EXHIBIT D

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Firm Resume



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Klafter Lesser LLP

Klafter Lesser LLP is a nationally recognized law firm that primarily focuses on vindicating the rights of investors, businesses, employees, and consumers under Federal securities and State securities, corporate, labor, and consumer protection laws. Its attorneys have led the prosecution of cases in all of these areas and have received recognition for their efforts from courts, professional organizations, and peers for their professionalism and excellent results. The Firm has successfully litigated cases from one end of the country to the other and its attorneys are admitted in multiple state courts and dozens of federal courts.

The Firm's predecessor was founded in June 2003, and on March 1, 2021, the Firm became Klafter Lesser LLP. The Firm's office is in New York. The Firm's principals bring to the practice over seventy years of combined experience representing plaintiffs and, occasionally, defendants.

The Firm's philosophy is to zealously prosecute selective actions as opposed to a "volume"-type operation. The Firm provides its clients with the full spectrum of litigation services including: (i) factual investigation, forensic accounting, and legal analysis; (ii) communications advising the client of the merits of the case, developments in the litigation, and settlement issues; and (iii) advisory services on an "as needed" basis on both case specific and general litigation matters.

The Firm will take its cases as far they need to go to obtain the best recovery for their clients. In fact, perhaps uniquely, in 2009, the Firm was co-lead counsel in what is one of the first FLSA misclassification collective actions ever tried to a jury. After the six-week trial, the firm obtained a verdict finding that the defendant there, Staples, Inc., had willfully violated the FLSA. The jury awarded the 342 assistant store manager collective action members a verdict of $2.4 million, which the Court doubled to $4.8 million because of the finding of willfulness. Subsequently, after the Firm filed additional similar claims cases, it was lead counsel in the resulting MDL proceeding, which settled for $42 million. *In re Staples Inc. Wage & Hour Employment Practices Litig.,* No. 08-5746 (D.N.J.) (KSH) (MDL-2025).

The attorneys in the Firm have obtained well over a billion dollars in settlements in the cases in which they have served as lead lawyers. These results have been obtained in a wide variety of individual and class action contexts. One federal judge stated on the record in open court to one of the Firm's attorneys that "the court already held that class counsel was adequate in the context of class certification. But more than just adequate, class counsel's performance in this case has been exemplary." Another called a settlement by the Firm a "magnificent result."



Complex Litigation Experience

The Firm and its Partners have been lead or co-lead counsel for the prosecution of many multi-party complex cases including:

- *In re Fisker Automotive Holdings Inc. Shareholder Litigation* (group action that involved securities and common law claims of 16 plaintiffs against 13 defendants) (settled; amount confidential).
- *In re Guidant Corp. Implantable Defibrillators Products Liability Litigation* - MDL No. 05-1708 (mass tort action involving claims of thousands of individuals who faced economic and personal injury from defectively designed implantable defibrillators) (settled for $240 million).
- *In re Staples, Inc. Wage & Hour Employment Practices Litig.* -MDL-2025 (see page 1)
- In re Doubleclick - MDL-1352 & In re Amazon-Alexa - MDL-1346 (firm was lead counsel in these internet privacy MDL proceedings that led to novel resolution that, at the time, represented state of the art protections for consumers)
- *In re Washington Public Power Supply System Litig.* (class action against over 100 defendants to recoup the losses suffered by the purchasers of municipal bonds issued by the Washington Public Power Supply System when it defaulted on those bonds.) (a principal attorney) (settled for approximately $800 million with most settlements occurring after the commencement of the trial).



Cases & Settlements

Consumer Rights Cases

The Firm has extensive experience in the area of consumer rights litigation. Whether representing individuals or businesses and whether through class or individual actions, the Firm's attorneys have recouped hundreds of millions of dollars for its clients in these areas.

The Firm's attorneys have been long been lead and co-lead counsel in major class action and MDL proceedings that successfully obtained recompense from banks, insurance companies, mortgage lenders, appraisers and title insurers, as well as rental companies, gasoline companies, automobile manufacturers, computer companies, and many others. In 2005, Partner Seth Lesser was the "Consumer Advocate of the Year" of the National Association of Consumer Lawyers. One of his largest successes involved obtaining over $100 million – 100% of individual's out-of-pocket damages – for New Jersey consumers who paid hidden usurious interest in *Perez v. Rent-a-Center, Inc.*, Docket No. CAM-L-21-03 (Sup. Ct. N.J.), for victims of mortgage fraud, and for compelling a bank to refund interest charges improperly calculated for commercial borrowers. This case and other consumer rights cases the Firm or its partners are litigating or have successfully litigated are as follows:

- University of Pittsburgh (class action suit for failure of UPitt to refund tuition and Mandatory Fees for the period they were closed due to COVID) (ongoing)
- Ohio State University (class action suit for failure of OSU to rebate certain mandatory fees for the period they were closed due to COVID) (ongoing)
- Spirit Airlines (class action suit regarding Spirit's charging carry-on fees without adequate notice to online travel agency purchasers) (ongoing)
- Ambit Energy (budget billing misrepresentations) ($3.65 million settlement)
- Ambit Energy (bait and switch to more expensive electricity and gas plans) ($29.75 million settlement)

- Rent-A-Center ($109 Million settlement) – class action suit against Rent-A-Center in New Jersey for charging consumers hidden usurious interest rates in violation of New Jersey State Law. After a favorable New Jersey Supreme Court ruling, class members were directly paid just over 100% of their out-of-pocket damages.
- In re Doubleclick (injunctive relief) – on behalf of almost every Internet user in America that compelled one of largest Internet ad servers to adhere to heightened privacy protections.

Securities Cases

The Firm and its Partners have served as lead counsel or have had significant roles in multiple securities actions that have returned nearly $1 billion to investors in a variety of group and individual actions.

- Antipodean Domestic Partners, LP v. Clovis Oncology, Inc. (securities opt-out action) (settled; amount confidential)
- In Re Fisker Automotive Holdings Inc. Shareholder Litigation (settled; amount confidential)
- Wonder Auto Group ($3 million settlement)
- AthroCare Corp. ($74 million settlement)
- Colonial Bancgroup ($18.4 million settlement)
- Countrywide Financial Corp. ($624 million settlement).
- American Business Financial Services, Inc.
- Limelight Networks, Inc. ($1.9 million settlement)
- Warner Chilcott Limited ($9 Million settlement)
- InfoSonics ($3.8 million settlement)
- IBM ($20 million settlement)
- Viisage Technology, Inc. ($2.3 Million settlement)
- Ashworth ($15.25 Million settlement)
- Friedman, Billings, Ramsey Group, Inc ($4.5 million) & FNY Entities ($300,000), and Hilary Shane
- Eaton Vance ($10.5 Million settlement)
- Smartalk Teleservices ($27.1 Million settlement)
- Independent Energy Holdings ($48 Million settlement)

Breach of Fiduciary Duty Claims

The Firm actively pursues claims for breach of fiduciary duty against corporate officers or directors on behalf of shareholders including in the following cases:

- The Firm was retained by the Post-Confirmation Equity Subcommittee in the bankruptcy of a public company, Superior Offshore International, Inc., to prosecute fiduciary duty claims against Superior's former officers and directors. The Firm brought suit in the United States Bankruptcy Court for the Southern District of Texas against four senior officers of the company for waste of corporate assets, insider trading and causing the company's bankruptcy. That litigation was settled to the satisfaction of the parties shortly before it was scheduled to be tried (the amount is confidential).
- The Firm was retained by the Liquidating Trust of Debtor PTMS Liquidating Corp. (f/k/a ProxyMed and MedAvant) and brought suit in the United States Bankruptcy Court for the District of Delaware for breach of fiduciary duty and fraud against General Atlantic, LLC and Braden Kelly for causing the demise of the Company. That litigation was also settled to the satisfaction of the parties shortly before it was scheduled to be tried (the amount is confidential).
- IMH Secured Loan Fund (breach of fiduciary duty claims of investors in IMH Senior Loan Fund whose managers reorganized the Fund for their own benefit to the detriment to the investors) ($1.345 million cash, $30 million security offerings, and corporate governance settlement)
- Living Independent Group (breach of fiduciary duty claims of common shareholders in Living Independent Group, Inc. who did not receive any share of the General Electric Co.'s purchase price of the company ($3 million settlement)

Antitrust Cases

The Firm is currently prosecuting, with co-counsel, antitrust class action claims against Total Gas & Power North America, Inc., Total, S.A., and Total Gas & Power, Ltd. arising from the Federal Energy Regulatory Commission proceeding against them for manipulating four Western electricity natural gas trading hubs. Past antirust cases the Firm has been co-lead in or a participant in include the following:

- Merced Irrigation District, on behalf of itself and all others similarly situated v. Barclays Bank PLC (monopolization of electricity trading hubs in CA) (co-lead counsel) ($29 million)
- *In re Dental Supplies Antitrust Litigation* ($80 million)
- *In re Air-Cargo Antitrust Litigation* ($1.2 billion)
- *In re Hydrogen Peroxide Antitrust Litigation* ($87.4 million)
- *In re High Pressure Laminates Antitrust Litigation*

The Firm currently is involved in the *In re Local TV Advertising Antitrust Litigation*.

Wage & Hour / Overtime and Other Employment Cases

The Firm has a strong national reputation for helping employees obtain the compensation to which they are entitled, whether overtime pay and other benefits under the FLSA and comparable state laws or other compensation due to employees. In these types of cases, the Firm represents workers across the country.

Its lawyers have successfully handled over 50 FLSA cases and have obtained over $250 million in settlements in class, collective, and individual cases against defendants in court and in arbitrations that have included Fortune 100 and other companies that have ranged from major retailers to nationwide financial institutions.

A summary of the principal employment cases the Firm has prosecuted and is currently prosecuting are as follows:

- IBM (class action suit on behalf of IBM salesmen alleging IBM cheated them out of commissions) (ongoing)
- Red Robbin (collective action on behalf of Assistant Managers and Kitchen Managers below the General Manager and of any Assistant General Manager not dually titled as AGM/Kitchen Manager) (ongoing)
- The Estee Lauder Companies (collective action on behalf of customer service representatives, sales representatives, product specialists, stylists, freelancers) (ongoing)
- Mariano's (collective action on behalf of Meat/Bakery Managers) (ongoing)
- Jimmy Johns (collective action on behalf of Assistant Managers (settlement pending)
- Target (collective action on behalf of Executive Team Leaders) (ongoing)
- Marshalls/Homegoods (collective action on behalf of Assistant Store Managers) ($31.5 million settlement)
- Burlington Coat Factory collective action on behalf of Assistant Store Managers ($19.61 million settlement)
- GEICO (collective action on behalf of TCRs Who Worked in Virginia Call Center) ($2 million settlement)
- Potbelly Sandwich (collective action on behalf of Assistant Managers) ($561,375.92 settlement)
- The Scotts Company (collective action on behalf of Sales Managers) ($2.25 million settlement)
- PetCo (collective action on behalf of Assistant Store Managers) ($10 million settlement)
- Kmart (collective action on behalf of Assistant Store Managers) ($3.81 million settlement)
- HMS Host ($1.29 million settlement)
- Abercrombie & Fitch ($5.25 million settlement)
- Morgan Stanley (collective action primarily on behalf of pre-production FAAs) ($5.99 million settlement)
- Weiss Markets ($2.46 million settlement)
- Dicks Sporting Goods ($10 million settlement)
- Office Max ($3.53 million settlement)
- Bob Evans Farms ($16.5 million settlement)
- Office Depot ($610,000 settlement)
- Avis Car Rental ($7.8 million settlement)
- Morgan Stanley (Client Service Associates) ($4.2 million settlement)
- Fifth Third Bancorp ($3 million settlement)
- Modell's Sporting Goods ($800,000 settlement)
- Kindred ($16.5 million settlement)
- Family Dollar$ (NJ) ($1.15 million settlement)
- EDS ($11.8 million settlement)
- PetSmart ($3.8 million settlement)

- Family Dollar (NY) ($14 million settlement)
- Rite Aid ($20.9 million settlement)
- CVS ($34 million settlement)
- BJs Wholesale Club ($9.3 million settlement)
- Staples, Inc. ($42 million settlement)
- Gentiva ($5 million settlement)
- Boston Market ($3 million settlement)
- Hewitt Associates ($4.9 million settlement)

Mortgage Fraud Cases

- Ocwen Loan Servicing, LLC / Morgan Stanley Private Bank / RBS Citizens Bank (failure to timely file mortgage satisfactions in accordance with California law)
- Bank of New York (failure to timely file mortgage satisfactions in accordance with New York law)
- Chase Manhattan Mortgage Corp. (100% recovery for mischarged interest rates)

Defective Medical Device and Hazardous Drug Litigation

The Firm's attorneys have extensive experience in representing victims of hazardous pharmaceutical drugs (such as Rezulin or Fen/Phen), defective medical devices (such as certain of Guidant's implantable defibrillators), and mass food poisonings (such as peanut butter contamination). We have represented not only individuals but also government agencies for reimbursement claims.

Our attorneys have been lead counsel in a number of such cases. One involved multiple LYMErix vaccine class actions which resulted, as a part of the settlement, in the withdrawal of the vaccine from the market - perhaps a unique and unprecedented resolution of a pharmaceutical class action - and which also set forth the terms pursuant to which the company could apply to the Food and Drug Administration to seek any reintroduction of the product. *Cassidy v. SmithKline Beecham*, No. 99-10423 (Ct. Common Pleas, PA state court).

In another national mass tort, one of our attorneys, Seth Lesser, was co-lead counsel *In re Guidant Corp. Implantable Defibrillators Products Liability Litigation*, MDL No. 05-1708 (DWF/AJB) (D. Minn.), where a $240 million settlement was obtained for individuals who faced economic and personal injury from defectively designed implantable defibrillators.

Our lawyers have also acted as the lead New York class counsel in the Fen/Phen diet drug litigation which obtained the first class certification under New York law for a medical monitoring class, and acted as the designated New York class counsel in the nationwide multi-billion dollar settlement with American Home Products. We have experience serving on state and federal executive and plaintiffs' steering committees for other mass tort claims and Mr. Lesser has been a co-chair of the American Association for Justice's Food Borne Illness litigation group.

Civil Rights Cases

The Firm has actively prosecuted numerous lawsuits on behalf of individuals who have had their civil or Constitutional rights violated.

The Firm's attorneys have obtained awards in many individual and class actions in which racial or gender discrimination was alleged, including the recent $24.4 million settlement reached in a case involving historical racial discrimination in the sale of life insurance. In that case, as co-lead counsel, we obtained class certification, defeated the defendant's attempt to obtain interlocutory appellate review of the certification decision and prevailed against a motion for summary judgment, *Norflet v. John Hancock Life Ins. Co.*, No. Civil No. 3:04cv1099 (D. Conn.).

The Firm is also involved in pending litigation regarding the constitutionality of a D.C. tax provision that excludes out-of-state businesses from claiming a sales and beverage tax exemption unless they have an office in the District of Columbia. *American Philosophical Association, et al. v. District of Columbia,* 2017 CA 004057 B (Sup. Ct. D.C.).

The Firm has also obtained significant recoveries on behalf of individuals who were illegally strip searched when they were arrested for non-serious crimes including a $7.5 million class action settlement with one New Jersey county (*Hicks v. County of Camden,* Civ. No. 05-1857 (D.N.J.), a $4.5 million settlement with another (*Suggs v. County of Cumberland,* Civ. No. 06-0087 (D.N.J.) and a $4 million settlement with a third (*Wilson v. Gloucester County,* Civ. No. 06-1368 (D.N.J.). At the final approval hearing of the *Wilson v. Gloucester County* settlement, on March 18, 2010, Judge Irenas of the United States District Court for the District of New Jersey stated on the record that "The court already held that class counsel was adequate in the context of class certification. But more than just adequate, class counsel's performance in this case has been exemplary."

The Firm's Attorneys

Jeffrey A. Klafter

Jeffrey A. Klafter has over 40 years of experience in prosecuting securities, breach of fiduciary duty, and commercial litigation. Mr. Klafter began his legal career with the Antitrust Division of the United States Department of Justice. After spending two years with the DOJ, Mr. Klafter entered private practice. From 1988 until mid-2003, Mr. Klafter was a partner of Bernstein Litowitz Berger & Grossmann LLP. Early in his career, Mr. Klafter was one of the principal lawyers responsible for the prosecution of over 100 defendants to recoup the losses suffered by the purchasers of municipal bonds issued by the Washington Public Power Supply System when it defaulted on those bonds. That litigation resulted in the recovery of approximately $800 million, one of the largest securities fraud settlements in history. Mr. Klafter has also served as sole or co lead counsel in prosecuting numerous securities class actions on behalf of investors in common stock, municipal bonds, convertible debentures and preferred stock in which hundreds of millions of dollars have been recovered on behalf of investors.

Among the many notable achievements for which he had sole or shared responsibility before forming the Firm are the recovery of $48 million in *In re Independent Energy PLC Securities Litigation*; the recovery of $300 million in *In re: DaimlerChrysler AG Securities Litigation*, the decision of the Second Circuit Court of Appeals reversing the district court's dismissal of plaintiffs' complaint in *In re Scholastic Corp. Securities Litigation* and ultimate settlement of that litigation; the recovery of $27.1 million in *In re SmarTalk Teleservices Inc. Securities Litigation*, and a significant recovery on behalf of holders of Sun Oil Company preferred stock in litigation over the indenture governing the stock.

Since forming the Firm, Mr. Klafter served as special counsel to lead counsel in the *In re Ahold N.V. Securities & ERISA Litigation*, Civil No.: 1:03-MD-01539-CCB (D. Md.) in which $1.1 billion was recovered on behalf of the class, had a significant role in the prosecution of the *Countrywide Financial Corporation Securities Litigation,* which settled for $624 million; successfully prosecuted the claims of the Liquidating Trust created by the Bankruptcy Court that approved the bankruptcy plan for ProxyMed, the claims of common shareholders in Living Independent Group, Inc. who did not receive any share of the General Electric Co.'s purchase price of the company, the claims of investors in IMH Senior Loan Fund whose managers reorganized the Fund for their own benefit to the detriment to the investors, and the claims of Antipodean Domestic Partners, LP against Clovis Oncology, Inc. for misrepresenting the effectiveness of a drug it was developing to treat a certain type of lung cancer. The plaintiff opted out of a securities class action. The case was settled after considerable discovery to the satisfaction of the parties.

Additionally, Mr. Klafter has been responsible for the prosecution of innovative and diverse litigation successfully pursuing innovative antitrust claims against Barclays Bank PLC for its alleged manipulation of four electricity hubs in California that led to a $29 million settlement, challenging Delaware regulations governing the disposal of solid waste on behalf of waste haulers; the laying of fiber optic cable along railroad rights of way on behalf of adjoining landowners; and efforts to impose the cost of Y2K compliance on businesses and medical practices by suppliers of various computer software.

Mr. Klafter is a member of the Bar of the State of New York, the United States District Court for the Southern District of New York, other federal district courts, the Second Circuit Court of Appeals, and the United States Supreme Court. Mr. Klafter has been a member of the Securities Law Committee of the Commercial and Federal Litigation Section of the New York State Bar Association and is a noted author and lecturer on securities litigation issues and has served as a judge of the American Bar Association Student Appellate Advocacy annual competition.

He has been repeatedly recognized by his peers as a SuperLawyer, and in two areas: class action practice and as one of the top 25 lawyers in Westchester County.

Seth R. Lesser

Seth R. Lesser practices in the areas of consumer advocacy, mass torts and wage and hour litigation, primarily on behalf of defrauded consumers, businesses and employees. In addition to handling cases at the trial court level, he also has an active appellate practice. He began his career at a large defense firm and subsequently was a partner at two plaintiff-oriented firms, Bernstein Litowitz Berger & Grossmann LLP and the Locks Law Firm. He joined the Firm in August 2008.

Mr. Lesser is a graduate of Princeton University, A.B., *summa cum laude* (1983); Oxford University, D.Phil. in Modern History, recipient of a Marshall Scholarship (1985); and Harvard Law School, J.D., *magna cum laude*, where he was an editor of the *Harvard Journal of International Law* and of the *Harvard Environmental Law Review* (1985). In addition, he was the coxswain of the Oxford Blue Boat in the Oxford-Cambridge Boat Race (1984 & 1985).

Since 1995, Mr. Lesser has primarily represented plaintiffs in class and collective actions and mass tort cases. He has been the lead plaintiff counsel in dozens of successful class and/or collective actions in the areas of consumer, privacy, mass tort, employment and securities litigation. The cases where he has personally served as plaintiffs' lead counsel have returned in excess of half a billion dollars to clients. Federal Multidistrict Litigation proceedings where he was lead or co-lead counsel have including, among others, MDL-1346 (*In re Amazon-Alexa) (sole lead); MDL-1352 (In re Doubleclick) (co-lead); MDL-1708 (In re Guidant Implantable Heart Devices) (co-lead); MDL-1739 (In re Grand Theft Auto Video Game Consumer Litigation*) (sole lead); MDL-1903 (*In re Pepsico, Inc. Bottled Water Sales Practices) (sole lead); MDL-2025 (In re Staples, Inc. Wage & Hour Employment Practices Litig.) (lead). He has been on numerous MDL Executive/Steering Committees, including, the Executive Committee in MDL-1845 (ConAgra Peanut Butter Products Liability Litigation*), and serving as Law & Briefing Co-Chair of the Government Actions Committee in MDL-1657 (Vioxx Products Liability Litigation). Among other things, he was the lead New York class counsel in the Fen/Phen diet drug litigation and in that case obtained the first certification under New York law for a medical monitoring class, and was the New York class counsel in the settlement with American Home Products. In recent years, he has particularly handled numerous wage and hour litigations on behalf of employees denied payment of overtime wages. He was also class counsel in *Perez v. Rent-A-Center* (New Jersey State Court) where a $109 million settlement returned over 100% of their out-of-pocket damages to 100,000 New Jersey consumers.

Mr. Lesser was the National Association of Consumer Advocates' Attorney of the Year in 2005 and was Chair of the Board of Directors of that organization for a number of years. He is presently a member of the Board of Directors and on the Executive Committee of Public Justice. He has been repeatedly recognized by his peers as a SuperLawyer, and in two areas: class action practice and as one of the top 25 lawyers in Westchester County.

From 1998 through 2001, he served as the representative of the American Council on Consumer Interests to the United Nations. He has also served on the *Amicus* Committee of the American Association for Justice; the Second Circuit Courts Committee of the Federal Bar Council; and has been active in the Members Consultative Group of the American Law Institute's Restatement of the Law Third, Restitution and Unjust Enrichment project. He is a member of, *inter alia,* the American Law Institute; the American Bar Association; the Second Circuit Federal Bar Council; the Bar Association of the City of New York; the National Association of Consumer Advocates; the American Association for Justice; and the National Employment Lawyers Association.

Other professional organization appointments have included being the Chair of American Bar Association's Business Law Section's Environmental Litigation Subcommittee (1995-2002); the Co-Chair of the ABA's Business Law Section's Annual Review of Litigation (1995-1998); a member of the New York City Bar Association's Committees on Consumer Affairs (1995-1998) and Federal Courts (1998-2001); a member of the Federal Bar Council's Second Circuit Courts Committee (2006 to date); and Co-Chair of the American Association for Justice's Food-borne Illness Litigation Group (2007 to date). He also was the Chair of the National Association of Securities and Consumer Attorneys Consumer Committee from 2003 to 2005. He was asked to draft revisions to New York State's class action law (2002-2003; Report, 2003), as well as having been involved in the drafting of numerous recommendations, testimony, reports, and other materials for various professional organizations. His election to the American Law Institute was in 2008. In addition, Mr. Lesser is on the Editorial Advisory Board of the *Class Action Law Monitor.*

Mr. Lesser is a member of the bars of New York, New Jersey and the District of Columbia as well as nine United States District Courts, nine federal Courts of Appeal and the United States Supreme Court.

Christopher M. Timmel

Christopher Timmel is an Associate of the Firm and a member of the bar of New York. His practice focuses on securities fraud and wage and hour class action litigation. Prior to joining the firm, Mr. Timmel worked at two nationally recognized law firms in New York, where his practice focused on private Section 10(b) and Rule 10b-5 litigation.

Mr. Timmel is a graduate of Dartmouth College and the University of Virginia School of Law, where he was sat on the Editorial Board of the Virginia Environmental Law Journal. He is also a graduate of Regis High School in New York City.

Amir Alimehri

Amir Alimehri is an associate of the Firm, primarily litigating complex class actions. Immediately prior to joining Klafter Lesser, Mr. Alimehri was a litigation associate at a boutique NY firm, primarily litigating complex antitrust and commodities manipulation cases. The notable cases he worked on are:

- *In re GSE Bonds Antitrust Litigation*, 19-CV-1704 (JSR) (S.D.N.Y.)- Sherman Antitrust Act class action alleging price-fixing by numerous financial institutions of unsecured debt issued by Fannie Mae and Freddie Mac. Defeated motions to dismiss. Total of $386 million in settlements.
- *Laydon, et al. v. Mizuho Bank, Ltd., et al.,* 12-CV-3419 (GBD) (S.D.N.Y.)- CEA class action alleging manipulation of the Tokyo Interbank Offered Rate (TIBOR) and the London Interbank Offered Rate for Japanese Yen (Yen LIBOR) by numerous financial institutions. Total of $236 million in settlements.
- *In re: Papa John's Employee and Franchisee Employee Antitrust Litigation*, 18-CV-825 (JHM) (W.D. Ky.)- Antitrust class action alleging suppression of employee wages/ benefits through no-hire clauses. Defeated a motion to dismiss.
- *Dennis, et al. v. JPMorgan Chase & Co., et al.,* 16-CV-6496 (LAK) (S.D.N.Y.)- Sherman Antitrust Act, CEA, and RICO class action against numerous global financial institutions for the manipulation of the Australian Bank Bill Swap Reference Rate (BBSW). Total of $7 million in settlements.
- *In re JPMorgan Precious Metals Spoofing Litigation*, 18-CV-10356 (GHW) (S.D.N.Y.)- CEA class action alleging manipulation of the precious metals market through spoofing and other manipulative acts.
- *Tera Group, Inc., et al. v. Citigroup, Inc., et al.,* 17-CV-4302 (RJS) (S.D.N.Y.)- Antitrust action alleging multiple financial institutions conspired to boycott the platform so as to prevent anonymous, all-to-all central limit order book swap execution facility trading for Credit Default Swaps. Defeated a motion to dismiss.
- *In re: London Silver Fixing, Ltd., Antitrust Litigation*, 14-MD-2573 (VEC) (S.D.N.Y.)- Sherman Antitrust Act, CEA, and RICO class action alleging manipulation of the London Silver Fix. Total of $38 million in settlements.

Prior to that, Mr. Alimehri served as a law clerk to the Honorable Sallyanne Floria, Assignment (Chief) Judge of the Essex County Superior Court. He also served other judges in the county, working on a variety of matters including but not limited to complex commercial litigation, Chancery litigation, construction litigation, marital disputes, petitions for post-conviction relief and the processing of child adoptions.

Mr. Alimehri currently serves as a court-appointed Committee Member on the Essex Vicinage Advisory Committee on Diversity, Inclusion and Community Engagement, and is a Board Member of the Philadelphia Diversity Law Group Alumni Association.

Mr. Alimehri graduated Rutgers Law School with a Juris Doctor, along with a certificate in Corporate and Business Law from the Rutgers Center for Corporate Law and Governance.

Mr. Alimehri is a member of the Bars of New York, New Jersey, and the federal District Court of New Jersey and the Southern District of New York.

Cyrus B. Kornfeld

Cyrus Kornfeld is an associate of the Firm and a member of the bar of New York. His practice focuses on class actions and wage and hour litigation. Prior to joining the firm, Mr. Kornfeld worked at a nationally recognized law firm in New York.

Mr. Kornfeld is a graduate of Harvard College and the New York University School of Law, where he attended with a Vanderbilt, full tuition scholarship. Raised in New Rochelle, NY, he attended Iona Preparatory.

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