in two trials.
- Represented consumer class in major MDL proceeding against Volkswagen, which failed to meet diesel emissions standards, resulting in a \$14.7 billion settlement, the biggest corporate settlement in history, including \$4 billion awarded to consumers. Involvement included discovery responsibilities and oversight of settlement claims process.
- Represented plaintiffs in MDL against Simply Orange, a brand of the Coca-Cola Company, involving allegations of false labeling and marketing of orange juice products; obtained denial of motion to dismiss and motion for summary judgment sought by defendant and certification

of an issues class. Involvement included substantial brief writing and expert discovery responsibilities.

- Represented plaintiffs in MDL against Tropicana, a brand of PepsiCo, involving allegations of false labeling and marketing of orange juice products; obtained denial of motion to dismiss. Involvement included brief writing and substantial expert discovery responsibilities.
- Represented plaintiffs in MDL proceeding against CPG International LLC (CPG) for manufacturing and selling defective decking; obtained denial of motion to dismiss. Involvement included substantial brief writing, discovery, expert work, and settlement negotiation responsibilities.
- Obtained dismissal of or settled numerous avoidance action lawsuits seeking to recover tens of millions of dollars from clients, brought by the Madoff Trustee under the Bankruptcy Code and the Securities Investor Protection Act.



CHRISTOPHER AYERS

Chris is a Partner with Seeger Weiss whose practice focuses on class action, mass tort and complex commercial litigation involving consumer protection, investment fraud, antitrust and pharmaceutical injury. Prior to joining Seeger Weiss, Chris worked as a senior trial lawyer in the New York office of a leading national law firm, where he focused on corporate and securities litigation, alternative dispute resolution, and domestic and foreign investment recovery. He has successfully tried numerous jury and bench trials to verdict or decision in state and federal courts throughout the U.S.

Chris was a four-year varsity athlete on Brown University's wrestling team, through which he developed a focus and discipline that serves him well in the courtroom today. While attending University of San Diego School of Law, Chris received the CALI Award for Advanced Trial Advocacy and the Virginia C. Nelson Graduate Prize in Advanced Advocacy.

Bar Admissions

- New York
- New Jersey
- Rhode Island
- Massachusetts
- Connecticut

Education

- J.D., University of San Diego School of Law, 2007
- B.A., Brown University, 2002