

COHN LIFLAND PEARLMAN
HERRMANN & KNOPF LLP
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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

LINCOLN ADVENTURES, LLC, a
Delaware Limited Liability Company,
and MICHIGAN MULTI-KING, INC.,
a Michigan Corporation, on Behalf of
Themselves and All Those Similarly
Situating,

Plaintiffs,

vs.

THOSE CERTAIN UNDERWRITERS
AT LLOYD'S, LONDON MEMBERS
OF SYNDICATES, et al.

Defendants.

) No. 2:08-cv-00235-CCC-JSA

) CLASS ACTION

) DECLARATION OF MATTHEW F.

) GATELY FILED ON BEHALF OF

) COHN LIFLAND PEARLMAN

) HERRMAN & KNOPF LLP IN

) SUPPORT OF PLAINTIFFS'

) APPLICATION FOR AWARD OF

) ATTORNEYS' FEES AND EXPENSES

_____)

I, Matthew F. Gately, declare as follows:

1. I am senior counsel with the firm of Cohn Lifland Pearlman Herrmann & Knopf LLP. I am submitting this declaration in support of Plaintiffs' application for an award of attorneys' fees and expenses ("expenses") in connection with services rendered in the above-entitled action.

2. This firm is counsel of record for Plaintiffs.

3. The information in this declaration regarding the firm's time and expenses is taken from time and expense printouts and supporting documentation prepared and/or maintained by the firm in the ordinary course of business. I am the attorney who oversaw and/or conducted the day-to-day activities in the litigation and I reviewed these printouts (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

4. The number of hours spent on this litigation from October 16, 2023 through July 31, 2026, by my firm is 35.2. A breakdown of the lodestar is provided in Exhibit A. The lodestar amount for attorney/paraprofessional time based on the firm's current rates is \$28,670.00. The hourly rates shown in Exhibit A are the usual and customary rates set by the firm for each individual.

5. From October 16, 2023 through July 31, 2026, my firm's total expenses/charges in connection with the prosecution of the litigation are \$25,803.40. Those are summarized by category in Exhibit B.

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

(a) Transportation, Tolls and Parking: \$23.72. In connection with the prosecution of this case, the firm has paid for travel expenses to, among other things, attend court hearings and meet with other counsel. To date, destination and purpose of each trip is set forth in Exhibit C.

(b) Court Hearing Transcripts: \$154.10. The vendors who were paid for hearing transcripts are listed in Exhibit D.

(c) Online Legal and Financial Research: \$79.10. This category includes vendors such as Westlaw and LEXIS. These resources were used to obtain access to factual databases, legal research and for cite-checking of briefs. This expense represents the expense incurred by the firm for use of these services in connection with this litigation. The charges for these vendors vary depending upon the type of services requested.

(d) Contributions to Litigation Expense Fund (not previously reimbursed): \$25,500.00. Robbins Geller Rudman & Dowd LLP maintain a litigation expense fund for certain common expenses in connection with the prosecution of this case. A breakdown of that fund can be found at Exhibit D to the Declaration of Alexandra S. Bernay Filed on Behalf of Robbins Geller Rudman & Dowd LLP in Support of Application for Award of Attorneys' Fees and Expenses.

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

8. The identification and background of my firm and its partners is attached hereto as Exhibit E.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and accurate. Executed this 18th day of September, 2026, at Saddle Brook, New Jersey.

/s/ Matthew F. Gately
Matthew F. Gately

EXHIBIT A

EXHIBIT A

***Lincoln Adventures, LLC, et al. v. Those Certain Underwriters at Lloyd's
London Members of Syndicates, et al.,
No. 2:08-cv-00235-CCC-JSA***

**Cohn Lifland Pearlman Herrmann & Knopf LLP
October 16, 2023 through July 31, 2026**

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Peter S. Pearlman	(P)	18.6	900	16,740.00
Matthew F. Gately	(P)	15.30	750	11,475.00
Michael Alderman	(A)	.50	550	275.00
Paralegals/Paraprofessionals				
Melinda Lugo	(PL)	.8	225	180.00
		35.2		<i>28,670.00</i>

(P) Partner

(A) Associate

(PL) Paralegals/Paraprofessionals

EXHIBIT B

EXHIBIT B

***Lincoln Adventures, LLC, et al. v. Those Certain Underwriters at Lloyd's
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**Cohn Lifland Pearlman Herrmann & Knopf LLP
October 16, 2023 through July 31, 2026**

<i>CATEGORY</i>	<i>AMOUNT</i>
Transportation, Tolls and Parking	\$ 23.72
Court Hearing Transcripts	\$ 154.10
FedEx and Postage	\$ 46.48
Online Legal and Financial Research	\$ 79.10
Litigation Fund Contribution	\$25,500.00
<i>TOTAL</i>	<i>\$25,803.40</i>

EXHIBIT C

***Lincoln Adventures, LLC, et al. v. Those Certain Underwriters at Lloyd's
London Members of Syndicates, et al.,
No. 2:08-cv-00235-CCC-JSA***

Cohn Lifland Pearlman Herrmann & Knopf LLP

Transportation, Tolls and Parking: \$23.72

<i>NAME</i>	<i>DATE</i>	<i>DESTINATION</i>	<i>PURPOSE</i>
Matthew F. Gately	12/18/2023	Tolls to Courthouse	Approval Hearing
Matthew F. Gately	12/18/2023	Parking at Courthouse	Approval Hearing

EXHIBIT D

***Lincoln Adventures, LLC, et al. v. Those Certain Underwriters at Lloyd's
London Members of Syndicates, et al.,
No. 2:08-cv-00235-CCC-JSA***

Cohn Lifland Pearlman Herrmann & Knopf LLP

Court Hearing Transcripts: \$154.10

<i>DATE</i>	<i>VENDOR</i>	<i>PURPOSE</i>
1/22/2024	Rhea Matteo, CSR, Inc.	Transcript

EXHIBIT E

COHN LIFLAND PEARLMAN HERRMANN & KNOPF LLP

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Founded in 1924, Cohn Lifland is a firm dedicated to the general practice of law at the highest level of professional competence, striving to achieve maximum benefit for our clients in the most efficient and professionally responsible manner. The Firm has a wide-ranging litigation practice at both the trial and appellate levels of the federal and New Jersey state court systems.

Many members of our firm are recognized experts in their particular areas of practice and have written, lectured, and taught regularly. Articles authored by firm members have been published in leading legal publications and repeatedly cited in reported decisions including those of the New Jersey Supreme Court. Cohn Lifland is consulted frequently by other members of the bar throughout the United States and the Firm acts as counsel in New Jersey to more than 100 leading law firms and practitioners both from within and without the state.

Our clientele includes many national and international corporations, local and regional companies, the State of New Jersey (which we represent in both securities and environmental litigation), government agencies, and pension funds, as well as individuals from all walks of life, presenting problems requiring a high degree of professional skill and practical counseling.

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Above all we take great pride in the high quality of services rendered and in our steadfast dedication to the diligent representation of the interests of each of our clients.

As relates to this application, Cohn Lifland has a particularly expansive and impressive record of handling complex, high-stakes class and derivative litigation, in the areas of corporate and securities fraud, lender and accounts' liability, consumer protection, franchise, antitrust, *qui tam*, RICO, employment, and intellectual property. In these areas of law, the Firm has achieved both significant recoveries and set important precedent. Cohn Lifland's representative matters include the following matters in which it has served as lead, co-lead, liaison counsel, or in which it has played a significant and substantive role:

- *In re Lucent Securities Litigation* (D.N.J.) (\$517 million recovery);
- *In re Diet Drug Litigation*, No. MRS-L-3042-97 (N.J. Sup. Ct.) (\$2.5 billion total recovery);
- *In re AT&T Securities Litigation*, 455 F.3d 160 (3d Cir. 2006) (\$100 million settlement for the benefit of the class);
- *Castro v. Sanofi Pasteur, Inc.*, 137 F. Supp. 3d 820 (D.N.J. 2015) (\$61.5 million settlement for the benefit of the class);
- *City of Sterling Heights General Employees' Retirement System v. Prudential Financial, Inc.*, 2015 WL 5097883 (D.N.J. Aug. 31, 2015) (\$33 million settlement for the benefit of the class);
- *In re Honeywell International Securities Litigation*, 211 F.R.D. 255 (D.N.J. 2002) and 182 F. Supp. 2d 414 (D.N.J. 2002) (\$100 million settlement obtained for the benefit of the class);

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- *In re K-Dur Antitrust Litigation*, 686 F.3d 197 (3d Cir. 2012), *vacated and remanded in view of Actavis, Upsher Smith Labs., Inc. v. Louisiana Wholesale Drug Co., Inc.*, 133 S. Ct. 2849 (2013), and 338 F. Supp. 2d 517 (D.N.J. 2004) (\$60,200,000 settlement for the benefit of the class; the Firm received the 2017 American Antitrust Institute Award for Outstanding Antitrust Litigation Achievement in Private Law Practice for Peter S. Pearlman's work in this matter which spanned 16 years of litigation);
- *In re Hibbard Brown Securities Litigation*, No. 93-1150, MDL No. 962 (D.N.J.) (\$150 million approved claim in bankruptcy);
- *Rolnik v. AT&T Wireless Services, Inc.*, No. ESX-L-180-04 (N.J. Sup. Ct.) (\$43 million recovery);
- *In re Remeron Antitrust Litigation*, No. 02-2007 (D.N.J.) (\$75 million recovery);
- *In re Lipitor Antitrust Litigation*, No. 12-2389 (D.N.J.) (\$93 million settlement);
- *In re Effexor Antitrust Litigation*, No. 11-479 (D.N.J.) (\$39 million settlement as against one defendant);
- *City of Southfield Fire & Police Retirement Sys. v. Hayward Holdings, Inc.*, No. 23-4146 (D.N.J.) (\$19.85 million settlement)
- *Shumacher v. Osmotica Pharma*, No. SOM-L-540-19 (N.J. Sup. Ct.) (\$5.25 million settlement);
- *Williams v. Chatmon*, No. ESX-L-10940-97 (N.J. Sup. Ct.) (\$1.6 million jury verdict in securities litigation);
- *Lerch v. Citizens First Bancorp*, 805 F. Supp. 1142 (D.N.J. 1992) and 144 F.R.D. 247 (D.N.J. 1992) (\$4 million settlement achieved for the benefit of the class);
- *Zinberg v. Washington Bancorp*, 138 F.R.D. 397 (D.N.J. 1990) (\$2.1 million settlement achieved for the benefit of the class);

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- *In re C.R. Bard, Inc. Securities Litigation*, No. 90-948 (D.N.J.) (\$18.1 million settlement);
- *Newman v. On Line Software International, Inc.*, No. 88-3247 (D.N.J.) (\$4.1 million recovery during trial in class action securities litigation);
- *In re California Life Insurance Company Securities Litigation*, MDL Docket No. 400 (C.D. Cal.) (\$3.25 million recovery);
- *In re General Public Utilities Corporation Securities Litigation*, No. 79-1420 (D.N.J.) (\$24.5 million settlement achieved for the benefit of the class);
- *Aviva Partners LLC v. Exide Technologies*, No. 05-3098 (D.N.J.) (\$13.7 million settlement on behalf of the class);
- *In re The Regina Company, Inc. Securities Litigation*, No. 88-4149 (D.N.J.) (\$7.3 million recovery);
- *Cammer v. Bloom*, 711 F. Supp. 1264 (D.N.J. 1989) (\$15 million settlement achieved for the benefit of the class);
- *Metz v. Jupiter Industries*, No. 85-8414 (N.D. Ill.) (\$3.1 million recovery in class action securities litigation);
- *In re Todd Shipyards Securities Litigation*, No. 88-2580 (D.N.J.) (\$12.6 million recovery);
- *In re Amerada Hess Corporation Securities Litigation*, No. 02-3359 (D.N.J.) (\$9 million settlement on behalf of the class);
- *In re Cambrex Corp. Securities Litigation.*, No. 03-4896 (D.N.J.) (\$3.15 million settlement on behalf of the class);
- *Burgo v. Volkswagen of America*, 183 F. Supp. 2d. 683 (D.N.J. 2001) (\$1.3 million recovery);
- *Weikel v. Tower Semiconductor, Ltd.*, 183 F.R.D. 377 (D.N.J. 1998) (\$16.25 million recovery in class action securities litigation);

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- *In re Anadigics, Inc. Securities Litigation*, No. 98-917 (D.N.J.) (\$11.5 million recovery);
- *In re Mobilemedia Securities Litigation*, 28 F. Supp. 2d. 901 (D.N.J. 1998) (\$23.95 million recovery);
- *Easton & Co. v. Mutual Benefit Life Insurance Co.*, Nos. 91-4012, 92-2095 (\$2.75 million recovery);
- *U.S. ex rel. Quinn v. Omnicare Inc.*, 382 F.3d 432 (3d Cir. 2004) (establishing standards for Qui Tam litigation in the Third Circuit and holding pharmaceutical suppliers to long term care facilities in New Jersey had no obligation to reimburse Medicaid for returned medications, even if those medications later were resold by the suppliers);
- *Reufenacht v. O'Halleran*, 737 F.2d 320 (3d Cir. 1984), *aff'd, sub. nom. Gould v. Reufenacht*, 471 U.S. 701 (1985) (succeeded in persuading the Supreme Court to disavow the “sale of business doctrine” and afford a private right of action under the antifraud provisions of the federal securities laws to those who purchase businesses by acquiring stock rather than assets);
- *In re PSE&G Shareholder Litigation*, 173 N.J. 258 (2002) (adopting new pleading standards for plaintiffs in shareholder derivative litigation in New Jersey);
- *In re Lipitor Antitrust Litigation*, 855 F.3d 126 (3d Cir. 2017) (clarifying the Third Circuit’s jurisdiction over reverse payment antitrust claims) and 868 F.3d 231 (establishing pleading standards in reverse-payment antitrust actions);
- *Gelles v. TDA Industries*, 44 F.3d. 102 (2d. Cir. 1994) (establishing standards in the Second Circuit on the “in connection with” principle for securities fraud);
- *Abramowitz v. Posner*, 672 F.2d 1025 (2d Cir. 1982) (setting standards for shareholders derivative litigation in the Second Circuit);
- *Willis v. Zim*, 705 F. Supp. 205 (D.N.J. 1988) (clarifying the right of arbitrators to award punitive damages on investors claims);

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- *Grassi v. Information Resources, Inc.*, 63 F. 3d. 596 (7th Cir. 1995) (class action securities litigation tried to conclusion);
- *King Drug Co. of Florence, Inc. v. SmithKline Beecham Corp.*, 791 F.3d 388 (3d Cir. 2015) (reverse payment in violation of antitrust laws need not be in cash);
- *In re Merck & Co. Securities, Derivative & ERISA Litigation*, 493 F.3d 393 (3d Cir. 2007) (the use of after acquired information obtained through discovery may be utilized to establish demand futility in shareholder derivative litigation); and
- *In re Nazi Era Cases Against German Defendants*, 198 F.R.D. 429 (D.N.J. 2000); *Burger-Fischer v. DeGussa AG*, 65 F. Supp. 2d. 248 (D.N.J. 1999); (pursuing claims against corporations that participated in the horrors of the Nazi regime).

Matthew F. Gately
mfg@njlawfirm.com

Matthew Gately has been certified by the Supreme Court of New Jersey as a Civil Trial Attorney and has tried cases in state and federal courts, as well as in private arbitration. His practice primarily involves complex commercial/contractual disputes and class/collective actions. Mr. Gately's class action practice is particularly broad, as he has represented both putative class representatives and corporate defendants in cases involving, among other things, securities fraud, ERISA, consumer fraud, and federal and state wage/hour laws. He has been part of the litigation team representing direct purchasers of pharmaceutical products in several antitrust and RICO class actions,

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including *In re K-Dur Antitrust Litigation* (\$60.2m settlement), *In re Lipitor Antitrust Litigation* (\$93m settlement), and *In re Effexor XR Antitrust Litigation* (D.N.J.) (\$39m settlement against one defendant). He currently serves as interim liaison counsel for the Class Action Track in *In re Insulin Pricing Litigation* (D.N.J.), and for the Direct Purchaser Plaintiffs in *In re Effexor XR Antitrust Litigation*, and *In re Vascepa Antitrust Litigation* (D.N.J.). He has also served as counsel in securities class actions and derivative litigations that have resulted in significant recoveries, including *City of Southfield Fire & Police Retirement Sys. v. Hayward Holdings, Inc.*, (D.N.J.) (\$19.85m settlement), *Shumacher v. Osmotica Pharma* (N.J. Superior Court) (\$5.25m settlement), and *In re Prudential Financial Securities Litigation* (D.N.J.) (\$35m settlement).

Additionally, Mr. Gately has represented clients in personal injury and malpractice cases, investor litigation/arbitration, partnership and other intra-business disputes, and employment discrimination matters. He has also provided counsel to New Jersey state agencies in environmental cost-recovery litigations.

He currently serves as Chair of the Bergen County Bar Association's Federal Practice Committee and a Trustee of the Association of the Federal Bar of New Jersey. He is also a member of the New Jersey State Bar Association and the Trial Attorneys of New Jersey. Mr. Gately has both written and presented on issues of federal practice.

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Mr. Gately is AV rated by Martindale-Hubbell and was invited to become the second Associate Fellow of Litigation Counsel of America in New Jersey. Mr. Gately has also been named a “New Leader of the Bar” by the *New Jersey Law Journal*, a “Rising Star” by *Super Lawyers*, and a “Top Lawyer” by both *(201) Magazine* and *Bergen Magazine*. He has also received recognition for his *pro bono* service.

Before joining Cohn Lifland, Mr. Gately clerked for the Hon. Madeline Cox Arleo, U.S.D.J., D.N.J., and the Hon. Michael A. Hammer, U.S.M.J., D.N.J., and worked for several years in the commercial litigation group of an AmLaw 100 law firm. Mr. Gately received his J.D. from Columbia Law School, where he was a Harlan Fiske Stone Scholar and published member of the *Columbia Business Law Review*. He received his B.A. (in three years), *magna cum laude*, from Lafayette College with a double major in Government & Law and Philosophy.

Mr. Gately was admitted in the state courts of New Jersey and New York, the United States Court of Appeals for the Third Circuit, the United States District Court for the District of New Jersey, the United States District Court for Southern District of New York, the United States District Court for the Eastern District of New York, and the United States District Court for the Western District of Arkansas.

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Peter S. Pearlman (1946-2025)

Peter S. Pearlman practices primarily in the area of commercial litigation in both federal and state courts. Cases in which Mr. Pearlman has been involved have been the subject of more than 60 published opinions, many of which have established important legal precedents.

Mr. Pearlman also regularly represents clients before FINRA, the Financial Industry Regulatory Authority. He has been certified by the Supreme Court of New Jersey's board on Trial Attorney Certification as a civil trial attorney continuously since that certification first became available.

Mr. Pearlman is AV rated by Martindale-Hubbell and has been recognized in *Best Lawyers in America*, as well as *SuperLawyers* in New Jersey for Business Litigation continuously in every year since that recognition first became available. He also is listed *SuperLawyers* Corporate Counsel.

As a transactional attorney, Mr. Pearlman has represented numerous clients in the formation, purchase, sale, reorganization and franchising of corporations, partnerships and limited liability companies in transactions ranging from a few hundred thousand dollars to in excess of \$100 million.

Mr. Pearlman served as a member of the Lawyers' Advisory Committee to the U.S. District Court District of New Jersey for fifteen years, is a past co-chair of the Class Action Committee of the New Jersey State Bar Association, and served for ten years as a trustee of the Association of the Federal Bar of New Jersey. In 2017, Mr. Pearlman was selected by the Association of the Federal Bar of New Jersey and the New Jersey Commission on Professionalism in Law as a recipient of the Professional Lawyer of the Year Award and received the New Jersey Law Journal's Lifetime Achievement Award in 2022.

Mr. Pearlman has lectured on topics involving business litigation for the American Bar Association and the New Jersey Institute for Continuing Legal Education. He has taught trial advocacy for the National Institute of Trial Advocacy and has also taught trial and appellate skills at Hofstra, Widener and Roger Williams Schools of Law.

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Published opinions in cases in which Mr. Pearlman has been involved and in which he acted as sole, lead, co-lead, or liaison counsel, include:

In re: Lamictal Antitrust Litigation, 957 F.3d 184 (3d Cir. 2020);

Amanda Mathis, et. al., v. Darden Restaurants, Inc., et. al., (United States District Court for the Southern District of Florida, case No. 12-61742) (a collective action on behalf of servers and bartenders of the world's largest full-service restaurant group for violations of the FLSA for unpaid time and overtime. When the federal action was decertified and sent to contractually mandated arbitration, we and our other two co-lead counsel brought approximately 2500 separate claims in that arbitration which resulted in \$8 million in recoveries on behalf of the clients plus attorneys' fees and expenses.

In re: Lipitor Antitrust Litigation, 868 F.3d 281 (3d Cir. 2017) (Establishing pleading standards in reverse-payments antitrust actions), also 855 F.3d 126 (3d Cir. 2017) (Clarifying the Third Circuit's jurisdiction over reverse payment antitrust claims), also 46 F. Supp. 3d 523 (D.N.J. 2014);

MaxLite, Inc. v. ATG Electronics, Inc., 139 F.Supp.3d 371 (D.N.J. 2016) (Analyzing minimum contacts for specific jurisdiction in unfair competition litigation between a New Jersey plaintiff and California defendant);

Castro v. Sanofi Pasteur Inc., 137 F. Supp. 3d 820 (D.N.J. 2015) (\$61,500,000 settlement for the benefit of the class);

King Drug Co. of Florence, Inc. v. SmithKline Beecham Corp., 791 F.3d 388 (3d Cir. 2015) (Reverse payment in violation of antitrust laws need not be in cash);

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Herman v. Yellow Pages, LLC, 780 F. Supp. 2d 1028 (S.D. Ca. 2011);

Kalow & Springut v. Commence Corp., 272 F.R.D. 397 (D.N.J. 2011);

State of New Jersey Dept. of Treasury v. Fuld, 604 F.3d 86 (3d Cir. 2010);

In re Merck & Co. Sec., Derivative & ERISA Litig., 493 F.3d 393 (3d Cir. 2007);

In re AT&T Securities Litigation, 455 F.3d 160 (3d Cir. 2006) (\$100 million settlement for the benefit of the class);

In re Remeron Antitrust Litigation, 367 F. Supp. 2d 675 (D.N.J. 2005) (\$75 million settlement for the benefit of the class);

U.S. ex rel. Quinn v. Omnicare Inc., 382 F.3d 432 (3d Cir. 2004) (in which the court established standards for *Qui Tam* litigation in this circuit and held that pharmaceutical suppliers to long term care facilities in New Jersey had no obligation to reimburse Medicaid for returned medications, even if those medications later were resold by the suppliers);

Varsolona v. Breen Capital Services Corp., 360 N.J. Super. 292 (App. Div. 2003), *aff'd as modified*, 180 N.J. 605 (2004);

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Naviant Marketing Solutions, Inc. v. Larry Tucker, Inc., 339 F. 3d 180 (3d Cir. 2003);

In re Honeywell International Securities Litigation, 211 F.R.D. 255 (D.N.J. 2002), also 182 F. Supp. 2d 414 (D.N.J. 2002) (\$100 million settlement obtained for the benefit of the class);

In re: PSE&G Shareholder Litigation, 173 N.J. 258 (2002) (the Supreme Court adopted new pleading standards for plaintiffs in shareholder derivative litigation, rejecting the more rigid Delaware standards), also 315 N.J. Super. 323 (Ch. Div. 1998);

Burgo v. Volkswagen of America, 183 F. Supp. 2d 683 (D.N.J. 2001);

California Public Employees Retirement System v. Chubb Corp., 127 F. Supp. 2d 572 (D.N.J. 2001);

Noorily v. Thomas & Betts Corp., 188 F.3d 153 (3d Cir. 1999), *cert. denied*, 529 U.S. 1053;

Megatech, Inc. v. NSD Acquisitions LP, 215 F.3d 1320 (4th Cir. 2000);

In re: Interneuron Pharmaceuticals Litigation, 188 F.R.D. 3 (D. Mass. 1999);

In re: Nice Systems Securities Litigation, 188 F.R.D. 206 (D.N.J. 1999);

Burger-Fischer v. DeGussa AG, 65 F. Supp. 2d 248 (D.N.J. 1999);

In re: Milestone Scientific Securities Litigation, 183 F.R.D. 404 (D.N.J. 1998), also 187 F.R.D. 165 (D.N.J. 1999), also 103 F. Supp. 2d 425 (D.N.J. 2000);

In re: Computron Software Litigation, 6 F. Supp. 2d 313 (D.N.J. 1998);

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Weikel v. Tower Semiconductor, Ltd., 183 F.R.D. 377 (D.N.J. 1998) (\$16.25 million settlement achieved for the benefit of the class);

In re: Mobilemedia Securities Litigation, 28 F. Supp. 2d 901 (D.N.J. 1998);

Matter of TDA Industries, Inc., 240 A.D. 2d 262 (N.Y.A.D. 1 Dept. 1997);

J.K. Funding, Inc. v. DeCara Enterprises, Ltd., 235 A.D. 2d 785 (N.Y.A.D. 3 Dept. 1997), also 270 A.D. 2d 456 (N.Y.A.D. 2 Dept. 2000);

Grassi v. Information Resources, Inc., 63 F. 3d 596 (7th Cir. 1995);

In Re: General Tire & Rubber Co. Securities Litigation, 726 F.2d 1057 (6th Cir. 1994);

Gelles v. TDA Industries, 44 F.3d 102 (2d Cir. 1994) (establishing new standards in the Second Circuit on the purchaser/seller requirement of SEC Rule 10b-5), also Fed. Sec. L. Rep. 1993 Transfer Binder 97,690 (S.D.N.Y. 1993), also Fed. Sec. L. Rep. 1990 Transfer Binder 96,110 (S.D.N.Y. 1991);

Easton & Co. v. Mutual Benefit Life Insurance Co., Fed. Sec. L. Rep. (CCH) 1993 Transfer Binder 96,595, 97,294 and 97,348 (D.N.J. 1993);

Resolution Trust Corp. v. DiDomenico, 837 F. Supp. 623 (D.N.J. 1993);

V. Rachael Lerch, et. al. v. Citizens First Bancorp, et al., 805 F. Supp. 1142 (D.N.J. 1992), also 144 F.R.D. 247 (D.N.J. 1992) (\$4 million settlement achieved for the benefit of the class);

Franz v. Raymond Eisenhardt Sons, Inc., 732 F. Supp. 521 (D.N.J. 1990);

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Zinberg v. Washington Bancorp, et al., 138 F.R.D. 397 (D.N.J. 1990) (\$2.1 million settlement achieved for the benefit of the class);

Rose Cammer, et al. v. Bruce M. Bloom, et al., 711 F. Supp. 1264 (D.N.J. 1989) (\$15 million settlement achieved for the benefit of the class);

Willis v. Rubiera Zim, 705 F. Supp. 205 (D.N.J. 1988) (clarifying the right of arbitrators to award punitive damages on investors claims);

Reufenacht v. O'Halleran, 737 F.2d 320 (3d Cir. 1984), *aff'd, sub. nom. Gould v. Reufenacht*, 471 U.S. 701 (1985) (the Supreme Court disavowed the sale of business doctrine, thereby confirming the right of those who purchase businesses by acquiring the corporate stock rather than the business assets to the protection of the anti-fraud provisions of the federal securities laws);

Degenaars v. Degenaars, 186 N.J. Super. 233 (Ch. Div. 1982);

Turner v. Aldens, Inc., 179 N.J. Super. 596 (App. Div. 1981);

Roem v. Borough of Dumont, 176 N.J. Super. 397 (App. Div. 1980);

In Re: General Public Utilities Corporation Securities Litigation, Fed. Sec. L. Rep. (CCH) 1983-1984 Transfer Binder, 99,566 (D.N.J. 1983) (\$24.5 million settlement achieved for the benefit of the class);

Abramowitz v. Posner, 672 F.2d 1025 (2d Cir. 1982), also 513 F. Supp. 120 (S.D.N.Y. 1981) (setting standards for shareholders derivative litigation in the Second Circuit);

Page 15

In re: General Tire & Rubber Co. Securities Litigation, 429 F. Supp. 1032 (J.P.M.L. 1977);

Scott v. Richstein, 129 N.J. Super. 516 (Law Div. 1974);

Crowell v. U.S. 1972 A.M.C. 2086 (D.N.J. 1972).

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Michael Alderman is an associate in the civil litigation practice group. He has been part of the litigation team representing plaintiffs in various class actions. Michael graduated *cum laude* from Seton Hall University School of Law and earned recognition for excellence in the Entertainment and New Media Law specialization. While in law school, Michael served as the Executive Editor of Volume 48 of the *Seton Hall Journal of Legislation and Public Policy* and published his Comment entitled “Free Speech Versus Compelled Speech: A First Amendment Reform of Section 230.” Michael also received recognition for excellence for his participation in the Civil Litigation and Practice Clinic, where he represented tenants in eviction proceedings in Essex and Bergen Counties.

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Page 16

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Before law school, Michael attended the University of South Florida, where he graduated *cum laude* with a Bachelor of Science in Social Science Education. While in college, Michael also served as a volunteer firefighter and first responder in his hometown of Ellenton, Florida. After graduation, Michael moved to New Jersey where he taught sixth-grade Language Arts Literacy at a charter school in Newark, New Jersey. Following his time as a teacher, Michael held various positions in nonprofit management, including roles in education management organizations and nonprofit media.

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Melinda Lugo is a litigation paralegal with over 20 years of experience supporting complex civil and commercial litigation matters. Since joining Cohn Lifland Pearlman Herrmann & Knopf LLP in 2008, she has worked on a broad range of cases, including employment, personal injury, products liability, and malpractice matters, in state and federal courts in New Jersey and New York, as well as at the appellate level.

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Page 17

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