

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ARKANSAS TEACHER RETIREMENT SYSTEM,
on behalf of itself and all others similarly situated,

Plaintiff,

v.

STATE STREET BANK AND TRUST COMPANY,

Defendant.

No. 11-cv-10230 MLW

ARNOLD HENRIQUEZ, MICHAEL T. COHN, WILLIAM R.
TAYLOR, RICHARD A. SUTHERLAND, and those similarly
situated,

Plaintiffs,

v.

STATE STREET BANK AND TRUST COMPANY,

Defendant.

No. 11-cv-12049 MLW

THE ANDOVER COMPANIES EMPLOYEE SAVINGS AND
PROFIT SHARING PLAN, on behalf of itself, and JAMES
PEHOUSHEK-STANGELAND, and all others similarly
situated,

Plaintiffs,

v.

STATE STREET BANK AND TRUST COMPANY,

Defendant.

No. 12-cv-11698 MLW

**LABATON SUCHAROW LLP'S SUBMISSION OF
PHASE I REPORT OF THE HONORABLE GARRETT E. BROWN, JR. (RET.)**

Pursuant to Paragraph 5 of the Court's November 8, 2018 Order, ECF 518, and discussion with the Court during the November 7, 2018 hearing,¹ Labaton Sucharow LLP respectfully submits, as Exhibit 1 hereto, the Phase I Report of the Honorable Garrett E. Brown, Jr. (Ret.).

Dated: January 8, 2019

Respectfully submitted,

By: /s/ Joan A. Lukey

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to all counsel of record on January 8, 2019.

/s/ Joan A. Lukey

Joan A. Lukey

¹ See November 7, 2018 Hearing Tr. at 21-22, 30-33, ECF 519.

JAMS

	:	
	:	No. 1425027998
In Re: LABATON SUCHAROW, LLP	:	
	:	PHASE I REPORT
	:	

Hon. Garrett E. Brown, Jr. (Ret.):

The Undersigned has been retained by the law firm Labaton Sucharow LLP (the “Firm”) to review: (I) the Firm’s historical practices regarding payment of referral fees; and (II) the substance and implementation of the Firm’s recently-revised practices regarding payment of referral fees. This Phase I Report and the attached Exhibits collectively address Phase I of the aforementioned review.¹

Executive Summary

During a hearing on November 7, 2018, the Hon. Mark L. Wolf, U.S.D.J. asked Michael P. Canty, Esq., Partner and General Counsel of the Firm, whether the payment of “bare referral” fees by the Firm to Damon Chargois, Esq. and/or his law firm Chargois & Herron, LLP was “unique” or “aberrant”. (See 11/7/18 Hr’g. Tr. at 22, lns. 16-17; and at 23, lns. 3-5). In response, Mr. Canty confirmed that I had been retained by the Firm to look into that question, and at the Court’s request, would report back not later than January 8, 2018.

For the reasons explained below, I have concluded that the Firm’s payment of “bare referral” fees to Mr. Chargois and/or his law firm Chargois & Herron, LLP was unique and aberrational. This conclusion is based upon two-months of thorough investigation, during which my Assistant and I:

- Met and corresponded extensively with Mr. Canty and the Firm’s Chief Compliance Officer, Carol C. Villegas, Esq. to learn about the Firm’s structure, records, history and accounting practices;
- Requested, received and reviewed an analysis of the more than 300 cases that the Firm has settled since it reorganized in 2007;
- Interviewed each of the 7 Responsible Attorneys designated by the Firm for those 300 plus settled cases, and reviewed a random sample of settled cases with each Responsible Attorney;
- Requested, received and reviewed Declarations from Mr. Canty and each of the 7 Responsible Attorneys that addressed the above question posed by the Court, and

¹ As noted below, this Phase I Report has been prepared on an expedited basis. I anticipate issuing a Phase II Report during calendar-year 2019 that addresses Phase II of the aforementioned review.

confirmed that other than with respect to Mr. Chargois and/or Chargois & Herron, LLP, the Firm has made no “bare referral” payments to any lawyer or law firm.

In so concluding, I commend the Firm – and particularly Mr. Canty and Ms. Villegas – for their critical role in facilitating the review process, which I believe was exhaustive, and tangibly reflected a genuine commitment by the Firm and its leadership to insure the accuracy and integrity of this Phase I Report and the attached Exhibits.

I. Contextual Background

This engagement arises from several consolidated class actions in the United States District Court for the District Massachusetts before the Hon. Mark L. Wolf, U.S.D.J. (the “Consolidated Litigation”). See Arkansas Teacher Retirement System v. State Street Bank and Trust Co., Civ. No. 11-cv-10230 (MLW); Henriquez v. State Street Bank and Trust Co., Civ. No. 11-cv-12049 (MLW); and The Andover Companies Savings and Profit Sharing Plan v. State Street Bank and Trust Co., Civ. No. 12-cv-11698 (MLW).

The Firm represents Arkansas Teacher Retirement System (“ATRS”), one of the Lead Plaintiffs in the Consolidated Litigation. In 2016, a global class settlement of the Consolidated Litigation was reached following extensive negotiations (the “Settlement”). As relevant here, the terms of that Settlement were a \$300 million fund for the settlement class, and a request of \$74,541,250 in attorneys’ fees payable from that fund (the “Attorneys’ Fees Request”). The Attorneys’ Fees Request was supported by a fee petition prepared by the Firm on behalf of all plaintiffs’ counsel (the “Fee Petition”).

Following a hearing on November 2, 2016, the Court issued final approval of the Parties’ proposed Settlement, including: (1) a gross \$300 million for the Settlement Class; and (2) the Attorneys’ Fees Request of \$74,541,250. Shortly after that final approval, media reports suggested that the Fee Petition submitted to the Court in support of the Attorneys’ Fees Request contained material inaccuracies. The Court appointed the Hon. Gerald E. Rosen (Ret.) as Special Master (the “Special Master”) to investigate.

The subsequent investigation culminated in a Report and Recommendations dated May 14, 2018, that the Special Master submitted to the Court (the “R&R”). Within that 377-page document, the Special Master detailed myriad flaws that plagued the Fee Petition, as well as the predicate institutional failures that allowed those flaws to arise, and to remain uncorrected.

Prominent among those flaws was the Firm’s \$4.1 million payment to Damon Chargois Esq., and/or his law firm Chargois & Herron LLP, from the attorneys’ fees awarded by the Court (the “Payment”). The Firm had not disclosed the Payment to the Court. Instead, it was discovered by the Special Master during the investigation. Consequently, the R&R contains “separate and extensive discussion and findings” related to the Firm’s relationship with Mr. Chargois in general, and the Payment in particular.

Ultimately, the Special Master found that because Mr. Chargois had neither made an appearance in the Consolidated Litigation, nor done any substantive work on the Consolidated Litigation, the Payment represented a “bare referral” – i.e., where a lawyer received “a referral fee for doing no work and having no attachment to the case or the client”. (R&R at 375). Based upon that finding, and others, the Special Master recommended that: (1) the Firm disgorge the \$4.1 million it paid to Mr. Chargois; and (2) those funds be distributed to other plaintiffs’ counsel and to the settlement class. (Id. at 368-370). However, the Special Master did not recommend professional disciplinary action against the Firm or any of its attorneys. (Id. at 370-371).

After meeting and conferring for several months, the Special Master and Labaton submitted a proposed settlement to the Court on October 10, 2018, to resolve the issues raised in the R&R (the “Proposed Settlement”). (DE 485). In the Proposed Settlement, the Special Master acknowledged that the Firm’s “failure to disclose [the Chargois Arrangement] did not comport with emerging best practices at the time of the fee submission,” but “the payment itself to Chargois did not violate [the rules of professional conduct] or constitute intentional misconduct.” (Id. at 5). Labaton, for its part, acknowledged that the Chargois Arrangement “should have led to a more robust discussion with its client, and the Court, prior to awarding attorneys’ fees”, and proposed to voluntarily retain a retired federal judge “to ensure that Labaton’s retention, fee sharing agreements and other policies concerning fee applications are in compliance with applicable rules and emerging best practices.” (Id. at 8). I was retained by the Firm pursuant to that proposal.

II. The Question Presented in Phase I

During a hearing on November 7, 2018, the Court closely examined Mr. Canty, Christopher J. Keller, Esq. (the Firm’s Co-Chairman), and Eric J. Belfi, Esq. (a Partner of the Firm), regarding factual Declarations they had submitted on issues related to the Firm’s payment of “bare referral” fees. While examining Mr. Canty, the Court made clear that those issues are of paramount importance as it considers the appropriateness of any sanction related to the Fee Petition. (See 11/7/18 Hr’g. Tr. at 22, Ins. 4-5). Specifically, the Court asked Mr. Canty: “Is this Chargois matter an insulated incident or not?” (Id. at 22, Ins. 16-17). The Court went on to highlight its interest “in knowing whether the Chargois arrangement was aberrant conduct and it just happened to be identified in this case or whether it wasn’t.” (Id. at 23, Ins. 3-5). The Court and the Firm agreed that I should address that question on an expedited basis, and report back by January 8, 2019.

III. Answer

For the reasons explained below, I have concluded that, based upon a two-month investigation, conducted with the help of my Assistant and senior members of the Firm, the “bare referral” payments to Mr. Chargois and/or Chargois & Herron, LLP were unique in the history of the firm since its reorganization in 2007.

IV. The Review Process

Following the hearing on November 7, 2018, I have worked closely with Mr. Canty and Ms. Villegas to learn about the Firm's structure, records, history, accounting and referral practices, in an effort to assess whether, within the larger context of the Firm's historical practices regarding payment of referral fees, the Firm's relationship with Mr. Chargois and the "bare referral" Payment were "aberrant".²

A. The Settlement Charts

As a starting point for the review process, I requested, and the Firm prepared, two charts that collectively referenced every case settled since 2007, when the Firm was reorganized to exclusively represent plaintiffs. The first chart lists 324 individual cases. (Exhibit A). The second chart lists two additional cases that the Firm identified after the first chart had been prepared. (Exhibit B). Hereinafter both of the aforementioned charts shall collectively be referred to as the "Settlement Charts". This Phase I Report focuses upon the Settlement Charts.³

The Settlement Charts contain the following 7 discrete categories of information for each case: (1) Case Name; (2) Case Type; (3) Firm Clients; (4) Date Settled; (5) Referral Obligation; (6) Was a Bare Referral Paid?; and (7) Responsible Attorney. Mr. Canty explained the steps taken by the Firm to generate the Settlement Charts as follows:

In order to assemble the list of settled cases from July 2007 to the present, Labaton Sucharow attorneys from the Compliance Department went to each practice group at the Firm – Securities, Antitrust, Delaware, RMBS, and Consumer – to assist in preparing the chart.

² As a predicate to this review, I was required to understand: (1) the Firm's relationship with Mr. Chargois; (2) the circumstances surrounding the Payment; and (3) any other "bare referral" payments the Firm made to him and/or Chargois & Herron, LLP. To gain that understanding, I first reviewed the Special Master's May 14, 2018 R&R, and the Executive Summary thereof that were submitted to the Court. After doing so, I requested that the Firm provide transcripts of the depositions taken during the Special Master's investigation for the following individuals: (1) Christopher J. Keller, Esq.; (2) Eric J. Belfi, Esq.; and (3) Damon J. Chargois, Esq. I reviewed those transcripts with the assistance of my Associate. Following that review, I clarified certain relevant facts via discussions with Mr. Canty, Ms. Villegas, and during the Interviews described below.

³ The Settlement Charts attached to this Report do not contain certain information which the Firm considers to be "Highly Confidential" or "Client Confidential". However, I had access to that information as part of the review process, and I am confident that it does not bear upon the question presented in any way.

For each practice group, the Compliance Department had paralegals and/or attorneys obtain information from each practice group's records as to all cases that had been settled from July 2007 until the present. These paralegals and/or attorneys used sources including case lists submitted to clients through the RFP process, cases compiled on the firm website, internal lists of cases kept by paralegals and assistants, internal lists of matter numbers kept by paralegals and assistants, and canvassing individual attorneys for institutional knowledge on settled cases. Once these records were obtained, additional records were reviewed, including records from the accounting department to ensure the list included all cases known to the Firm that settled between July 2007 and the present.

After a complete list of cases was compiled, the Firm undertook the task of determining who the Firm client was for each of the listed cases. These names were obtained by either firsthand knowledge of the attorneys at the firm, a review of the case files, or a review of submissions to the court associated with the cases. Once it was determined who the Firm client was, the Compliance Department confirmed the date the case settled by reviewing the records of settlement payments or by reviewing court documents to see when final approval of a settlement was granted.

The Firm then assigned a Responsible Attorney to review each case. The Responsible Attorney either (1) worked on the case assigned to him in the Settlement Chart and has personal knowledge of the case (including whether there was a referral relationship and the work performed by the referring attorney) and/or reviewed records to confirm this information, or (2) did not work on the case, but reviewed records to determine if there was a referral relationship and the work performed by the referring attorney.

After determining (1) the full list of cases (2) the date each matter settled and (3) the Responsible Attorney, attorneys and paralegals of the Firm researched whether or not a case or matter had a referral obligation.

For a large number of cases, the Responsible Attorney had firsthand knowledge of whether there was in fact a referral obligation, and in the cases where there was a referral obligation, the work done by the referring attorney or law firm. Once the Responsible Attorney determined that the particular law firm or lawyer was not a bare referral obligation, the Compliance Department along with the Responsible Attorney reviewed accounting records to corroborate

the payment and to ensure that there were no additional referral payments made in the case.

For those cases where the Responsible Attorney had no specific recollection about whether there was a referral obligation in a specific matter, the Compliance Department located accounting records to determine whether there were any payments made to attorneys or law firms. If there was a payment to an outside lawyer or law firm, additional materials including court filings and emails were searched to determine whether the attorney or law firm referred the client and if so, what work the attorney or law firm provided in the representation of the client.

Once the list was completed regarding whether there were referral fees, an additional investigation was conducted to determine the accuracy of the claim that there was no referral obligation in a certain case. Specifically, the Compliance Department reviewed accounting records for each case that listed no referral obligation to corroborate that there were no referral fees paid.

(Exhibit C: Canty 12/12/8 Decl. at Attachment A).

With respect to the “additional investigation” of accounting records referenced by Mr. Canty in his Declaration, during the transcribed Interviews of certain Firm attorneys that I conducted on November 29, 2018, the following insightful colloquy took place on the record between Mr. Canty, Ms. Villegas and Mr. Keller (as noted, the Firm’s Co-Chairman) in my presence:

MS. VILLEGAS: We have the trust reports for a vast majority, I would say 80 to 85 percent of these cases. There are certain cases where we don’t have trust reports for two reasons.

The first reason is fees haven’t come in. So, a case settled but the fee just hasn’t come in yet, so there’s no trust report generated to show what has gone out from the firm. But we have confirmed those with accounting, that there’s no trust report generated for that reason. And the other situation is, when we’re sole counsel, sometimes the money goes directly into the firm and no monies get paid out. In those situations, trust reports are not generated. And we’ve confirmed that with the accounting department. But I would say for the vast majority of these cases, we do have trust reports.

MR. KELLER: Are you then stating that for all matters in which there’s been a payment out of a case, that a trust report was generated?

MS. VILLEGAS: Yes.

MR. KELLER: So, in all matters in which a referral fee was paid, we have a trust report?

MS. VILLEGAS: Yes. There are – so, the answer to your question is yes. To the extent [Judge Brown], that you want to also audit cases that we say there's no referral, just to confirm for yourself that no money was paid, we do have trust reports for a lot of those cases. And you'll see maybe something was paid to an expert or co-counsel or local counsel. For some of those we don't have a trust report.

So, I just want to make that clear. Obviously if you need any further corroboration, we're happy to –

MR. CANTY: And to that point, if there was no trust report, we didn't simply say, oh, that's it, we don't have to look any further. We did look and take additional steps to corroborate there was, in fact, no referral payment. So, the mere lack of a trust report was not dispositive to us. Oh, that's it, no referral, we're good.

MS. VILLEGAS: Right.

MR. CANTY: We made sure we independently corroborated it with the attorney that worked on the case or through other extrinsic evidence.⁴

Notably, the Firm's generation of the Settlement Charts is the tangible representation of a very significant undertaking. With respect thereto, at my request, Mr. Canty explained as follows in his Declaration:

The preparation of the chart, the review of the materials, and the interview process required substantial time from Labaton Sucharow attorneys and staff. The majority of the work occurred in the week leading up to the Thanksgiving holiday and over Thanksgiving weekend. In total over 29 individuals were involved in this time intensive process and spent approximately 913 hours of their time to complete this task.

(Exhibit C: Canty 12/12/8 Decl. at Attachment A).

⁴ In a review of the transcript, Ms. Villegas clarified that her affirmative answer referred to both trust report and accounting records of the firm to corroborate all referral payments.

B. The Interviews

The next component of the review process was, as the foregoing excerpt illustrates, a series of transcribed Interviews conducted at the Firm's offices in New York City. During those Interviews, I questioned each of the 7 Responsible Attorneys identified on the Settlement Charts, as follows:

- On November 29, 2018, I interviewed: Eric J. Belfi, Esq.; Christopher J. Keller, Esq.; and Thomas A. Dubbs, Esq. (In-person).
- On November 30, 2018, I interviewed: Ned Weinberger, Esq.; and Jordan A. Thomas, Esq. (Mr. Weinberger in-person, Mr. Thomas via telephone).
- On December 7, 2018, I interviewed: Lawrence A. Sucharow, Esq.; and Gregory S. Ascioffa, Esq. (In-person).

The questions I asked primarily focused upon: (1) the steps taken by each Responsible Attorney to verify the information on the Settlement Charts; (2) specifically, whether each Responsible Attorney knew of a "bare referral" paid on any of the settled cases for which they were responsible, such as the Payment to Mr. Chargois; and (3) for each Responsible Attorney, a random selection of cases appearing on the Settlement Charts, and an examination of the Responsible Attorney's knowledge thereof.⁵

As representative examples:

First, with respect to the steps he took to verify the information on the Settlement Charts, Mr. Keller stated as follows in pertinent part during his Interview on November 29, 2018:

JUDGE BROWN: I'd like to move on to the chart that Mr. Canty and Ms. Villegas prepared and with your assistance, I believe. I want to look at that. The first eight pages have cases with your name as the responsible attorney.

Have you reviewed each of those cases?

MR. KELLER: I have.

JUDGE BROWN: Tell me what you've done.

MR. KELLER: Working with [Ms. Villegas and Mr. Canty], sat down with them, they walked me through their process. We – what

⁵ Throughout the review process described herein, the Firm was extremely cooperative and extremely candid with regard to the information that was provided at my request. Part of that information was provided to me through the Interviews that I discuss below, which I requested be transcribed in order to assist me in my review and reporting function. Due to the candid nature of those Interviews, the transcripts contain information that the Firm considers "Highly Confidential", "Client Confidential". I am confident that information does not bear upon the question presented in any way, and therefore the transcripts have not been attached as Exhibits.

they've asked other staff members of the Firm to perform, the search for all cases that have settled from mid-2007 going forward in which we've been paid a fee. And they've reviewed with me – they confirmed that it was an exhaustive review.

So that they flagged all cases in which the firm has received fees. They then performed a deeper dive on the accounting side to review and review with me the trust documents to show all of the outflows and in-flows into any particular account related to each matter. They asked me questions about all the matters in which I was involved which are reflected on this list to confirm in fact, whether a referral fee had been paid or not. And if one had been paid to identify what those lawyers or law firms did in the case in order to earn the fee. And we did this for each matter.

Second, with respect to his knowledge of any “bare referrals” paid, Mr. Ascioffa (head of the Firm’s Antitrust Practice Group) stated as follows in pertinent part during his Interview on December 7, 2018:

JUDGE BROWN: Other than the payments to Mr. Chargois on occasion, are you aware of any other bare referrals that were agreed to or paid by the law firm?

MR. ASCIOLLA: In the antitrust – from – in antitrust cases, no. But I am familiar with a few others I was shown on a chart that listed a few others.

JUDGE BROWN: All involved Mr. Chargois?

MR. ASCIOLLA: Exactly, exactly.

JUDGE BROWN: Do you know of any cases where the firm either agreed to or paid bare referrals to anyone other than Chargois or his law firm?

MR. ASCIOLLA: I’m not aware of any.

JUDGE BROWN: And does the Firm have a policy concerning payment of bare referrals or [a] practice?

MR. ASCIOLLA: It has a policy that we will not do that. We will not engage in bare referrals.

JUDGE BROWN: And when did that policy come about?

MR. ASCIOLLA: I would say within the last year.

JUDGE BROWN: Before that policy, was it the practice of the Firm to pay bare referrals or not?

MR. ASCIOLLA: It was not the practice of the Firm.

JUDGE BROWN: So you now have a clearly articulated policy. Before that, your practice was to pay bare referrals or not to pay them?

MR. ASCIOLLA: It was not to pay them.

Third, with respect to a Responsible Attorney's knowledge based upon a random sample of cases that I had selected, Mr. Belfi (a Partner of the Firm responsible for business development, and notably, the Responsible Attorney for the ATRS cases) stated as follows during his Interview on November 29, 2018, in reference to one of the cases on the Settlement Charts, In re Intuitive Surgical Securities Litigation, No. 13-cv-1920 (N.D. Cal.):

MR. BELFI: Intuitive Surgical Securities. We represent the Employees' Retirement System of Hawaii and Greater Pennsylvania Carpenters. We only have a referral fee on the Employees' Retirement System of the State of Hawaii. I know this because I've worked on this case, personal knowledge.

The two attorneys we have a referral fee with are the Thornton firm and Anthony Takitani. Anthony Takitani is a local Hawaiian lawyer. And you obviously know the Thornton firm. This was a client that Garrett [Bradley], myself and Mr. Takitani developed together. All of us had been very, very involved with this client. It's in Hawaii so we've managed to get out there a few times.

But the discovery was – we spent a lot of time with the client going through all of their records because this was the first time they did it. So we actually went out and did it in person, brought a couple of Labaton people. Then when it came to settlement, the three of us sat down with the chairman of the board to go over the settlement and discuss what was the appropriate amount and got a sign-off.

Mr. Takitani has been very involved with the Attorney General's office there which is the overseer of the pension board and our general direct contact.

MR. CANTY: Just for clarification, if I may ask a question. Eric, can you just describe whether or not the payment has come in on that and just to confirm that there is absolutely no other referral payment contemplated when the money comes in other than what's listed in the referral obligation here?

MR. BELFI: We have a final approval hearing on December 20th, so we have not been paid yet. And the only referral payments we

would have would be to the ones listed here, Mr. Takitani and the Thornton firm.

C. The Declarations

The final component of the review process was the submission of Declarations made under penalty of perjury by Mr. Canty and each of the 7 Responsible Attorneys.

As noted above, Mr. Canty's Declaration primarily details the actions taken by the Firm in response to the Court's inquiry during the November 7, 2018 hearing. (See Exhibit C: Canty 12/12/8 Decl.).

Moreover, in their respective Declarations, the Responsible Attorneys each attest to: (1) the Responsible Attorney's review of the Settlement Charts; (2) that other than any "bare referral" payments made to Damon Chargois, the Responsible Attorney is unaware of any "bare referral agreement between the Firm and any law firm or attorney concerning any case presently or previously prosecuted by Labaton Sucharow"; and (3) the Responsible Attorney understands "a bare referral to mean an agreement whether written or unwritten, where Labaton Sucharow would share a fee with any lawyer or law firm solely for assistance in obtaining clients for Labaton Sucharow." (See Exhibit D: 12/3/18 Ascioffa Decl., Exhibit E: 12/4/18 Belfi Decl., Exhibit F: 12/11/18 Dubbs Decl.; Exhibit G: 12/5/18 Keller Decl., Exhibit H: 12/7/18 Sucharow Decl., Exhibit J: Weinberger Decl.).⁶

V. Results of the Review Process

A. The Firm's "Bare Referral" Payments

As the Settlement Charts make clear, of the more than 300 cases settled since 2007, the Firm has made "bare referral" payments in only the following 7:

- Arkansas Teacher Retirement System v. State Street Bank and Trust Co., No. 11-cv-10230 (D.Mass)
- Brado v. Vocera Communications, Inc., No. 13-cv-3567 (N.D. Cal.)
- In re Spectrum Pharmaceuticals, Inc. Securities Litigation, No. 13-cv-0433 (D. Nev.)

⁶ Notably, the Declaration submitted by Jordan A. Thomas, Esq. differs from the Declarations submitted by all other Responsible Attorneys in one material respect. (See Exhibit I: 12/6/18 Thomas Decl.). Mr. Thomas leads the Firm's "whistleblower" practice. Due to the highly confidential nature of that practice, it is subject to a so-called "Chinese wall" within the Firm. As a result of that "Chinese wall", and unlike the other Responsible Attorneys, in his Declaration Mr. Thomas states that he has: "no personal knowledge about any business dealings, including referral agreements between the rest of the Firm and Damon Chargois or any other attorney or law firm." (*Id.*). Nevertheless, Mr. Thomas attests that none of the cases for which he is the Responsible Attorney involve a "bare referral". (*Id.*). The substance of Mr. Thomas' Declaration was corroborated during his telephonic Interview on November 30, 2018.

- In re Colonial BancGroup Inc. Securities Litigation, No. 09-cv-9194 (M.D. Al.)
- Gammel v. Hewlett-Packard Co., No. 11-cv-1404 (C.D. Cal.)
- Hoppaugh v. K12 Inc., No. 12-cv-0103 (E.D. Va.)
- In re Beckman Coulter, Inc. Securities Litigation, No. 10-cv-1327 (C.D. Cal.)

For each of those 7 cases, the Settlement Charts also make clear that: (1) the Responsible Attorney is Eric Belfi; (2) the Firm represented ATRS; and (3) the “bare referral” payments were made to Mr. Chargois and/or Chargois & Herron, LLP.

During his Interview on November 29, 2018, I questioned Mr. Belfi regarding the development of the Firm’s relationship with Mr. Chargois and the circumstances surrounding each of those “bare referral” payments. Mr. Belfi explained that each of those “bare referral” payments resulted from the Firm’s representation of ATRS in the settled case.

On that point, Mr. Belfi concisely summarized the relationship between him, the Firm, Mr. Chargois, and ATRS as follows:

MR. BELFI: I had a relationship with Mr. Chargois. Mr. Chargois told me that his partner Mr. Herron had a relationship with Mr. Doane and he said he could get me an opportunity to do a presentation in Arkansas.

JUDGE BROWN: Do what?

MR. BELFI: Do a presentation in Arkansas. So, my relationship was almost exclusively with Mr. Chargois. I had limited contact with Mr. Herron. All my contact was generally with Mr. Chargois. Mr. Herron and Mr. Chargois had a falling out at some – I’m sorry. Let me stop there.

Mr. Doane leaves Arkansas at some point in the second half of 2008. Mr. Hopkins comes in. Mr. Herron did not have a relationship or direct contact with Mr. Hopkins. So Chargois’ connection to Arkansas was Mr. Herron and now Mr. Herron’s contact with Arkansas was broken when Mr. Doane left. And my contact had been through Mr. Chargois. So my contact essentially had been broken. I ended up then dealing directly with Mr. Hopkins.

Thus, after Mr. Hopkins’ replaced Mr. Doane as the executive in charge of ATRS in 2008, Mr. Chargois became irrelevant to the Firm’s representation of ATRS. Nevertheless, based upon the initial introduction to ATRS facilitated by Chargois & Herron, LLP, whenever an ATRS case settled, the Firm continued to make what had become “bare referral” payments to Mr. Chargois and/or Chargois & Herron, LLP.

During his interview, Mr. Belfi confirmed that those payments ranged between approximately \$26,000 and \$300,000 – with the \$4.1 million Payment as the last and by far the largest. Mr. Belfi explained the Firm’s rationale for those “bare referral” payments as follows:

MR. BELFI: And what happened, when we originally started the relationship, Mr. Chargois had represented that he had done a lot of litigation and that he had worked at Baron Budd and had done tons of trials, although not in the securities area, in the litigation realm. So, when we had negotiated or attempted to negotiate a finalized agreement, the referral that we had agreed to, although not in a written agreement, was 20 percent. And the concept of the 20 percent was that he was going to be a very active player in this relationship.

This was not going to just be that he was referring a client but our expectation and anticipation was that he would be very involved with the client in litigation. My previous experience in working with referring counsel prior to coming into this relationship had always been working with lawyers that worked very, very closely with the clients, whether it was because it was an existing client or –

JUDGE BROWN: Did Mr. Chargois have a close relationship with the Arkansas Teachers Fund?

MR. BELFI: Mr. Herron had a close relationship with Mr. Doane. When Mr. Doane left the Arkansas Teacher Retirement System, the relationship that Chargois and Herron had was greatly diminished.

JUDGE BROWN: Okay.

MR. BELFI: To basically nothing.

JUDGE BROWN: But the 20 percent remained?

MR. BELFI: That is correct. And we – we had – looking at it back in 20/20 hindsight at that time, I'm just looking at it now, we should have made a readjustment when Mr. Doane left because obviously the relationship had changed.

Our expectation was that they were going to stay involved in the relationship and they would be active in any cases including doing work. They had talked about doing discovery work in cases. They had made many representations, especially Mr. Chargois, that he wanted to be active in these cases and that was my expectation.

Mr. Belfi's explanation continued as follows:

JUDGE BROWN: So if your expectation was they were going to work with the clients and continue to work and they didn't, why did you pay him later on?

MR. BELFI: What happened is, we reached a point where, you know, this had become an issue as we started to have to pay him. Because before we had to pay him, it was not an issue. Once we –

JUDGE BROWN: Why did you have to pay him?

MR. BELFI: Well, in the sense that the cases resolved, so we were coming up to the point where there would be an opportunity or there would be the scenario where he would feel as though we had that obligation. Because before 2012 we had not generated any revenue from Arkansas. So, that was the first time it came up.

When we started raising issues about the lack of his involvement in these cases, in the conversation that I had with him, he threatened to sue us in Galveston. And that threat of lawsuit would also bring in our client, the Arkansas Teacher Retirement System. And we had real concerns that that was going to impact the relationship to the point where it could destroy the relationship if we ended up having this public fight.

And this is a client, as we proceeded along, became more and more important to the firm to the point where I think it became the most important client to the firm. And so we were very concerned about disrupting that relationship with a lawsuit.

Therefore, based upon the information produced by the Firm during the review process, it is clear to me that the “bare referral” payments made to Mr. Chargois were the result of: (1) a referral relationship that materially devolved from its inception (when it was anticipated to be substantive) until the Payment was made at a significantly later time (when it had unquestionably assumed a “bare referral” posture); and (2) despite that devolution, the Firm’s decision to continue making “bare referral” payments to Mr. Chargois as the path of least resistance in an effort to preserve its relationship with an important client. It is also clear to me that those circumstances are unique at the Firm since at least 2007.

Further, it is clear to me that the unique circumstances that gave rise to the “bare referral” relationship with Mr. Chargois will not result in a “bare referral” relationship with any other lawyer or law firm in the future. On that point, Mr. Keller clarified the following during his Interview on November 29, 2018:

MR. KELLER: We will not honor any referral relationship or referral agreement from now until the end of time unless it’s in full compliance with the rules and our new standards, heightened standards, we put in place.

...

The Firm's policy regarding referral fees is that they both need to be assented to in writing by the client and that the lawyers in those cases need to assume responsibility and do work. Chargois will not be paid in any future Arkansas-related matter. I would be surprised if at some point in the future we have a relationship with Mr. Chargois.

(Emphasis added).

B. Other Referral Payments

In contrast to the Firm's relationship with Mr. Chargois and the "bare referral" payments made to him and/or Chargois & Herron, LLP, the review process has clearly convinced me that for all other cases settled since 2007, the Firm only paid referral fees to an attorney or a law firm that did substantive work on the case.

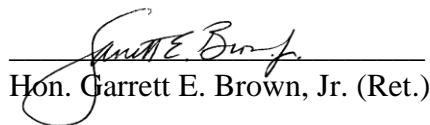
Indeed, during the Interview process, each Responsible Attorney was questioned regarding randomly selected cases from the Settlement Charts – including many of the cases for which a referral fee was paid. Without exception, each Responsible Attorney was able to provide additional factual information about the attorney and/or law firm that received the payment (the "Payee"), and the nature of the substantive work they did on the case.

In some instances, the Payee had filed a formal appearance in the litigation. But whether or not they did, in apparently all cases, the Responsible Attorney represented that the Payee performed substantive work on the case, including some or all of the following: (1) reviewing the complaint and/or theories of the case; (2) assisting the client with document production in discovery; (3) assisting the client with deposition preparation and/or attending depositions; and (4) participating in the settlement process.

VI. Conclusion

For the reasons explained above, based upon the aforementioned review process, I am clearly convinced that at least since the Firm's reorganization in 2007:

- (1) The Firm's relationship with Damon Chargois and/or Chargois & Herron, LLP is unique, and any "bare referral" payments made thereto were aberrational; and
- (2) Other than the "bare referral" payments to Damon Chargois and/or Chargois & Herron, LLP, the Firm has made not made "bare referral" payments to any other lawyer or law firm.


Hon. Garrett E. Brown, Jr. (Ret.)

DATED: January 8, 2019

Exhibit A

Settled Cases – 2018 Through July 2007

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
Chris Keller							
1	<i>Linder v. Conn's, Inc.</i> , No. 14-cv-0548 (S.D. Tex.)	Securities	St. Paul Teachers' Retirement Fund Association	10/11/2018	Yes	No	Chris Keller
2	<i>Wang v. PTC Therapeutics, Inc.</i> , No. 16-cv-1224 (D.N.J.)	Securities	Boston Retirement System	9/10/2018	Yes	No	Chris Keller
3	<i>Bell v. Ubiquiti Networks, Inc.</i> , No. 12-cv-4677 (N.D. Cal.)	Securities	Bristol County Retirement System	12/20/2017	Yes	No	Chris Keller
4	<i>City of Hialeah Employees' Retirement System v. Genworth Financial, Inc.</i> , No. 14-cv-2392 (S.D.N.Y.)	Securities	New Bedford Contributory Retirement System	11/16/2017	Yes	No	Chris Keller
5	<i>Weston v. RCS Capital Corporation</i> , No. 14-cv-10136 (S.D.N.Y.)	Securities	City of Providence	9/28/2017	Yes	No	Chris Keller
6	<i>In re Barrick Gold Securities Litigation</i> , No. 13-cv-3851 (S.D.N.Y.)	Securities	Brockton Retirement Board (filing plaintiff)	12/2/2016	Yes	No	Chris Keller
7	<i>Van Noppen v. InnerWorkings, Inc.</i> , No. 14-cv-1416 (N.D. Ill.)	Securities	Plymouth County Retirement System; Boston Retirement System (Class Representative not certified)	11/2/2016	Yes	No	Chris Keller
8	<i>Freedman v. Nu Skin Enterprises, Inc.</i> , No. 14-cv-0033 (D. Utah)	Securities	Boston Retirement System	10/13/2016	Yes	No	Chris Keller
9	<i>Plymouth County Retirement System v. Model N, Inc.</i> , No. CIV530291 (Cal. Super. Ct. San Mateo Cty.)	Securities	Plymouth County Retirement System	4/4/2016	Yes	No	Chris Keller
10	<i>Medoff v. CVS Caremark Corp.</i> , No. 09-cv-0554 (D.R.I.)	Securities	Norfolk County Retirement System; Plymouth County Retirement System	2/17/2016	Yes	No	Chris Keller

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
11	Freedman v. Weatherford International Ltd., No. 12-cv-2121 (S.D.N.Y.)	Securities	Sacramento City Employees' Retirement System	11/4/2015	Yes	No	Chris Keller
12	Bristol County Retirement System v. Allscripts Healthcare Solutions, Inc., No. 12-cv-3297 (N.D. Ill.)	Securities	Bristol County Retirement System; Plymouth County Retirement System; Electrical Workers Pension Fund, Local 103, I.B.E.W.	7/22/2015	Yes	No	Chris Keller
13	In re OmniVision Technologies, Inc. Securities Litigation, No. 11-cv-5235 (N.D. Cal.)	Securities	Woburn Retirement System	6/5/2015	Yes	No	Chris Keller
14	In re Fannie Mae 2008 Securities Litigation, No. 08-cv-7831 (S.D.N.Y.)	Securities	Boston Retirement System	3/3/2015	Yes	No	Chris Keller
15	In re Freeport-McMoRan Copper & Gold Inc. Derivative Litigation, No. 8145-VCN (Del. Ch.)	Delaware	Boston Retirement System	1/12/2015	Yes	No	Chris Keller
16	In re Safeway Inc. Shareholder Litigation, No. 9445 (Del. Ch.)	Delaware	Bristol County Retirement System; Louisiana Municipal Police Employees' Retirement System	Resolved in 2014	Yes	No	Chris Keller
17	Construction Laborers Pension Trust of Greater St. Louis v. Autoliv, Inc., No. 13-cv-2546 (S.D.N.Y.)	Securities	Electrical Workers Pension Fund, Local 103, I.B.E.W.	10/29/2014	Yes	No	Chris Keller
18	In re Beam Inc. Stockholders Litigation, No. 9301 (Del. Ch.)	Delaware	City of Providence	9/17/2014	Yes	No	Chris Keller
19	Greater Pennsylvania Carpenters' Pension Fund v. Chemed Corp., No. 12-cv-0028 (S.D. Ohio)	Securities	Electrical Workers Pension Fund, Local 103, I.B.E.W.	7/15/2014	Yes	No	Chris Keller
20	In re Massey Energy Co. Securities Litigation, No. 10-cv-0689 (S.D. W. Va.)	Securities	Massachusetts Pension Reserves Investment Management Board	6/4/2014	Yes	No	Chris Keller
21	The City of Providence v. Aeropostale, Inc., No. 11-cv-7132 (S.D.N.Y.)	Securities	City of Providence	5/14/2014	Yes	No	Chris Keller
22	Public Pension Fund Group v. KV Pharmaceutical Co., No. 08-cv-1859 (E.D. Mo.)	Securities	Boston Retirement System; Norfolk County Retirement System	4/23/2014	Yes	No	Chris Keller
23	In re Carter's Inc. Securities Litigation, No. 08-cv-2940 (N.D. Ga.)	Securities	Plymouth County Retirement System	10/11/2013	Yes	No	Chris Keller

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
24	<i>In re Schering-Plough Corp./ENHANCE Securities Litigation, No. 08-cv-0397 (D.N.J.)</i>	Securities	Massachusetts Pension Reserves Investment Management Board	10/1/2013	Yes	No	Chris Keller
25	<i>In re Regions Morgan Keegan Closed-End Mutual Fund Litigation, No. 09-md-2009 (W.D. Tenn.)</i>	Securities	Lion Fund LP; Dr. J. Samir Sulieman; Larry Lattimore	8/6/2013	Yes	No	Chris Keller
26	<i>Ramsey v. MRV Communications Inc., No. 08-cv-4561 (C.D. Cal.)</i>	Securities	Kwok Wong	6/13/2013	No	N/A	Chris Keller
27	<i>In re Goodrich Shareholder Litigation, No. 13699/2011 (N.Y. Sup. Ct. Nassau Cty.)</i>	Delaware	Massachusetts Laborers' Pension Fund	5/1/2013	Yes	No	Chris Keller
28	<i>In re Wells Real Estate Investment Trust, Inc. Securities Litigation, No. 07-cv-0862 (N.D. Ga.)</i>	Securities	Washtenaw County Employees' Retirement System	4/18/2013	No	N/A	Chris Keller
29	<i>In re Harbin Electric Shareholder Litigation, No. 35327-2010 (N.Y. Sup. Ct. Suffolk Cty.)</i>	Delaware	Norfolk County Retirement System	2012	Yes	No	Chris Keller
30	<i>Packer v. Coinstar Inc., No. 11-cv-0133 (W.D. Wash.)</i>	Securities	Employees' Retirement System of the State of Rhode Island	11/9/2012	Yes	No	Chris Keller
31	<i>In re El Paso Corp. Shareholder Litigation, No. 6949 (Del. Ch.)</i>	Delaware	Pipefitters Local Union #537 Trust Funds	9/7/2012	Yes	No	Chris Keller
32	<i>Massachusetts Bricklayers & Masons Trust Funds v. Deutsche Alt-A Securities, Inc., No. 08-cv-3178 (E.D.N.Y.)</i>	Securities	Massachusetts Bricklayers & Masons Trust Funds	7/11/2012	Yes	No	Chris Keller
33	<i>In re Barnes & Noble Stockholder & Derivative Litigation, No. 4813 (Del. Ch.)</i>	Delaware	Electrical Workers Pension Fund, Local 103, IBEW	6/13/2012	Yes	No	Chris Keller
34	<i>In re Dynegy Shareholders Litigation, No. 5739 (Del. Ch.)</i>	Delaware	Ariel Holdings LLC	2011	No	N/A	Chris Keller
35	<i>In re Accuray Inc. Securities Litigation, No. 09-cv-3362 (N.D. Cal.)</i>	Securities	City of Brockton Retirement System	12/8/2011	Yes	No	Chris Keller
36	<i>Rubin v. MF Global Ltd., No. 08-cv-2233 (S.D.N.Y.)</i>	Securities	Boston Retirement System	11/18/2011	Yes	No	Chris Keller

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
37	Rotman v. PricewaterhouseCoopers International Ltd. II, No. 03-cv-23044 (S.D. Fla.) (Lancer)	Securities	John Bruhl	10/7/2011	Yes	No	Chris Keller
38	In re Phoenix Leasing Inc. Limited Partnership Litigation, No. 173739 (Cal. Super. Ct.)	Securities	J & Doris Ash Enterprises, Inc.; George F. Copeland; Dr. Theodore Meves; Melvin A. Smith; Jack Herzbrun as trustee of the Jack and Elaine Herzbrun Trust; Bernard Kozlow; Jerry Goldwein; Bernard Berger	9/30/2011	No	N/A	Chris Keller
39	In re Core Bond Fund (Oppenheimer Core Bond Fund), No. 09-cv-1186 (D. Colo.)	Securities	Dr. Philip Pattinson	9/30/2011	No	N/A	Chris Keller
40	In re Oppenheimer Champion Fund Securities Fraud Class Actions, No. 09-cv-0386 (D. Colo.)	Securities	Thomas Goodman; Errol Glynn O'Steen	9/30/2011	No	N/A	Chris Keller
41	In re DG FastChannel, Inc. Securities Litigation, No. 10-cv-6523 (S.D.N.Y.)	Securities	Norfolk County Retirement System	9/14/2011	Yes	No	Chris Keller
42	In re Progress Energy Shareholder Litigation, No. 11-cvs-739 (Wake Cty. N.C.)	Delaware	Pipefitters Local Union #537 Trust Fund	7/8/2011	Yes	No	Chris Keller
43	Middlesex County Retirement System v. Semtech Corp., No. 07-cv-7183 (S.D.N.Y.)	Securities	Public Employees' Retirement System of Mississippi (Labaton Sucharow was local counsel)	6/27/2011	No	N/A	Chris Keller
44	In re RehabCare Group Inc. Shareholder Litigation, No. 6197 (Del. Ch.)	Delaware	Norfolk County Retirement System	5/12/2011	Yes	No	Chris Keller
45	In re Huron Consulting Group Inc. Securities Litigation, No. 09-cv-4734 (N.D. Ill.)	Securities	Boston Retirement System; Cambridge Retirement System; Bristol County Retirement System	5/6/2011	Yes	No	Chris Keller
46	In re Celera Corp. Shareholders Litigation, No. 6304 (Del. Ch.)	Delaware	New Orleans Employees' Retirement System; Ariel Holdings LLC; Greg Henderson; David Jaroslawicz	4/18/2011	No	N/A	Chris Keller
47	Gross v. NYMAGIC, Inc., No. 650979/2010 (N.Y. Sup. Ct. New York County)	Delaware	Cambridge Retirement System	4/7/2011	Yes	No	Chris Keller
48	In re Spectranetics Corp. Securities Litigation, No. 08-cv-2048 (D. Colo.)	Securities	Genesee County Employees' Retirement System	4/5/2011	No	N/A	Chris Keller

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
49	<i>In re iMergent Securities Litigation, No. 05-cv-0204 (D. Utah)</i>	Securities	Gregory Dronsejko; Claudio Borghasen; Pedro Garcia; Antonio Mielec; Perla Sierra	3/30/2011	No	N/A	Chris Keller
50	<i>Heffez v. Limelight Network, Inc., No. 07-cv-1603 (D. Ariz.)</i>	Securities	Mitchell Robbins; David Gechlik; ThaiKy Nguyen	3/23/2011	Yes	No	Chris Keller
51	<i>In re Countrywide Financial Corp. Securities Litigation, No. 07-cv-5295 (C.D. Cal.)</i>	Securities	New York State Common Retirement Fund; New York City Employees' Retirement System; New York City Fire Department Pension Fund; New York City Board of Education Retirement System; New York City Police Department Pension Fund; New York City Teachers' Retirement System	3/4/2011	No	N/A	Chris Keller
52	<i>In re Gildan Activewear Inc. Securities Litigation, No. 08-cv-5048 (S.D.N.Y.)</i>	Securities	Norfolk County Retirement System	3/2/2011	Yes	No	Chris Keller
53	<i>In re Compellent Technologies Inc. Shareholder Litigation, No. 6084 (Del. Ch.)</i>	Delaware	Genesee County Employees' Retirement System	1/31/2011	No	N/A	Chris Keller
54	<i>In re The Student Loan Corp. Litigation, No. 5832 (Del. Ch.)</i>	Delaware	Electrical Workers Pension Fund, Local 103, I.B.E.W.	12/23/2010	Yes	No	Chris Keller
55	<i>Police & Fire Retirement System of the City of Detroit v. SafeNet, Inc., No. 06-cv-5797 (S.D.N.Y.)</i>	Securities	Plymouth County Retirement System; Boston Retirement System	12/20/2010	Yes	No	Chris Keller
56	<i>In re Mutual Funds Investment Litigation, No. 04-md-15862 (D. Md.)</i>	Securities	Retirement Design and Management, Inc.; Nations Funds Class Plaintiffs	10/25/2010	No	N/A	Chris Keller
57	<i>In re Take-Two Interactive Securities Litigation, No. 06-cv-0803 (S.D.N.Y.)</i>	Securities	New York City Employees' Retirement System; New York City Police Pension Fund; New York City Fire Department Pension Fund	10/18/2010	No	N/A	Chris Keller
58	<i>In re Herley Industries, Inc. Securities Litigation, No. 06-cv-2596 (E.D. Pa.)</i>	Securities	Norfolk County Retirement System	9/14/2010	Yes	No	Chris Keller
59	<i>In re CKE Restaurants Inc., No. 5290 (Del. Ch.)</i>	Delaware	Tom Hudson	9/13/2010	No	N/A	Chris Keller

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
60	<i>In re Coca Cola Enterprises, Inc. Shareholders Litigation, No. 5291</i> (Del. Ch.)	Delaware	Boston Retirement System	9/7/2010	Yes	No	Chris Keller
61	<i>City of Westland Police & Fire Retirement System v. Sonic Solutions, No. 07-cv-5111</i> (N.D. Cal.)	Securities	Plymouth County Retirement System	4/8/2010	Yes	No	Chris Keller
62	<i>In re Cbeyond, Inc. Securities Litigation, No. 08-cv-1666</i> (N.D. Ga.)	Securities	Genesee County Employees' Retirement System; Essex Regional Retirement Board	1/5/2010	Yes	No	Chris Keller
63	<i>In re Pepsi Bottling Group Inc Shareholders Litigation, No. 4526</i> (Del. Ch.)	Delaware	Electrical Workers Pension Fund, Local 103, I.B.E.W.	11/25/2009	Yes	No	Chris Keller
64	<i>In re Amkor Technology Inc. Securities Litigation, No. 07-cv-0278</i> (D. Ariz.)	Securities	Boston Retirement System; Scott Bishins	11/19/2009	Yes	No	Chris Keller
65	<i>Norfolk County Retirement System v. First American Corp., No. 4710</i> (Del. Ch.) (<i>First Advantage Corp.</i>)	Delaware	Norfolk County Retirement System	10/26/2009	Yes	No	Chris Keller
66	<i>In re IPO Securities Litigation, No. 21-MC-92</i> (S.D.N.Y.)	Securities	Michael Parker; Ellen Exelbert	10/6/2009	No	N/A	Chris Keller
67	<i>In re Monster Worldwide, Inc., Securities Litigation, No. 07-cv-2237</i> (S.D.N.Y.)	Securities	Middlesex County Retirement System; Steamship Trade Association/International Longshoremen's Association Pension Fund	11/25/2008	Yes	No	Chris Keller
68	<i>Desert Orchid Partners, LLC v. Transaction Systems Architects, Inc., No. 02-cv-0561</i> (D. Neb.)	Securities	Genesee County Employees' Retirement System	3/2/2007	No	N/A	Chris Keller
69	<i>In re Mercury Interactive Corp. Securities Litigation, No. 05-cv-3395</i> (N.D. Cal.)	Securities	Steamship Trade Association/International Longshoremen's Association Pension Fund	9/25/2008	Yes	No	Chris Keller
70	<i>In re Career Education Securities Litigation, No. 03-cv-8884</i> (N.D. Ill.)	Securities	Thomas Schroder	9/18/2008	No	N/A	Chris Keller
71	<i>In re International Business Machines Corp. Securities Litigation, No. 05-cv-6279</i> (S.D.N.Y.)	Securities	Joseph and Nilda Anchinovski	9/10/2008	No	N/A	Chris Keller
72	<i>Kuck v. Veritas Software, No. 04-cv-0831</i> (D. Del.)	Securities	Tay Siew Choon	8/6/2008	No	N/A	Chris Keller

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
73	<i>In re Top Tankers, Inc. Securities Litigation, No. 06-cv-13761 (S.D.N.Y.)</i>	Securities	Joseph A. Deshayes, individually and on behalf of Ann P. DeShayes, his wife, Susan A. Keenan and Joel M. Keenan, his daughter and son-in-law; On Site Drapery Cleaning, Inc., a business managed by Mr. DeShayes	7/31/2008	No	N/A	Chris Keller
74	<i>Bristol County Retirement System v. HCC Insurance Holdings Inc., No. 07-cv-0801 (S.D. Tex.)</i>	Securities	Bristol County Retirement System; Plymouth County Retirement System	7/17/2008	Yes	No	Chris Keller
75	<i>In re Zale Corp. Securities Litigation, No. 06-cv-1470 (N.D. Tex.)</i>	Securities	Pipefitters Local No. 636 Defined Benefit Plan; Iron Workers Local 16 Pension Fund	7/10/2008	Yes	No	Chris Keller
76	<i>In re DHB Industries, Inc. Class Action Litigation, No. 05-cv-4296 (E.D.N.Y.)</i>	Securities	Robino Stortini Holdings LLC	7/8/2008	No	N/A	Chris Keller
77	<i>In re American Tower Corp. Securities Litigation, No. 06-cv-10933 (D. Mass.)</i>	Securities	Steamship Trade Association/International Longshoremen's Association Pension Fund	6/11/2008	Yes	No	Chris Keller
78	<i>Vanamringe v. Royal Group Technologies, No. 06-cv-822 (S.D.N.Y.)</i>	Securities	L. Messenger	3/11/2008	No	N/A	Chris Keller
79	<i>Aronson v. McKesson, No. 99-cv-20743 (N.D. Cal.)</i>	Securities	Daniel Rodriguez; Robert Waring	1/18/2008	No	N/A	Chris Keller
80	<i>In re SupportSoft, Inc. Securities Litigation, No. 04-cv-5222 (N.D. Cal.)</i>	Securities	Scott Rowland; Jay Young	10/2/2007	Yes	No	Chris Keller
81	<i>In re STEC, Inc. Securities Litigation, No. 09-cv-1304 (C.D. Cal.)</i>	Securities	State of New Jersey, Department of Treasury, Division of Investment; Electrical Workers Pension Fund, Local 103, I.B.E.W. (Representative Party); Norfolk County Retirement System (Representative Party)	5/23/2013	Yes	No	Chris Keller
Eric Belfi							
82	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	2018	No	N/A	Eric Belfi
83	<i>GKC Strategic Value Master Fund, LP f/k/a GKC Appraisal Rights Master Fund, LP v. Baker Hughes Inc., No. 2017-0769 (Del. Ch.)</i>	Delaware	GKC Strategic Value Master Fund, LP; Walleye Trading LLC	2018	No	N/A	Eric Belfi

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
84	<i>City of Monroe Employees' Retirement System v. Murdoch</i> , No. 2017-0833 (Del. Ch.) (21st Century Fox)	Delaware	Seattle City Employees' Retirement System	2018	No	N/A	Eric Belfi
85	<i>Howard v. Liquidity Services, Inc.</i> , No. 14-cv-1183 (D.D.C.)	Securities	Newport News Employees' Retirement Fund	10/5/2018	No	N/A	Eric Belfi
86	<i>In re Intuitive Surgical Securities Litigation</i> , No. 13-cv-1920 (N.D. Cal.)	Securities	The Employees' Retirement System of the State of Hawaii; Greater Pennsylvania Carpenters' Pension Fund (representative party)	10/4/2018* (preliminary approval)	Yes	No	Eric Belfi
87	<i>Chavez v. Celadon Group, Inc.</i> , No. 17-cv-2828 (S.D.N.Y.)	Securities	Greater Pennsylvania Carpenters' Pension Fund; Arkansas Teacher Retirement System	9/27/2018	Yes	No	Eric Belfi
88	<i>Vance v. CPI Card Group, Inc.</i> , No. 16-cv-4531 (S.D.N.Y.)	Securities	Alex Stewart	9/21/2018	Yes	No	Eric Belfi
89	<i>Hong v. Extreme Networks, Inc.</i> , No. 15-cv-4883 (N.D. Cal.)	Securities	Arkansas Teacher Retirement System	9/7/2018* (preliminary approval)	No	N/A	Eric Belfi
90	<i>Public Employees' Retirement System of Mississippi v. Sprouts Farmers Market, Inc.</i> , No. CV2016-050480 (Ariz. Super. Ct. Cty. of Maricopa)	Securities	Public Employees' Retirement System of Mississippi	9/5/2018* (preliminary approval)	No	N/A	Eric Belfi
91	<i>In re Appraisal of Kate Spade & Co.</i> , No. 2017-0714 (Del. Ch.)	Delaware	GKC Strategic Value Master Fund, LP	7/10/2018	No	N/A	Eric Belfi
92	<i>Cummins v. Virtus Investment Partners Inc.</i> , No. 15-cv-1249 (S.D.N.Y.)	Securities	Arkansas Teacher Retirement System	6/28/2018* (preliminary approval)	No	N/A	Eric Belfi
93	<i>In re Petrobras Securities Litigation</i> , No. 14-cv-9662 (S.D.N.Y.)	Securities	City of Providence (filing plaintiff); The Employees' Retirement System of the State of Hawaii (Class Representative)	6/27/2018	Yes	No	Eric Belfi
94	<i>In re Ariad Pharmaceuticals, Inc. Securities Litigation</i> , No. 13-cv-12544 (D. Mass.)	Securities	Dr. William A. Gaul	5/11/2018	No	N/A	Eric Belfi
95	<i>Hatamian v. Advanced Micro Devices, Inc.</i> , No. 14-cv-0226 (N.D. Cal.)	Securities	Arkansas Teacher Retirement System	3/6/2018	No	N/A	Eric Belfi

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
96	<i>In re Facebook, Inc. IPO Securities & Derivative Litigation, No. 12-md-2389 (S.D.N.Y.)</i>	Securities	North Carolina Department of State Treasurer on behalf of the North Carolina Retirement Systems (withdrew from action); Arkansas Teacher Retirement System	11/26/2018	No	N/A	Eric Belfi
97	<i>In re Takata Airbag Product Liability Litigation, No. 15-md-2599 (S.D. Fla.)</i>	Consumer	Nicole Peaslee; William Dougherty; Kathleen Wilkinson; Coleman Haklar; Pamela Koehler; Tasha R. Severio; David Takeda; David M. Jorgensen; Megan Sayre-Scibona; Mary E. Hasley; Pamela A. Wilsey; Doreen Dembeck; Helen Klemer; Lisa Peterson; Matt Dean; Gerald Ordonio	2017	No	N/A	Eric Belfi
98	<i>Kohut v. KBR, Inc., No. 14-cv-1287 (S.D. Tex.)</i>	Securities	IBEW Local No. 58 / SMC NECA Funds	8/24/2017	Yes	No	Eric Belfi
99	<i>Deutsche Zentralgenossenschaftsbank AG, New York Branch, d/b/a DZ Bank AG, New York Branch v. Morgan Stanley, No. 654035/2012 (Sup. Ct. N.Y. Cty.)</i>	RMBS	Deutsche Zentralgenossenschaftsbank AG, New York Branch, d/b/a DZ Bank AG, New York Branch; DG Holding Trust	6/26/2017	No	N/A	Eric Belfi
100	<i>Deutsche Zentral-Genossenschaftsbank AG, New York Branch, d/b/a DZ Bank AG, New York Branch v. Credit Suisse Holdings (USA), Inc., No. 650967/2013 (Sup. Ct. N.Y. Cty.)</i>	RMBS	Deutsche Zentral-Genossenschaftsbank AG, New York Branch, d/b/a DZ Bank AG, New York Branch	6/13/2017	No	N/A	Eric Belfi
101	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	5/24/2017	No	N/A	Eric Belfi
102	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	3/24/2017	No	N/A	Eric Belfi
103	<i>City of Warren Police & Fire Retirement System v. A10 Networks, Inc., No. 15CV278575 (Cal. Super. Ct. Santa Clara Cty.)</i>	Securities	Arkansas Teacher Retirement System	3/2/2017	No	N/A	Eric Belfi
104	<i>Randall v. Fifth Street Finance Corp., No. 15-cv-7759 (S.D.N.Y.)</i>	Securities	Oklahoma Police Pension and Retirement System	2/17/2017	No	N/A	Eric Belfi

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
105	Arkansas Teacher Retirement System v. State Street Bank and Trust Company, No. 11-cv-10230 (D. Mass.)	Securities	Arkansas Teacher Retirement System	11/2/2016	Yes	Yes	Eric Belfi
106	Oklahoma Firefighters Pension and Retirement System v. Castlight Health, Inc., No. CIV533647 (Cal. Super. Ct. Cty. of San Mateo)	Securities	Oklahoma Firefighters Pension and Retirement System	10/31/2016	No	N/A	Eric Belfi
107	In re MF Global Holdings Ltd. Securities Litigation, No. 11-cv-7866 (S.D.N.Y.) (DeAngelis v. Corzine)	Securities	Her Majesty the Queen in Right of Alberta (Alberta Investment Management Corp.)	10/18/2016	No	N/A	Eric Belfi
108	Iron Workers District Council of New England Pension Fund v. NII Holdings, Inc., No. 14-cv-0227 (E.D. Va.)	Securities	IBEW Local No. 58 / SMC NECA Funds; Pension Trust Fund for Operating Engineers Pension Plan; Boston Retirement System (filing plaintiff)	9/16/2016	Yes	No	Eric Belfi
109	Brado v. Vocera Communications, Inc., No. 13-cv-3567 (N.D. Cal.)	Securities	Baltimore County Employees' Retirement System; Arkansas Teacher Retirement System	7/29/2016	Yes	Yes (Arkansas Teacher)	Eric Belfi
110	In re Spectrum Pharmaceuticals, Inc. Securities Litigation, No. 13-cv-0433 (D. Nev.)	Securities	Arkansas Teacher Retirement System	6/13/2016	Yes	Yes	Eric Belfi
111	HSH Nordbank AG v. Morgan Stanley, No. 652988/2012 (Sup. Ct. N.Y. Cty.)	RMBS	HSH Nordbank AG; HSH Nordbank AG, Luxembourg Branch; HSH Nordbank Securities S.A.; Carrera Capital Finance Limited	5/25/2016	No	N/A	Eric Belfi
112	Deutsche Zentral-Genossenschaftsbank AG, New York Branch, d/b/a DZ Bank AG, New York Branch v. The Royal Bank of Scotland Group plc, No. 654569/2012 (Sup. Ct. N.Y. Cty.)	RMBS	Deutsche Zentral-Genossenschaftsbank AG, New York Branch, d/b/a DZ Bank AG, New York Branch	5/4/2016	No	N/A	Eric Belfi

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
113	<i>In re Adelpia Communications Corp. Securities & Derivative Litigation (No. II), No. 03-md-1529 (S.D.N.Y.); New York City Employees' Retirement System v. Rigas, No. 03-cv-5789 (S.D.N.Y.)</i>	Securities	New York City Employees' Retirement System; New York City Teachers' Retirement System; New York City Board of Education Retirement System; New York City Police Department Pension Fund; New York City Fire Department Pension Fund; New York City Police Officers' Variable Supplements Fund; New York City Police Superior Officers' Variable Supplements Fund; New York City Firefighters' Variable Supplements Fund; New York City Fire Officers' Variable Supplements Fund; New Jersey Division of Investment	2/16/2016	No	N/A	Eric Belfi
114	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	2/4/2016	No	N/A	Eric Belfi
115	<i>Landesbank Baden-Württemberg v. Morgan Stanley, No. 654466/2012 (Sup. Ct. N.Y. Cty.)</i>	RMBS	Landesbank Baden-Württemberg; Georges Quay Funding I Limited; Spencerview Asset Management Limited	1/25/2016	No	N/A	Eric Belfi
116	<i>Oklahoma Firefighters Pension and Retirement System v. NeuStar, Inc., No. 14-cv-0885 (E.D. Va.)</i>	Securities	Indiana Public Retirement System	12/3/2015	Yes	No	Eric Belfi
117	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	11/3/2015	No	N/A	Eric Belfi
118	<i>In re Celestica Inc. Securities Litigation, No. 07-cv-0312 (S.D.N.Y.)</i>	Securities	Drywall Acoustic Lathing & Insulation Local 675 Pension Fund; Milwright Regional Council of Ontario Pension Trust Fund; Carpenters' Local 27 Benefit Trust Funds; New Orleans Employees' Retirement System	7/28/2015	Yes	No	Eric Belfi
119	<i>In re Colonial BancGroup Inc. Securities Litigation, No. 09-cv-0104 (M.D. Ala.)</i>	Securities	Arkansas Teacher Retirement System; Boston Retirement System; Norfolk County Retirement System; City of Brockton Retirement System	6/19/2015	Yes	Yes (Arkansas Teacher)	Eric Belfi
120	<i>Bank Hapoalim B.M. v. Morgan Stanley, No. 653036/2012 (Sup. Ct. N.Y. Cty.)</i>	RMBS	Bank Hapoalim B.M.	6/11/2015	No	N/A	Eric Belfi
121	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	5/14/2015	No	N/A	Eric Belfi

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
122	<i>Castro v. ViroPharma Inc., No. 12-cv-2714 (E.D. Pa.)</i>	Securities	Carpenters' Local 27 Benefit Trust Funds	5/7/2015	Yes	No	Eric Belfi
123	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	4/30/2015	No	N/A	Eric Belfi
124	<i>HSH Nordbank AG v. RBS Holdings USA Inc., No. 13-cv-03303 (S.D.N.Y.)</i>	RMBS	HSH Nordbank AG; HSH Nordbank AG, Luxembourg Branch; HSH Nordbank Securities S.A.	4/24/2015	No	N/A	Eric Belfi
125	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	3/10/2015	No	N/A	Eric Belfi
126	<i>Rieckborn v. Velti plc, No. 13-cv-3889 (N.D. Cal.)</i>	Securities	Newport News Employees' Retirement Fund (representative party)	2/3/2015	Yes	No	Eric Belfi
127	<i>In re Walgreens Co. Derivative Litigation, No. 13-cv-5471 (N.D. Ill.)</i>	Delaware	Police Retirement System of St. Louis; Steamfitters Local 449; West Palm Beach Police Pension Fund	2014	Yes	No	Eric Belfi
128	<i>Deutsche Zentral-Genossenschaftsbank AG, New York Branch, d/b/a DZ Bank AG, New York Branch v. Citigroup Inc., No. 654566/2012 (Sup. Ct. N.Y. Cty.)</i>	RMBS	Deutsche Zentral-Genossenschaftsbank AG, New York Branch, d/b/a DZ Bank AG, New York Branch; DG Holding Trust	10/24/2014	No	N/A	Eric Belfi
129	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	9/16/2014	No	N/A	Eric Belfi
130	<i>Gammel v. Hewlett-Packard Co., No. 11-cv-1404 (C.D. Cal.)</i>	Securities	Arkansas Teacher Retirement System; Labourers' Pension Fund of Central and Eastern Canada	9/15/2014	Yes	Yes (Arkansas Teacher)	Eric Belfi
131	<i>Sealink Funding Limited v. Citigroup Inc., No. 653844/2012 (Sup. Ct. N.Y. Cty.)</i>	RMBS	Sealink Funding Limited	9/12/2014	Yes	No	Eric Belfi
132	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	8/20/2014	No	N/A	Eric Belfi

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
133	Landesbank Baden-Württemberg v. RBS Holdings USA, Inc., No. 12-cv-5476 (S.D.N.Y.)	RMBS	Landesbank Baden-Württemberg; Georges Quay Funding I Ltd.; Spencerview Asset Management Limited and Caledonian Trust (Cayman) Limited, Acting in its Capacity as Trustee of the Leveraged Accrual Asset Management Sub-Trust, a Sub-Trust of the Panacea Trust; the Leveraged Accrual Asset Management II Sub-Trust, a Sub-Trust of the Panacea Trust; the Leveraged Accrual Asset Management XI Sub-Trust, a Sub-Trust of the Pivot Master Trust	8/19/2014	No	N/A	Eric Belfi
134	Pompano Beach Police & Firefighters' Retirement System, Derivatively on Behalf of Google, Inc., No. C.A. 7064 (Del. Ch.)	Delaware	Louisiana Municipal Police Employees' Retirement System	8/7/2014	No	N/A	Eric Belfi
135	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	7/25/2014	No	N/A	Eric Belfi
136	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	7/25/2014	Yes	No	Eric Belfi
137	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	7/15/2014	No	N/A	Eric Belfi
138	Sealink Funding Limited v. RBS Holdings USA, Inc., No. 12-cv-5118 (S.D.N.Y.)	RMBS	Sealink Funding Limited	7/15/2014	Yes	No	Eric Belfi
139	Asset Management Fund, d/b/a AMF Funds v. Morgan Stanley, No. 651466/2012 (Sup. Ct. N.Y. Cty.)	RMBS	Asset Management Fund, d/b/a AMF Funds; AMF Intermediate Mortgage Fund; AMF Ultra Short Fund; AMF Ultra Short Mortgage Fund; AMF Short U.S. Government Fund; AMF U.S. Government Mortgage Fund	6/9/2014	No	N/A	Eric Belfi
140	Bank Hapoalim B.M. v. The Royal Bank of Scotland Group plc, No. 653673/2012 (Sup. Ct. N.Y. Cty.)	RMBS	Bank Hapoalim B.M.	5/15/2014	No	N/A	Eric Belfi

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
141	<i>Deutsche Zentral-Genossenschaftsbank AG, New York Branch, d/b/a DZ Bank AG, New York Branch v. HSBC North America Holdings Inc., No. 12-cv-4025 (S.D.N.Y.)</i>	RMBS	Deutsche Zentral-Genossenschaftsbank AG, New York Branch, d/b/a DZ Bank AG, New York Branch; HSH Nordbank AG; HSH Nordbank AG, Luxembourg Branch; HSH Nordbank AG, New York Branch; HSH Nordbank Securities S.A.	4/30/2014	No	N/A	Eric Belfi
142	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	4/24/2014	No	N/A	Eric Belfi
143	<i>In re Lehman Bros. Equity/Debt Securities Litigation, No. 08-cv-5523 (S.D.N.Y.)</i>	Securities	City of Edinburgh Council as Administering Authority for the Lothian Pension Fund	4/16/2014	No	N/A	Eric Belfi
144	<i>Bayerische Landesbank v. HSBC Holdings plc, No. 654581/2012 (Sup. Ct. N.Y. Cty.)</i>	RMBS	Bayerische Landesbank	4/9/2014	No	N/A	Eric Belfi
145	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	3/25/2014	No	N/A	Eric Belfi
146	<i>City of St. Clair Shores General Employees Retirement System v. Lender Processing Services, Inc., No. 10-cv-1073 (M.D. Fla.)</i>	Securities	Baltimore County Employees' Retirement System	3/4/2014	No	N/A	Eric Belfi
147	<i>In re Satyam Computer Services, Ltd. Securities Litigation, No. 09-md-2027 (S.D.N.Y.)</i>	Securities	Mineworkers' Pension Scheme	2/4/2014	No	N/A	Eric Belfi
148	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	1/29/2014	No	N/A	Eric Belfi
149	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	1/21/2014	Yes	No	Eric Belfi
150	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	1/14/2014	Yes	No	Eric Belfi
151	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	12/31/2013	No	N/A	Eric Belfi
152	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	11/15/2013	No	N/A	Eric Belfi

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
153	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	11/15/2013	No	N/A	Eric Belfi
154	<i>Monk v. Johnson & Johnson, No. 10-cv-4841 (D.N.J.)</i>	Securities	FRANKFURT-TRUST Investment GmbH; FRANKFURT-TRUST Investment Luxemburg AG	11/14/2013	Yes	No	Eric Belfi
155	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	10/31/2013	Yes	No	Eric Belfi
156	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	10/31/2013	Yes	No	Eric Belfi
157	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	10/31/2013	Yes	No	Eric Belfi
158	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	10/31/2013	No	N/A	Eric Belfi
159	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	10/31/2013	Yes	No	Eric Belfi
160	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	10/31/2013	No	N/A	Eric Belfi
161	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	10/31/2013	No	N/A	Eric Belfi
162	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	10/31/2013	No	N/A	Eric Belfi
163	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	10/10/2013	Yes	No	Eric Belfi
164	<i>Bank Hapoalim B.M. v. The Goldman Sachs Group, Inc., No. 650319/2013 (Sup. Ct. N.Y. Cty.)</i>	RMBS	Bank Hapoalim B.M.	9/23/2013	No	N/A	Eric Belfi
165	<i>In re Computer Sciences Corp. Securities Litigation, No. 11-cv-0610 (E.D. Va.)</i>	Securities	Ontario Teachers' Pension Plan Board	9/20/2013	No	N/A	Eric Belfi

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
166	<i>Bank Hapoalim B.M. v. JP Morgan Chase & Co., No. 652799/2012 (Sup. Ct. N.Y. Cty.)</i>	RMBS	Bank Hapoalim B.M.	8/23/2013	No	N/A	Eric Belfi
167	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	8/15/2013	Yes	No	Eric Belfi
168	<i>Hoppaugh v. K12 Inc., No. 12-cv-0103 (E.D. Va.)</i>	Securities	Arkansas Teacher Retirement System	7/25/2013	Yes	Yes	Eric Belfi
169	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	6/10/2013	No	N/A	Eric Belfi
170	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	5/24/2013	Yes	No	Eric Belfi
171	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	5/24/2013	No	N/A	Eric Belfi
172	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	5/7/2013	Yes	No	Eric Belfi
173	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	4/17/2013	Yes	No	Eric Belfi
174	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	3/25/2013	Yes	No	Eric Belfi
175	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	3/13/2013	Yes	No	Eric Belfi
176	<i>In re PSS World Medical Inc., No. 016771-1 (Fla.) 2012-CA-013015</i>	Delaware	Baltimore County Employees' Retirement System	3/8/2013	No	N/A	Eric Belfi
177	<i>HSH Nordbank AG v. JPMorgan Chase Bank, N.A., No. 652416/2011 (Sup. Ct. N.Y. Cty.)</i>	RMBS	HSH Nordbank AG and HSH Nordbank Securities S.A.	12/20/2012	No	N/A	Eric Belfi
178	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	11/2012	Yes	No	Eric Belfi

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
179	Cornwell v. Credit Suisse Group, No. 08-cv-3758 (S.D.N.Y.)	Securities	Irish Life Investment Managers Limited (Representative Party)	7/20/2012	No	N/A	Eric Belfi
180	In re Beckman Coulter, Inc. Securities Litigation, No. 10-cv-1327 (C.D. Cal.)	Securities	Arkansas Teacher Retirement System; Iron Workers District Council of New England Pension Fund	3/2/2012	Yes	Yes (Arkansas Teacher)	Eric Belfi
181	In re Medco Health Solutions Inc. Shareholders Litigation, No. 6720 (Del. Ch.)	Delaware	Labourers Pension Fund of Central and Eastern Canada	11/25/2011	Yes	No	Eric Belfi
182	In re Infineon Technology AG Securities Litigation, No. 04-cv-4156 (N.D. Cal.)	Securities	Reinhard Shroeder	11/1/2011	Yes	No	Eric Belfi
183	In re Wells Fargo Mortgage-Backed Certificates Litigation, No. 09-cv-1376 (N.D. Cal.)	Securities	Plumbers & Steamfitters Local 60 Pension Plan (Labaton Sucharow was additional counsel)	10/27/2011	Yes	No	Eric Belfi
184	In re J. Crew Securities Litigation, No. 6043 (Del. Ch.)	Delaware	New Orleans Employees' Retirement System	8/31/2011	No	N/A	Eric Belfi
185	In re Lawson Software, Inc. Shareholder Litigation, No. 6443 (Del. Ch.)	Delaware	Steamfitters Local 449	6/20/2011	Yes	No	Eric Belfi
186	In re GSI Commerce Litigation, No. 6346 (Del. Ch.)	Delaware	New Orleans Employers/ International Longshoremen's Association, AFL-CIO Pension Fund	6/10/2011	Yes	No	Eric Belfi
187	In re Retail Ventures Inc., No. 11-cv-002078 (Court of Common Pleas Ohio)	Delaware	Steamfitters Local 449 Pension Fund	4/29/2011	Yes	No	Eric Belfi
188	In re Allion Healthcare Inc. Shareholders Litigation, No. 041990/2009 (N.Y. Sup. Ct. Suffolk County)	Delaware	Steamfitters Local 449 Pension Fund	10/20/2010	Yes	No	Eric Belfi
189	In re NovaGold Resources Inc. Securities Litigation, No. 08-cv-7041 (S.D.N.Y.)	Securities	New Orleans Employees' Retirement System	9/10/2010	No	N/A	Eric Belfi
190	In re Able Laboratories Securities Litigation, No. 05-cv-2681 (D.N.J.)	Securities	Genesee County Employees' Retirement System; Deka International (Ireland) Limited	8/25/2010	Yes	No	Eric Belfi
191	Louisiana Municipal Police Employees' Retirement System v. Alvarez, No. 5620 (Del. Ch.); Arkansas Carpenters Pension Fund v. T J X Co Inc., No. 2806 (Del. Ch.)	Delaware	[CONFIDENTIAL]	7/2/2010	Yes	No	Eric Belfi

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
192	<i>In re Burlington Northern Santa Fe Shareholders Litigation, No. 5043 (Del. Ch.); In re Burlington Northern Santa Fe Corp. Shareholders Litigation, No. 348-241465-09 (348th District Court, Tarrant County, Texas)</i>	Delaware	Louisiana Municipal Police Employees' Retirement System	1/18/2010	No	N/A	Eric Belfi
193	<i>In re Molson Coors Brewing Co. Securities Litigation, No. 05-cv-294 (D. Del.)</i>	Securities	Drywall Acoustic Lathing and Insulation Local 675 Pension Fund	5/18/2009	Yes	No	Eric Belfi
194	<i>In re General Motors Corp. Securities & Derivative Litigation, No. 06-md-1749 (E.D. Mich.)</i>	Securities	Deka Investment GmbH; Deka International S.A., Luxembourg	1/6/2009	Yes	No	Eric Belfi
195	<i>In re Escala Group, Inc. Securities Litigation, No. 06-cv-3518 (S.D.N.Y.)</i>	Securities	Capitalia	12/3/2008	Yes	No	Eric Belfi

Greg Ascioia

196	<i>In re Lidoderm Antitrust Litigation, No. 14-md-02521 (N.D. Cal.)</i>	Antitrust	Iron Workers District Council of New England Welfare Fund; Ottavio Gallotto as personal representative of the estate of Letizia Gallotto	2018	Yes	No	Greg Ascioia
197	<i>In re Aggrenox Antitrust Litigation, No. 14-md-02516 (D. Conn.)</i>	Antitrust	Pipefitters Union Local No. 537 Health & Welfare Fund	2018	Yes	No	Greg Ascioia
198	<i>Alaska Electrical Pension Fund v. Bank of America, Corp., No. 14-cv-7126 (S.D.N.Y.) (ISDAFIX)</i>	Antitrust	Genesee County Employees' Retirement System	2018	No	N/A	Greg Ascioia
199	<i>In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation, No. 05-md-01720 (E.D.N.Y.)</i>	Antitrust	Capital Audio Electronics Inc.	2018	No	N/A	Greg Ascioia
200	<i>In re Foreign Exchange Benchmark Rates Antitrust Litigation, No. 13-cv-07789 (S.D.N.Y.)</i>	Antitrust	Boston Retirement System	2018	Yes	No	Greg Ascioia
201	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	2017	Yes	No	Greg Ascioia

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
202	<i>In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation, No. 15-MD-02672 (N.D. Cal.)</i> ***MAIN MDL*** -Original Action- <i>Ruth Jelkmann et al v. Volkswagen Group of America, Inc., No. 2:15-cv-07566 (C.D. Cal.)</i>	Consumer	Ruth Jelkmann; Zoran Baisch; Mark Slaughter; Samuel R. Gates; Laura McNeil; Patrick Cutler; Amy Nelson; Alison Russo; Steven Weise; John Impeduglia; Arthur Thexton	2016	No	N/A	Greg Ascioffa
203	<i>In re Municipal Derivatives Antitrust Litigation, MDL No. 1950, 08-cv-2516 (S.D.N.Y.)</i>	Antitrust	City of Baltimore, Maryland	2016	No	N/A	Greg Ascioffa
204	<i>In re Credit Default Swaps Antitrust Litigation, No. 13-md-2476 (S.D.N.Y.)</i>	Antitrust	Essex Regional Retirement System	2016	Yes	No	Greg Ascioffa
205	<i>In re Air Cargo Shipping Services Antitrust Litigation, No. 06-md-1775 (E.D.N.Y.)</i>	Antitrust	Fleurchem (voluntarily dismissed); Benchmark Export Services, Inc.	2016	No	N/A	Greg Ascioffa
206	<i>In re Capacitors Antitrust Litigation, No. 14-cv-3264 (N.D. Cal.)</i>	Antitrust	Quathimatine Holdings Inc., d/b/a Divicom	2016	Yes	No	Greg Ascioffa
207	<i>In re Commodity Exchange Inc., Gold Futures and Options Trading Litigation, No. 14-md-2548 (S.D.N.Y.)</i>	Antitrust	David Markun	2016	Yes	No	Greg Ascioffa
208	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	2015	No	N/A	Greg Ascioffa
209	<i>In re Lithium-Ion Batteries Antitrust Litigation, No. 13-md-2420 (N.D. Cal.) (Clark v. LG Chem America)</i>	Antitrust	Woodrow Clark II	2015	Yes	No	Greg Ascioffa
210	<i>In re Crude Oil Commodity Futures Litigation, No. 11-cv-3600 (S.D.N.Y.) (WTI)</i>	Antitrust	Stephen Ardizzzone; John Losordo; Adam Harrington	2015	Yes	No	Greg Ascioffa
211	<i>In re Fresh and Processed Potatoes Antitrust Litigation, No. 10-md-2186 (D. Idaho)</i>	Antitrust	Brigiotta Farmland Produce & Garden Center, Inc.	2015	Yes	No	Greg Ascioffa
212	<i>In re Ductile Iron Pipe Fittings Antitrust Litigation, No. 12-cv-711 (D.N.J.)</i>	Antitrust	Hoadley & Sons	2015	Yes	No	Greg Ascioffa

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
213	<i>In re NFL Players' Concussion Injury Litigation</i> , MDL No. 2323 (E.D. Pa.) <i>Jacobs v. NFL</i> , No. 12-cv-01035 (E.D. Pa.) <i>Rucker v. NFL</i> , No. 12-cv-01036 (E.D. Pa.)	Antitrust	N/A	2/2015	No	N/A	Greg Ascioffa
214	<i>Sandhaus v. Bayer AG</i> , No. 00-cv-6193 (Dist. Ct. of Kan., Johnson Cty.)	Antitrust	Rebecca Sandhaus	2015	No	N/A	Greg Ascioffa
215	<i>In re Optiver Commodities Litigation</i> , No. 08-cv-06842 (S.D.N.Y.)	Antitrust	Brendan Cody	2015	No	N/A	Greg Ascioffa
216	<i>In re Pools Products Distribution Market Antitrust Litigation</i> , No. MDL 2328 (E.D. La.)	Antitrust	Aqua Clear	2014	No	N/A	Greg Ascioffa
217	<i>In re NCAA Student-Athlete Name & Likeness Licensing Litigation</i> , No. 09-cv-1967 (N.D. Cal.)	Antitrust	N/A	2014	No	N/A	Greg Ascioffa
218	<i>In re Aftermarket Automotive Lighting Products Antitrust Litigation</i> , No. 09-ml-02007 (C.D. Cal.)	Antitrust	Dynacorn Autobody Parts, Inc.; Sioux Plating Co., Inc.	2014	No	N/A	Greg Ascioffa
219	<i>In re Transpacific Passenger Air Transportation Antitrust Litigation</i> , No. 07-cv-5634 (N.D. Cal.)	Antitrust	N/A	2014	No	N/A	Greg Ascioffa
220	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	2013	No	N/A	Greg Ascioffa
221	<i>In re Automotive Parts Antitrust Litigation</i> , No. 12-md-02311 (E.D. Mich.)	Antitrust	Michael Hupa; Brad Zirulnik ; Ron Blau; Susan LaCava; Arthur Stukey	12/2013	Yes	No (while at Labaton Sucharow)	Greg Ascioffa
222	<i>In re Imprelis Herbicide Marketing, Sales Practices and Products Liability Litigation</i> , No. 11-md-02284 (E.D. Pa.)	Antitrust	Washtenaw Acquisition, LLC; Polo Fields East, LLC; Polo Fields Golf & Country Club, LLC	2013	Yes	No	Greg Ascioffa
223	<i>In re DDAVP Indirect Purchaser Antitrust Litigation</i> , No. 05-cv-2237 (S.D.N.Y.)	Antitrust	Vista Healthplan Inc.; Painters District Council No. 30 Health and Welfare Fund	2013	No	N/A	Greg Ascioffa
224	<i>In re Electronic Books (E-Books) Antitrust Litigation</i> , No. 11-md-02293 (S.D.N.Y.)	Antitrust	Robert Cheatham	2013	No	N/A	Greg Ascioffa

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
225	Fishbein v. All Market Inc., d/b/a/ Vita Coco, No. 11-cv-5580 (S.D.N.Y.)	Antitrust	Stacey Fishbein	2012	No	N/A	Greg Ascioffa
226	In re Refrigerant Compressors Antitrust Litigation, No. 09-md-2042 (E.D. Mich.)	Antitrust	LeBlanc & Assocs; John Lucido	2012	No	N/A	Greg Ascioffa
227	Ace Marine Rigging & Supply, Inc. v. Virginia Harbor Services, No. 11-cv-00436 (C.D. Cal.); Board of Trustees of Commissioners of the Port of New Orleans v. Virginia Harbor Services, No. 11-cv-00437 (C.D. Cal.)	Antitrust	Board of Commissioners of the Port of New Orleans; OSG Lightering LLC	2012	No	N/A	Greg Ascioffa
228	In re Aftermarket Filters Antitrust Litigation, No. 08-cv-4883 (N.D. Ill.)	Antitrust	S&E Quick Lube Distributors, Inc.; Flash Sales, Inc.; William Bruene, d//b/a Lone Star Lube	2012	No	N/A	Greg Ascioffa
229	In re Amaranth Natural Gas Commodities Litigation, No. 07-cv-6377 (S.D.N.Y.)	Antitrust	John F. Special	2012	No	N/A	Greg Ascioffa
230	In re Blood Reagents Antitrust Litigation, No. 09-md-2081 (E.D. Pa.)	Antitrust	Professional Resources Management of Crenshaw LLC d/b/a Crenshaw Community Hospital; Professional Resources Management Inc. d/b/a Bullock County Hospital; Legacy Health System	2012	Yes	No	Greg Ascioffa
231	In re Florida Cement & Concrete Antitrust Litigation, No. 09-cv-23187 (S.D. Fla.)	Antitrust	Daniel Morgan Construction Inc.; Action Ready Mix Concrete; Superior Concrete	2011	No	N/A	Greg Ascioffa
232	In re Polyurethane Foam Antitrust Litigation, No. 10-md-02196 (N.D. Ohio)	Antitrust	Shore-Line Carpet Supplies Inc. (action dismissed); Ace Foam, Inc.	2011	Yes	No	Greg Ascioffa
233	In re Flat Glass Antitrust Litigation (II), No. 08-mc-00180 (W.D. Pa.)	Antitrust	Jackson Glass Company	2011	Yes	No	Greg Ascioffa
234	In re Puerto Rican Cabotage Antitrust Litigation, No. 08-md-01960 (D.P.R.)	Antitrust	Yoly Industrial Supply, Inc.; Magazine Auto, Inc.; X-Press Freight Forwarders; Horizon International Shipping	2011	Yes	No	Greg Ascioffa
235	In re Food Service Equipment Hardware Antitrust Litigation, No. 10-cv-1849 (N.D. Ga.) (Qualserv Corp. v. Kason Industries Inc.)	Antitrust	QualServ Corporation	2010	Yes	No	Greg Ascioffa

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
236	<i>In re Vitamins Antitrust Litigation</i> , No. 99-mc-00197 (D.D.C.)	Antitrust	N/A	1999 (through 2010)	No	N/A	Greg Ascioffa
237	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	2010	No	N/A	Greg Ascioffa
238	<i>In re Packaged Ice Antitrust Litigation</i> , No. 08-md-1952 (E.D. Mich.)	Antitrust	Arkansas Garden Center West and North; Ridge Plaza Inc.; Solid Waste Ltd. Inc. d/b/a Bayland Marina; Thrifty Liquor Inc.; GM Food & Fuel	2009	No	N/A	Greg Ascioffa
239	<i>In re Vioxx Products Liability Litigation</i> , No. MDL 1657 Teamsters Local 237 Funds, No. 0344/2004 (N.Y. Sup. Ct.) Suffolk County, No. C.A. 05-1582 (E.D.N.Y.) International Union of Operating Engineers Local No. 68 Welfare Fund, ATL-L-3015-MT (N.J. Super Ct.)	Antitrust	Teamsters Local 237 Funds; Suffolk County International Union of Operating Engineers Local No. 68 Welfare Fund	2009	No	N/A	Greg Ascioffa
240	<i>In re TFT-LCD (Flat Panel) Antitrust Litigation</i> , MDL 1827, C-07-1827 (N.D. Cal.)	Antitrust	Diplomat Merchandise Corp (voluntarily dismissed)	2009	No	N/A	Greg Ascioffa
241	<i>In re TriCor Indirect Purchaser Antitrust Litigation</i> , No. 05-cv-00360 (D. Del.)	Antitrust	Vista Healthplan Inc.; Allied Service Division Welfare Fund	2009	Yes	No	Greg Ascioffa
242	<i>In re Abbott Labs Norvir Antitrust Litigation</i> , No. 04-cv-01511 (N.D. Cal.)	Antitrust	Service Employees International Union Health and Welfare Fund	2009	No	N/A	Greg Ascioffa
243	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	2009	No	N/A	Greg Ascioffa
244	<i>In re Polyester Staple Antitrust Litigation</i> , No. 03-cv-1516 (W.D.N.C.) <i>Polyester Staple Cases</i> , JCCP 4278 (Sup. Ct. San Francisco)	Antitrust	Fed'l: N/A State: Elise Eidemiller	2003-2008	No	N/A	Greg Ascioffa
245	<i>In re Marine Hose Antitrust Litigation</i> , No. 08-md-1888 (S.D. Fla.)	Antitrust	Bayside Rubber & Products, Inc.	2008	Yes	No	Greg Ascioffa

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
246	<i>In re Reformulated Gasoline (RFG) Antitrust & Patent Litigation, No. 05-ml-1671 (C.D. Cal.)</i>	Antitrust	Corey Rosen	2008	No	N/A	Greg Ascioffa
247	<i>In re Foundry Resins Antitrust Litigation, No. 04-md-01638 (S.D. Ohio)</i>	Antitrust	Hayes-Albion Corp; Harvard Industries, Inc.	2007	Yes	No	Greg Ascioffa
248	<i>In re Hydrogen Peroxide Antitrust Litigation, No. 05-md-01682 (E.D. Pa.)</i>	Antitrust	Atlantis Caribbean Chemical Corp.	2007	Yes	No	Greg Ascioffa
249	<i>In re Ready-Mixed Concrete Antitrust Litigation, No. 05-cv-979 (S.D. Ind.)</i>	Antitrust	M&M Properties of Louisville; MDR Properties of Louisville; 502 Properties; Lyane Enterprises	2007	No	N/A	Greg Ascioffa
250	<i>In re Publication Paper Antitrust Litigation, No. 04-md-1631 (D. Conn.)</i>	Antitrust	Copyrite Inc.; Richard Bentley	2007	No	N/A	Greg Ascioffa
251	<i>In re Pressure Sensitive Labelstock Antitrust Litigation, No. 03-md-01556 (M.D. Pa.)</i>	Antitrust	Pamco Printed Tape & Label Co, Inc.	2007 (settlements continued after 2007)	No	N/A	Greg Ascioffa
252	<i>In re International Air Transportation Surcharge Antitrust Litigation, No. 06-md-1793 (N.D. Cal.)</i>	Antitrust	Kimberly Nelson; Jon Wayman; Michelle Mazzocco	2006 (settlements continued after 2007)	No	N/A	Greg Ascioffa
253	<i>In re Insurance Brokerage Antitrust Litigation (Marsh & McClellan), No. 04-cv-5184 (D.N.J.)</i>	Antitrust	QLM Associates, Inc.	2006 (settlements continued after 2007)	No	N/A	Greg Ascioffa
254	<i>In re New Motor Vehicles Canadian Export Antitrust Litigation, No. 03-md-1532 (D. Me.)</i>	Antitrust	Katherine Barrett Riley; Kenneth Martinez; Susan LaCava; Alison Arrington; Hilary Eliot; John and Angela Nemes	2006 (settlements continued after 2007)	No	N/A	Greg Ascioffa
255	<i>In re Potash Antitrust Litigation, No. 08-cv-6910 (N.D. Ill.)</i>	Antitrust	Kraft Chemical; Thomasville Feed and Seed, Inc.	2003 (settlements continued after 2007)	Yes	No	Greg Ascioffa
Larry Sucharow							
256	<i>Gaines v. Consolidated Capital Institutional Properties, L.P., No 74-115-Y-00419-11) (Cal. State Court) (AIMCO)</i>	Delaware	Ira Gaines	4/26/2012	No	N/A	Larry Sucharow

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
Ned Weinberger							
257	<i>Silberberg v. Acacia Communications, Inc.</i> , No. 2018-0262 (Del. Ch.)	Delaware	Gary Silberberg	7/19/2018	No	N/A	Ned Weinberger
258	<i>In re Sears Holdings Corporation Stockholder and Derivative Litigation</i> , No. 11081 (Del. Ch.)	Delaware	Cambridge Retirement System	Resolved in 2017	No	N/A	Ned Weinberger
259	<i>Hong v. Hovnanian</i> , No. 12999 (Del. Ch.)	Delaware	Joseph Hong	12/18/2017	No	N/A	Ned Weinberger
260	<i>Lashkari v. Chipotle Mexican Grill, Inc.</i> , No. 16-cv-03180 (D. Colo.) -Consolidated with- <i>Gubricky v. Ells</i> , No. 16-cv-02011 (D. Colo.)	Delaware	Cyrus Lashkari; Sean Gubricki	9/29/2017	Yes	No	Ned Weinberger
261	<i>Haverhill Retirement System v. Kerley</i> , No. 11149 (Del. Ch.) (Providence Service Corp.)	Delaware	Haverhill Retirement System	6/23/2017	Yes	No	Ned Weinberger
262	<i>Alpha Venture Capital Partners, L.P. v. Elam</i> , No. 2017-0239 (Del. Ch.) (AntriaBio, Inc.)	Delaware	Alpha Venture Capital Partners, LP	6/15/2017	No	N/A	Ned Weinberger
263	<i>Norfolk County Retirement System v. Aaron's Inc.</i> , No. 14-A-02937-4 (Super. Ct. Gwinnett Cty.)	Delaware	Norfolk County Retirement System	Resolved in 2016	Yes	No	Ned Weinberger
264	<i>In re Vaalco Energy, Inc. Consolidated Stockholder Litigation</i> , No. 11775 (Del. Ch.)	Delaware	George Shapiro	2016	Yes	No	Ned Weinberger
265	<i>Norfolk County Retirement System v. Cardoso</i> , No. 15-cv-01507 (D. Conn.) (Hubbell Inc.)	Delaware	Norfolk County Retirement System	2016	Yes	No	Ned Weinberger
266	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	5/5/2016	Yes	No	Ned Weinberger
267	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	4/21/2016	Yes	No	Ned Weinberger
268	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	2/5/2016	Yes	No	Ned Weinberger

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
269	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	2/5/2016	No	N/A	Ned Weinberger
270	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	2/1/2016	Yes	No	Ned Weinberger
271	<i>City of Atlanta FireFighters Pension Fund v. Creel, No. 9924 (Del. Ch.) (URS Corp.)</i>	Delaware	Cambridge Retirement System; Oklahoma Police Pension and Retirement System	Resolved in 2015	Yes	No	Ned Weinberger
272	<i>State Boston Retirement System v. Wildrick, No. 9291 (Del. Ch.) (Jos. A. Bank Clothiers, Inc.)</i>	Delaware	Boston Retirement System	Resolved in 2015	Yes	No	Ned Weinberger
273	<i>Norfolk County Retirement System v. Sangwoo Ahn & Furmanite Corp., No. 10727 (Del. Ch.) (Furmanite)</i>	Delaware	Norfolk County Retirement System	Resolved in 2015	Yes	No	Ned Weinberger
274	<i>In re Colfax Corporation Stockholder Derivative Litigation, No. 10447 (Del. Ch.)</i>	Delaware	West Palm Beach Police Pension Fund	Resolved in 2015	No	N/A	Ned Weinberger
275	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	Resolved in 2015	Yes	No	Ned Weinberger
276	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	2015	Yes	No	Ned Weinberger
277	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	2015	Yes	No	Ned Weinberger
278	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	11/30/2015	Yes	No	Ned Weinberger
279	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	11/24/2015	Yes	No	Ned Weinberger
280	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	11/16/2015	Yes	No	Ned Weinberger
281	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	11/5/2015	Yes	No	Ned Weinberger

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
282	[CONFIDENTIAL] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	11/4/2015	No	N/A	Ned Weinberger
283	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	10/30/2015	Yes	No	Ned Weinberger
284	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	10/20/2015	Yes	No	Ned Weinberger
285	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	10/15/2015	Yes	No	Ned Weinberger
286	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	10/12/2015	Yes	No	Ned Weinberger
287	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	9/18/2015	Yes	No	Ned Weinberger
288	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	9/16/2015	Yes	No	Ned Weinberger
289	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	9/9/2015	Yes	No	Ned Weinberger
290	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	9/8/2015	Yes	No	Ned Weinberger
291	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	9/3/2015	Yes	No	Ned Weinberger
292	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	9/3/2015	Yes	No	Ned Weinberger
293	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	9/3/2015	Yes	No	Ned Weinberger
294	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	9/2/2015	Yes	No	Ned Weinberger

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
295	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	9/1/2015	Yes	No	Ned Weinberger
296	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	9/1/2015	Yes	No	Ned Weinberger
297	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	7/21/2015	Yes	No	Ned Weinberger
298	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	7/20/2015	Yes	No	Ned Weinberger
299	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	7/16/2015	Yes	No	Ned Weinberger
300	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	7/16/2015	Yes	No	Ned Weinberger
301	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	7/15/2015	Yes	No	Ned Weinberger
302	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	7/13/2015	Yes	No	Ned Weinberger
303	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	7/10/2015	Yes	No	Ned Weinberger
304	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	7/6/2015	Yes	No	Ned Weinberger
305	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	7/1/2015	Yes	No	Ned Weinberger
306	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	6/30/2015	No	N/A	Ned Weinberger
307	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	6/29/2015	Yes	No	Ned Weinberger

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
308	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	6/22/2015	Yes	No	Ned Weinberger
309	<i>Cambridge Retirement System v. Unilife Corp., No. 9178 (Del. Ch.)</i>	Delaware	Cambridge Retirement System	6/4/2015	Yes	No	Ned Weinberger
310	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	5/27/2015	Yes	No	Ned Weinberger
311	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	5/14/2015	Yes	No	Ned Weinberger
312	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	5/5/2015	Yes	No	Ned Weinberger
313	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	2/18/2015	Yes	No	Ned Weinberger
314	<i>Haverhill Retirement System v. Asali, No. 9474 (Del. Ch.) (Harbinger)</i>	Delaware	Haverhill Retirement System	12/23/2014	Yes	No	Ned Weinberger
315	<i>Belmont Mass. Contributory Retirement System v. RLI Corp., No. 2014-CH-11951 (Cook Cty. Ill.)</i>	Delaware	Belmont Mass. Contributory Retirement System	12/15/2014	Yes	No	Ned Weinberger
316	<i>In re Arthrocare Corp. Stockholder Litigation, No. 9313 (Del. Ch.)</i>	Delaware	Boston Retirement System	8/4/2014	Yes	No	Ned Weinberger
Tom Dubbs							
317	<i>Connecticut Retirement Plans & Trust Funds v. Amgen Inc., No. 07-cv-2536 (C.D. Cal.)</i>	Securities	Connecticut Retirement Plans & Trust Funds	10/26/2016	No	N/A	Tom Dubbs
318	<i>In re American International Group Securities Litigation, No. 04-cv-8141 (S.D.N.Y.)</i>	Securities	Ohio Public Employees Retirement System; State Teachers Retirement System of Ohio; Ohio Police & Fire Pension Fund	9/11/2013	No	N/A	Tom Dubbs
319	<i>In re Broadcom Corp. Class Action Litigation, No. 06-cv-5036 (C.D. Cal.)</i>	Securities	New Mexico State Investment Council	12/4/2012	No	N/A	Tom Dubbs

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
320	<i>In re Bear Stearns Cos. Inc. Securities, Derivative & ERISA Litigation, No. 08-cv-2793 (S.D.N.Y.)</i>	Securities	State Treasurer of the State of Michigan, Custodian of the Michigan Public School Employees Retirement System; State Employees' Retirement System; Michigan State Police Retirement System; Michigan Judges Retirement System	11/29/2012	No	N/A	Tom Dubbs
321	<i>Eastwood Enterprises, LLC v. Farha, No. 07-cv-1940 (M.D. Fla.) (WellCare Health Plans)</i>	Securities	New Mexico State Investment Council; Public Employees Retirement Association of New Mexico	5/4/2011	No	N/A	Tom Dubbs
322	<i>In re HealthSouth Securities Litigation, No. 03-cv-1500 (N.D. Ala.)</i>	Securities	New Mexico State Investment Council; the Educational Retirement Board of New Mexico	7/26/2010	No	N/A	Tom Dubbs
323	<i>In re Vesta Insurance Group. Inc. Securities Litigation, No. 98-cv-1407 (N.D. Ala.)</i>	Securities	The State Board of Administration of Florida	12/12/2008	No	N/A	Tom Dubbs
324	<i>In re St. Paul Travelers Securities Litigation II, No. 04-cv-4697 (D. Minn.)</i>	Securities	Educational Retirement Board of New Mexico	7/24/2008	No	N/A	Tom Dubbs

Exhibit B

Settled Cases – 2018 Through July 2007 Supplement

	Case Name	Case Type	Firm Clients	Date Settled	Referral Obligation?	Bare Referral?	Responsible Attorney
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Recently Settled Confidential Matter

1	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	9/10/2018	No	N/A	Eric Belfi
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Additional Confidential Matter

2	[CONFIDENTIAL MATTER] HIGHLY CONFIDENTIAL	[CONFIDENTIAL]	[CONFIDENTIAL]	2012	No	N/A	Eric Belfi
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Exhibit C

DECLARATION OF MICHAEL P. CANTY

I, Michael P. Canty, declare as follows:

1. I am an attorney duly licensed to practice law in the state of New York. I am a partner of Labaton Sucharow LLP (“Labaton Sucharow” or “the Firm”). I joined the Firm in November 2016, as a partner, and was appointed General Counsel in July 2018.

2. This declaration explains the steps taken to assemble and provide information for the Honorable Garrett E. Brown, (Ret.) pursuant to his retention by Labaton Sucharow in an effort to ascertain whether any bare referrals were paid in any cases settled by the Firm beginning in July 2007 to the present. July 2007 was selected as the start date because this coincides with the date the Firm was re-organized as a plaintiffs’ firm.

3. At my direction, a chart was prepared that included all settled cases at the Firm beginning in July 2007 (“Settlement Chart”). See Attachment A for steps taken to produce the Settlement Chart. The Settlement Chart was assembled based on information and records kept by each department at the Firm – Securities, Antitrust, Delaware, RMBS and Consumer. Cases involving Whistleblower settlements were provided to Judge Brown during the interview process and not included in Settlement Chart due to the sensitive nature of those matters.

5. For each case, information was included in the Settlement Chart as to the (1) Case Type, (2) Firm Client, (3) Date Settled, (4) Referral Obligation, (5) whether the referral was a bare referral, and (6) the Responsible Attorney.

6. The Responsible Attorney either (1) worked on the case assigned to him in the Settlement Chart and has personal knowledge of the case (including whether there was a referral relationship and the work performed by the referring attorney) and/or reviewed records to confirm this information, or (2) did not work on the case, but reviewed records to determine if there was a referral relationship and the work performed by the referring attorney. An attorney was assigned to be a Responsible Attorney for cases he did not work on in situations where the attorneys who worked on the case have since left the firm.

7. The Responsible Attorney was responsible for reviewing each individual case assigned to him in the Settlement Chart and determining, based on his own experience working on the case, and/or a review of the accounting file and case file, the status of the referral obligation, if any.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of December, 2018.


Michael P. Canty

Attachment A

In order to assemble the list of settled cases from July 2007 to the present, Labaton Sucharow attorneys from the Compliance Department went to each practice group at the Firm – Securities, Antitrust, Delaware, RMBS, and Consumer -- to assist in preparing the chart.

For each practice group, the Compliance Department had paralegals and/or attorneys obtain information from each practice group's records as to all cases that had been settled from July 2007 until the present. These paralegals and/or attorneys used sources including case lists submitted to clients through the RFP process, cases compiled on the firm website, internal lists of cases kept by paralegals and assistants, internal lists of matter numbers kept by paralegals and assistants, and canvassing individual attorneys for institutional knowledge on settled cases. Once these records were obtained, additional records were reviewed, including records from the accounting department to ensure the list included all cases known to the Firm that settled between July 2007 and the present.

After a complete list of cases was compiled, the Firm undertook the task of determining who the Firm client was for each of the listed cases. These names were obtained by either firsthand knowledge of attorneys at the firm, a review of the case files, or a review of submissions to the court associated with the cases. Once it was determined who the Firm client was, the Compliance Department confirmed the date that the case settled by reviewing the records of settlement payments or by reviewing court documents to see when final approval of a settlement was granted.

The Firm then assigned a Responsible Attorney to review each case. The Responsible Attorney either (1) worked on the case assigned to him in the Settlement Chart and has personal knowledge of the case (including whether there was a referral relationship and the work performed by the referring attorney) and/or reviewed records to confirm this information, or (2) did not work on the case, but reviewed records to determine if there was a referral relationship and the work performed by the referring attorney.

After determining (1) the full list of cases (2) the date each case or matter settled and (3) the Responsible Attorney, attorneys and paralegals of the Firm researched whether or not a case or matter had a referral obligation.

For a large number of cases, the Responsible Attorney had firsthand knowledge of whether there was in fact a referral obligation, and in the cases where there was a referral obligation, the work done by the referring attorney or law firm. Once the Responsible Attorney determined that the particular law firm or lawyer was not a bare referral obligation, the Compliance Department along with the Responsible Attorney reviewed accounting records to corroborate the payment and to ensure that there were no additional referral payments made in the case.

For those cases where the Responsible Attorney had no specific recollection about whether there was a referral obligation in a specific matter, the Compliance Department located accounting records to determine whether there were any payments made to outside attorneys or law firms. If there was a payment to an outside lawyer or law firm, additional materials including court filings

and emails were searched to determine whether the attorney or law firm referred the client and if so, what work the attorney or law firm provided in the representation of the client.

Once the list was completed regarding whether there were referral fees, an additional investigation was conducted to determine the accuracy of the claim that there was no referral obligation on a certain case. Specifically, the Compliance Department reviewed accounting records for each case that listed no referral obligation to corroborate that there were no referral fees paid.

Prior to being interviewed by Judge Garrett Brown (Ret.), both the General Counsel and the Chief Compliance Officer at Labaton Sucharow met with all Responsible Attorneys and inquired as to the information provided in the chart. The Responsible Attorney was asked to provide specific evidence outlining the type of work done by the referring attorney or law firm to corroborate that there were no bare referral obligations outside of the fees paid to Damon Chargois.

Lastly, Judge Brown interviewed all of the Responsible Attorneys to inquire as to the determinations they made with respect to all cases listed. After being interviewed by Judge Brown, the Responsible Attorneys again reviewed the list of cases to check that the information was accurate and provided a declaration with respect to the information provided both in the chart and to Judge Brown.

The preparation of the chart, the review of the materials, and the interview process required substantial time from Labaton Sucharow attorneys and staff. The majority of the work occurred in the week leading up to the Thanksgiving holiday and over the Thanksgiving weekend. In total, over 29 individuals were involved in this time intensive process and spent approximately 913 hours of their time to complete this task.

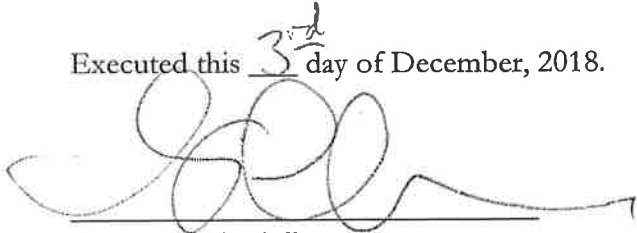
Exhibit D

DECLARATION OF GREGORY S. ASCIOLLA

I, Gregory S. Ascioffa, declare as follows:

1. I am an attorney duly licensed to practice law in the state of New York. I am a partner of Labaton Sucharow LLP ("Labaton Sucharow" or "the Firm"). I joined the Firm in April 2007 as an associate and was elevated to partner in February 2013.
2. I am the co-chair of the Antitrust practice group, and I am responsible for overseeing the cases prosecuted by the Antitrust practice group.
3. I have been provided with the chart that includes all of the Firm's settled cases from July 2007 to the present ("Settlement Chart"). I specifically reviewed the cases on the Settlement Chart where I have been designated the Responsible Attorney and determined, based on my own experience working on the case, and/or a review of the accounting file and case file, the existence and nature of the referral obligation, if any.
4. Based on my personal knowledge and/or an inquiry into the payments made to referring counsel on these cases, I attest that none of those cases – except for those referenced in No. 5 below - involved the payment of a bare referral fee by the Firm to any law firm or attorney.
5. Aside from the cases which involved a bare referral fee paid by the Firm to Damon Chargois, I am not aware of any bare referral agreement between the Firm and any law firm or attorney concerning any case presently or previously prosecuted by Labaton Sucharow.
6. I understand a bare referral to mean an agreement, whether written or unwritten, where Labaton Sucharow would share a fee with any lawyer or law firm solely for assistance in obtaining clients for Labaton Sucharow.
7. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 3rd day of December, 2018.



Gregory S. Ascioffa

Exhibit E

DECLARATION OF ERIC J. BELFI

I, Eric J. Belfi, declare as follows:

1. I am an attorney duly licensed to practice law in the state of New York. I am a partner of Labaton Sucharow LLP ("Labaton Sucharow" or "the Firm"). I joined the Firm in 2006 as a partner.
2. As a partner at Labaton Sucharow, I primarily engage in business development, which means I develop clients that have retained the Firm for portfolio monitoring or litigation.
3. I have been provided with the chart that includes all of the Firm's settled cases from July 2007 to the present ("Settlement Chart"). I specifically reviewed the cases on the Settlement Chart where I have been designated the Responsible Attorney and determined, based on my own experience working on the case, and/or a review of the accounting file and case file, the existence and nature of the referral obligation, if any.
4. Based on my personal knowledge and/or an inquiry into the payments made to referring counsel on these cases, I attest that none of those cases – except for those referenced in No. 5 below - involved the payment of a bare referral fee by the Firm to any law firm or attorney.
5. Aside from the cases which involved a bare referral fee paid by the Firm to Damon Chargois, I am not aware of any bare referral agreement between the Firm and any law firm or attorney concerning any case presently or previously prosecuted by Labaton Sucharow.
6. I understand a bare referral to mean an agreement, whether written or unwritten, where Labaton Sucharow would share a fee with any lawyer or law firm solely for assistance in obtaining clients for Labaton Sucharow.
7. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 4th day of December, 2018.



Eric J. Belfi

Exhibit F

DECLARATION OF THOMAS A. DUBBS

I, Thomas A. Dubbs, declare as follows:

1. I am an attorney duly licensed to practice law in the state of New York. I am a partner of Labaton Sucharow LLP ("Labaton Sucharow" or "the Firm"). I joined the Firm on February 1, 1998 as a partner.
2. I am the head of a Securities practice group, and I am also a member of the Executive Committee for the Firm.
3. I have been provided with the chart that includes all of the Firm's settled cases from July 2007 to the present ("Settlement Chart"). I specifically reviewed the cases on the Settlement Chart where I have been designated the Responsible Attorney and determined, based on my own experience working on the case, and/or a review of the accounting file and case file, the existence and nature of the referral obligation, if any.
4. Based on my personal knowledge I attest that none of those cases where I am listed as the Responsible Attorney involved the payment of a bare referral fee by the Firm to any law firm or attorney.
5. Aside from the cases which involved a bare referral fee paid by the Firm to Damon Chargois, I am not aware of any bare referral agreement between the Firm and any law firm or attorney concerning any case presently or previously prosecuted by Labaton Sucharow.
6. I understand a bare referral to mean an agreement, whether written or unwritten, where Labaton Sucharow would share a fee with any lawyer or law firm solely for assistance in obtaining clients for Labaton Sucharow.
7. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11th day of December, 2018.



Thomas A. Dubbs

Exhibit G

DECLARATION OF CHRISTOPHER J. KELLER

I, Christopher J. Keller, declare as follows:

1. I am an attorney duly licensed to practice law in the states of New York and Ohio. I am a partner of Labaton Sucharow LLP ("Labaton Sucharow" or "the Firm"). I joined the Firm in March 2000 as an associate and was elevated to partner in 2005.
2. I am the Co-Chairman of the Firm. As Co-Chairman, I manage the day-to-day operations of the Firm. I also engage in business development, which means I develop clients that have retained the Firm for portfolio monitoring or litigation.
3. I have been provided with the chart that includes all of the Firm's settled cases from July 2007 to the present ("Settlement Chart"). I specifically reviewed the cases on the Settlement Chart where I have been designated the Responsible Attorney and determined, based on my own experience working on the case, and/or a review of the accounting file and case file, the existence and nature of the referral obligation, if any.
4. Based on my personal knowledge and/or an inquiry into the payments made to referring counsel on these cases, I attest that none of those cases – except for those referenced in No. 5 below - involved the payment of a bare referral fee by the Firm to any law firm or attorney.
5. Aside from the cases which involved a bare referral fee paid by the Firm to Damon Chargois, I am not aware of any bare referral agreement between the Firm and any law firm or attorney concerning any case presently or previously prosecuted by Labaton Sucharow.
6. I understand a bare referral to mean an agreement, whether written or unwritten, where Labaton Sucharow would share a fee with any lawyer or law firm solely for assistance in obtaining clients for Labaton Sucharow.
7. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5 day of December, 2018.

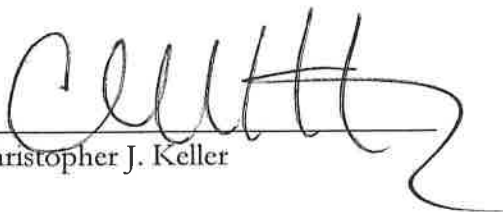

Christopher J. Keller

Exhibit H

DECLARATION OF LAWRENCE A. SUCHAROW

I, Lawrence A. Sucharow, declare as follows:

1. I am an attorney duly licensed to practice law in the state of New York. I am a partner of Labaton Sucharow LLP ("Labaton Sucharow" or "the Firm"). I joined the Firm in 1977 as an associate and was elevated to partner in 1983.
2. As Co-Chairman I assist in strategic planning and provide advice and direction to the Firm.
3. I have been provided with the chart that includes all of the Firm's settled cases from July 2007 to the present ("Settlement Chart"). I specifically reviewed the case on the Settlement Chart where I have been designated the Responsible Attorney and determined, based on my own experience working on the case, the existence and nature of the referral obligation, if any.
4. Based on my personal knowledge, I attest that for the case where I am designated the Responsible Attorney there was no referring attorney, and therefore, no referral payment.
5. Aside from the cases which involved a bare referral fee paid by the Firm to Damon Chargois, I am not aware of any bare referral agreement between the Firm and any law firm or attorney concerning any case presently or previously prosecuted by Labaton Sucharow.
6. I understand a bare referral to mean an agreement, whether written or unwritten, where Labaton Sucharow would share a fee with any lawyer or law firm solely for assistance in obtaining clients for Labaton Sucharow.
7. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7th day of December, 2018.



Lawrence A. Sucharow

Exhibit I

DECLARATION OF JORDAN A. THOMAS

I, Jordan A. Thomas, declare as follows:

1. I am an attorney duly licensed to practice law in the state of New York, Washington D.C., Virginia, and New Mexico. I am a partner of Labaton Sucharow LLP ("Labaton Sucharow" or "the Firm"). I joined the Firm in July 2011 as a partner.
2. I am the founding member and the head of the Firm's Whistleblower practice group. As the head of the Whistleblower practice group, I am responsible for overseeing all of the Firm's Whistleblower matters.
3. As I discussed with Judge Brown on November 30, 2018, eleven Whistleblower matters have awards pending or have been paid since I started the Whistleblower practice in 2011. I have worked on all of those matters, and I have personal knowledge of the existence and nature of referral obligations in those cases.
4. Based on my personal knowledge I attest that three of those eleven matters had referring counsel. None of those referrals were bare referrals. The other eight cases did not have referring counsel.
5. Due to the specialized nature of my whistleblower practice, our remote working arrangements, and the Chinese wall that exists between the whistleblower practice and the rest of the firm, I have no personal knowledge about any business dealings, including referral agreements, between the rest of the Firm and Damon Chargois or any other attorney or law firm.
6. I understand a bare referral to mean a referral fee paid to an attorney who refers a client, where the referring attorney does not do any work for the fee.
7. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of December, 2018.



Jordan A. Thomas

Exhibit J

DECLARATION OF NED WEINBERGER

I, Ned Weinberger, declare as follows:

1. I am an attorney duly licensed to practice law in the state of Delaware. I am a partner of Labaton Sucharow LLP (“Labaton Sucharow” or “the Firm”). I joined the Firm in September 2013 as an associate and was elevated to partner in 2016.
2. I am the head of the Delaware practice group. I am responsible for overseeing the cases prosecuted by the Delaware practice group. The Delaware practice group specializes in corporate governance and transactional litigation, including class, derivative, and appraisal actions.
3. I have been provided with the chart that includes all of the Firm’s settled cases from July 2007 to the present (“Settlement Chart”). I specifically reviewed the cases on the Settlement Chart where I have been designated the Responsible Attorney and determined, based on my own experience working on the case, and/or a review of the accounting file and case file, the existence and nature of the referral obligation, if any.
4. Based on my personal knowledge and/or an inquiry into the payments made to referring counsel on these cases, I attest that none of those cases – except for those referenced in No. 5 below - involved the payment of a bare referral fee by the Firm to any law firm or attorney.
5. Aside from the cases which involved a bare referral fee paid by the Firm to Damon Chargois, I am not aware of any bare referral agreement between the Firm and any law firm or attorney concerning any case presently or previously prosecuted by Labaton Sucharow.
6. I understand a bare referral to mean an agreement, whether written or unwritten, where Labaton Sucharow would share a fee with any lawyer or law firm solely for assistance in obtaining clients for Labaton Sucharow.
7. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 3rd day of December, 2018.



Ned Weinberger