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12 *Co-Lead Counsel for Plaintiffs*

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **COUNTY OF SANTA CLARA**

15 IN RE HPE ENTERPRISE SERVICES-DXC
TECHNOLOGY CO. MERGER
16 LITIGATION

Lead Case No. 19CV353132

CLASS ACTION

17 _____
18 This Document Relates to:
19 ALL ACTIONS

**INDEX OF DECLARATIONS AND
EXHIBITS IN SUPPORT OF
PLAINTIFFS' MOTIONS FOR (1)
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND APPROVAL OF
20 PLAN OF ALLOCATION AND (2)
AWARD OF ATTORNEYS' FEES AND
EXPENSES TO LEAD COUNSEL AND
21 SERVICE AWARDS TO PLAINTIFFS
(Tabs 3-6) (Part 2 of 2)**

22 Dept: 22
23 Judge: Hon. Beth McGowen
24 Action Filed: August 20, 2019
Hearing: June 11, 2026, 1:30 p.m.

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28 **INDEX OF DECLARATIONS AND EXHIBITS IN SUPPORT OF PLAINTIFFS' MOTIONS
FOR (1) FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND APPROVAL OF PLAN
OF ALLOCATION AND (2) AWARD OF ATTORNEYS' FEES AND EXPENSES TO LEAD
COUNSEL AND SERVICE AWARDS TO PLAINTIFFS (TABS 3-6) (PART 2 OF 2)**

TABLE OF CONTENTS

Joint Declaration of James I. Jaconette, Adam E. Polk, and David W. Hall.....TAB 1

- Exhibit A A true and correct copy of the report titled *Securities Class Action Settlements: 2025 Review & Analysis*, published by Cornerstone Research on February 19, 2026.
- Exhibit B A true and correct copy of the Order Concerning Motions for: A) Final Approval of Settlement; and B) Attorney Fees and Costs, filed in the Superior Court of the State of California, County of Santa Clara, in *In re Maxar Technologies Inc. Shareholder Litig.*, No. 19CV357070, dated December 11, 2023.
- Exhibit C A true and correct copy of the Judgment and Order Granting Final Approval, Approving Plan of Allocation, and Awarding Attorneys’ Fees, Reimbursement of Expenses, and Approving Service Awards, filed in the Superior Court of the State of California, County of San Mateo, in *In re Micro Focus Int’l PLC Sec. Litig.*, No. 18CIV01549, dated July 27, 2023.
- Exhibit D A true and correct copy of the Final Order Approving Class Action Settlement, filed in the Superior Court of the State of California, County of Los Angeles, in *Snap Inc. Sec. Cases*, No. JCCP 4960, dated April 14, 2021.
- Exhibit E A true and correct copy of the Judgment and Order Granting Final Approval of Class Action Settlement, filed in the Superior Court of the State of California, County of San Mateo, in *In re Menlo Therapeutics Inc. Sec. Litig.*, No. 18CIV06049, dated August 14, 2020.
- Exhibit F A true and correct copy of the Judgment and Order Granting Final Approval of Class Action Settlement, filed in the Superior Court of the State of California, County of San Mateo, in *In re ProNAi S’holder Litig.*, No. 16CIV02473, dated May 24, 2019.
- Exhibit G A true and correct copy of the Judgment and Order Granting Final Approval

1 of Class Action Settlement, filed in the Superior Court of the State of
2 California, County of San Mateo, in *In re Sunrun, Inc. S’holder Litig.*, No.
3 CIV538215, dated December 14, 2018.

- 4 • Exhibit H A true and correct copy of the Final Approval Order and Judgment, filed in
5 the Superior Court of the State of California, County of Santa Clara, in *Paton*
6 *v. Advanced Micro Devices, Inc.*, No. 1-07-CV-084838, dated August 22,
7 2014.

8
9 Declaration of James I. Jaconette on Behalf of Robbins Geller Rudman & Dowd LLP.....TAB 2

- 10 • Exhibit A A true and correct copy of a summary of the time spent by Robbins Geller
11 Rudman & Dowd LLP (“Robbins Geller”) attorneys and paraprofessional
12 staff from inception through and including February 26, 2026, and the
13 lodestar calculation for each of those individuals based on their current
14 hourly rates.
- 15 • Exhibit B A true and correct copy of a summary of the expenses and charges incurred
16 by Robbins Geller in connection with the prosecution of the Action from
17 inception through and including March 31, 2026.
- 18 • Exhibit C A true and correct copy of a summary of the vendors paid by Robbins Geller
19 for filing and attorney service fees in connection with the prosecution of the
20 Action.
- 21 • Exhibit D A true and correct copy of a summary of the date, destination, and purpose
22 of each trip relating to travel-related expenses paid by Robbins Geller in
23 connection with the prosecution of the Action.
- 24 • Exhibit E A true and correct copy of a summary of the vendors paid by Robbins Geller
25 for court and deposition transcripts in connection with the prosecution of the
26 Action.
- 27 • Exhibit F A true and correct copy of a summary breakdown of the contributions to and

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payments made from the litigation expense fund maintained by Robbins Geller in connection with the prosecution of the Action.

- Exhibit G A true and correct copy of Robbins Geller’s firm resume.

Declaration of Adam E. Polk on Behalf of Girard Sharp LLP.....TAB 3

- Exhibit A A true and correct copy of a summary of the time spent by Girard Sharp LLP (“Girard Sharp”) attorneys and paraprofessional staff from inception through and including April 9, 2026, and the lodestar calculation for each of those individuals based on their current hourly rates.
- Exhibit B A true and correct copy of a summary of the expenses and charges incurred by Girard Sharp in connection with the prosecution of the Action from inception through and including April 9, 2026.
- Exhibit C A true and correct copy of a summary of the vendors paid by Girard Sharp for filing, service, and other fees in connection with the prosecution of the Action.
- Exhibit D A true and correct copy of a summary of the date, destination, and purpose of each trip relating to travel-related expenses paid by Girard Sharp in connection with the prosecution of the Action.
- Exhibit E A true and correct copy of a summary of the vendor paid by Girard Sharp for a court hearing transcript in connection with the prosecution of the Action.
- Exhibit F A true and correct copy of Girard Sharp’s firm resume.

Declaration of David W. Hall on Behalf of The Hall Firm, Ltd.....TAB 4

- Exhibit A A true and correct copy of a summary of the time spent by The Hall Firm,

1 Ltd. (“Hall Firm”) attorneys from inception through and including April 9,
2 2026, and the lodestar calculation for each of those individuals based on their
3 current hourly rates.

4 • Exhibit B A true and correct copy of a summary of the expenses and charges incurred
5 by Hall Firm in connection with the prosecution of the Action from inception
6 through and including April 9, 2026.

7 • Exhibit C A true and correct copy of a summary of the date, destination, and purpose of
8 each trip relating to travel-related expenses paid by Hall Firm in connection
9 with the prosecution of the Action.

10 • Exhibit D A true and correct copy of Hall Firm’s firm resume.

11
12 Declaration of David Stein on Behalf of Gibbs Mura LLP.....TAB 5

13 • Exhibit A A true and correct copy of a summary of the time spent by Gibbs Mura LLP
14 (“Gibbs Mura”) attorneys from inception through and including April 23,
15 2026, and the lodestar calculation for each of those individuals based on their
16 current hourly rates.

17 • Exhibit B A true and correct copy of a summary of the expenses and charges incurred
18 by Gibbs Mura in connection with the prosecution of the Action from
19 inception through and including April 23, 2026.

20 • Exhibit C A true and correct copy of a summary of the vendors paid by Gibbs Mura
21 for filing and other fees in connection with the prosecution of the Action.

22 • Exhibit D A true and correct copy of Gibbs Mura’s firm resume.

23
24 Declaration of Ross D. Murray.....TAB 6

25 • Exhibit A A true and correct copy of the Notice of Proposed Settlement of Class Action
26 and Proof of Claim and Release form.

27 • Exhibit B A true and correct copy of a sample cover letter mailed to Nominee Holders

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and the institutions included on the U.S. Securities and Exchange Commission’s list of active brokers and dealers.

- Exhibit C A true and correct copy of confirmations of the Summary Notice being published in *The Wall Street Journal* and transmitted over *Business Wire*.
- Exhibit D A true and correct copy of a list of persons and entity requesting exclusion from the Class.

TAB 3

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14 *Co-Lead Counsel for Plaintiffs*

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF SANTA CLARA**
17

18 IN RE HPE ENTERPRISE SERVICES-DXC
19 TECHNOLOGY CO. MERGER
20 LITIGATION

Case No. 19CV353132

**DECLARATION OF ADAM E. POLK
ON BEHALF OF GIRARD SHARP LLP
IN SUPPORT OF APPLICATION FOR
AWARD OF ATTORNEYS' FEES AND
EXPENSES**

21 This Document Relates to:
22 ALL ACTIONS

23 Dept: 22
Judge: Hon. Beth McGowen
Action Filed: August 20, 2019
24 Hearing: June 11, 2026, 1:30 p.m.

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**DECLARATION OF ADAM E. POLK ON BEHALF OF GIRARD SHARP LLP IN SUPPORT
OF APPLICATION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES**

1 I, Adam E. Polk, declare as follows:

2 1. I am a partner of the firm Girard Sharp LLP (“Girard Sharp” or the “Firm”). I submit
3 this declaration in support of the application for an award of attorneys’ fees and expenses/charges
4 (“expenses”) in connection with services rendered in the above-captioned action. If called upon, I
5 could and would competently testify to the contents of this declaration.

6 2. Girard Sharp is counsel of record for Plaintiff¹ and class representative Jason McLees
7 and Court-appointed co-Lead Counsel for the certified Class.

8 3. The information in this declaration regarding my Firm’s time and expenses derives
9 from contemporaneous time and expense reports and supporting documentation prepared and/or
10 maintained by the Firm in the ordinary course of business. I am the partner at Girard Sharp who
11 oversaw and conducted the day-to-day litigation activities in this Action, and I reviewed these reports
12 (and backup documentation where necessary or appropriate) in connection with preparing this
13 declaration. The purpose of this review was to confirm both the accuracy of the entries as well as the
14 necessity for, and reasonableness of, the time and expenses committed to the Action. Through my
15 periodic review, I exercised billing judgment, and where necessary, reduced both time and expenses.
16 Based on this review, I believe that the time reflected in the Firm’s lodestar calculation and the
17 expenses for which reimbursement is sought are reasonable and were necessary for the effective and
18 efficient prosecution and resolution of the Action.
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20

21 4. After the reductions referred to above, the number of hours spent on the litigation by
22 my Firm is 7,208.40. A breakdown of the lodestar is provided in Exhibit A. The lodestar amount for
23 attorney/paraprofessional time based on the Firm’s current rates is \$5,349,272.50.
24

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27 ¹ Unless otherwise noted, all capitalized terms have the meanings ascribed to them in Stipulation of
Settlement, finalized on October 17, 2025.

1 5. The hourly rates listed for Girard Sharp employees included in Exhibit A are the
2 current rates charged for the Firm’s services in contingency matters as well as in non-contingent
3 matters. For personnel who are no longer employed by the Firm, the “current rate” used for the
4 lodestar calculation is based upon the rate for that person in his or her final year of employment with
5 the Firm. Different timekeepers within the same employment category (e.g., partners, of counsel,
6 associates, litigation assistants, etc.) may have different rates based on a variety of factors, including
7 years of practice, years at the firm, year in the current position, judicial clerkships, relevant
8 experience, relative expertise, and the rates of similarly experienced peers at our firm or other firms.
9 Based on my relevant experience and knowledge of the type and quality of work performed on this
10 case, I believe Girard Sharp’s rates are commensurate with the rates charged by other firms with
11 similar experience and expertise in the relevant market for legal services. Girard Sharp sets its hourly
12 rates based on peer law firm surveys published in *The National Law Journal* and our independent
13 review of the hourly rates charged by other attorneys in comparable litigation. Our rates have been
14 accepted by corporate and institutional clients for services provided on an hourly rate basis.

17 6. Girard Sharp’s billing rates have been approved by courts in class action litigation
18 throughout the United States. *See, e.g., In re GWG Holdings, Inc. Sec. Litig.*, No. 3:22-cv-00410-B,
19 ECF No. 170 (N.D. Tex. Jan. 13, 2026); *In re JUUL Labs, Inc., Marketing, Sales Practices, and*
20 *Products Liab. Litig.*, No. 3:19-md-02913-WHO, ECF No. 4179 (N.D. Cal. Dec. 18, 2023); *In re*
21 *Maxar Technologies Inc. S’holder Litig.*, No. 19CV357070, op. at 11-13 (Santa Clara Cnty. Dec. 11,
22 2023); *In re Woodbridge Investments Litig.*, 2021 WL 6878356 (C.D. Cal. Dec. 17, 2021); *In re*
23 *Capacitors Antitrust Litig.*, No. 3:14-CV-03264-JD, 2020 WL 6544472, at *2 (N.D. Cal. Nov. 7,
24 2020); *Weeks v. Google LLC*, No. 5:18-CV-00801-NC, 2019 WL 8135563, at *3-4 (N.D. Cal. Dec.
25 13, 2019); *In re Nexus 6P Products Liab. Litig.*, No. 17-cv-02185-BLF, ECF No. 225 (N.D. Cal. Nov.
26 12, 2019); *In re Lidoderm Antitrust Litig.*, No. 14-MD-02521-WHO, 2018 WL 4620695, at *2 (N.D.
27 Cal. Sept. 20, 2018).

1 7. My Firm also seeks an award of \$196,012.16 in expenses and charges in connection
2 with the prosecution of the litigation. Those expenses and charges are summarized by category in
3 Exhibit B.

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

5 (a) Filing, Witness, and Other Fees: \$6,864.57. These expenses have been paid to
6 the Court for filing fees and to attorney service firms for filing and service fees and for remote court
7 appearances (CourtCall). The vendors who were paid for these services are set forth in Exhibit C.

8 (b) Litigation Fund: \$162,500.00. In connection with this case, the Firm provided
9 capital outlays to a litigation fund managed by Robbins Geller Rudman & Dowd LLP that were
10 essential to the development of the factual record and the prosecution of the Action. Such expenses
11 include, but are not limited to, fees to experts and expert consultants, e-discovery management, and
12 mediation fees, all of which were incurred solely for the progression of this matter.
13

14 (c) Transportation, Hotels, and Meals: \$13,705.33. In connection with the
15 prosecution of this case, the Firm has paid for travel expenses to, among other things, attend court
16 hearings, meet with Plaintiff McLees, mediators and opposing counsel, and defend a deposition. The
17 date, destination, and purpose of each trip is set forth in Exhibit D.
18

19 (d) Court Hearing Transcript: \$69.75. The vendor who was paid for a hearing
20 transcript is listed in Exhibit E.
21

22 (e) Photocopies: \$1,402.50. In connection with this case, the Firm made 2,550 in-
23 house photocopies, charging \$0.55 per copy for a total of \$1,402.50. Each time an in-house copy
24 machine is used, our billing system requires that a case or administrative billing code be entered and
25 that is how the 2,550 copies were identified as related to this case.

26 (f) Online Legal and Financial Research: \$9,471.95. This category includes
27 vendors such as Westlaw and PACER. These resources were used to obtain access to court filings,
28

EXHIBIT A

EXHIBIT A

In re HPE Enterprise Services-DXC Technology Co. Merger Litigation, No. 19CV353132

Girard Sharp LLP

Inception through April 9, 2026

NAME	HOURS	HOURLY RATE	LODESTAR
Partners			
Dena Sharp	14.00	\$1,250.00	\$17,500.00
Adam E. Polk	705.40	\$1,100.00	\$775,940.00
Trevor T. Tan	64.80	\$1,000.00	\$64,800.00
Of Counsel			
Daniel C. Girard	78.60	\$1,400.00	\$110,040.00
Jordan Elias	140.30	\$1,100.00	\$154,330.00
Attorneys			
Sean Greene	2,058.20	\$800.00	\$1,646,560.00
Erika Garcia	1,610.20	\$700.00	\$1,127,140.00
Namita Dhawan	218.80	\$700.00	\$153,160.00
Peter Touschner	1,506.30	\$625.00	\$941,437.50
James E. Richardson	232.70	\$575.00	\$133,802.50
Isabel Velez*	235.70	\$525.00	\$123,742.50
Kai Lucid	59.50	\$425.00	\$25,287.50
Professional Support Staff			
Anne von Goetz	46.30	\$325.00	\$15,047.50
Marie Montoya	23.60	\$325.00	\$7,670.00
Isabel Velez*	175.20	\$250.00	\$43,800.00
Jack Conklin	25.10	\$250.00	\$6,275.00
Schuyler Sandeen	13.70	\$200.00	\$2,740.00
TOTALS:	7,208.40		\$5,349,272.50

* Ms. Velez became a member of the State Bar of California during the pendency of this Action. Prior to becoming a member of the State Bar of California, Ms. Velez was employed by Girard Sharp as a law clerk. Ms. Velez's two hourly rates and differences thereof reflect her change in role from law clerk to attorney while at Girard Sharp.

EXHIBIT B

EXHIBIT B

In re HPE Enterprise Services-DXC Technology Co. Merger Litigation, No. 19CV353132
Girard Sharp LLP
Inception through April 9, 2026

<i>CATEGORY</i>	<i>AMOUNT</i>
Filing, Witness, and Other Fees	\$6,864.57
Transportation, Hotels, and Meals	\$13,705.33
Telephone	\$131.54
Postage	\$15.60
Messenger, Overnight Delivery	\$801.89
Court Hearing Transcript	\$69.75
Photocopies	
In-House: (2,550 copies at \$0.55 per page)	\$1,402.50
Online Legal and Financial Research	\$9,471.95
Litigation Fund Contribution	\$162,500.00
Miscellaneous	\$1,049.03
<i>TOTAL</i>	<i>\$196,012.16</i>

EXHIBIT C

EXHIBIT C

In re HPE Enterprise Services-DXC Technology Co. Merger Litigation, No. 19CV353132
Girard Sharp LLP

Filing, Witness, and Other Fees: \$6,864.57

DATE	VENDOR	PURPOSE
8/20/2019	One Legal, LLC	Filing of initial Complaint and related documents.
9/6/2019	One Legal, LLC	Filing of Proof of Service and Summons.
10/23/2019	One Legal, LLC	Filing of Motion for Lead Counsel.
11/1/2019	One Legal, LLC	Filing of Proofs of Service of Complaint on Defendants Alving, Aghi, and Lawande.
11/4/2019	One Legal, LLC	Filing of Proof of Service of Complaint on Defendants Portalatin, Herzog, Rutland, and Woods.
11/11/2019	Class Action Research & Litigation Support Services, Inc.	Personal service of Complaint on Defendant Hewlett Packard Enterprise Company.
11/11/2019	Class Action Research & Litigation Support Services, Inc.	Personal service of Complaint on Defendant DXC Technology Company.
11/19/2019	One Legal, LLC	Filing of Proof of Service of Complaint on Defendants Varma, Stonesifer, and Cox.
12/2/2019	Class Action Research & Litigation Support Services, Inc.	Personal service of Order Deeming Case Complex and Staying Discovery and Responsive Pleading on Defendant Hewlett Packard Enterprise Company.
12/9/2019	One Legal, LLC	Filing of Joint Stipulation and Proposed Order Consolidating Actions and Appointing Lead Counsel.
12/23/2019	One Legal, LLC	Filing of Joint Case Management Statement.
1/1/2020	Class Action Research & Litigation Support Services, Inc.	Attempt of personal service of Summons; Class Action Complaint; Civil Case Cover Sheet; Civil Lawsuit Notice.
1/1/2020	Class Action Research & Litigation Support Services, Inc.	Attempt of personal service of Summons; Class Action Complaint; Civil Case Cover Sheet; Civil

		Lawsuit Notice on Defendant Herzog.
1/1/2020	Class Action Research & Litigation Support Services, Inc.	Personal service of Summons; Class Action Complaint; Civil Case Cover Sheet; Civil Lawsuit Notice on Defendant Portalatin.
1/1/2020	Class Action Research & Litigation Support Services, Inc.	Personal service of Summons; Class Action Complaint; Civil Case Cover Sheet; Civil Lawsuit Notice on Defendant Lawrie.
1/1/2020	Class Action Research & Litigation Support Services, Inc.	Personal service of Summons; Class Action Complaint; Civil Case Cover Sheet; Civil Lawsuit Notice on Defendant Lawande.
1/1/2020	Class Action Research & Litigation Support Services, Inc.	Personal service of Summons; Class Action Complaint; Civil Case Cover Sheet; Civil Lawsuit Notice on Defendant Herzog.
1/1/2020	Class Action Research & Litigation Support Services, Inc.	Personal service of Summons; Class Action Complaint; Civil Case Cover Sheet; Civil Lawsuit Notice on Defendant Alving.
1/1/2020	Class Action Research & Litigation Support Services, Inc.	Personal service of Summons; Class Action Complaint; Civil Case Cover Sheet; Civil Lawsuit Notice; ADR Information Sheet on Defendant Aghi.
1/13/2020	One Legal, LLC	Filing of Joint Stipulation and Proposed Order Regarding Briefing Schedule.
2/4/2020	One Legal, LLC	Filing of Amended Complaint.
3/17/2020	One Legal, LLC	Filing of Opposition to Motion to Stay and Supporting Declaration.
7/3/2020	One Legal, LLC	Filing of Joint Case Management Statement.
8/1/2020	CourtCall, LLC	Remote appearance for Case Management Conference and on Defendants' Motion to Stay.
10/1/2020	One Legal, LLC	Filing of Plaintiffs' Opposition to Demurrer.
10/31/2020	One Legal, LLC	Filing of Joint Case Management Statement.
7/9/2021	One Legal, LLC	Filing of Stipulation Regarding Amendment to Complaint.
2/28/2022	One Legal, LLC	Filing of Stipulation Regarding Case Schedule.

3/9/2022	One Legal, LLC	Filing of First Amended Complaint.
5/23/2022	One Legal, LLC	Filing of Notice of Appearance for J. Elias.
5/24/2022	One Legal, LLC	Filing of Opposition to Demurrer.
8/1/2022	One Legal, LLC	Filing of Joint Case Management Statement.
8/3/2022	One Legal, LLC	Filing of Notice of Intent to Appear at Hearing for A. Polk and D. Hall.
8/25/2022	One Legal, LLC	Filing of Stipulation Regarding Case Schedule.
9/1/2022	CourtCall, LLC	Remote appearance.
9/23/2022	One Legal, LLC	Filing of Amended Complaint.
10/3/2022	CourtCall, LLC	Remote appearance.
11/1/2022	Class Action Research & Litigation Support Services, Inc.	Service of Notice of CourtCall Appearances.
11/23/2022	One Legal, LLC	Filing of Opposition to Demurrer.
2/23/2023	One Legal, LLC	Filing of Joint Case Management Statement.
2/24/2023	One Legal, LLC	Filing of Request for Court Reporter.
3/15/2023	Class Action Research & Litigation Support Services, Inc.	Filing of Notice of Appearance for S. Greene.
3/20/2023	One Legal, LLC	Filing of Stipulation Regarding Case Schedule.
3/24/2023	Class Action Research & Litigation Support Services, Inc.	Filing of Notice of Posting Jury Fees.
4/4/2023	One Legal, LLC	Filing of Stipulated Protective Order.
4/4/2023	One Legal, LLC	Filing of Stipulation Regarding ESI Protocol.
5/30/2023	One Legal, LLC	Filing of Joint Case Management Statement.
6/7/2023	One Legal, LLC	Filing of Stipulation and Order Regarding Revised Schedule.
8/2/2023	One Legal, LLC	Filing of Motion for Class Certification.
8/3/2023	One Legal, LLC	Re-filing of Motion for Class Certification.
8/7/2023	One Legal, LLC	Filing of Joint Case Management Statement.
8/7/2023	One Legal, LLC	Filing of Stipulation and Order Regarding Revised Case Schedule.
8/8/2023	One Legal, LLC	Re-filing of Stipulation Regarding Revised Case Schedule.

10/26/2023	Class Action Research & Litigation Support Services, Inc.	Service of IL Deposition Subpoena for Personal Appearance and Production of Documents and Things; CA Subpoena for Personal Appearance and Production of Documents and Things; Stipulation and Protective Order Regarding Confidential Information; Plaintiffs' Notice of Deposition on Alight Solutions, LLC.
10/31/2023	Class Action Research & Litigation Support Services, Inc.	Service of Deposition Subpoena for Personal Appearance and Production of Documents and Things; Stipulation and Protective Order Regarding Confidential Information.
11/29/2023	One Legal, LLC	Filing of Stipulation and Proposed Case Management Order and Revised Case Schedule.
12/22/2023	One Legal, LLC	Filing of Reply in Support of Class Certification.
12/22/2023	One Legal, LLC	Filing of Plaintiffs' Objections to and Request to Strike Exhibits 3 and 5, and the Materials included in the appendix to the Declaration of Andrew H. Roper.
12/30/2023	Class Action Research & Litigation Support Services, Inc.	Service of Deposition Subpoena for Personal Appearance and Production of Documents and Things; Stipulation and Protective Order Regarding Confidential Information.
1/2/2024	One Legal, LLC	Filing of Statement of Non-Opposition to Defendants' Motion to Seal.
2/23/2024	One Legal, LLC	Filing of Opposition to Motion to Strike.
2/28/2024	One Legal, LLC	Filing of Reply in Support of Plaintiffs' Motion to Strike the Declaration of Andrew H. Roper.
6/3/2024	One Legal, LLC	Filing of Joint Case Management Statement.
9/16/2024	One Legal, LLC	Filing of Joint Case Management Statement.
9/17/2024	One Legal, LLC	Filing of Joint Stipulation Extending Case Schedule.

9/18/2024	One Legal, LLC	Electronic service of Order regarding Joint Stipulation Extending Case Schedule.
11/26/2024	One Legal, LLC	Filing of Joint Case Management Statement.
12/19/2024	One Legal, LLC	Filing of Informal Discovery Conference Statement.
3/5/2025	One Legal, LLC	Filing of Opposition to Defendant Hewlett Packard Enterprise Company's Motion for Judgment on the Pleadings.
3/6/2025	One Legal, LLC	Filing of Motion for A Protective Order.
3/19/2025	One Legal, LLC	Filing of Notice of Appearance of D. Sharp.
3/21/2025	One Legal, LLC	Filing of Joint Case Management Statement.
3/21/2025	One Legal, LLC	Filing of Reply in Support of Motion for Protective Order.
3/25/2025	One Legal, LLC	Re-filing of Declaration in Support of Motion for Protective Order.
5/13/2025	One Legal, LLC	Filing of Joint Stipulation Extending Case Schedule.
5/14/2025	One Legal, LLC	Filing of Response to Defendant Hewlett Packard Enterprise Company's Notice of New Authority.
5/14/2025	One Legal, LLC	Re-filing of Response to Defendant Hewlett Packard Enterprise Company's Notice of New Authority.
6/25/2025	One Legal, LLC	Filing of Stipulation to Stay Deadlines Pending Submission of Motion for Preliminary Approval of Settlement.
8/22/2025	One Legal, LLC	Filing of Joint Status Report.
9/12/2025	One Legal, LLC	Filing of Joint Status Report.
10/3/2025	One Legal, LLC	Filing of Joint Status Report.
10/21/2025	One Legal, LLC	Filing of Motion for Preliminary Approval of Class Action Settlement.
10/30/2025	One Legal, LLC	Filing of Joint Stipulation and Order Advancing Hearing Date for Plaintiffs' Unopposed Motion for Preliminary Approval.

EXHIBIT D

EXHIBIT D

In re HPE Enterprise Services-DXC Technology Co. Merger Litigation, No. 19CV353132
Girard Sharp LLP

Transportation, Hotels, and Meals: \$13,705.33

<i>NAME</i>	<i>DATE</i>	<i>DESTINATION</i>	<i>PURPOSE</i>
Adam Polk	11/21/2019	Palo Alto, CA	Attend meet and confer meeting.
Daniel Girard	12/13/2019	San Jose, CA	Appear at case management conference.
Adam Polk	8/17/2023	Columbia, SC	Attend in-person client meeting.
Adam Polk	8/28/2023	Columbia, SC	Attend deposition preparation sessions with co-counsel and client and defend deposition thereafter.
Sean Greene	3/7/2024	San Jose, CA	Attend class certification hearing.
Adam Polk	3/7/2024	San Jose, CA	Appear at class certification hearing.
Sean Greene	6/6/2024	San Jose, CA	Appear at case management conference.
Daniel Girard	3/10/2025	Corona del Mar, CA	Attend mediation session.
Adam Polk	3/10/2025	Corona del Mar, CA	Attend mediation session.
Dena Sharp	3/27/2025	San Jose, CA	Appear at hearing on motion for protective order and further case management conference.
Adam Polk	6/5/2025	San Jose, CA	Appear at hearing on motion for protective order.

EXHIBIT E

EXHIBIT E

In re HPE Enterprise Services-DXC Technology Co. Merger Litigation, No. 19CV353132
Girard Sharp LLP

Court Hearing Transcript: \$69.75

<i>DATE</i>	<i>VENDOR</i>	<i>PURPOSE</i>
4/9/2024	Superior Court Reporters	Transcript of hearing on motion for class certification.

EXHIBIT F

GIRARD

SHARP

Firm Resume

GIRARD SHARP LLP

About the Firm

Girard Sharp is a San Francisco based law firm representing plaintiffs nationwide in class actions, multidistrict litigation, arbitrations, and other complex litigation. We take on the most important, high-stakes cases, with proven results across a variety of practice areas including antitrust, consumer privacy, securities, financial fraud, catastrophic injury, defective products, fertility, sexual abuse, and women's health.

Since our founding in 1995, we have recovered billions in trial judgments and settlements, leveling the playing field for our clients, who range from individual consumers and small businesses to Fortune 100 companies and public retirement systems. Our experienced trial lawyers thrive on solving the toughest legal challenges through innovation, collaboration, and deep subject-matter expertise.

The firm's commitment to excellence is reflected in its consistent recognition by industry peers and legal publications. Several Girard Sharp attorneys have been honored with the California Lawyer Attorney of the Year Award, one of the most prestigious recognitions in California legal circles. Chambers USA Guide recognized managing partner Dena Sharp with a prestigious Band 1 ranking among California plaintiffs' antitrust lawyers. The firm has consistently been nationally ranked in the U.S. News Best Lawyers "Best Law Firms" list, achieving Tier 1 status for Mass Tort Litigation/Class Actions. In addition, the firm's attorneys are frequently recognized in The Best Lawyers in America and Law360's "Rising Stars," underscoring their skill, integrity, and commitment to justice.

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ATTORNEYS

PARTNERS

Dena Sharp

Adam Polk

Sarah London

Scott Grzenczyk

Simon Grille

Trevor Tan

Andrew Kaufman

OF COUNSEL

Daniel Girard

Jordan Elias

Kristen Palumbo

ASSOCIATES

Renee Applegate

Samhita Collur

Sophie Flynn

Reid Gaa

Erika Garcia

Nina Gliozzo

Sean Greene

Jordan Isern

Maya Kalonia

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Securities and Financial Fraud

Privacy & Data Breach

Women's Advocacy & Fertility

Sexual Abuse

Catastrophic Injury

Consumer Protection

ATTORNEY BIOS

PARTNERS



DENA SHARP

Dena Sharp is a trial lawyer who is dedicated to finding common-sense solutions in even the most complex litigation. She recently served as co-lead counsel in the Juul Labs Inc. multidistrict litigation, which resulted in recoveries of nearly \$2 billion for individual consumers, school districts, municipalities, and Native American tribes. The final \$235 million settlement with Altria was reached after she rested the plaintiff's case in a bellwether jury trial, underscoring her skill in high-stakes litigation.

Dena tries cutting-edge cases. In a first-of-its-kind jury trial, Dena and team represented clients whose eggs and embryos were in a freezer tank at a fertility clinic that failed. After a nearly four-week bellwether trial, the jury returned a \$15 million verdict for the plaintiffs, leading to a global resolution with the tank manufacturer for the dozens of households represented by Girard Sharp.

Dena has built a record of significant antitrust recoveries. She recently secured nearly \$200 million in settlements for drug purchasers as co-lead counsel on the eve of trial in *In re Xyrem Antitrust Litigation*, and previously led a team to a \$104.75 million recovery in *In re Lidoderm Antitrust Litigation*, a "pay-for-delay" antitrust class action. *Xyrem* and *Lidoderm* are among the largest end-payor recoveries in these notoriously complex generic pharmaceutical delay cases. Dena also serves as a member of the End-Payer Steering Committee in the massive *In re Generic Pharmaceuticals Pricing Antitrust Litigation*.

Dena represents consumers seeking accurate credit information in her role as co-lead counsel in *In re Equifax Fair Credit Reporting Act Litigation*, which arises from Equifax's widespread misreporting of consumer credit information in 2022. On the privacy front, Dena serves as counsel preparing for trial the *In re BetterHelp, Inc. Data Disclosure Cases*, in which consumers allege that the online therapy platform shared sensitive mental health information with advertisers. She also serves as interim co-lead counsel in *In re PayPal Honey Browser Extension Litigation*, in which content creators allege that PayPal's Honey browser extension diverted their earned commissions by swapping cookies at checkout.

Outside the courtroom, Dena is immediate past Board Chair of the Impact Fund, a public interest nonprofit, and she previously co-chaired the Northern District of California's Committee of Lawyer Representatives to the Ninth Circuit Judicial Council. She is an elected member of the American Law Institute. She has contributed to influential legal publications such as the ABA's Class Action Strategy and Practice Guide and the Sedona Principles for electronic discovery. A first-generation American fluent in Spanish and German, Dena graduated magna cum laude from Brown University and cum laude from UC Law San Francisco. Her peers have recognized her with numerous honors, including multiple "Lawyer of the Year" awards from Best Lawyers, designation as a "Titan of the Plaintiffs' Bar" by Law360, and inclusion in the National Law Journal's Elite Women of the Plaintiffs' Bar. Dena is also regularly named among the Top 50 Women Attorneys in Northern California and one of the Top 100 Super Lawyers in the region.

Notable work includes:

- Co-lead counsel in Juul Labs Inc. MDL, resulting in nearly \$2 billion in recoveries
- Co-lead counsel in Xyrem, resulting in \$198.4 million in settlements
- \$15 million verdict in Pacific Fertility Center
- Co-lead counsel in Equifax Fair Credit Reporting Act Litigation
- Trial counsel in BetterHelp, Inc. Data Disclosure Cases
- Co-lead counsel in Illumina, Inc. Shareholder Litigation
- Interim co-lead counsel in PayPal Honey Browser Extension Litigation

Select Honors:

- Chambers USA –Antitrust: Mainly Plaintiff – California, Band 1; Antitrust: Mainly Plaintiff – USA Nationwide, Band 2
- Lawdragon500 Leading Litigators in America (2026)
- Top 100 Super Lawyers in Northern California
- Best Lawyers “Lawyer of the Year” in San Francisco (2023, 2025)
- Law360 “Titan of the Plaintiffs Bar” (2023)
- NLJ Elite Women of the Plaintiffs’ Bar (3x honoree)
- Top 50 Women Attorneys in Northern California (San Francisco Magazine)



ADAM POLK

Adam Polk handles all phases of complex civil litigation and currently serves as co-lead counsel in several high-profile class actions, including shareholder, consumer privacy, and product liability cases. He has played a pivotal role in securing significant recoveries in cases involving major corporations such as Hewlett Packard, Maxar, Sears, Apple, and Google. Adam is known for his leadership in technologically complex consumer litigation, including privacy cases representing millions of affected individuals, as well as high-stakes securities and financial fraud matters. His experience extends to catastrophic injury and product liability litigation, exemplified by his work in the Pacific Fertility Center case, where he helped secure a landmark \$15 million jury verdict. Adam is also active in shaping class action policy and practice through his leadership

as co-chair of the American Bar Association’s National Institute on Class Actions and the American Association for Justice’s Class Action Litigation Section. His broad practice encompasses securities & financial fraud, consumer privacy & defective products, sexual abuse, and catastrophic injury litigation, demonstrating a commitment to protecting consumers and investors alike.

Notable work includes:

- \$15 million trial verdict in Pacific Fertility Center
- \$36.5 million in Maxar Technologies Shareholder Litigation
- \$17 million in phone defect cases against Google
- \$40 million in Sears Holdings Derivative Litigation

Select Honors:

- Adam is co-chair of the ABA’s National Institute on Class Actions and chair of AAJ’s Class Action Law Section
- Top 40 Under 40 by National Trial Lawyers (since 2019)
- Rising Star of the Plaintiffs Bar by National Law Journal (2022)
- Lawdragon 500 Leading Consumer Plaintiff Lawyers (2023, 2025)
- National Trial Lawyers “Top 100 Civil Plaintiffs Lawyers” list (2024)
- Northern California Super Lawyer (2024, 2025)



SARAH LONDON

Sarah is a relentless advocate known for her leadership in high-profile, socially significant cases. She is currently Co-Lead and Liaison Counsel in the multidistrict litigation against Uber, representing passengers who were sexually assaulted by drivers and holding the company accountable for failing to ensure passenger safety. She was appointed as Co-Lead Counsel in the multidistrict litigation against Roblox, representing families and children alleging online grooming and exploitation on the gaming platform. Sarah also leads groundbreaking fertility-related litigation, including cases against genetic testing companies and IVF product manufacturers, notably securing a historic trial verdict in litigation involving a cryopreservation tank failure at a San Francisco fertility clinic.

Her advocacy extends to consumer protection and public health, having managed over 3,000 tobacco-related cases culminating in a landmark \$100 million settlement. More recently, she served as Co-Lead and Liaison Counsel in the Juul Labs multidistrict litigation, coordinating a team of more than 65 law firms and over 7,000 lawsuits, which resolved for nearly \$2 billion in claims tied to the youth vaping epidemic. Sarah also represents families in novel product liability claims against Stiiizy, Inc., addressing youth-targeted marketing and dangerously high-potency THC cannabis products.

Sarah's expertise further spans pharmaceutical and medical device litigation, including her role on the Plaintiffs' Executive Committee in the Gilead HIV Drug Kidney & Bone Injuries Litigation and successfully resolving hundreds of cases involving defective transvaginal mesh and problematic birth control products. A sought-after speaker and lecturer, she has appeared at numerous prestigious legal conferences and panels hosted by organizations such as the Federal Bar Association, American Bar Association, American Association for Justice, and the Judicial Panel on Multidistrict Litigation.

Committed to advancing women in law and systemic reform, Sarah holds leadership roles with the Consumer Attorneys of California, serving as Treasurer on its Executive Committee, and was appointed Chair of the Resource Board of the National Association of Women Judges in 2019. Her courtroom tenacity and dedication to social justice have earned her numerous honors, including the California Consumer Attorney of the Year Award (CAOC), California Lawyer of the Year (CLAY), and the Mattie Bell Davis Award from the National Association of Women Judges.

Notable work includes:

- Juul MDL, coordinating over 7,000 lawsuits to a \$2 billion resolution
- Over 3,000 tobacco cases resulting in a \$100 million settlement
- Groundbreaking cannabis and pharmaceutical claims

Select Honors:

- California Consumer Attorney of the Year, Consumer Attorneys of California (CAOC), 2024
- California Lawyer of the Year (CLAW) Award, California Lawyer (2024)
- Mattie Bell Davis Award, National Association of Woman Judges (2024)



SCOTT GRZENCZYK

Scott Grzenczyk has helped recover billions in class action settlements, especially in the pharmaceutical, tech, and life sciences spaces. He played major roles in the JUUL MDL, Google Ad Tech, and class actions involving the government of Guam and disability rights. Scott brings creative strategy and relentless preparation to every case.

Notable work includes:

- \$198.4 million in Xyrem
- \$104.75 million in Lidoderm
- \$117.5 million for insurance policyholders

Select Honors:

- California’s Top Antitrust Lawyers (2023)
- Lawdragon 500 Leading Plaintiff Financial Lawyer (2024, 2025)
- Chambers USA –Antitrust: Mainly Plaintiff – California, “Up and Coming”



SIMON GRILLE

Simon Grille is a leading trial attorney in class and privacy litigation. He’s lead counsel in a data breach case against the University of California and privacy lawsuits against companies like Patreon, Rakuten Viki, and Prudential. Simon is also a frequent speaker and contributor to panels concerning emerging issues in class action litigation.

Notable work includes:

- \$50 million in MacBook Keyboard Litigation
- \$17 million in phone defect cases
- \$63 million in OPM Data Breach

Select Honors:

- Top 40 Under 40 by Daily Journal
- Super Lawyers Rising Star



TREVOR TAN

Trevor Tan specializes in complex research and writing in consumer protection, data privacy, securities, and financial fraud litigation. He clerked for multiple federal judges and served immigrant children as an advocate during law school. Trevor is a key strategist behind several major privacy and consumer rights cases.

Notable work includes:

- Lead briefing in Woodbridge Investment litigation, which settled for \$54.2 million
- \$50 million in MacBook Keyboard Litigation
- Lead briefing in PFA Insurance Marketing Litigation

Select Honors:

- A Best Lawyers: Ones to Watch honoree
- Super Lawyers Rising Star Class Actions (2024)
- Northern California Super Lawyers (2023-2025)
- Lawdragon 500 Leading Plaintiff Consumer Lawyers (2025)



ANDREW KAUFMAN

Andrew Kaufman brings deep appellate and trial briefing experience. He's a former partner at a national plaintiffs' firm and clerked on both the Sixth Circuit and D.C. Court of Appeals.

Notable work includes:

- Co-led briefing for the Juul bellwether trial, which settled for \$235 million
- Led appeals in Florida Engle tobacco litigation
- Represented clients in the McKinsey opioid and Kona coffee cases

Select Honors:

- Lawdragon 500 Leading Plaintiff Consumer Lawyers in America (2023-2025)
- Best Lawyers, Ones to Watch (2023-2025)
- Consumer Attorney of the Year, Consumer Attorneys of California (CAOC) (2024)
- Lawdragon 500 X – The Next Generation (2023, 2024)
- National Law Journal “Rising Star of the Plaintiffs’ Bar” (2024)



DANIEL GIRARD

Daniel Girard, Senior Advisor and Of Counsel, founded Girard Sharp in 1995 with a mission to offer top-tier representation to consumers and investors. Serving as managing partner until 2025, Daniel led the firm to national prominence while mentoring and inspiring several generations of younger lawyers.

Daniel's case work has centered on investment and consumer litigation in federal courts. Recent highlights include service as lead counsel in successful cases in the Northern District of Texas (*In re GWG Securities Litigation*), the Central and Southern Districts of California (*In re Woodbridge Investments*, *In re Silvergate Bank*), and the District of Nevada (*In re J&J Investments*). His experience extends to a range of subject matters, including corporate governance, institutional reform, and digital privacy.

Daniel was appointed by the Chief Justice of the Supreme Court to serve consecutive terms on the United States Judicial Conference Advisory Committee on Civil Rules (2006-2012) and the Standing Committee on Rules of Procedure (2015-2021). He is an elected member of the American Law Institute, serving on the Council, the Audit Committee (Chair) and the Membership Committee. Daniel appears in Best Lawyers and Northern California Super Lawyers (2013 San Francisco Lawyer of the Year). He was honored by the Chinese American Democratic Club for his advocacy on behalf of San Francisco public school students.



JORDAN ELIAS

Jordan Elias is a strategic appellate and trial lawyer. Jordan clerked for Ninth Circuit Judge Cynthia Holcomb Hall and holds degrees from Yale (Field Prize for best humanities thesis) and Stanford Law. He is a prolific legal writer with articles in the Harvard Law & Policy Review and Baylor Law Review, and co-authorship credits in ABA and California antitrust publications. Jordan is a member of the American Law Institute and has been selected by his peers for inclusion in The Best Lawyers in America.

Notable work includes:

- Leading a successful appeal in the OPM Data Breach Litigation
- Arguing key motions in the Google Ad Tech MDL
- Helping write the plaintiffs' briefs in the landmark Cipro pay-for-delay case

Select Honors:

- Best Lawyers in America (since 2022)
- Lawdragon 500 Leading Consumer Plaintiff Lawyers (2024, 2025)



KRISTEN PALUMBO

Kristen Palumbo focuses on antitrust and high-stakes complex litigation. She was a key member of the trial team in the Uber Passenger Sexual Assault Litigation, serving on the ground during trial proceedings. Kristen previously practiced at two international firms, where she also led pro bono and diversity initiatives. She has represented numerous incarcerated clients pro bono in civil rights matters.

Notable work includes:

- Uber Passenger Sexual Assault Litigation
- Lakeview Data Breach Litigation

ASSOCIATES



RENEE APPLGATE

Renee Applegate advocates for plaintiffs in class actions and other complex civil litigation. Her past experiences include:

- Externed for Justice Kelli M. Evans of the Supreme Court of California
- Participated in the Individual Representation Clinic
- Successfully represented clients in a Social Security appeal and a criminal Clean Slate case

She earned her J.D., cum laude, from UC Law SF.



SAMHITA COLLUR

Samhita Collur focuses on class actions and complex litigation. She earned her J.D. cum laude from the University of Wisconsin Law School, where she:

- Interned for a Wisconsin Supreme Court Justice
- Was named Best Oral Advocate in a First Amendment competition
- Advocated for immigrants seeking humanitarian relief through her law school clinic

Before law school, she worked as a program manager for a San Francisco nonprofit providing financial services to underserved communities.



SOPHIE FLYNN

Sophie Flynn is committed to advancing plaintiffs' rights through class actions and complex litigation. Her past experiences include:

- Interned at the California Attorney General's Office in the Public Rights Division
- Worked in the Workers' Rights Clinic and Environmental Law Clinic
- Participated in the International Human Rights Workshop

She earned her J.D. from UC Berkeley School of Law.



REID GAA

Reid Gaa works on class action, securities, and digital privacy litigation. He has played a key role in consumer privacy cases involving alleged violations of the Video Privacy Protection Act, including class actions against AARP and Rakuten Viki for the improper disclosure of subscribers' personal information and video-viewing data to third parties without consent. Reid also contributes to the firm's securities litigation practice.

Notable work includes:

- AARP Video Privacy Protection Act Litigation
- Rakuten Viki Video Privacy Protection Act Litigation

Reid earned his J.D. from UC Law SF (cum laude) and has been recognized as a Northern California Super Lawyers Rising Star from 2022–2025.



ERIKA GARCIA

Erika Garcia focuses her practice on complex electronic discovery. Prior to joining Girard Sharp, she worked at an international firm on:

- Commercial litigation
- Class actions
- Regulatory investigations

She is fluent in Spanish and previously served as a refugee advocate in Ecuador. Erika holds a J.D. from UC Law SF and is admitted in both California and New York.



NINA GLIOZZO

Nina Gliozzo has been central to several of Girard Sharp’s biggest trial wins:

- Directly examined plaintiffs in the Pacific Fertility Center trial that led to a \$15 million verdict
- Helped develop and litigate claims in the Juul MDL, leading to a nearly \$2 billion settlement
- Key strategist in Altria bellwether case, which settled after the plaintiff rested

Nina clerked for Judge Marsha Berzon on the Ninth Circuit and externed for Judge Charles Breyer in the Northern District of California. She was also named to Lawdragon’s 500 X: The Next Generation.



SEAN GREENE

Sean Greene represents investors and policyholders in securities and insurance fraud litigation, including:

- GWG Holdings Securities Litigation
- Illumina, Inc. Shareholder Litigation
- PFA Insurance Marketing Litigation

He previously worked in insurance defense and public health, with a background in expanding school-based care programs. Sean earned his J.D. at UC Law SF.



JORDAN ISERN

Jordan Isern focuses on antitrust and securities litigation. She is a Harvard Law graduate, where she served as Executive Technical Editor of the Civil Rights–Civil Liberties Law Review.

Prior experience includes work with:

- Xyrem (Sodium Oxybate) Antitrust Litigation
- DOJ Antitrust Division
- The Eastern District of Pennsylvania (externship)
- Nonprofits including AALDEF and the Innocence Project

Outside of law, Jordan enjoys long-distance backpacking and rock climbing.



MAYA KALONIA

Maya Kalonia advocates for consumers and investors in complex class actions and mass torts. She was an instrumental member of the winning trial team in the Uber Passenger Sexual Assault Litigation. She earned her J.D. from UC Berkeley School of Law, where she:

- Interned with the California AG’s Consumer Protection Section and the FTC
- Participated in the East Bay Community Law Center’s Consumer Justice Clinic

Before law school, Maya worked in D.C. as a policy advisor to Senator Richard Blumenthal.



FATIMA LADHA

Fatima Ladha brings a strong background in civil rights, privacy, and technology policy to her work representing plaintiffs in complex litigation. Her past experiences include:

- Served as Editor-in-Chief of the *California Law Review*
- Researched privacy and tech policy with the Samuelson Law, Technology & Public Policy Clinic and the Digital Rights Project
- Interned with the ACLU of Northern California’s Technology and Civil Liberties Program
- Clerked for Chief Judge Richard Seeborg, U.S. District Court for the Northern District of California

She earned her J.D. from UC Berkeley School of Law.



KYLE QUACKENBUSH

Kyle Quackenbush prosecutes antitrust and consumer protection class actions. Key work includes:

- Delta Dental Data Breach
- Natera Prenatal Testing Litigation

He’s received the 2024 Consumer Attorney of the Year award and was named to Lawdragon’s 500 X: The Next Generation and Best Lawyers: Ones to Watch.



TONY ROGARI

Tony Rogari litigates digital privacy and complex consumer protection cases. He has worked on matters involving health insurance data breaches, affiliate marketing fraud, and a range of consumer protection issues. He earned his J.D. from UC Davis School of Law, where he:

- Published a note on the California Voter Participation Rights Act
- Led trial advocacy programs and mock trial competitions
- Participated in the Civil Rights Clinic handling prisoner cases

Notable work includes:

- PayPal Honey Browser Extension
- Blue Shield of California Data Breach



PETER TOUSCHNER

Peter Touschner manages complex class action discovery across a range of practice areas, including antitrust, consumer protection, securities, and product liability litigation. Prior to joining Girard Sharp, he investigated deceptive advertising at the Center for Democracy & Technology and represented victims of the Volkswagen emissions scandal.

Notable work includes:

- Generic Pharmaceuticals Pricing Antitrust Litigation
- Equifax Fair Credit Reporting Act Litigation

He externed for Judge Charles Breyer and was a senior editor at Hastings Science and Technology Law Journal.



ISABEL VELEZ

Isabel Velez represents consumers and individuals harmed by defective products, with experience spanning fertility litigation, child safety, and complex antitrust class actions.

Notable work includes:

- CooperSurgical Embryo Loss Litigation
- Roblox Child Exploitation MDL

She earned her J.D. magna cum laude from UC Law SF.

PRACTICE AREAS

ANTITRUST

Girard Sharp is a nationally recognized leader in antitrust litigation. We represent individuals, businesses, and public entities injured by anticompetitive conduct. Our attorneys currently hold leadership positions in some of the most significant antitrust cases in the country.

Key cases include:

- Xyrem (Sodium Oxybate) Antitrust Litigation
- Lidoderm Antitrust Litigation
- Generic Pharmaceuticals Pricing Antitrust Litigation
- Apple Smartphone Antitrust MDL

We have recovered hundreds of millions for clients harmed by price-fixing, pay-for-delay schemes, and monopolistic conduct in industries ranging from pharmaceuticals to digital advertising.

SECURITIES AND FINANCIAL FRAUD

We represent investors—both individuals and institutions—who suffer losses due to securities fraud, market manipulation, and breaches of fiduciary duty.

Key cases include:

- DXC Technology Litigation - \$47.5 million settlement
- Maxar Technologies Securities Litigation – \$36.5 million recovery
- Sears Holdings Derivative Litigation – \$40 million settlement
- GWG Holdings Securities Litigation
- PFA Insurance Marketing Litigation
- Illumina, Inc. Shareholder Litigation
- Arcadium Lithium Securities Litigation

We litigate securities fraud, ERISA, and insurance bad faith cases in federal and state courts nationwide, pursuing corporate accountability and financial justice for our clients.

PRIVACY & DATA BREACH

Girard Sharp is a recognized leader in data privacy and data breach litigation, representing millions of individuals whose sensitive personal information has been compromised by corporate negligence and inadequate data security practices. Our attorneys hold leadership positions in some of the most significant privacy and data breach cases in the country.

Key cases include:

- BetterHelp, Inc. Data Disclosure Cases
- Salesforce Data Breach
- Accellion Data Breach
- Delta Dental Data Breach

These cases often involve millions of affected individuals and complex federal and state privacy laws, and our team is experienced in both leading and coordinating such efforts nationwide.

SEXUAL ABUSE

Girard Sharp represents survivors of sexual abuse and assault with compassion, discretion, and a deep commitment to justice. We offer trauma-informed legal claims related to religious institutions and schools.

Key cases include:

- Uber Passenger Sexual Assault Litigation
- Roblox Child Exploitation Litigation

Our legal team is committed to helping survivors pursue justice in a way that centers their needs and protects their dignity.

WOMEN'S ADVOCACY & FERTILITY

We are deeply committed to representing women in high-impact litigation involving reproductive healthcare failures, IVF and embryo destruction, and the misleading marketing of prenatal and women's health services.

Key cases include:

- Pacific Fertility Center
- CooperSurgical embryo loss lawsuits
- Ovation Fertility Lawsuit

Our approach combines fierce legal advocacy with trauma-informed client care.

CATASTROPHIC INJURY

We represent individuals in complex mass torts involving dangerous pharmaceuticals, harmful medical devices, and widespread toxic exposure.

Key cases include:

- JUUL's targeting of youth through flavored nicotine products
- Stiiizy Cannabis Litigation
- Opioid addiction accountability

These cases often involve multi-district litigation (MDLs), and our team is experienced in both leading and coordinating such efforts.

CONSUMER PROTECTION

Girard Sharp focuses on holding powerful entities accountable for fraud, defective products, privacy violations, and unfair insurance practices. We represent individuals harmed by deceptive business conduct, dangerous products, misuse of personal data, and bad faith denials of insurance coverage, seeking justice across a broad range of industries and legal issues. We pursue cases involving false advertising and product mislabeling. We also challenge unlawful fees and billing practices. Additionally, we fight against unfair contract terms and consumer scams.

Key cases include:

- Deceptive marketing by JUUL Labs
- Equifax Fair Credit Reporting Act Litigation
- MacBook Keyboard Defect Litigation – \$50 million recovery
- Google Pixel & Nexus Defect Litigation – \$17 million recovery

Our attorneys combine trial experience with a consumer-first lens, aiming to restore fairness and transparency in consumer markets.

VERDICTS & SETTLEMENTS

PACIFIC FERTILITY CENTER TRIAL

\$14.975 million jury verdict for five plaintiffs whose frozen eggs and embryos were destroyed when a storage tank failed at Pacific Fertility Center. Girard Sharp served as trial counsel in the three-week trial, which resulted in one of the first jury verdicts in a fertility loss case. This landmark result helped set a national precedent for recognizing and valuing reproductive harm and has influenced related litigation across the country.

JUUL LABS MULTIDISTRICT LITIGATION

Nearly \$2 billion in global settlements were secured from JUUL and Altria in litigation involving over 7,000 cases. Girard Sharp served as co-lead counsel and helped coordinate the JUUL multidistrict litigation (MDL), which addressed youth nicotine addiction, false advertising, and product design defects. The firm played a critical role in securing these settlements, including a \$235 million settlement reached after a bellwether trial began.

XYREM ANTITRUST LITIGATION

\$198.4 million in total settlements recovered in one of the largest reverse-payment antitrust cases in history. Girard Sharp represented plaintiffs alleging a pay-for-delay scheme involving the sleep drug Xyrem, the firm led the case to the eve of trial before achieving a favorable resolution.

LIDODERM ANTITRUST LITIGATION

\$104.75 million settlement was secured by Girard Sharp for indirect purchasers affected by anticompetitive practices involving the pain-relief patch Lidoderm. The firm played a lead role in discovery and briefing in the Lidoderm “pay-for-delay” antitrust case, contributing to a significant victory for consumers and pharmacies.

MACBOOK KEYBOARD DEFECT LITIGATION

\$50 million settlement was secured for users of defective “butterfly” keyboards in Apple MacBook models, providing direct payments to class members. Girard Sharp served as co-lead counsel in the nationwide class action against Apple. After years of litigation and expert work, the case resolved with significant compensation for affected customers.

GOOGLE PIXEL & NEXUS PHONE DEFECT LITIGATION

\$17 million settlement was secured for consumers affected by defective smartphones. Girard Sharp helped expose and resolve hardware defect claims on behalf of Google phone users experiencing audio defects and connectivity issues in Pixel and Nexus models. The case involved allegations of concealment and warranty violations.

U.S. OFFICE OF PERSONNEL MANAGEMENT DATA BREACH

\$63 million class settlement was secured after hackers stole personal data from federal workers and contractors. Girard Sharp represented the affected individuals and played a lead role in resolving the litigation. In one of the largest federal data breach settlements, the firm helped secure significant relief for those impacted by the OPM data breach.

MAXAR TECHNOLOGIES SECURITIES LITIGATION

\$36.5 million recovery for shareholders who alleged false and misleading statements regarding company performance.

SEARS HOLDINGS DERIVATIVE LITIGATION

\$40 million recovered in one of the largest derivative settlements approved in the Northern District of Illinois.

AWARDS

Chambers
AND PARTNERS



Daily Journal
Established 1888



Best Lawyers



THE NATIONAL
LAW JOURNAL



GIRARD

SHARP

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TAB 4

1 Dena C. Sharp (SBN 245869)
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2 Adam E. Polk (SBN 273000)
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13 Facsimile: (415) 402-0058

14 *Co-Lead Counsel for Plaintiffs*

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15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF SANTA CLARA**
17

18 IN RE HPE ENTERPRISE SERVICES-DXC
19 TECHNOLOGY CO. MERGER
20 LITIGATION

Case No. 19CV353132

**DECLARATION OF DAVID W. HALL
ON BEHALF OF THE HALL FIRM, LTD
IN SUPPORT OF APPLICATION FOR
AWARD OF ATTORNEYS' FEES AND
EXPENSES**

21 This Document Relates to:
22 ALL ACTIONS

23 Dept: 22
Judge: Hon. Beth McGowen
Action Filed: August 20, 2019
24 Hearing: June 11, 2026, 1:30 p.m.

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**DECLARATION OF DAVID. W. HALL ON BEHALF OF THE HALL FIRM, LTD. IN
SUPPORT OF APPLICATION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES**

1 I, David W. Hall, declare as follows:

2 1. I am a partner of the firm The Hall Firm, Ltd. (“Hall Firm” or the “Firm”). I submit
3 this declaration in support of the application for an award of attorneys’ fees and expenses/charges
4 (“expenses”) in connection with services rendered in the above-captioned action. If called upon, I
5 could and would competently testify to the contents of this declaration.

6 2. The Hall Firm is counsel of record for Plaintiff¹ and class representative Jason McLees
7 and Court-appointed co-Lead Counsel for the certified Class.

8 3. The information in this declaration regarding my Firm’s time and expenses derives
9 from time and expense reports and supporting documentation prepared and/or maintained by the Firm
10 in the ordinary course of business. I am the partner at the Hall Firm who oversaw and conducted the
11 day-to-day litigation activities in this Action, and I reviewed these reports (and backup documentation
12 where necessary or appropriate) in connection with preparing this declaration. The purpose of this
13 review was to confirm both the accuracy of the entries as well as the necessity for, and reasonableness
14 of, the time and expenses committed to the Action. Through my periodic review, I exercised billing
15 judgment, and where necessary, reduced both time and expenses. Based on this review, I believe that
16 the time reflected in the Firm’s lodestar calculation and the expenses for which reimbursement is
17 sought are reasonable and were necessary for the effective and efficient prosecution and resolution of
18 the Action.

19 4. After the reductions referred to above, the number of hours spent on the litigation by
20 my Firm is 6,044.6. A breakdown of the lodestar is provided in Exhibit A. The lodestar amount for
21 attorney time based on the Firm’s current rates is \$5,837,320.00.

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27 ¹ Unless otherwise noted, all capitalized terms have the meanings ascribed to them in Stipulation of
Settlement, finalized on October 17, 2025.

1 5. Based on my relevant experience and knowledge of the type and quality of work
2 performed on this case, I believe the Hall Firm's rates listed in Exhibit A are consistent with the
3 hourly rates currently charged by firms in similar securities class action litigation, and are set based
4 on periodic analyses of rates charged by firms performing comparable work both on the plaintiff and
5 defense side in the same legal markets. For personnel who are no longer associated with the Hall
6 Firm, the "current rate" used for the lodestar calculation is based upon the rate for that person in his
7 final year of employment with the Firm.
8

9 6. My Firm also seeks an award of \$69,658.41 in expenses and charges in connection
10 with the prosecution of the litigation. Those expenses and charges are summarized by category in
11 Exhibit B. These expenses are reflected in the books and records prepared and maintained by my Firm
12 in the ordinary course of business. These books and records were prepared from receipts, expense
13 vouchers, check records and other documents and are an accurate record of the expenses paid by my
14 Firm in connection with the Action.

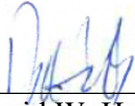
15 7. The following is additional information regarding certain of these expenses:

16 (a) Litigation Fund: \$62,500. In connection with this case, the Firm provided
17 capital outlays to a litigation fund managed by Robbins Geller Rudman & Dowd LLP that were
18 essential to the development of the factual record and the prosecution of the Action. Such expenses
19 include, but are not limited to, fees to experts and expert consultants, e-discovery management, and
20 mediation fees, all of which were incurred for this matter.
21

22 (b) Transportation, Hotels, and Meals: \$7,158.41. In connection with the
23 prosecution of this case, the Firm has paid for travel expenses to, among other things, attend court
24 hearings, meet with Plaintiffs, mediators and opposing counsel, and defend a deposition. The date,
25 destination, and purpose of each trip is set forth in Exhibit C.
26

27 8. Additional information and background of my Firm and its attorneys is reflected in the
28 Hall Firm resumé attached as Exhibit D.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this 5 day
2 of May, 2026, at Piedmont, California.

3 
4 _____
5 David W. Hall

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EXHIBIT A

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EXHIBIT A

In re HPE Enterprise Services-DXC Technology Co. Merger Litigation, No. 19CV353132
The Hall Firm, Ltd.
Inception through April 9, 2026

NAME	TITLE	HOURS	HOURLY RATE	LODESTAR
David W. Hall	(P)	3338.8	\$1,100	\$3,672,680.00
Frank S. Hedin	(P)	47.4	\$800	\$37,920.00
Armen Zohrabian	(C)	2,631.2	\$800	\$2,104,960.00
Arun Ravindran	(C)	27.2	\$800	\$21,760.00
TOTALS		6,044.6		\$5,837,320.00

(P) Partner
(C) Counsel

EXHIBIT B

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EXHIBIT B

In re HPE Enterprise Services-DXC Technology Co. Merger Litigation, No. 19CV353132
The Hall Firm, Ltd.
Inception through April 9, 2026

<i>CATEGORY</i>	<i>AMOUNT</i>
Transportation, Hotels, and Meals	\$7,158.41
Litigation Fund Contribution	\$62,500.00
<i>TOTAL</i>	\$69,658.41

EXHIBIT C

1 **EXHIBIT C**

2 *In re HPE Enterprise Services-DXC Technology Co. Merger Litigation*, No. 19CV353132
3 The Hall Firm, Ltd.

4 Transportation, Hotels, and Meals: \$7,158.41

5

<i>NAME</i>	<i>DATE</i>	<i>DESTINATION</i>	<i>PURPOSE</i>
David Hall	11/21/2019	Palo Alto, CA	Attend meet and confer meeting.
David Hall	12/13/2019	San Jose, CA	Appear at initial case management conference.
David Hall	8/28/2023	Columbia, SC	Attend deposition preparation sessions with co-counsel and client and defend deposition thereafter.
David Hall	3/7/2024	San Jose, CA	Appear at class certification hearing.
David Hall	6/6/2024	San Jose, CA	Appear at case management conference.
David Hall	3/10/2025	Corona del Mar, CA	Attend mediation session.
Armen Zohrabian	3/10/2025	Corona del Mar, CA	Attend mediation session.
David Hall	3/27/2025	San Jose, CA	Appear at hearing on motion for protective order and further case management conference.
David Hall	6/5/2025	San Jose, CA	Appear at hearing on motion for protective order.

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EXHIBIT D



THE
HALL FIRM
LTD

FIRM RESUME

1. Based out of San Francisco, California, The Hall Firm, Ltd., represents consumers and shareholders in shareholder rights, data privacy, and consumer protection class actions in state and federal courts nationwide.

2. We prosecute difficult cases aimed at redressing injuries suffered by large, diverse groups of people, many of which implicate cutting-edge technologies and issues of national significance. Our work has led to meaningful, industry-wide changes for the betterment of society and, over the past nine years alone, has contributed to the recovery of over \$1 billion for the aggrieved consumers and investors we have had the privilege to represent. Representative examples of our securities work include:

- *In re HPE Enterprise Services-DXC Technology Co. Merger Litig.*, (Cal. Super. Ct., Santa Clara County.) (\$47.5 million settlement pending final approval for class of aggrieved investors);
- *In re Maxar Technologies Inc. Shareholder Litig.* (Cal. Sup. Ct., Santa Clara Cnty.) (\$36.5 million settlement for class of aggrieved investors);
- *In re Newell Brands* (N.J. Sup. Ct., Hudson County) (\$102.5 million settlement for class of aggrieved investors);
- *In re Pivotal Software, Inc. Sec. Litig.*, (Cal. Sup. Ct., San Francisco Cnty.) (\$2.75 million settlement for class of aggrieved investors);
- *Plymouth County Retirement System v. Impinj, Inc., et al.*, (N.Y. Sup. Ct., N.Y. Cnty.) (\$20 million aggregate settlement for class of aggrieved investors);
- *In re PPD AI Grp. Sec. Litig.*, (N.Y. Sup. Ct., N.Y. Cnty.) (\$9 million settlement for class of aggrieved investors);
- *In re Altice USA, Inc. Sec. Litig.*, (N.Y. Sup. Ct., Queens Cnty.) (\$4.75 million settlement for class of aggrieved investors);
- *Plutte v. Sea Ltd.*, (N.Y. Sup. Ct., N.Y. Cnty.) (\$10.75 million settlement for class of aggrieved investors);



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- *In re EverQuote, Inc. Sec. Litig.*, (N.Y. Sup. Ct., N.Y. Cnty.) (\$4.75 million settlement for class of aggrieved investors);
- *In re Menlo Therapeutics Inc. Sec. Litig.*, (Cal. Sup. Ct., San Mateo Cnty.) (\$9.5 million settlement for class of aggrieved investors);
- *Wolther v. Maheshwari (In re Veeco Instruments, Inc. Sec. Litig.)*, (Cal. Sup. Ct., Santa Clara Cnty.) (\$15 million class settlement for class of aggrieved investors);
- *City of Sterling Heights General Employees' Retirement System v. Prudential Financial, Inc.* (D.N.J.) (\$33 million settlement for class of aggrieved investors);
- *Louisiana Municipal Police Employees' Pension Fund v. KPMG, LLP, et al.* (N.D. Ohio) (\$32.6 million settlement for class of aggrieved investors);
- *Cyan v. Beaver County Employees Retirement Fund*, (U.S. Supreme Court) (9-0 victory for plaintiffs on issues of first impression related to concurrent jurisdiction, dual sovereignty, the Supremacy Clause, PSLRA, SLUSA, and the Securities Act removal bar);
- *Wiley v. Envivio, Inc., et al.* (Cal. Sup. Ct., San Mateo Cnty.) (\$8.5 million settlement for class of aggrieved investors);
- *In re MobileIron Shareholder Litig.* (Cal. Sup. Ct., Santa Clara Cnty.) (\$7.5 million settlement for class of aggrieved investors);
- *In re Model N Shareholder Litig.* (Cal. Sup. Ct., San Mateo Cnty.) (\$8.55 million settlement for aggrieved class of investors);
- *Xiang v. Inovalon Holdings, Inc., et al.* (S.D.N.Y.) (\$17 million settlement for aggrieved class of investors);
- *Buelow v. Alibaba Group Holding Ltd., et al.* (Cal. Sup. Ct., San Mateo Cnty.) (\$75 million settlement for aggrieved class of investors).

3. The firm's principal attorneys have significant experience representing nationwide groups of people in disputes concerning shareholder rights, data privacy, and consumer protection. The firm is committed to representing everyday people in complex class action litigation. Our shareholder rights practice, in particular, runs the gamut, from historic securities fraud class actions to pioneering recoveries in the wake of botched IPOs to the still emerging threat of crypto-currency fraud. We stay ahead of the curve by eschewing the assembly line approach of other firms. Fresh eyes and an open mind give us an edge, and it pays off for the individual and institutional investors



THE
HALL FIRM
LTD

we represent. Over the past 5 years alone, the work of our attorneys has contributed to over \$500 million in recoveries for aggrieved investors.

4. David W. Hall manages the firm's San Francisco office. He is a member in good standing of the State Bar of California and is admitted to practice in numerous federal courts. Before founding The Hall Firm, Ltd., Mr. Hall was a founding partner of the firm formerly known as Hedin Hall LLP, and before that managed cases for one of the largest plaintiffs' firms in the United States, where he developed, inter *alia*, state court Securities Act and data privacy class action practices. Earlier in his legal career, he was privileged to serve as a judicial law clerk to the Honorable Irma E. Gonzalez in the United States District Court for the Southern District of California, one of the heaviest class action dockets in the country. His responsibilities included civil and criminal trial dockets as well as panels of the United States Court of Appeals for the Ninth Circuit. Mr. Hall is a graduate of the University of California, Hastings College of the Law, *cum laude*, and the New England Conservatory of Music. At Hastings, he received a number of writing, examination, and Moot Court competition awards, served as a Staff Editor of the Hastings Business Law Journal, worked as a teaching assistant in the Legal Writing & Research Department, and served as extern to the Honorable Joyce L. Kennard of the California Supreme Court.

5. Armen Zohrabian's practice includes complex class action litigation including securities and antitrust matters. He is a member in good standing of the State Bar of California and is admitted to practice in numerous federal courts. Between 2012 and 2021, he worked on securities and antitrust matters in the San Francisco office of a prominent plaintiff-side class action firm where he helped achieve \$229.5 million in settlements. Before joining the plaintiff's bar, he worked as an associate in the San Francisco office of a large international law firm, where his practice focused on complex commercial litigation, and where he represented several pro bono



THE
HALL FIRM
LTD

clients in parole hearings and in asylum applications. He graduated with honors from Wake Forest University with a Bachelor of Arts degree in Politics and Economics. He earned his Juris Doctor degree from the University of California at Berkeley School of Law, Boalt Hall, with a Certificate in Law and Technology. During law school, Armen was a member of the Berkeley Technology Law Journal, worked as a law clerk for the Federal Trade Commission, and served as a judicial extern for the Honorable Oliver W. Wanger in the United States District Court for the Eastern District of California. He has been on the Homeless Action Center's board for over a decade. Based in Oakland and Berkeley, HAC provides no-cost, barrier-free, culturally competent legal representation that makes it possible for people who are homeless (or at risk of becoming homeless) to access social safety net programs that help restore dignity and provide sustainable income, healthcare, mental health treatment and housing.

6. The Hall Firm, Ltd. firm currently serves or has served as plaintiffs' counsel in numerous securities class actions nationwide. *E.g.*, *In re HPE Enterprise Services-DXC Technology Co. Merger Litig.*, Lead Case No. 19CV353132, (Cal. Super. Ct., Santa Clara County.); *City of Warren Police & Fire Ret. Sys. v. CVS Health Corp., et al.*, Case No. PC-2019-5658 (R.I. Super. Ct.); *Twigg v. AbbVie, Inc., et al.*, Case No. 2021CH02234 (Ill. Cir. Ct., Cook County); *Arnoys, et al. v. Huntington Bancshares Inc., et al.*, Lead Case No. 23-012420-CB (Mich. Cir. Ct., Wayne County); *Rossi v. Becker, et al.*, 3:23cv2335-HSG (N.D. Cal.); *In re Slack Tech. Inc. Shareholder Litig.*, Lead Case No. 19CIV05370 (Cal. Super. Ct. San Mateo County); *In re Illumina, Inc. Shareholder Litig.*, Lead Case No. 24CIV00585 (Cal. Super. Ct., San Mateo County); *Bernstein v. Bristol-Myers Squibb Co., et al.*, Dkt. No. UNN-L-3887-21 (N.J. Super. Ct., Union County).

TAB 5

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azohrabian@hallfirmlltd.com

12 Co-Lead Counsel for Plaintiffs

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 COUNTY OF SANTA CLARA

15 In re HPE ENTERPRISE SERVICES-DXC) Lead Case No. 19CV353132
TECHNOLOGY CO. MERGER LITIGATION)

16) CLASS ACTION

17 This Document Relates To:

18 ALL ACTIONS.

19) DECLARATION OF DAVID STEIN FILED
20) ON BEHALF OF GIBBS MURA LLP IN
21) SUPPORT OF APPLICATION FOR AWARD
22) OF ATTORNEYS' FEES AND EXPENSES

23) Assigned for All Purposes to:
24) Judge: Honorable Beth McGowen
25) Dept. 22
26) Date Action Filed: August 20, 2019
27) Hearing: June 11, 2026, 1:30 p.m.
28)

1 I, David Stein, declare as follows:

2 1. I am a partner at Gibbs Mura LLP. I am submitting this declaration in support of the
3 application for an award of attorneys' fees and expenses/charges ("expenses") in connection with
4 services rendered in the above-entitled action.

5 2. Gibbs Mura is a member of Plaintiffs' Executive Committee.

6 3. The information in this declaration regarding Gibbs Mura's time and expenses is taken
7 from time and expense reports and supporting documentation prepared and/or maintained by Gibbs
8 Mura in the ordinary course of business. I am the partner who oversaw the day-to-day activities in
9 the litigation, and I reviewed these reports (and backup documentation where necessary or
10 appropriate) in connection with the preparation of this declaration. The purpose of this review was
11 to confirm both the accuracy of the entries as well as the necessity for, and reasonableness of, the
12 time and expenses committed to the litigation. As a result of this review, reductions were made to
13 both time and expenses in the exercise of billing judgment. Based on this review and the adjustments
14 made, I believe that the time reflected in Gibbs Mura's lodestar calculation and the expenses for which
15 payment is sought herein are reasonable and were necessary for the effective and efficient prosecution
16 and resolution of the litigation.

17 4. After the reductions referred to above, the number of hours spent on the litigation by
18 Gibbs Mura is 156.4. A breakdown of the lodestar is provided in Exhibit A. The lodestar amount for
19 attorney time based on Gibbs Mura's current rates is \$125,598.50. The hourly rates shown in Exhibit
20 A are consistent with hourly rates submitted by Gibbs Mura in other securities class action litigation.
21 Gibbs Mura's rates are set based on periodic analysis of rates charged by firms performing
22 comparable work both on the plaintiff and defense side. For personnel who are no longer employed
23 by Gibbs Mura, the "current rate" used for the lodestar calculation is based upon the rate for that
24 person in his or her final year of employment with Gibbs Mura.

25 5. Gibbs Mura seeks an award of \$1,580.19 in expenses and charges in connection with
26 the prosecution of the litigation. Those expenses and charges are summarized by category in
27 Exhibit B.

28

EXHIBIT A

EXHIBIT A

In re HPE Enterprise Services-DXC Technology Co. Merger Litigation, No. 19CV353132

Gibbs Mura LLP

Inception through April 23, 2026

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Emily Beale	(A)	4.3	\$585	\$2,515.50
Eileen Epstein Carney	(P)	27.9	\$805	\$22,459.50
Kyla Gibboney	(A)	59.0	\$665	\$39,235.00
Eric Gibbs	(P)	2.2	\$1,230	\$2,706.00
Dylan Hughes	(P)	4.1	\$1,120	\$4,592.00
Jeff Kosbie	(A)	15.1	\$725	\$10,947.50
David Stein	(P)	43.8	\$985	\$43,143.00
<i>TOTAL</i>		<i>156.4</i>		<i>\$125,598.50</i>

(P) Partner

(A) Associate

EXHIBIT B

EXHIBIT B

In re HPE Enterprise Services-DXC Technology Co. Merger Litigation, No. 19CV353132

Gibbs Mura LLP

Inception through April 23, 2026

<i>CATEGORY</i>	<i>AMOUNT</i>
Filing, Witness, and Other Fees	\$ 251.42
Online Legal and Financial Research	\$1,328.77
<i>TOTAL</i>	<i>\$1,580.19</i>

EXHIBIT C

EXHIBIT C

In re HPE Enterprise Services-DXC Technology Co. Merger Litigation, No. 19CV353132
Gibbs Mura LLP

Filing, Witness, and Other Fees: \$251.42

<i>DATE</i>	<i>VENDOR</i>	<i>PURPOSE</i>
11/8/2019	One Legal LLC	Filed Notice of Appearance for Kyla Gibboney with the Court
2/28/2020	Class Acton Research & Litigation	Filed Joint Notice that Defendants' Petition for Coordination and Application for Stay Order is Moot with the Judicial Counsel of California
7/8/2020	CourtCall	Provided services for remote Court appearance

EXHIBIT D

GibbsMura

A LAW GROUP

Firm Resume

Gibbs Mura is a national litigation firm providing the highest caliber of representation to plaintiffs in class and collective actions in state and federal courts, and in arbitration matters worldwide. The firm serves clients in consumer protection, securities and financial fraud, antitrust, whistleblower, personal injury, and employment cases.

The firm regularly prosecutes multi-state class actions and has one of the best track records in the country for successfully certifying classes, developing practical damages methodologies, obtaining prompt relief for class members victimized by unlawful practices, and working cooperatively with other firms.

Our attorneys take pride in their ability to simplify complex issues; willingness to pursue narrow and innovative legal theories; ability to work cooperatively with other plaintiffs' firms; and desire to outwork and outlast well-funded defense teams.

In less than a decade since its 2014 founding, the firm has recovered over \$2.5 billion for its clients. During that time, the firm has been honored repeatedly for the quality of its work and the results delivered to its clients, including:

- Top Law Firm, California Litigation: Mainly Plaintiffs – *Chambers USA*, 2025, 2024, 2023, 2022
- Class Action Practice Group of the Year, *Law360*, 2023, 2019
- Top Boutique Law Firms in California, *Daily Journal*, 2019

These accolades have also included individual recognition of many of the firm's attorneys:

- Top 40 Under 40, *Daily Journal*, 2025 (Steve Lopez)
- Top Women Lawyers in California, *Daily Journal*, 2024 (Rosemary Rivas)
- California Lawyer of the Year (CLAY) Award, *Daily Journal*, 2023 (Andre Mura, Steven Tindall, Zeke Wald)
- Top Women Lawyers in California, *Daily Journal*, 2023, 2021 (Amy Zeman)
- Top Plaintiff Lawyers in California, *Daily Journal*, 2021 (Andre Mura, Amy Zeman)
- Product Liability MVP, *Law360*, 2021 (Amy Zeman)
- Lawyer of the Year- Mass Torts/ Class Action, *Best Lawyers*, 2022 (Eric Gibbs)
- Titans of the Plaintiffs Bar, *Law360*, 2019 (Eric Gibbs)
- California Lawyer of the Year (CLAY) Award, *Daily Journal*, 2019 (Eric Gibbs)
- California Lawyer of the Year (CLAY) Award, *Daily Journal*, 2019 (Steven Tindall)
- Top Plaintiff Lawyers in California, *Daily Journal*, 2020, 2019, 2016 (Eric Gibbs)
- Top Cybersecurity/ Privacy Attorneys Under 40, *Law360 Rising Stars*, 2017 (Andre Mura)

ATTORNEYS

Partners

<i>Eric Gibbs</i>	p. 3
<i>Andre Mura</i>	p. 5
<i>David Berger</i>	p. 7
<i>Eileen Epstein Carney</i>	p. 9
<i>Dylan Hughes</i>	p. 10
<i>Linda Lam</i>	p. 11
<i>Steve Lopez</i>	p. 13
<i>Rosemary Rivas</i>	p. 15
<i>Dave Stein</i>	p. 17
<i>Steven Tindall</i>	p. 19
<i>Amy Zeman</i>	p. 21

Of Counsel & Counsel

<i>Brian Bailey</i>	p. 23
<i>Aaron Blumenthal</i>	p. 24
<i>Spencer Hughes</i>	p. 25
<i>Parker Hutchinson</i>	p. 26
<i>Rosanne Mah</i>	p. 27
<i>Karen Barth Menzies</i>	p. 28
<i>Ashleigh Musser</i>	p. 30

Associates

<i>Yusuf Al-Bazian</i>	p. 31
<i>Emily Beale</i>	p. 32
<i>Delaney Brooks</i>	p. 33
<i>Sadie Hillier</i>	p. 34
<i>Hanne Jensen</i>	p. 35
<i>Anna Katz</i>	p. 36
<i>Jeff Kosbie</i>	p. 37
<i>Angela Ma</i>	p. 38
<i>Emma MacPhee</i>	p. 39
<i>Jake Seidman</i>	p. 40
<i>Jennifer Sun</i>	p. 41
<i>Wynne Tidwell</i>	p. 42
<i>Zeke Wald</i>	p. 43
<i>Kate Walford</i>	p. 45
<i>Taylor Walters</i>	p. 46

Staff Attorneys

<i>Dorry Gardner</i>	p. 47
<i>Sierra Morris</i>	p. 48
<i>Alyssa Prothero</i>	p. 49

SIGNIFICANT RECOVERIES

<i>Deceptive Marketing</i>	p. 50
<i>Defective Products</i>	p. 51
<i>Antitrust & Unfair Business Practices</i>	p. 53
<i>Securities & Financial Fraud</i>	p. 55
<i>Data Breach & Privacy</i>	p. 56
<i>Mass Tort</i>	p. 57
<i>Sexual Assault Litigation</i>	p. 57
<i>Government Reform</i>	p. 58

1111 Broadway, Suite 2100, Oakland, CA 94607

☎ 510 350 9700

📠 510 350 9701

www.ClassLawGroup.com

Voting Rights Task Force

Gibbs Mura is proud to have launched our Voting Rights Task Force, through which we have been participating in efforts to protect and expand civic participation across the country. The Task Force seeks to identify specific opportunities for both our attorneys and staff to promote voter engagement and maximize voter participation. We implemented new programs to promote firmwide involvement in protecting and expanding the right to vote, including:

- Making Election Day a firm holiday.
- Allowing support staff to bill a set number of hours per week to Voting Rights Task Force efforts, including with nonprofit organizations.
- Encouraging attorney participation in voter protection volunteer opportunities during elections, including staffing voter protection hotlines, poll watching, and helping triage issues that arise.



Eric H. Gibbs | Partner

Eric prosecutes antitrust, consumer protection, whistleblower, financial fraud and mass tort matters. He has been appointed to leadership positions in dozens of contested, high profile class actions and coordinated proceedings. Eric has recovered billions of dollars for the clients and classes he represents and has negotiated groundbreaking settlements that resulted in meaningful reforms to business practices and have favorably impacted plaintiffs' legal rights.

Reputation and Recognition by the Courts

In over 20 years of practice, Eric has developed a distinguished reputation with his peers and the judiciary for his ability to work efficiently and cooperatively with co-counsel, and professionally with opposing counsel in class action litigation.

"[Mr. Gibbs] efficiently managed the requests from well over 20 different law firms and effectively represented the interests of Non-Settling Plaintiffs throughout this litigation."

- Hon. G. Wu, *In re Hyundai & Kia Fuel Economy Litig.* (C.D. Cal)

"The attorneys who handled the case were particularly skilled by virtue of their ability and experience."

- Hon. D. Debevoise, *In re: Mercedes-Benz Teleaid Contract Litig.* (D. N.J.)

"They are experienced and knowledgeable counsel and have significant breadth of experience in terms of consumer class actions."

- Hon. R. Sabraw, *Mitchell v. Am. Fair Credit Assoc'n* (Alameda Cty. Superior Ct.)

"Representation was professional and competent; in the Court's opinion, counsel obtained an excellent result for the class."

- Hon. J. Fogel, *Sugarman v. Ducati N. Am.* (N.D. Cal)

Achievements and Leadership

Eric has been recognized as a leading lawyer in class and mass actions. In 2019, *Law360* recognized Eric among its "Titans of the Plaintiffs Bar," one of only 10 attorneys nationwide to receive the prestigious award. He also received the 2019 *California Lawyer Attorney of the Year (CLAY) Award* for his work in the Anthem Data Breach Litigation. *Daily Journal* named him to its coveted list of "Top Plaintiff Lawyers in California" for 2020, 2019 and 2016. *Law360* recognized Eric as a "2016 Consumer Protection MVP," (the only plaintiff-side lawyer in the country selected in that category) and as a "2018 Cybersecurity & Privacy MVP." Consumer Attorneys of California selected Eric and co-counsel as finalists for *Consumer Attorney of the Year* for achieving a \$100 million settlement in the Chase "Check Loan" Litigation. His cases have been chronicled in major legal and news publications including *NBC News*, *CNN*, the *National Law Journal*, *The New York Times*, *Market Watch*, and *Bloomberg News*. Eric holds a variety of leadership positions in professional associations for consumer advocacy, and he frequently presents on developing trends in the law at conferences throughout the country.

Litigation Highlights

In re Anthem, Inc. Data Breach Privacy Litigation – Served as a court-appointed member of the Plaintiffs' Steering Committee representing the interests of plaintiffs and putative class members following a massive data breach of approximately 80 million personal records. The lawsuit settled in August 2018 for \$115 million, the largest data breach settlement in history at the time.

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Practice Emphasis

Antitrust & Unfair Competition
Banking and Financial Fraud
Class Actions
Consumer Protection
Mass Personal Injury
Whistleblower

Education

Seattle University School of
Law, J.D., 1995
San Francisco State
University, B.A., 1991

Select Awards & Honors

Nationwide Products Liability: Plaintiffs – Band 4,
Chambers USA, 2022-2025
"Lawyer of the Year," *Best Lawyers in America for Class Actions/ Mass Tort Litigation*, 2022
Lawdragon 500 Leading Plaintiff Financial Lawyer, 2020-2026
Lawdragon 500 Leading Plaintiff Consumer Lawyer, 2019-2025
Titans of the Plaintiffs Bar, Law360, 2019
California Lawyer Attorney of the Year Award, 2019
Top Plaintiff Lawyers in California for 2020, 2019, 2016, Daily Journal
Cybersecurity & Privacy MVP, Law360, 2018
Consumer Protection MVP, Law360, 2016
AV Preeminent® Peer Review Rated by Martindale-Hubbell

Admissions

California

In re Chase Bank U.S.A., N.A. “Check Loan” Contract Litigation – multidistrict litigation that alleged Chase Bank wronged consumers by offering long-term fixed-rate loans, only to later more-than-double the required loan payments. Eric led negotiations in the case, which resulted in a \$100 million settlement with Chase eight weeks prior to trial.

In re Adobe Systems Inc. Privacy Litigation – As court-appointed lead counsel, Eric and his team reversed a long line of decisions adverse to consumers whose personal information was stolen in data breaches. Judge Koh issued a 41 page decision in plaintiffs’ favor and Eric negotiated a comprehensive reform of Adobe’s data security practices. The court’s landmark decision on Article III standing in this case marked a sea change and has been cited favorably in over twenty cases in the year since it was issued.

In re Hyundai & Kia Fuel Econ. Litigation – As court-appointed liaison counsel, Eric reconciled the plaintiffs’ interests and coordinated discovery and settlement negotiations. He helped finalize a settlement with an estimated value of up to \$210 million.

Skold v. Intel Corp. – After more than a decade of litigation, Eric as lead counsel achieved a nationwide class action settlement on behalf of approximately 5 million consumers of Intel Pentium 4 processors. The lawsuit changed Intel’s benchmarking practices and Intel agreed to a cash settlement for the class, along with \$4 million in charitable donations.

Parkinson v. Hyundai Motor America – Eric served as class counsel in this lawsuit alleging that the flywheel and clutch system in certain Hyundai vehicles was defective. After achieving nationwide class certification, Hyundai agreed to a settlement that provided for 50-100% reimbursements to class members for their repairs and full reimbursement for rental vehicle expenses.

De La Cruz v. Masco Retail Cabinet Group – Eric served as lead attorney litigating the collective claims of dozens of misclassified account representatives for overtime pay under the Fair Labor Standards Act (FLSA). Successfully certified a class of current and former Masco account representatives and personally arbitrated the case to judgment obtaining full recovery for the class.

In re Providian Credit Card Cases – Eric played a prominent role in this nationwide class action suit brought on behalf of Providian credit card holders alleging that Providian engaged in unlawful and fraudulent business practices in connection with the marketing and fee assessments for its credit cards. The Honorable Stuart Pollack approved a \$105 million settlement, plus injunctive relief—one of the largest class action recoveries in the United States arising out of consumer credit card litigation.

Professional Affiliations

American Association for Justice, Board of Governors, Co-founder and past co-chair of Consumer Privacy and Data Breach Litigation Group, Co-founder and past co-chair of AAJ Litigation Group, Past editor of Class Action Litigation Group newsletter, Creator and co-chair of Class Action Litigation Group Objector Database and Task Force, Law School Committee

American Bar Foundation- Fellow

Consumer Attorneys of California

Equal Justice Society- Advisory Board

National Association of Consumer Advocates

National Consumer Law Center

National Plaintiffs' Law Association, Advisory Board Member

Public Justice Foundation- Former Member, Class Action Preservation Project Committee

San Francisco Trial Lawyers Association

Association of Business Trial Lawyers

American Bar Association



Andre M. Mura | Partner

Andre represents plaintiffs in class actions and mass torts including in the areas of consumer protection, privacy, and products liability. Before joining Gibbs Mura, Andre was senior litigation counsel at the Center for Constitutional Litigation PC, where he represented plaintiffs in high-stakes appeals in state supreme courts and federal appellate courts.

Andre has been honored twice with a California Lawyer Attorney of the Year Award: in 2023 for his involvement and success at trial in *Patz v. City of San Diego*, and in 2019 for his work in the California Supreme Court in *De La Torre v. CashCall*. He is on the Board of the Civil Justice Research Initiative of Berkeley Law, a Fellow of the American Bar Foundation, a member of the Lawyers Committee of the National Center for State Courts, President of the National Civil Justice Institute, past Chair of the American Association for Justice’s LGBT Caucus, past Trustee of the National College of Advocacy, and a member of Williams College’s Latino/a and BiGLATA Alumni Network.

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Practice Emphasis

Class Actions
Consumer Protection
Privacy
Mass Personal Injury

Education

The George Washington
University Law School, J.D.,
2004
Williams College, B.A., 2000

Awards & Honors

*Lawdragon 500 Leading
Plaintiff Financial Lawyer*,
2025-2026
*Lawdragon 500 Leading
Plaintiff Consumer Lawyer*,
2021-2025
*California Lawyer Attorney of
the Year (CLAY) Award*, Daily
Journal, 2023, 2019
*Top Plaintiff Lawyers in
California*, Daily Journal,
2021
*Top Cybersecurity & Privacy
Attorneys Under 40*, Law360
Rising Stars 2017
*Northern California Super
Lawyers*, 2019-2025; *Rising
Star*, 2016-2018

Admissions

California
District of Columbia

Litigation Highlights

In re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation – Andre was court-appointed to Plaintiffs’ Steering Committee Leadership and has undertaken a wide range of responsibilities, including law and briefing and managing discovery related to the TikTok defendants. The firm also represents children and families in lawsuits in federal and state court against Facebook, Instagram, TikTok, Snap, and YouTube.

In re: Meta Pixel Healthcare Data Privacy Litigation – Andre was court-appointed to the plaintiffs’ executive committee in this consolidated litigation, representing millions of patients whose sensitive health data was allegedly collected and shared without their consent. In his appointment decision, Judge Orrick said he chose interim class counsel for their “highly relevant” experience and knowledge.

Brooks v. Thomson Reuters Corporation – Andre is court-appointed class counsel in this data privacy case against Thomson Reuters for its CLEAR product. The lawsuit alleged that Thomson Reuters collected millions of California residents’ personal and confidential information and then sold access to it without their knowledge or consent. After the court granted plaintiffs’ motion for class certification, the parties reached a class settlement for \$27.5 million and substantial injunctive relief. The court granted final approval of the settlement on February 21, 2025.

San Diego and Otay Water District Tiered Water Rates Lawsuits – Lead trial counsel achieving a \$79.5 million verdict on behalf of single-family customers in a lawsuit charging the City of San Diego with setting water rates that run afoul of the California Constitution. After successfully defending the Court’s judgment in favor of the class on appeal, the case is currently on limited remand in San Diego Superior Court.

Key member of the litigation team achieving a verdict on behalf of single-family residential customers in a lawsuit challenging the Otay Water District with setting unconstitutional water rates. The case is also on limited remand.

In re: 3M Combat Arms Earplug Products Liability Litigation – Andre was court-appointed to the plaintiffs’ law-and-briefing committee in this multi-district litigation on behalf of military servicemembers and veterans who suffered injuries due to defective 3M earplugs, which were standard-issue for U.S. military members for more than a decade. Andre also served on several bellwether trial teams, securing multiple favorable jury verdicts.

In re: Taxotere (Docetaxel) Products Liability Litigation – Andre was a member of the trial team in a two-week federal jury trial and is member of Plaintiffs’ Steering Committee and co-chair of Law and Briefing in this multi-district litigation on behalf of breast cancer survivors who suffered permanent hair loss after using the Taxotere chemotherapy drug. He recently obtained a unanimous decision granting a bellwether plaintiff a new trial. *See* 26 F.4th 256 (5th Cir. 2022)

In re: Vizio, Inc. Consumer Privacy Litigation – Andre is co-lead counsel for the settlement class in this multi-district lawsuit alleging that Vizio collected and sold data about consumers' television viewing habits and their digital identities to advertisers without consumers' knowledge or consent. He negotiated a settlement providing for class-wide injunctive relief transforming the company's data collection practices, as well as a \$17 million fund to compensate consumers who were affected.

De La Torre v. CashCall – Andre played a key role in briefing before the California Supreme Court, resulting in a unanimous decision in the plaintiffs' favor. The decision changed decades-old assumptions that lenders in California had a virtual "safe harbor" from unconscionability challenges to loan interest rate terms.

In re: Lenovo Adware Litigation – Andre briefed and argued a motion to dismiss and motion to certify a nationwide litigation class for monetary damages. The court approved a \$7.3 million class action settlement to resolve allegations that Lenovo preinstalled software on laptops that caused performance, privacy and security issues for consumers.

Beaver et. al. v. Tarsadia Hotels, Inc. – Andre contributed to briefing before the Ninth Circuit Court of Appeals resulting in a unanimous decision affirming the lower court's ruling that the UCL's four-year statute of limitations (and its accrual rule) applied in claims alleging violations of the Interstate Land Sales Full Disclosure Act (ILSA) even though ILSA has a shorter statute of limitations.

Watts v. Lester E. Cox Medical Centers, 376 S.W.3d 633 (Mo. 2012) – Andre successfully argued that a state law limiting compensatory damages in medical malpractice cases violated his client's right to trial by jury. In ruling for Andre's client, the Missouri high court agreed to overturn a 20-year-old precedent.

U.S. Supreme Court Advocacy

Merck Sharp & Dohme Corp. v. Albrecht, 139 S. Ct. 1668 (2019) – Before the U.S. Supreme Court, in a case concerning the scope of federal immunity for brand-name drug manufacturers, Andre represented medical doctors appearing as amici curiae. His amicus brief was discussed at oral argument, with Supreme Court counsel for Albrecht telling the Justices, "It's a beautifully done amicus brief to explain what the scientists knew and when they knew it...."

Mutual Pharmaceutical Co., Inc. v. Bartlett, 133 S. Ct. 2466 (2013) – Andre was the lead author of an amicus curiae brief for the American Association for Justice and Public Justice in a case examining whether federal drug safety law preempts state-law liability for defectively designed generic drugs.

Professional Affiliations

American Association for Justice- Class Action Litigation Group, Legal Affairs Group,
LGBT Caucus

American Bar Foundation, Fellow

Consumer Attorneys of California, Member

Civil Justice Research Initiative of Berkeley Law, Board Member

Impact Fund, Board Member

Law360- Cybersecurity & Privacy, Former Editorial Advisory Board Member

National Center for State Courts, Lawyers Committee

National Civil Justice Institute, President

Select Publications & Presentations

Presenter, "Emerging Issues Affecting Class Actions and Pharma Litigation: Legal Writing," AAJ Annual Convention, July 2025.

Moderator, "The N.D. Guidelines in Practice," Civil Justice Research Initiative, November 2023.



David M. Berger | Partner

David represents plaintiffs in class actions with a special emphasis on data breach, privacy, and financial services litigation. He currently serves as lead or co-lead counsel in matters including *In re: Prosper Funding, LLC Data Breach Litigation* (N.D. Cal.); *In re: MGM Customer Data Sec. Litigation* (D. Nev.); *In re: Equifax, Inc. Fair Credit Reporting Act Litigation* (N.D. Ga.); and *In re: Sequoia Benefits and Insurance Data Breach Litigation* (N.D. Cal.), among others. David has also represented victims in some of the largest and most influential data privacy and security cases, including litigation against Equifax, Anthem, Vizio, Adobe, Banner Health, and Excellus BlueCross BlueShield. David has repeatedly obtained record-breaking settlements on behalf of his clients, including in the Equifax and Anthem data breach cases, which set successive records for the largest data breach settlement in history.

David is widely regarded as a leader in litigation involving data breach and privacy, which is underscored by his broad technical expertise—from hacking techniques and cybersecurity controls to industry standard IT practices, information security frameworks, and auditing processes. He has deposed Chief Information Security Officers and information security professionals at Fortune 500 corporations, worked with expert witnesses on cutting-edge cybersecurity and damages theories, and supervised large-scale document review teams poring over millions of technical documents in a compressed timeframe.

Outside of his litigation experience, David is an active member of the class action legal community. He is the former chair of the American Association for Justice’s Consumer Privacy and Data Breach Litigation Group. He is also an active member of The Sedona Conference’s Working Group on Data Security and Privacy Liability, which identifies and comments on trends in data security and privacy jurisprudence to move the law forward in a reasoned and just way. David was a member of The Sedona Conference’s Biometric Security Brainstorming Group, and was recently selected to the Breach Notification Statutes Brainstorming Group. David is also frequently invited to present at conferences and symposia on information security and privacy issues and consumer class actions.

Prior to joining Gibbs Mura, he served as a law clerk to the Honorable Laurel Beeler, Northern District of California (2011-2014). Before law school, David worked as a magazine editor and television presenter in Taiwan and managed an outdoor center on an island off the West Coast of Scotland.

Litigation Highlights

In re Prosper Funding, LLC Data Breach Litigation – Interim co-lead counsel in ongoing litigation against financial services company Prosper Funding LLC, concerning a September 2025 data breach which exposed and compromised the sensitive personal identifying information like social security numbers.

In re Equifax, Inc. Customer Data Security Breach Litigation – In securing what was described by the court as “the largest and most comprehensive recovery in a data breach case in U.S. history by several orders of magnitude,” David played an integral role by negotiating key business practice changes including overhauling Equifax’s handling of consumers’ personal information and data security and requiring that the company spend at least \$1 billion for data security and related technology over five years in addition to comprehensive technical and governance reforms.

In re Anthem, Inc. Data Breach Privacy Litigation – Key member of the litigation team representing interests of plaintiffs and putative class members following massive data breach of approximately 80 million personal records, including names, dates of birth, Social Security numbers, health care ID numbers, email and physical addresses, employment information, and income data. The lawsuit settled in August 2018 for \$115 million, the largest data breach settlement in history.

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Practice Emphasis

Class Actions

Consumer Protection

Privacy

Education

Northwestern University
School of Law, J.D., 2008

University of Wisconsin,
Madison, B.A., 1998

Admissions

California

In re Adobe Systems Inc. Privacy Litigation – Key member of the litigation team that succeeded in reversing a long line of decisions adverse to consumers whose personal information was stolen in data breaches. Judge Koh issued a 41-page decision in plaintiffs’ favor and the settlement resulted in a comprehensive reform of Adobe’s data security practices. The court’s landmark decision on Article III standing marked a sea change and has been cited favorably in over twenty cases in the year since it was issued.

In re Equifax, Inc. Fair Credit Reporting Act Litigation – Court-appointed Interim Co-lead counsel in ongoing litigation against Equifax related to the company reporting inaccurate credit information on approximately 2.5 million Americans who applied for mortgages, loans, and credit cards between March 17 and April 6, 2022.

Smallman v. MGM Resorts International – Interim Co-lead Counsel in litigation against MGM, following the data breaches in 2019 and again in 2023 in which the personal data of 10.6 million MGM customers was stolen and posted on underground hacking forums. A settlement for \$45 million received final approval on June 18, 2025.

In re Sequoia Benefits Data Breach Litigation – Court-appointed Class Counsel in litigation against Sequoia Benefits regarding the 2022 data breach which exposed and compromised the sensitive information of over 580,000 people nationwide, including Social Security numbers, member IDs, and wage data. A settlement for \$8.7 million cash payment to a nationwide class, including a California subclass receiving an extra cash payment, and requiring Sequoia Benefits to adopt enhanced data privacy practices, received preliminary approval on September 10, 2026. Final approval is scheduled for April 7, 2026.

Awards & Honors

Lawdragon 500 Leading Plaintiff Financial Lawyers (2025-2026)

Northern California Super Lawyers (2021-2025)

Rising Star, Northern California Super Lawyers (2016-2018)

Professional Affiliations

American Association for Justice- Consumer Privacy and Data Breach Litigation Group
(Board Member, Former Chair)

Member, Sedona Conference’s Working Group on Data Security and Privacy Liability

Co-Chair, Sedona Conference’s WG11 Brainstorming Group “Exploring Greater
Efficiencies in Data Breach and Privacy Class Action Litigation”

National Civil Justice Institute

Selected Presentations and Publications

Presenter, “Strategies and Tactics in Consumer Privacy and Data Breach Cases: Damage Theories Supporting Class Certification,” AAJ Annual Convention, July 2025.

Presenter, “Cybersecurity Issues Affecting Health Benefit Plans,” U.S. Department of Labor, Advisory Council on Employee Welfare and Pension Benefit Plans, July 2022.

Presenter, "Internet Data Accumulation and Protection," Pound Civil Justice Institute, The Internet and the Law: Legal Challenges in the New Digital Age, November 2021.

Presenter, "Facial Recognition Technology Bans," The Sedona Conference, Annual Meeting of Working Group 11 on Data Security and Privacy Liability, April 2021.

Presenter, "Privacy and Data Breach Class Actions," Western Alliance Bank Class Action Law Forum 2020, March 2020.

Presenter, “Communicating with the Class,” Class Action Mastery Forum, January 2019.

Presenter, “Hot Topics in Consumer Class Actions Against Insurers: Filed Rate Doctrine, Standing, and Reverse Preemption of RICO Claims,” Sacramento California Insurance Regulation and Litigation Seminar, Clyde & Co., March 2018.



Eileen Epstein Carney | Partner

Eileen represents investors and consumers who have been harmed by financial fraud and other corporate misconduct. This includes oversight of investigation into alleged Ponzi schemes, securities fraud, and other financial scams. Eileen helps run initial case investigations and deploys her substantial experience to ensuring that the victims of financial fraud are made whole.

Eileen is also deeply involved in the day-to-day operations of Gibbs Mura. She executes on the firm's strategic vision with a focus on recruiting talented and diverse professionals, training, mentorship, community engagement, and client-focused activities. She previously spent seven years as the Director of Business Development at Gibbs Mura, leading the firm's marketing, business development and public relations activities. She has more than 15 years of experience in legal marketing and business development, with a proven track record of success overseeing teams and implementing firm-wide strategies for new business growth, marketing and media relations.

Eileen earned a J.D. from American University, Washington College of Law, and graduated *magna cum laude*, *Phi Beta Kappa*, from Lehigh University with a B.A. in journalism.

She is admitted to practice law in Minnesota.

Professional Affiliations

American Association for Justice

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eye@classlawgroup.com

Education

American University
Washington College of Law,
J.D., 2005

Lehigh University, B.A., *magna cum laude*, *Phi Beta Kappa*,
2002

Admissions

Minnesota



Dylan Hughes | Partner

Dylan Hughes concentrates his practice on investigating and prosecuting fraud matters on behalf of whistleblowers, consumers and employees who have been harmed by corporate misconduct. He coordinates initial case evaluations and analyses in a variety of practice areas and has substantial experience in matters involving health care fraud, particularly in the Medicare and pharmaceutical contexts. Dylan represents consumers in cases ranging from false advertising to defective products, and employees in misclassification and wage and hour cases under state and federal laws.

Mr. Hughes has extensive experience prosecuting complex personal injury cases. He helped to obtain millions of dollars for women who suffered blood clots and other serious injuries after taking birth control pills. He has also represented clients injured by defective medical devices, including defibrillators, blood filters, as well as back pain implants. Mr. Hughes was part of the team that recently settled a case alleging medical malpractice for a spinal surgery that resulted in partial paralysis.

Mr. Hughes began his career as a law clerk for the Honorable Paul A. Mapes, Administrative Law Judge of the Office of Administrative Law Judges, United States Department of Labor. He is a member of the American Bar Association, Consumer Attorneys of California, American Association for Justice Class Action Litigation Group and the Consumer Rights Section of the Barristers Club.

Litigation Highlights

Skold v. Intel Corp. – Key member of the legal team in this decade-long litigation that achieved a nationwide class action settlement on behalf of approximately 5 million consumers of Intel Pentium 4 processors. The lawsuit changed Intel’s benchmarking practices and Intel agreed to a cash settlement for the class, along with \$4 million in charitable donations.

In re Adobe Systems Inc. Privacy Litigation – Key member of the litigation team that succeeded in reversing a long line of decisions adverse to consumers whose personal information was stolen in data breaches. Judge Koh issued a 41-page decision in plaintiffs’ favor and the settlement resulted in a comprehensive reform of Adobe’s data security practices. The court’s landmark decision on Article III standing in this case marked a sea change and has been cited favorably in over twenty cases in the year since it was issued.

Velasco v. Chrysler Group LLP (n/k/a FCA US LLC) – represented consumers who alleged they were sold and leased vehicles with defective power control modules that caused vehicle stalling. In addition to negotiating a recall of all 2012-13 Jeep Grand Cherokee and Dodge Durango vehicles, the lawsuit also resulted in Chrysler reimbursing owners for all repair and rental car expenses, and extending its warranty.

Parkinson v. Hyundai Motor America – certified a nationwide class alleging Hyundai sold vehicles with defective flywheel systems, resulting in a favorable settlement for the class.

Awards & Honors

Northern California Super Lawyer (2012-2025)

Professional Affiliations

Consumer Attorneys of California
American Association for Justice- Class Action Litigation Group

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Practice Emphasis

Class Actions
Consumer Protection
Employment Law
Whistleblower

Education

University of California College
of the Law, San Francisco, J.D.,
2000
University of California,
Berkeley, B.A., 1995

Admissions

California



Linda Lam | Partner

Linda Lam focuses her practice on representing individuals who have been harmed by corporate misconduct. She has recovered tens of millions of dollars for consumers and investors by prosecuting fraud, breach of contract, and breach of fiduciary duty cases against large banks and insurance companies.

Linda regularly represents investors who have lost substantial sums of money as a result of fraud, including most recently in *Camenisch v. Umpqua Bank*. There, the plaintiffs alleged that Umpqua aided and abetted a fraudulent scheme based in Marin County that caused investors, many of whom are senior citizens, to lose hundreds of millions of dollars. After a four-week trial that ended in a hung jury, the case settled for \$55 million.

Linda has also been an advocate for borrowers who suffered foreclosures during the Great Recession. She represented a certified class of over 1,200 borrowers who lost their homes after Wells Fargo wrongfully denied them trial mortgage modifications. The case settled for \$40 million, resulting in significant payments to each class member.

In addition to prosecuting class actions, Linda also represents individual clients in personal injury cases. Most recently, she achieved a favorable settlement for a student who suffered a traumatic brain injury as a result of peer-on-peer harassment at a Bay Area school. She has also represented individuals in automobile and pedestrian accident cases, as well as medical malpractice cases.

Before joining Gibbs Mura, Linda represented workers and retirees in cases concerning employee benefits.

Litigation Highlights

Camenisch v. Umpqua Bank – One of the trial lawyers who represented over 1,200 class members in a four-week jury trial against Umpqua Bank (now known as Columbia Bank). The plaintiff class alleged that Umpqua aided and abetted a fraudulent investment scheme by Professional Financial Investors (PFI). Plaintiffs argued that PFI ran a fraudulent scheme that used investor money to personally benefit PFI’s executives, including its principals Ken Casey and Lewis Wallach, pay other investors, and cover recurring shortages across its dozens of accounts at Umpqua. Ultimately, the jury could not reach a unanimous decision, and the court declared a mistrial. The parties reached a \$55 million settlement weeks later, and the Court granted final approval on September 11, 2025. Judge P. Casey Pitts, who oversaw the trial, called the settlement an “excellent” outcome for the class.

Hernandez v. Wells Fargo Bank, N.A. – Represented a certified class of more than 1,200 mortgage borrowers who lost their homes to foreclosure after Wells Fargo erroneously denied them trial mortgage modifications. The case settled in two phases for a total of \$40.3 million. Judge William Alsup, who oversaw the case, praised the settlement as bringing “significant” relief to each class member and noted the amount was “greater than those approved by other courts in this district involving similar claims concerning loan modifications.”

Steven Cooper v. United States of America – Represented a veteran of the United States Army who alleged that he received negligent medical care at a VA facility, resulting in a delayed diagnosis of aggressive prostate cancer. The plaintiff alleged that by the time the cancer was discovered and diagnosed, it had become incurable. Linda was part of the trial team that won a \$2.5 million judgment for the plaintiff.

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Practice Emphasis

Class Actions

Consumer Protection

Education

University of California College
of the Law, San Francisco, J.D.,
magna cum laude, *Order of the
Coif*, 2014

University of California Los
Angeles, B.A., 2011

Admissions

California

Asokan et. al. v. American General Ins. Co. – Litigated this insurance and investment fraud case against American General Insurance Co, an AIG subsidiary. Linda represented six plaintiffs who were marketed an investment involving a specialized American General whole life policy that, when purchased through a particular defined benefit plan, would supposedly provide a multitude of tax benefits. Plaintiffs alleged that American General knew but concealed from them that its attorney had advised that these plans no longer complied with the law. Plaintiffs suffered substantial losses as a result of this alleged fraudulent concealment. The case settled for a confidential sum eight days into the jury trial.

Awards & Honors

Northern California Super Lawyers, *Rising Star* (2017-2024)

Publications & Presentations

Co-author, “H.R. 1215: Obliterating Access to Justice for Severe Medical Negligence,” Impact Fund Practitioner Blog, May 2, 2017.

Author, *The Real ID Act: Proposed Amendments for Credibility Determinations*, 11 Hastings Race & Poverty L.J. 321, 2014.



Steve Lopez | Partner

Steve Lopez represents consumers, employees and whistleblowers who have been harmed by corporate misconduct. He has litigated a wide variety of cases, including automotive class actions, environmental mass torts, pharmaceutical cases, sexual abuse litigation, financial negligence cases, employment class actions, and mass arbitrations. For years, Steve has co- led large teams of lawyers and paralegals representing thousands of renters, homeowners and business owners affected by devastating California wildfires. He is a vital member of the team that helped secure over \$1 billion from PG&E on behalf of survivors of the Camp Fire and North Bay Fires.

Leadership Roles

Courts have appointed Steve to leadership roles in a number of high impact cases. He currently serves on the Plaintiffs' Steering Committee in the consolidated Social Media Addiction Lawsuits in California state court, representing hundreds of children and families alleging that they have been harmed by addiction to TikTok, Instagram, Snapchat, and other social media platforms. Steve serves as co-liaison counsel in lawsuits against Pfizer alleging that Depo-Provera birth control causes brain tumors. Steve also serves on the Plaintiffs' Steering Committee in litigation related to the Eaton Fire in Los Angeles, representing individual and family wildfire survivors against the utility Southern California Edison. Previously, Steve was appointed as liaison counsel in class action litigation on behalf of investors who lost money during a platform outage on the Robinhood Trading Platform, which resulted in a \$9.9 million settlement.

Awards and Recognition

In 2025, the *Daily Journal* named Steve to its Top 40 Under 40 list, a recognition of the top lawyers under the age of 40 in California. From 2023 to 2025, Steve has been named to Lawdragon's list for *500 X – The Next Generation*, which highlights promising young attorneys who have already handled matters with "significant impact" as future leaders of the legal profession.

Steve is a 2014 graduate of the University of California, Berkeley, School of Law, where he was a Publishing Editor for the California Law Review and an Editor for the Berkeley Journal of Employment and Labor Law. He was also a member of the La Raza Law Students Association and the Legal Aid Society–Employment Law Center's Berkeley Workers' Rights Clinic.

Prior to law school, Mr. Lopez performed research for a consulting firm dedicated to improving justice programs. He received his B.A. in economics and international relations from the University of Virginia in 2008.

Litigation Highlights

In re PG&E Corp. (2017 North Bay Fire and 2018 Camp Fire Lawsuits) – Co-led a team from Gibbs Mura and co-counsel representing over 6,000 wildfire survivors of the 2018 Camp Fire in Paradise, California, and the 2017 North Bay Fires across Northern California. The lawsuits against PG&E alleged that electrical equipment and power lines owned and operated by the utility ignited the wildfires that raged across Northern California. The team secured over \$1 billion in compensation on behalf of their clients.

In re Social Media Adolescent Addiction/Personal Injury Products Liability Litigation – Court-appointed to the Plaintiffs' Steering Committee in the JCCP consolidation of lawsuits against Instagram, Facebook, Snapchat, TikTok, and YouTube. He plays an integral role in working with data experts, motion practice, and plaintiff discovery. Steve coordinates client outreach and case development on behalf of hundreds of children, teens, and their families who allege that these social media companies purposely designed their platforms to be defective and dangerous, with addictive algorithms and features that may cause a wide variety of harms including depression, anxiety, and eating disorders.

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Practice Emphasis

Class Actions

Consumer Protection

Education

University of California,
Berkeley, School of Law,
J.D., 2014

University of Virginia, B.A.,
2008

Admissions

California

Cadena v. American Honda Motor Co. – Represents hundreds of thousands of Honda CR-V and Honda Accord purchasers in litigation alleging that the automatic emergency braking system in these vehicles is defective and may cause the car to suddenly brake without warning. Steve argued class certification, summary judgment, and related Daubert motions, and oversees discovery and expert work. In June 2024, the Court certified eight classes of consumers.

Individual Claimants v. Amazon.com, Inc. – Represents over 32,000 Amazon Flex drivers in mass arbitration, alleging that Amazon has misclassified them as independent contractors and underpaid them as a result. Drivers’ claims include violations of overtime law, failure to pay for rest and meal breaks, and failure reimburse business-related expenses.

Southern California Gas Leak Cases – Represented over 900 residents around the Los Angeles suburb of Porter Ranch who were affected by the Aliso Canyon well rupture and ensuing gas leak, the largest methane leak in U.S. history. Plaintiffs were displaced from their homes, suffered illnesses and injuries, sustained property value losses, or lost business due to the leak. Steve and the team worked closely with the firm’s clients for over eight years to submit damages during the discovery process, ultimately achieving over \$25 million in settlement payments.

O’Brien v. POPSUGAR – Represented a certified class of internet influencers who alleged that PopSugar had misappropriated their identities and likenesses to deprive them of affiliate link profits in a case involving copyright issues. Steve and the team successfully won a motion to remand after defendants attempted to assert that the copyright claims meant plaintiffs’ state law claims for damages were preempted. The litigation settled for over \$2 million.

Glenn v. Hyundai Motor America – Represented Hyundai drivers alleging that their vehicles were defective because their sunroofs had a propensity to spontaneously shatter. Steve led discovery efforts and worked on the expert discovery team. The team achieved a \$30+ million class action settlement, which the court praised as “an extraordinarily creative solution” for “an extraordinarily complex case.”

Awards & Honors

Top 40 Under 40, *Daily Journal*, 2025

Lawdragon 500 X – The Next Generation (2023-2025)

Northern California Super Lawyers, *Rising Star* (2017-2025)

Professional Affiliations

American Association for Justice

Consumer Attorneys of California, Former Board Member

Publications and Presentations

Presenter, “California Fires Litigation,” Fourth Annual Shades of Mass Conference, September 6, 2025.



Rosemary Rivas | Partner

Rosemary has dedicated her legal career to representing consumers in complex class action litigation involving a wide variety of claims, from false advertising and defective products to privacy violations. She is committed to obtaining justice for consumers and has recovered billions of dollars for her clients and the classes they represent.

Rosemary serves in leadership positions in a number of large, complex class action cases and multi-district litigation. In a highly competitive appointment process, the Honorable Charles R. Breyer appointed Rosemary to the Plaintiffs' Steering Committee in the Volkswagen Clean Diesel Litigation, which resulted in a record-breaking settlement totaling more than \$14 billion. The Recorder, a San Francisco legal newspaper, named the lawyers selected by Judge Breyer as a class action "dream team." For her work in the Volkswagen case, Rosemary received the 2018 California Lawyer Attorney of the Year (CLAY) Award, which is given to outstanding California lawyers "whose extraordinary work and cases had a major impact on the law."

She has received numerous awards and honors for the quality of her legal work, including the Bay Area Legal Aid Guardian of Justice Award for her achievements in the law and her role in helping direct *cy pres* (remaining settlement) funds to promote equal access to the legal system. She has been recognized as a *Northern California Super Lawyer* since 2019 and was previously named a *Rising Star* by Super Lawyers Magazine. Rosemary is currently a Lawyer Representative for the Northern District of California and to the Ninth Circuit Judicial Conference.

Rosemary is a fluent Spanish-speaker and previously served on the Board and as Diversity Director of the Barristers Club of the San Francisco Bar Association. She frequently presents at legal conferences on developments in consumer protection and class action litigation.

Litigation Highlights

Porsche Gasoline Litigation – As part of the Plaintiffs' Steering Committee and as Class Counsel, Rosemary represented consumers alleging that Porsche engaged in practices that skewed emissions and fuel economy test results for certain Porsche vehicles. The Honorable Charles R. Breyer granted final approval of a proposed nationwide class action settlement providing a non-reversionary common fund of \$80 million.

Lash Boost Cases – As Class Counsel, Rosemary Rivas represented consumers who alleged that Rodan + Fields failed to disclose material information relating to its Lash Boost product, namely, the potential side effects and risks of adverse reactions presented by the ingredient Isopropyl Cloprostenate. The Honorable Ethan Schulman granted final approval of a proposed nationwide class action settlement providing a non-reversion common fund of \$30 million in cash and \$8 million in credits.

In re: Apple Inc. Device Performance Litigation – The Honorable Edward J. Davila appointed Rosemary to the Plaintiffs' Executive Committee in this nationwide class action alleging that Apple intentionally slowed down consumers' iPhones. The case settled for \$310 million.

In re: Hill's Pet Nutrition, Inc., Dog Food Products Liability Litigation – Rosemary represented consumers alleging that Hill's sold dog food with excessive Vitamin D that was harmful to pets. Chief Judge Julie A. Robinson granted final approval of a nationwide class action settlement providing for a common fund of \$12.5 million.

Awards & Honors

Lawdragon 500 Leading Plaintiff Financial Lawyers (2025-2026)

Top Women Lawyers in California, *Daily Journal* (2024)

Northern California Super Lawyer (2019-2025)

California Lawyer Attorney of the Year (CLAY) Award, *Daily Journal* (2018)

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Practice Emphasis

Class Actions
Consumer Protection
Financial Fraud

Education

University of California College
of the Law, San Francisco,
J.D., 2000

San Francisco State
University, B.A., 1997

Admissions

California

Rising Star, *Northern California Super Lawyers* (2009-2011)
Guardian of Justice Award, *Bay Area Legal Aid* (2015)

Professional Affiliations

American Association for Justice- Class Action Litigation Group
Equal Justice Society, Advisory Board Member
Law360- Consumer Protection, Former Editorial Advisory Board Member
Lawyer Representative for the Northern District of California and to the Ninth Circuit
Judicial Conference

Publications and Presentations

Presenter, “Current Trends in Consumer Class Actions,” Class of Our Own: Litigating Women’s Summit, May 2023.

Presenter, “Consumer Class Actions,” Western Alliance Bank Class Action Law Forum, 2021 and 2022.

Presenter, “Nationwide Settlement Classes: The Impact of the Hyundai/ Kia Litigation,” National Consumer Law Center’s Consumer Rights Litigation Conference and Class Action Symposium, 2018.

Presenter, “One Class or 50? Choice of Law Considerations as Potential Impediment to Nationwide Class Action Settlements,” 5th Annual Western CLE Program on Class Actions and Mass Torts, 2018.

Presenter, “The Right Approach to Effective Claims,” Beard Group- Class Action Money & Ethics, 2018.

Presenter, “False Advertising Class Actions: A Practitioner’s Guide to Class Certification, Damages and Trial,” The Bar Association of San Francisco, 2017.



Dave Stein | Partner

Dave Stein represents clients in cases ranging from securities and financial fraud class actions, to product liability and consumer-protection cases. Courts frequently appoint Dave as lead counsel in these cases, and Law360 praised him as a “tenacious” litigator with a “reputation as one of the best consumer advocates around.”

The Daily Journal recognized Dave as one of the Top 40 attorneys in the state of California under the age of 40, and he was also honored in *Law360*'s nationwide list of “Top Class Action Attorneys Under 40.” Dave has also been repeatedly rated by his colleagues as a Northern California Super Lawyer.

Dave is frequently called upon to discuss emerging issues in complex litigation. He has been selected four times to serve on Law360's Product Liability Editorial Advisory Board, advising on emerging trends and important issues impacting product liability cases.

Before entering private practice, Dave served as judicial law clerk to U.S. District Court Judge Keith Starrett and U.S. Magistrate Judge Karen L. Hayes.

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Practice Emphasis

Class Actions
Consumer Protection
Financial Fraud
Product Liability
Securities Litigation

Education

Emory University School of
Law, J.D., 2007
University of California, Santa
Barbara, B.A., 2003

Admissions

California

Reputation and Recognition by the Courts

Dave has built a reputation for the quality of his representation and tenacious advocacy on behalf of the clients and classes he represents:

“[T]his is an extraordinarily complex case and an extraordinarily creative solution... I [want to] thank you and compliment you gentlemen. It's been a real pleasure to work with you.”

- Hon. D. Carter, *Glenn v. Hyundai Motor America* (C.D. Cal.)

“You made it very easy to deal with this case and clearly your years of expertise have carried the day here. Nice work. Thank you.”

- Hon. M. Watson, *In re Am. Honda Motor CR-V Vibration Litig.* (S.D. Ohio)

“Exceedingly well argued on both sides. Sometimes people really know their stuff on both sides which is what happened today so thank you.”

- Hon. J. Tigar, *In re General Motors CP4 Fuel Pump Litig.* (N.D. Cal.)

Litigation Highlights

In re: Peregrine PFG Best Customer Accounts Litigation – Represented investors in litigation against U.S. Bank and JPMorgan Chase arising from the collapse of Peregrine Financial Group, Inc. The former Peregrine customers were seeking to recover the millions of dollars that was stolen from them out of segregated funds accounts. Plaintiffs' efforts led to settlements with JPMorgan Chase and U.S. Bank worth over \$75 million.

Todd Benjamin International, Ltd. v. Grant Thornton International – Represented investors in TCA Global Credit Master Fund L.P. and its feeder funds. The investors alleged that the funds' management inflated assets and earnings, and that the funds' auditors knew about the overstatement but failed to take appropriate action. After multiple years of litigation, Plaintiffs' efforts led to settlements of \$26.5 million for investors. At the hearing granting final approval on May 20, 2025, Judge Scola thanked counsel for their “excellent work in the case.”

Edwards v. Ford Motor Co. – In a class action alleging that Ford sold vehicles despite a known safety defect, Dave twice argued plaintiff's position before the U.S. Court of Appeals for the Ninth Circuit. In the first appeal, Dave succeeded in obtaining a reversal of the trial court's denial of class certification. In the second, plaintiff again prevailed, with the Ninth Circuit affirming a ruling that Dave's and his colleagues' efforts generated free repairs, reimbursements, and extended warranties for the class.

Edwards v. Ford Motor Co. – In a class action alleging that Ford sold vehicles despite a known safety defect, Dave twice argued plaintiff’s position before the U.S. Court of Appeals for the Ninth Circuit. In the first appeal, Dave succeeded in obtaining a reversal of the trial court’s denial of class certification. In the second, plaintiff again prevailed, with the Ninth Circuit affirming a ruling that Dave’s and his colleagues’ efforts generated free repairs, reimbursements, and extended warranties for the class.

Browne v. American Honda Motor Co., Inc. – Represented purchasers of 750,000 Honda Accord and Acura TSX vehicles that were allegedly sold with brake pads that wore out prematurely. The case settled with class members receiving approximately \$25 million.

LLE One v. Facebook – Represented small businesses who alleged that Facebook overstated how long users were watching video ads on Facebook’s platform. After years of litigation, the federal court approved a \$40 million settlement to the class.

Paeste v. Government of Guam – Secured a permanent injunction against the Government of Guam and several of its highest ranking officials in a suit involving the government’s unlawful administration of income tax refunds. Defended the judgment before the Ninth Circuit U.S. Court of Appeals, leading to a complete victory for the taxpayers in the published decision, *Paeste v. Government of Guam*, 798 F.3d 1228 (9th Cir. 2015)

Awards & Honors

Lawdragon 500 Leading Plaintiff Financial Lawyers (2025-2026)
Northern California Super Lawyer (2021, 2023-2025); Rising Star (2013-2020)
“2017 Top 40 Under 40,” *Daily Journal*
Top Class Action Attorneys Under 40, *Law360* Rising Stars (2017)

Professional Affiliations

American Association for Justice

Selected Publications & Presentations

Moderator, “A View from the Bench II: Judicial Insights on Managing Complex Litigation and the Pandemic’s Lasting Impact,” *ABA Tort Trial & Insurance Practice Section, 2022 Motor Vehicle Product Liability Litigation Conference*, April 2022.

Presenter, “Class Damages,” *AAJ Class Action Litigation Group*, June 2020.

Co-Author, “Recent Decision Highlights the Importance of Early Discovery in Arbitration,” *Daily Journal*, May 2019.

Presenter, “Article III Standing in Data Breach Litigation,” AAJ Class Action Seminar, December 2018.

Presenter, “Determining Damages in Class Actions,” *Class Action Mastery Conference*, HB Litigation, May 2018.

Presenter, “Mass Torts and Class Actions: The Latest and Greatest, Update on Class Action Standing” *56th Annual Consumer Attorneys of California Convention*, November 2017.

Author, Third Circuit Crystallizes Post-Spokeo Standard, *Impact Fund Practitioner Blog*, July 2017.



Steven Tindall | Partner

Steven Tindall represents employees seeking fair pay and just treatment in individual, representative, and class action lawsuits against employers. His cases involve allegations of misclassification, discrimination, sexual harassment, wrongful termination, retaliation, WARN Act, and ERISA violations. He has 25 years of experience representing employees in a variety of industries, including tech, gig economy, financial services, construction, transportation, and private education. Steven also represents consumers in class action litigation and individuals in mass tort personal injury lawsuits. He has been honored twice with the Daily Journal's California Lawyer Attorney of the Year ("CLAY") award: in 2023 for his involvement and success at trial against the City of San Diego on behalf of single-family residential customers challenging San Diego's unconstitutional water rates, and in 2019 for his work litigating before the California Supreme Court on behalf of low-income borrowers challenging CashCall's lending practices.

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Practice Emphasis

Class Actions

Employment Litigation

Education

University of California,
Berkeley, School of Law, J.D.,
magna cum laude, 1996.

Yale University, B.A., *summa
cum laude*, *Phi Beta Kappa*.

Admissions

California

Steven clerked for Hon. Judith N. Keep of the United States District Court for the Southern District of California and for Hon. Claudia Wilken of the U.S. District Court for the Northern District of California. Prior to joining Gibbs Mura, he was a partner at Rukin Hyland Doria & Tindall, and at Lief Cabraser Heimann & Bernstein. At Rukin Hyland and Lief Cabraser, he focused on plaintiffs' class action litigation in the fields of wage and hour and other employment law, antitrust, and consumer protection. Steven also litigated multiple mass tort personal injury and toxic tort cases.

Steven received his B.A. degree in English Literature from Yale University, graduating *summa cum laude*, Phi Beta Kappa, and with distinction in his major. He earned his J.D. degree from the University of California, Berkeley, School of Law in 1996. While at Berkeley Law, Steven co-directed the East Bay Workers' Rights Clinic.

Litigation Highlights

San Diego and Otay Water District Tiered Water Rates Lawsuits – Key member of the litigation team achieving a \$79.5 million verdict on behalf of single-family customers in a lawsuit charging the City of San Diego with setting water rates that are noncompliant with the California Constitution. Steven was instrumental in challenging San Diego's asserted justifications for its unconstitutional water rates. The case is currently on limited remand in San Diego Superior Court.

Key member of the litigation team achieving a verdict on behalf of single-family residential customers in a lawsuit challenging the Otay Water District with setting unconstitutional water rates. The case is also on limited remand.

Breach of Contract – As co-lead counsel, Steven helped recover over \$29 million on behalf of hundreds of employees in a class action lawsuit involving breach of contract claims against a global consulting company.

Retirement Benefits – Represented retirees whose retirement benefits were slashed after a corporate spinoff. The litigation resulted in a \$9 million recovery paid out to class members.

Gig Economy – Represents thousands of individual clients in multiple gig economy cases alleging that they were misclassified as independent contractors and should be entitled to minimum wage, overtime pay, and expense reimbursement under California and other state labor laws.

Consumer Loans – Represents over 100,000 borrowers in a certified class action lawsuit against online lender, CashCall, alleging that they preyed on low-income borrowers through high-interest-rate loans. Steven was part of the litigation team that achieved a ruling from the Trial Court awarding \$245 million in restitution for class members, which defendant may appeal. Previously, Steven had helped achieve a unanimous ruling from the CA Supreme Court regarding the possible unconscionability of the loan contracts involved in the case.

Awards & Honors

Best Lawyers in America, Employment Law – Individuals (2026)
California Lawyer Attorney of the Year (CLAY) Award (2023, 2019)
Northern California Super Lawyers (2009-2025)

Publications & Presentations

Presenter, “When to Consider a Mass Arbitration, What to Expect and How to Reach a Successful Conclusion,” California Employment Lawyers Association (CELA) Advanced Wage & Hour Seminar, April 25, 2025.

Presenter and Panelist, “Arbitrating Wage and Hour Cases from Start to Finish,” California Employment Lawyers Association (CELA) Annual Conference, September 30, 2023.

Co-Author, “DoorDash: Quick Food, Slow Justice,” Daily Journal, March 24, 2020.

Presenter, “Damages & Penalties in Exemption and Misclassification Cases,” Bridgeport Independent Contractor, Joint Employment Misclassification Litigation Conference, July 26, 2019.

Contributor, “Can Interest Rates be Unconscionable?” Daily Journal Appellate Report Podcast, July 6, 2018.

Co-Author, “Epic Systems and the Erosion of Federal Class Actions,” Law360 Expert Analysis, July 5, 2018.

Co-Author, “Senate Should Reject Choice Act and Its Payday Free Pass,” Law360 Expert Analysis, July 12, 2017.

Presenter, “Understanding and Litigating PAGA Claims,” Bridgeport Continuing Legal Education, March 3, 2017.

Contributing Author, California Class Actions Practice and Procedure, Matthew Bender & Co., Inc., 2006

Author, *Do as She Does, Not as She Says: The Shortcomings of Justice O’Connor’s Direct Evidence Requirement in Price Waterhouse v. Hopkins*, Berkeley Journal of Employment and Labor Law, 17, No. 2, 1996.



Amy Zeman | Partner

Amy’s tenacious trial advocacy in class actions and mass torts ensures her clients’ voices are heard and respected. She led a multi-million-dollar Ponzi Scheme class action through a four-week trial against Umpqua Bank, ultimately securing a \$55 million settlement on behalf of defrauded investors. Amy also achieved a \$14.975 million dollar jury verdict as co-lead trial counsel on behalf of Pacific Fertility Center patients whose genetic material was destroyed in a catastrophic cryo-preservation tank failure; the Washington Post hailed the outcome as “a historic verdict.” And Amy’s work led to a \$73 million settlement from UCLA on behalf of sexual assault survivors who brought claims against gynecologist Dr. James Heaps. Her tenacious style has delivered outstanding results and justice to consumers, victims of personal injuries, and sexual assault survivors in class action and mass tort litigation.

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Practice Emphasis

Class Actions

Consumer Protection

Mass Personal Injury

Whistleblower/ Qui Tam

Education

University of California
College of the Law, San
Francisco, J.D., *magna cum
laude*, 2010.

University of Missouri, B.A.,
summa cum laude, 1998.

Awards & Honors

*Lawdragon 500 Leading
Plaintiff Financial Lawyers,*
2025-2026

*Lawdragon 500 Leading
Plaintiff Consumer Lawyers,*
2023-2025

*Top Women Lawyers in
California,* Daily Journal,
2023, 2021

Winning Litigators Finalist,
National Law Journal, 2021

Product Liability MVP,
Law360, 2021

*Top Plaintiff Lawyers in
California,* Daily Journal,
2021

*Northern California Super
Lawyer 2021-2025,* Rising
Star 2013-2020

Admissions

California

Florida

Lawdragon has selected Amy to both its Leading Plaintiffs Consumer Lawyer and Leading Plaintiff Financial Lawyer lists for 2025, and she was previously honored as one of the Top Women Lawyers in California by the Daily Journal in 2023. Amy has previously served in leadership roles for the American Association for Justice’s Class Action and Qui Tam Litigation Groups.

As a leader of the firm’s whistleblower attorney practice group, Amy represents the first-to-file relator in *U.S. ex rel. Ronda Osinek v. Kaiser Permanente, et al.*, which led to an historic \$556 million settlement from Kaiser Permanente in January of 2026, described as the largest False Claims Act recovery in the history of the Medicare Advantage program by Law360.

Amy is a distinguished litigator in consumer protection and mass injury matters. She represented service members injured by 3M’s Combat Arms earplugs in the largest multi-district proceeding in U.S. history. She has litigated successful class actions on behalf of Nissan Altima owners, Ducati motorcyclists, Chase Bank credit card holders, and more. She has also represented individuals harmed by the chemotherapy drug Taxotere (docetaxel), by transvaginal mesh, the birth control medications Yaz and Yasmin, the diabetes drug Actos, and the antipsychotic medication Risperdal.

Prior to attending law school, Amy pursued a career in the financial sector, serving as the Accounting and Compliance Manager for the Marin County Federal Credit Union for almost seven years. Amy was a spring 2010 extern for the Honorable Marilyn Hall Patel of the United States District Court, Northern District of California. She received her J.D. magna cum laude from the University of California at Hastings and her two B.A. degrees summa cum laude from the University of Missouri.

Litigation Highlights

Camenisch v. Umpqua Bank – Amy served as lead trial counsel in a four-week jury trial on behalf of over 1,200 class members who alleged that Umpqua Bank (now known as Columbia Bank) aided and abetted a fraudulent investment scheme by Professional Financial Investors (PFI). Plaintiffs argued that PFI ran a fraudulent scheme that used investor money to personally benefit PFI’s executives, including its principals Ken Casey and Lewis Wallach, pay other investors, and cover recurring shortages across its dozens of accounts at Umpqua. Ultimately, the jury could not reach a unanimous decision, and the court declared a mistrial. The parties reached a \$55 million settlement weeks later, and the Court granted final approval on September 11, 2025. Judge P. Casey Pitts, who oversaw the trial, called the settlement an “excellent” outcome for the class.

Pacific Fertility Center Litigation – Amy served as co-lead trial counsel in a three-week trial on behalf of several patients who tragically lost eggs and embryos in a catastrophic cryo-preservation tank failure at San Francisco’s Pacific Fertility Center in 2018. The jury found the cryogenic tank manufacturer, Chart Inc., liable on all claims, and awarded \$14.975 million in aggregate damages to the five plaintiffs. Amy led the Gibbs Mura team, which first filed the lawsuit in March 2018 with co-counsel, and represented dozens of PFC patients whose frozen eggs and embryos were harmed or destroyed as a result of the tank failure. The 2021 trial was to be the first of over 30 trials in the consolidated litigation and led to a significant aggregate settlement that resolved hundreds of cases pending in federal and state court.

A.B. v. The Regents of the University of California – Amy served as plaintiffs’ counsel representing patients of former UCLA OB-GYN Dr. James Heaps in a class action lawsuit alleging assault, abuse, and sexual harassment against both Dr. Heaps and UCLA. The litigation resulted in a \$73 million dollar settlement to compensate over 5,500 women who received treatment from Dr. Heaps, as well as mandatory reforms to UCLA’s patient safety measures. The settlement received final approval in July 2021.

Kaiser Medicare Qui Tam Litigation – Amy and Gibbs Mura filed a qui tam lawsuit on behalf of a relator stating whistleblower allegations that Kaiser Permanente overcharged Medicare through improper diagnostic coding. On July 31, 2021, the Attorney General’s office and the Department of Justice elected to intervene in this litigation, and it was brought out from under seal into the public record. Kaiser Permanent agreed to pay \$556 million to settle the lawsuit in January 2026.

Sanborn, et al. v. Nissan North America, Inc. – appointed as class counsel with Eric Gibbs and others. Obtained a settlement 11 days before trial was set to begin on claims that the dashboards in certain Nissan vehicles were melting into a shiny, sticky surface that produced a dangerous glare. The settlement allowed class members to obtain a \$1500-\$2000 dashboard replacement for just \$250, or equivalent reimbursement for prior replacements.

Chase Bank U.S.A., N.A. “Check Loan” Contract Litigation – key member of the litigation team in this multidistrict case alleging that Chase Bank wronged consumers by offering long-term fixed-rate loans, only to later more-than-double the required loan payments. The litigation resulted in a \$100 million settlement eight weeks prior to trial.

Sugarman v. Ducati North America, Inc., - represented Ducati motorcycle owners whose fuel tanks on their motorcycles degraded and deformed due to incompatibility with the motorcycles’ fuel. In January 2012, the Court approved a settlement that provided an extended warranty and repairs, writing, “The Court recognizes that class counsel assumed substantial risks and burdens in this litigation. Representation was professional and competent; in the Court’s opinion, counsel obtained an excellent result for the class.”

Professional Affiliations

American Association for Justice - Co-Vice Chair of the Class Action Litigation Group; Past Co-Chair of the Qui Tam Litigation Group; Member of the Women Trial Lawyers Caucus Consumer Attorneys of California

Select Publications & Presentations

Presenter, “Fighting the Sealing of Settlements,” AAJ Annual Convention, July 2023.

Presenter, “Trial Skills Workshop: Strategies for Cross Examination,” CAOC Sonoma Seminar, March 2023.

Presenter, “Fees in Class Action Cases,” and “Qui Tam Case Strategies,” Mass Tort Med School and Class Action Conference, March 2017.

Presenter, “Claims-processing in Large and Mass-Tort MDLs,” Emerging Issues in Mass-Tort MDLs Conference, Duke University, October 2016.



Brian Bailey | Of Counsel

Brian represents clients harmed by corporate misconduct in complex litigation including employment discrimination, personal injury, and consumer protection cases. He represents employees and consumers in our cases against Honda, IBM, Amazon, and PG&E. Brian was an integral member of the team that secured \$1.5 billion in compensation for over 6,000 survivors of utility-caused wildfires in Northern California, and he currently represents survivors of the Eaton Fire in Los Angeles.

Prior to joining the firm, Brian worked at the Federal Labor Relations Authority in Dallas, Texas where he conducted investigations on federal unfair labor practices and coordinated federal union elections. Previously, Brian represented a high volume of disabled individuals in administrative hearings.

Brian is a 2016 graduate of Texas A&M University School of Law, where he served as the president of the TAMU Black Law Student Association. During law school, he interned for the Honorable Justice Ken Molberg when he was District Judge at the 95th Texas Civil District Court and served as a research assistant for Professors Michael Z. Green and Sahar Aziz. Prior to law school, Brian worked as an international flight attendant at United Airlines and volunteered as an Occupational Injury Representative at the Association of Flight Attendants, Local Council 11 in Washington D.C.

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Education

Texas A&M University
School of Law, J.D., 2016
Colorado Technical
University, B.S., *with honors*

Admissions

Texas

Awards & Honors

The National Black Lawyers, Top 100

AAJ Leadership Academy – Graduate, Diversity & Inclusion Committee, Class of 2022

Professional Affiliations

American Association for Justice: Diversity, Equity, Inclusion, & Accessibility Committee;
Membership Oversight Committee; Minority Caucus, Member Committee Co-Chair;
LGBT Caucus

Shades of Mass, Board Member

L. Clifford Davis Legal Association

The International Legal Honor Society of Phi Delta Phi

The American Constitution Society for Law & Policy

Texas Young Lawyers Association

State Bar of Texas: African-American Lawyers (AALS), Consumer and Commercial Law,
Labor and Employment Law, LGBT Law

Presentations and Articles

Presenter, “Broadening the Pathway: Implementing Hiring Efforts to Reach Underserved Communities,” National Consumer Law Center (NCLC) Consumer Rights Litigation Conference and Class Action Symposium, October 2024.

Presenter, “A Movement to Defend, Avoiding Exclusionary Hiring Practices,” American Association for Justice (AAJ) Annual Convention, July 2024.



Aaron Blumenthal | Counsel

Aaron Blumenthal represents employees, whistleblowers, and consumers in complex and class action litigation. He is a member of our California whistleblower attorney practice group.

Aaron attended law school at the University of California, Berkeley, where he graduated *Order of the Coif*, the highest level of distinction. While in law school, Aaron wrote an article about class action waivers that was published by the California Law Review, one of the top law reviews in the country. He also served as a research assistant to Professor Franklin Zimring, who described Aaron in the acknowledgements section of one of his books as a “statistical jack-of-all-trades.”

Litigation Highlights

In Re Anthem, Inc. Data Breach Litigation – represented consumers whose personal information was impacted by the Anthem data breach, which was announced in 2015 as affecting nearly 80 million insurance customers. The case resulted in a \$115 million settlement, which offered extended credit monitoring to affected consumers.

LLE One v. Facebook – key member of the litigation team representing video advertisers in a putative class action against Facebook alleging that the company inflated its metrics for the average time users spent watching video ads, causing the plaintiffs to spend more for video advertising on Facebook than they otherwise would have.

JPMorgan Chase Litigation – represented a class of mortgage borrowers against JPMorgan Chase, alleging that the bank charged them invalid “post-payment interest” when they paid off their loans. The case resulted in an \$11 million settlement.

Awards & Honors

Rising Star, Northern California Super Lawyers, 2018-2025

Presentations and Articles

Presenter, “Impact of the Viking River Cruises Ruling on PAGA and Mass Arbitrations,” Simpluris Podcast, October 2022

Author, “Why Justices’ PAGA Ruling May Not Be Real Win For Cos.,” Law360 Employment Authority, July 2022

Co-author, “DoorDash: Quick Food, Slow Justice,” Daily Journal, March 2020

Co-author, “In the Breach,” Trial Magazine, American Association for Justice, September 2017

Author, “Winning Strategies in Privacy and Data Security Class Actions: The Plaintiffs’ Perspective,” Berkeley Center for Law & Technology, January 2017

Author, “Circumventing Concepcion: Conceptualizing Innovative Strategies to Ensure the Enforcement of Consumer Protection Laws in the Age of the Inviolable Class Action Waiver,” 103 Calif. L. Review 699, 2015

Author, “Religiosity and Same-Sex Marriage in the United States and Europe,” 32 Berkeley J. Int’l. L. 195, 2014.

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Education

University of California,
Berkeley, School of Law,
J.D., *Order of the Coif*, 2015

University of California,
Berkeley, B.A., *Phi Beta
Kappa*, 2008

Admissions

California



T 510.250.4840

shughes@classlawgroup.com

Education

Duke University School of Law, J.D., 2017

Iowa State University, B.A., 2014

Admissions

California

District of Columbia

Spencer Hughes | Counsel

Spencer represents consumers against corporations in all stages of litigation. He is experienced in both trial-level and appellate litigation, frequently briefing and arguing novel questions of law across the country.

Spencer is experienced in complex class actions involving automobile defects, financial misconduct by banks and cryptocurrency institutions, and other fraud and consumer protection actions.

Spencer practiced at a plaintiffs' class action boutique and one of the largest litigation firms in the world prior to joining Gibbs Mura. He has represented a U.S. Senator in the Supreme Court and argued multiple times in federal appeals court.

Before entering private practice, Spencer clerked for the Honorable Gerald Bard Tjoflat on the U.S. Court of Appeals for the Eleventh Circuit. He is a graduate of Duke University School of Law and Iowa State University.

Litigation Highlights

Cadena v. American Honda Motor Co. – Represents class of consumers who purchased Honda vehicles in action about automatic emergency braking systems. Spencer briefed summary judgment and motions to exclude Honda's expert testimony. After Spencer's argument in court, Honda voluntarily withdrew its experts' testimony.

In re J&J Investment Litigation – Represented class of investors victimized by a Ponzi scheme operated through accounts held at Wells Fargo Bank. Spencer worked with banking industry expert witnesses and briefed novel legal questions to defend against summary judgment.

In re PNC Cash Sweep Programs Litigation – Represents plaintiffs in litigation arising from the interest rates paid to PNC consumers in cash-sweep brokerage accounts. Spencer defended against PNC's motion to dismiss the complaint.

Murthy v. Missouri – Represented United States Senator as amicus curiae to the Supreme Court of the United States, arguing to protect the U.S. intelligence community's ability to counter foreign malign influence in our elections.

Awards & Honors

Rising Star, Super Lawyers, 2023-2024

Professional Affiliations

American Association for Justice

Presentations and Articles

Co-author, "Tools To Fight Delay From Arbitrability Appeals After Coinbase," Law360, August 2023



Parker Hutchinson | Counsel

Parker Hutchinson represents plaintiffs in class actions and other complex litigation, with extensive practice in the field of prescription drug product liability. Parker currently represents clients in multi district litigation including servicemembers who suffered hearing loss or tinnitus from defective 3M ear plugs and cancer survivors who suffered permanent disfiguring hair loss from the chemotherapy drug Taxotere. Prior to joining Gibbs Mura, Parker wrote extensive briefing *In re Taxotere* as a member of the Plaintiffs' Law & Briefing Committee. In his appellate advocacy work, Parker has also achieved an expansion of the definition of "adverse employment action" under Title VII in an issue of first impression.

Parker is a 2009 graduate of Columbia Law School, where he was a leader at the Columbia Journal of European Law. During law school, Parker was a judicial extern with the Honorable Stanwood Duval, Jr. of the Eastern District of Louisiana. Before law school, Parker worked as a congressional staffer, a musician, and a writer. He involved himself closely in New Orleans's recovery following Hurricane Katrina, including the resurrection of progressive community radio station WTUL. He received his undergraduate degree, *cum laude*, from Tulane University in 2004.

Professional Affiliations

American Association for Justice
Louisiana State Bar Association
National Civil Justice Institute

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Education

Columbia Law School, J.D.,
2009

Tulane University, B.A., *cum
laude*, 2004

Admissions

New York
Louisiana



Rosanne Mah | Counsel

Rosanne L. Mah represents consumers in complex class action litigation involving deceptive and misleading practices, false advertising, and defective products. She also represents survivors of childhood sexual abuse in Boy Scouts Sexual Abuse Litigation and in New Orleans Catholic Church Sexual Abuse Litigation.

Rosanne is integrally involved in client relations, including communicating with class members, through all stages of the litigation process, from intake to settlement.

Rosanne has over 15 years of experience in providing the highest level of legal representation to individuals and businesses in a wide variety of cases. Throughout her legal career she has specialized in consumer protection, defective products, cybersecurity, data privacy, and employment law at several law firms, as well as through her own practice. Rosanne attended the University of San Francisco, School of Law, during which she was a judicial extern with the Honorable Anne Bouliane of the San Francisco Superior Court. During law school, she advocated for tenants facing housing issues, including eviction and habitability problems.

She is a member of the California Bar and is admitted to practice before the United States Court of Appeals for the Ninth Circuit and the United States District Courts for the Northern, Central, Eastern, and Southern Districts of California.

Awards & Honors

Outstanding Volunteer in Public Service Certificate, *Debt Defense and Education Clinic for the Bar Association of San Francisco's Volunteer Legal Services Program* (2010-2011)

Presentations and Articles

Panelist, "Ethical Issues in Mass & Class Actions – Representation Challenges and Responsibilities," Legal Ethics Committee of the San Francisco Bar Association, September 11, 2025.

Litigation Highlights

Vallin v. PNC Investments, LLC, et al. – Member of interim class counsel representing PNC current and former customers with brokerage accounts, advisory accounts, and retirement accounts who had cash deposits or balances in the PNC cash sweep program. Plaintiffs claim that PNC pays unreasonably low interest rates to customers in its cash sweep program while generating massive profits for themselves.

Biederman, et al. v. FCA US LLC, et al. – Represents current and former Ram truck owners and lessors with model years 2013 to 2018 Ram 2500 and Ram 3500 trucks equipped with a Cummins 6.7-Liter diesel engine. Plaintiffs allege that FCA US and Cummins together designed, manufactured, and sold 2013-2023 Ram 2500 and 3500 diesel trucks with undisclosed and unauthorized emission control devices that illegally bypass, render inoperative, or otherwise reduce the effectiveness of the vehicles' emission control system.

In re Midwestern Pet Foods Marketing, Sales Practices and Product Liability Litigation – Represented consumers alleging that Midwestern Pet Food sold dog food containing dangerous levels of Aflatoxin and Salmonella that was harmful to pets. Judge Matthew P. Brookman granted final approval of a nationwide class action settlement providing for a common fund of \$6.3 million to compensate purchasers of the recalled pet food products for pet injury claims and consumer food purchaser claims.

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Practice Emphasis

Class Actions

Consumer Protection

Education

University of San Francisco

School of Law, J.D., 2005

University of California, Santa

Cruz, B.A., 1995

Admissions

California



Karen Barth Menzies | Of Counsel

Karen is a nationally recognized mass tort attorney with more than twenty years of experience in federal and state litigation. Courts throughout the country have appointed Karen to serve in leadership positions including Lead Counsel, Liaison Counsel and Plaintiff Steering Committee in some of the largest pharmaceutical and device mass tort cases. Karen currently serves in leadership positions in the Taxotere Litigation (federal court), Zolof Birth Defect Litigation (federal and California state courts), Transvaginal Mesh Litigation (federal and California state courts), Fosamax Femur Fracture Litigation (California state court), Lexapro/Celexa Birth Defect Litigation (Missouri state court).

Karen is particularly focused on women's health issues and sexual abuse claims, including a current Boy Scouts of America sexual abuse lawsuit investigation involving claims of abuse by scoutmasters, troop leaders and other adults affiliated with the Boy Scouts of America. She also represents women suffering permanent baldness following breast cancer chemotherapy treatments with Taxotere, and children who experienced severe side effects after taking the widely prescribed medication Risperdal. Karen believes in advocating for the victims who've been taken advantage of, and helping to ensure drug safety in the face of profit-driven corporations that hide the risks of their products. She has testified twice before FDA advisory boards as well as the California State Legislature on the safety concerns regarding the SSRI antidepressants and the manufacturers' misconduct. She has also advised victim advocacy groups in their efforts to inform governmental agencies and legislative bodies of harms caused by corporations.

Karen frequently publishes and presents on issues involving drug safety, mass tort litigation, FDA reform and federal preemption for both legal organizations (plaintiff and defense) and medical groups.

Awards & Honors

AV Preeminent® Peer Review Rated by Martindale-Hubbell
Best Lawyers in America, Personal Injury Litigation (2013, 2018, 2021-2023)
Individual Recognition Chambers USA: Product Liability Plaintiffs (2020)
Southern California Super Lawyer (2004-2023)
Lawyer of the Year by *Lanier's Weekly USA* (2004)
California Lawyer of the Year by *California Lawyer* magazine (2005)
Consumer Attorney of the Year Finalist by CAOC (2006)

Professional Affiliations

American Association for Justice, Co-Chair, Taxotere Litigation Group
Consumer Attorneys of California
Consumer Attorneys of Los Angeles
American Bar Association (appointed member of the Plaintiffs' Task Force)
Women En Mass
The Sedona Conference (WG1, Electronic Document Retention and Production)
The National Trial Lawyers
National Women Trial Lawyers Association
LA County Bar Association
Women Lawyers Association of Los Angeles
Public Justice

Select Publications & Presentations

Author, "Prepping for the Prescriber Deposition," Trial Magazine, American Association for Justice, January 2020.

Presenter, "Deposing the Treating/ Prescribing Physician, Learned Intermediary, the One Potentially Fatal Fact Witness," American Association for Justice Convention: Discovery and Litigation Strategies for Drug and Device Cases, February 2019.

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Practice Emphasis

Class Actions
Mass Personal Injury

Education

University of California, Davis
King Hall School of Law, J.D.,
1995

Colorado State University,
B.A., 1989

Admissions

California

Presenter, “A Funny Thing Did Happen on the Way to the Forum: Navigating the New Landscape of Personal Jurisdiction Challenges,” ABA Section of Litigation 2019 Environmental & Energy, Mass Torts, and Products Liability Litigation Committees’ Joint CLE Seminar, March 2018.

Presenter, “Federal and State Court Coordination of Mass Tort Litigation: Navigating State Court vs. Multidistrict Litigation, Mass Torts Made Perfect Conference, October 2018.

Presenter, “Taxotere Litigation: Federal MDL 2740, New Orleans and State Court Jurisdictions, Mass Torts Made Perfect Conference, October 2018.

Presenter, “505(b)(2) Defendants – The Non-Generic Alternative; Social Media and Support Groups; Settlement Committees,” AAJ Section on Torts, Environmental and Product Liability (STEP): On the Cutting Edge of Torts Litigation, July 2018.

Presenter, “Location, Location, Location Part II: State Court Consolidations,” AAJ Mass Torts Best Practices Seminar, July 2017.

Presenter, “Personal Jurisdiction in Mass Torts and Class Actions: Bristol-Myers Squibb Co. v. Superior Court (Cal. 2016),” Mass Torts Judicial Forum with Judge Corodemus and JAMS, April 2017.

Author, “Bringing the Remote Office Closer,” Trial Magazine, American Association for Justice, March 2017.



Ashleigh Musser | Counsel

Ashleigh represents consumers and employees in class actions and mass arbitration involving consumer protection and employment law. She litigates complex cases involving misclassification, discrimination, and wage and hour claims brought under state law, including under the Private Attorneys General Act (PAGA). She currently represents thousands of gig economy workers in legal actions alleging that they were misclassified as independent contractors and should be entitled to minimum wage, overtime pay, and expense reimbursement under California and other state labor laws. Ashleigh is a proficient Spanish speaker and has experience representing and working with Spanish-speaking clients.

Ashleigh previously worked at a litigation firm in San Francisco, representing clients in criminal and civil proceedings, with an emphasis in personal injury, real estate, and wrongful death claims. More recently, she counseled and represented plaintiffs in individual and representative labor and employment matters at a boutique law firm in San Francisco. She has extensive experience protecting the rights of employees in cases involving California Labor Code violations, California Family Rights Act violations, and violations of the California Fair Employment and Housing Act, which includes representing plaintiffs with sexual harassment, disability and pregnancy discrimination, and retaliation claims.

Ashleigh is a 2014 graduate of Seattle University School of Law, where she served as the treasurer of the Moot Court Board, and as a chair of the International Law Society. During her time in law school, Ashleigh externed at the AIDS Legal Referral Panel of San Francisco, and subsequently volunteered as a licensed lawyer, where she represented clients facing eviction, and researched issues including the impact lump sum payments have on Section 8, the Housing Choice Voucher Program. As a law student, Ashleigh studied abroad at the University of Witwatersrand in Johannesburg, South Africa, focusing on how businesses adversely impact human rights, primarily in African countries. Ashleigh further diversified her legal experience by becoming a licensed to practice intern in Washington State, allowing her to practice law as a law student for the City Prosecutor's Office. In this role, she had to balance defending the City with the rights of the individuals that came before her in court.

Awards & Honors

Rising Star, Northern California Super Lawyers (2021-2025)

Professional Affiliations

California Employment Lawyers Association
San Francisco Trial Lawyers Association

Presentations and Articles

Author, "The Estrada decision on review: What to do with "unmanageable" PAGA claims?"
Daily Journal, July 2022

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Education

Seattle University School of
Law, J.D., 2014

Bates College, B.A., 2010

Admissions

California



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Education

University of California
College of the Law, San
Francisco, J.D., 2025
University of California,
Berkeley, B.A., 2020

Admissions

California

Yusuf Al-Bazian | Associate

Yusuf represents clients in class actions, mass torts, and personal injury cases. His primary practice areas include securities and shareholder litigation, financial fraud, and consumer protection.

In addition to his work representing plaintiffs in complex litigation at Gibbs Mura, Yusuf holds leadership positions and is engaged in initiatives to increase access to civil justice nationwide. He currently serves on the board of the San Francisco Bay Area Chapter of the National Lawyers Guild (NLG), as well as the Access to Justice Committee of Public Justice.

During law school Yusuf co-founded The National Plaintiffs' Law Association (NPLA), an organization leading the effort to increase plaintiff-side presence and job opportunities across the country. He competed on the UC Law San Francisco trial team and was president of the Muslim Law Student Association.

Prior to law school, Yusuf studied Rhetoric and French at UC Berkeley, and worked in personal injury law, handling catastrophic injury claims on behalf of plaintiffs in California and Georgia.

Professional Affiliations

Public Justice, Access to Justice Committee
National Lawyers Guild, San Francisco Bay Area Chapter, Board Member
American Association for Justice
National Plaintiffs' Law Association
San Francisco Trial Lawyers Association
Federal Bar Association

Presentations and Articles

Presenter, "Diversity in the Plaintiffs' Bar," UC Berkeley Law, Plaintiffs' Law Association, LSAD, and WOCC+, October 23, 2025.

Presenter, "Broadening the Pathway: Implementing Hiring Efforts to Reach Underserved Communities," National Consumer Law Center's Consumer Rights Litigation Conference and Class Action Symposium, October 26, 2024.



Emily Beale | Associate

Emily Beale represents investors and consumers harmed by financial fraud and corporate misconduct in class actions.

Emily has worked on cases involving Ponzi schemes and fraudulent investments in all facets of litigation, delivering excellent results. She has managed and assisted with a range of complex fact and expert discovery. Emily prides herself on her attention to detail in complex matters. Outside of litigation, Emily is passionate about educating law students on the opportunities the plaintiffs' bar provides.

Prior to joining Gibbs Mura, Emily clerked for the Honorable Benjamin H. Settle in the Western District of Washington.

Emily graduated Seattle University School of Law *summa cum laude* and first in her class. While in law school, she served as Managing Editor for the Seattle University Law Review and on the Moot Court Board.

Litigation Highlights

Todd Benjamin International, Ltd. v. Grant Thornton International – Class counsel for investors in TCA Global Credit Master Fund L.P. and its feeder funds. The investors alleged that the funds' management inflated assets and earnings, and that the funds' auditors knew about the overstatement but failed to take appropriate action. After multiple years of litigation, Gibbs Mura helped secure settlements of \$26.5 million for investors. At the hearing granting final approval on May 20, 2025, Judge Scola thanked counsel for their "excellent work in the case."

In re J&J Investment Litigation – Member of interim co-lead counsel representing hundreds of victims of Matthew Beasley's Ponzi scheme in a proposed class action against Wells Fargo for allegedly aiding and abetting the fraud.

Vallin v. PNC Investments LLC – Member of interim class counsel representing customers against PNC for depositing brokerage clients' uninvested cash into cash sweep accounts paying unreasonably low interest rates while generating massive profits for themselves.

Presentations and Articles

Author, "Unfair-but-not-Deceptive: Confronting the Ambiguity in Washington State's Consumer Protection Act," 43 Seattle U. L. R. 1011 (2020)

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Education

Seattle University School of Law, J.D., *summa cum laude*, 2020

University of Washington, B.A., 2015

Admissions

Washington
New York



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Education

University of California,
Berkeley, School of Law, J.D.,
2022
Northwestern University, B.A.,
2016

Admissions

California

Delaney Brooks | Associate

Delaney Brooks represents plaintiffs in class action lawsuits, primarily in cases involving unfair business practices and defective products.

Delaney has helped achieve class certification in highly contested cases, representing hundreds of thousands of consumers from states around the country. She is also an experienced oral advocate and has taken a lead role in arbitration proceedings. Delaney has extensive experience working with expert witnesses, especially damages experts, helping defend the experts' work through motion practice and depositions. Delaney also prioritizes her close relationships with clients, helping steer the clients toward successful results.

Delaney graduated from the University of California, Berkeley, School of Law in 2022. While at Berkeley Law, Delaney was a member of the Moot Court, participated in several pro bono projects, and served as a judicial extern for the Honorable William H. Alsup, Northern District of California.

Litigation Highlights

GreenSky Litigation – Represents consumers who took out loans for home maintenance repairs and were charged allegedly unlawful fees by GreenSky, Inc.

Destination Fees Litigation – Represents vehicle owners from 13 states who overpaid when they purchased new vehicles because FCA inflated its delivery fees to include extra profit.

Porsche PCM Malfunction Litigation – Represented Porsche owners whose vehicles received a software update that allegedly damaged the vehicles' infotainment systems. The Honorable Mark H. Cohen granted final approval to a nationwide class action settlement that included cash reimbursements of up to \$7,500 per class member.

Professional Affiliations

California Lawyers Association, Antitrust and Unfair Competition Law Section

Presentations and Articles

Presenter, "Junk Fees in Auto Sales and Finance," National Consumer Law Center's Class Action Symposium, October 2025.



Sadie Hillier | Associate

Sadie is passionate about protecting clients' rights and holding corporations accountable. She represents consumers primarily in class action lawsuits with a special emphasis on privacy and data breach litigation.

Prior to joining Gibbs Mura, Sadie spent two years as an Assistant Federal Public Defender representing indigent clients on death row in late-stage federal appeals. She then transitioned to civil law, representing clients in a variety of civil rights cases centered on reproductive rights, First Amendment, police brutality, LGBTQ rights, and the right to privacy.

Sadie graduated from Harvard Law School in 2020. While in law school, she was heavily involved with and served as the Executive Director of the Harvard Prison Legal Assistance Project, where she spent three years advocating for the rights of incarcerated people in disciplinary and parole hearings, through policy advocacy with the Massachusetts legislature, and in civil rights lawsuits. Sadie was also on the board of the Harvard Civil Rights—Civil Liberties Law Review, served as President of HLS Child & Youth Advocates, and completed a variety of public interest internships and externships, including at the Civil Rights Division of the Department of Justice, Civil Rights Corps, and the Orange County (California) Public Defender. At the Orange County Public Defender, Sadie worked on the case that ultimately made public the fact that Global Tel Link (GTL), the nation's largest jail and prison phones vendor, had a history of nationwide system problems causing it to illegally record thousands of attorney-client phone calls.

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Education

Harvard Law School, J.D.,
2020

University of North Texas,
B.A., 2015

Admissions

Texas

Massachusetts

Professional Affiliations

The LGBTQ+ Bar

American Bar Association, Privacy and Data Security Committee

Dallas LGBT Bar Association



Hanne Jensen | Associate

Hanne represents consumers in class action and complex litigation, with particular focuses on unfair business practices, products liability, constitutional issues, and privacy law.

Hanne graduated from the University of California, Berkeley, School of Law in 2020. During her time at Berkeley Law, Hanne served as editor of three law journals, including as Senior Notes Editor of the *California Law Review*, co-Editor-in-Chief of the *Berkeley Journal of Gender, Law & Justice*, and Executive Editor of the *Berkeley Journal of Employment & Labor Law*. She also dedicated pro bono time to the Consumer Advocacy & Protection Society and Center for Consumer & Economic Justice. Before joining Gibbs Mura, Hanne clerked for U.S. District Judge Miranda M. Du of the District of Nevada in her beautiful hometown of Reno.

Hanne received degrees in English and Philosophy *magna cum laude* from Whitman College, where she was a member of Phi Beta Kappa, and served as editor-in-chief of two literary magazines. She then worked as a English Teaching Assistant in Germany before attending law school.

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Education

University of California,
Berkeley, School of Law, J.D.,
2020

Whitman College, *magna cum
laude*, B.A., 2014

Admissions

California

Litigation Highlights

In re: Meta Pixel Healthcare Data Privacy Litigation – Key member of the litigation team representing millions of patients in a proposed consolidated class action whose sensitive health information was allegedly collected and shared without their consent.

In re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation – Key member of the multi-district consolidation of lawsuits against Instagram, Facebook, Snapchat, TikTok, and YouTube. Hanne works with Andre Mura and the MDL team on a wide range of responsibilities, including law and briefing, discovery, and liability as to the TikTok defendants.

Professional Affiliations

American Association for Justice
Bay Area Lawyers for Individual Freedom

Presentations and Articles

Presenter, “Data Privacy and Data Broker Class Actions: Strategies and Insights,” National Consumer Law Center’s Class Action Symposium, October 27, 2024.



Anna Katz | Associate

Anna represents plaintiffs in class action and complex litigation involving corporate wrongdoing and financial fraud.

Anna attended law school at the University of California, Berkeley, School of Law, where she graduated *Order of the Coif* in 2023. While in law school, Anna served as an Editor for the California Law Review and on the Editorial Board of the Berkeley Journal of Gender, Law, and Justice. Anna also worked to build enthusiasm for plaintiff-side practice as the Career Development Director of Berkeley Law's new Plaintiffs Law Association. For her dedication to public interest work involving reproductive justice, workers' rights, and indigent defense, Anna earned pro bono honors with distinction and a Public Interest and Social Justice Certificate. Anna also served as a research assistant for Professor Jonathan Glater's research on unfair corporate practices and predatory student debt.

Anna received her undergraduate degree, *magna cum laude* and Phi Beta Kappa, from Duke University, with majors in African and African American Studies and Global Health. Prior to law school, Anna was a reproductive health researcher in Oakland.

Professional Affiliations

American Association for Justice
Public Justice

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Education

University of California,
Berkeley, School of Law, J.D.,
Order of the Coif, 2023

Duke University, *magna cum
laude*, B.A., 2018

Admissions

California



Jeff Kosbie | Associate

Jeff Kosbie represents workers and consumers in class actions and other complex lawsuits involving data breaches and consumer privacy, employment law, and other corporate misconduct. He previously worked as a staff attorney in the United States Court of Appeals for the Ninth Circuit (2017-2018) and served as a Multidistrict Litigation Law Clerk to the Judges Lucy Koh, Beth Freeman, and Edward Davila of the Northern District of California (2018-2019).

Jeff serves as Treasurer of Bay Area Lawyers for Individual Freedom (“BALIF”), the nation’s oldest association of lesbian, gay, bisexual and transgender (LGBTQI) persons in the field of law, and he is on the board of the BALIF Foundation. He was also selected to serve on the California Lawyers Association Litigation Section Executive Committee. He has published multiple articles in law reviews related to the history of LGBTQ rights. Jeff is a 2015 graduate, *magna cum laude*, of Northwestern University School of Law and Northwestern University Graduate School where he received a J.D. and a Ph.D. in Sociology. While in law school, Jeff served as an Articles Editor of the Northwestern Journal of Law and Social Policy. He received his undergraduate degree, *summa cum laude*, *Phi Beta Kappa*, in Sociology from Brandeis University in 2006.

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Education

Northwestern University School of Law, J.D., *magna cum laude*, 2015

Northwestern University Graduate School, Ph.D., 2015

Brandeis University, B.A., *summa cum laude*, *Phi Beta Kappa*, 2006

Admissions

California

Awards & Honors

Best Lawyers in America: Ones to Watch, 2023-2026

Rising Star, Northern California Super Lawyers, 2021-2025

Best LGBTQ+ Lawyers Under 40, LGBT Bar Association, 2021

Unity Award, Minority Bar Coalition, 2019

Professional Affiliations

American Association for Justice

Bay Area Lawyers for Individual Freedom, Former Co-chair, Former Treasurer

BALIF Foundation, Former Treasurer

California Lawyers Association, Litigation Section Executive Committee Advisor

Consumer Attorneys of California

Bar Association of San Francisco, Finance Committee; Justice and Diversity Center, Board Member

Select Presentations and Articles

Presenter, “Navigating Complex Diversity, Equity and Inclusion Issues in a Rapidly Changing Environment”; Organizer, “Core Skills: Jury Selection”; CLA Litigation & Appellate Summit, May 2023.

Presenter, “An Important Discussion re Civil Rights: Racism, Diversity, Equity, and Inclusion while Surviving COVID-19,” California Lawyers Association Litigation and Appellate Summit, May 2021.

Presenter, “LGBTQ+ Employment Discrimination Claims in Practice,” BALIF CLE Series, February 2021.

Author, “Overdue Protection for LGTBQ Workers,” Trial Magazine, American Association for Justice, September 2020.

Author, “How the Right to be Sexual Shaped the Emergence of LGBT Rights,” 22 U. Pa. J. Const. L. 1389, August 2020.

Author, “Donor Preferences and the Crisis in Public Interest Law,” 57 Santa Clara L. Rev. 43, 2017.

Author, “(No) State Interests in Regulating Gender: How Suppression of Gender Nonconformity Violates Freedom of Speech,” 19 Wm. & Mary J. Women & L. 187, 2013.



Angela Ma | Associate

Angela represents plaintiffs in class actions and mass torts concerning consumer protection and products liability.

Angela graduated from University of California, Berkeley, School of Law in 2025, as a member of the Order of the Barristers and with pro bono honors. While in law school, she served as an Associate Editor for the California Law Review, won first place and semifinalist awards in national mock trial tournaments, and represented complainants alleging police misconduct in administrative hearings overseen by the city of Berkeley's Police Accountability Board. She also worked as a judicial extern for the Honorable Yvonne Gonzalez Rogers for the U.S. District Court for the Northern District of California.

Angela received her undergraduate degree Phi Beta Kappa from Reed College, where she majored in Philosophy.

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Education

University of California,
Berkeley, School of Law, J.D.,
Order of the Barristers, 2025
Reed College, B.A., 2022

Admissions

California



Emma MacPhee | Associate

Emma represents plaintiffs harmed by corporate wrongdoing and survivors of sexual assault.

Emma graduated from the University of California, Berkeley, School of Law in 2023. While in law school, she was on the Submissions team for the Berkeley Journal of International Law and received a Public Interest and Social Justice Certificate for the pro bono work she pursued during law school. She was a law clerk for the Youth Law Center, where she supported litigation projects related to the juvenile justice and child-welfare systems in California. During law school, she advocated for voting rights, fair electoral maps, and democracy reform with the Political and Election Empowerment Project. As a Clinical Law Student for the International Human Rights Clinic, she researched corporate accountability related to the digital privacy of children. She was also a student researcher for the Human Rights Center at Berkeley Law, where she worked on a research project with the Center for Investigative Reporting that was focused on national access to reproductive rights.

Emma received her undergraduate degree, *magna cum laude*, from New York University in 2018, with majors in International Relations and French. Before law school, Emma worked as an investigative analyst and was responsible for conducting investigations into sex and labor trafficking in New York City.

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Education

University of California,
Berkeley, School of Law, J.D.,
2023

New York University, *magna
cum laude*, B.A., 2018

Admissions

California



Jake Seidman | Associate

Jake represents plaintiffs in products liability and mass tort cases focused on redressing harms of corporate wrongdoing.

Jake graduated from Stanford Law School in 2022 with high pro bono distinction and academic awards in torts, state constitutional law, and criminal procedure. While in law school, he worked on briefs for clients in civil and criminal matters before the United States Supreme Court as part of Stanford's Supreme Court Litigation Clinic and served as Special Issues Editor and Lead Online Editor for the *Stanford Journal of Civil Rights & Civil Liberties* and the *Stanford Law & Policy Review*, respectively.

As a student, Jake pursued his abiding interest in state and local government efforts to reimagine law enforcement through affirmative litigation and justice system reforms. As part of the law school's Litigation & Policy Partnership with the Santa Clara County Counsel, he assisted with County consumer protection litigation. He also co-authored a Stanford Criminal Justice Center report on non-police approaches to public safety.

Prior to joining Gibbs Mura, Jake served as a law clerk to Magistrate Judge Sallie Kim in the Northern District of California. He also worked as a Legal Fellow at Public Rights Project, where his work focused on state constitutional litigation combating backlash to local criminal justice reforms.

Jake received his undergraduate degree *magna cum laude* and Phi Beta Kappa from Columbia University, where he double majored in Political Science and Russian Language & Culture. Prior to law school, he worked on jail planning and reforms in the New York City Mayor's Office.

Professional Affiliations

American Association for Justice
National Center for State Courts, Young Lawyers Committee

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Education

Stanford Law School, J.D.,
2022

Columbia University, *magna cum laude*, B.A., 2017

Admissions

California



Jennifer Sun | Associate

Jennifer represents plaintiffs in class actions and complex litigation at the intersection of consumer protection and data security and privacy. Her work focuses on holding companies to account when they fail to safeguard personal information or profit from the misuse of consumers' data.

Jennifer specializes in navigating technically complex matters brought against the world's largest technology companies. She has taken and supported the depositions of engineering, security, and compliance executives, managed expert discovery, and litigated numerous discovery disputes. Most recently, she helped achieve a \$45 million settlement against a large entertainment and hospitality corporation on behalf of millions of consumers whose sensitive personal information were exposed in multiple data breaches.

Jennifer graduated from the University of California, Berkeley, School of Law with a certificate in Law & Technology. While in law school, she externed for the Knight First Amendment Institute at Columbia University and the Electronic Frontier Foundation. She also researched the regulation of digital economies with Professors Pamela Samuelson and Tejas Narechania and advocated for the public's right of access to electronic-surveillance warrant information as a member of the Samuelson Law, Technology & Public Policy Clinic. Jennifer served on the boards of the Asian American Law Journal and the Asian Pacific American Law Students Association.

In a prior life, Jennifer was a product manager at Dotdash Meredith and *The Atlantic*, where she worked closely with executives, business partners, and engineers on the publishers' programmatic advertising and revenue products. She received a B.S. Economics from The Wharton School at the University of Pennsylvania, where she served as President and Executive Editor of *The Daily Pennsylvanian*.

Litigation Highlights

Smallman v. MGM Resorts International – Jennifer helped achieve a \$45 million settlement from MGM after data breaches in 2019 and 2023, in which the personal data of over 100 million customers was stolen and posted on underground hacking forums. The settlement received final approval on June 18, 2025.

Flock Safety Litigation – Jennifer represents drivers in a putative class action lawsuit against Flock Safety and its use of automated license plate cameras. Plaintiffs allege Flock Safety shares millions of Californians' daily movements with law enforcement agencies in violation of California privacy laws.

Change Healthcare Data Breach Litigation – After the largest healthcare data breach in US history that disrupted healthcare systems nationwide and affected an estimated 193 million people in 2024, Jennifer represents a putative class of medical providers who lost money and were harmed by the cyberattack.

In re Equifax, Inc. Fair Credit Reporting Act Litigation – Jennifer represents over 2.5 million consumers in litigation against Equifax, one of the Big Three credit reporting agencies, for allegedly misreporting their credit scores of when they applied for mortgages, loans, and credit cards between March 17 and April 6, 2022.

In re Prosper Health Data Breach Litigation – Jennifer represents millions of consumers against Prosper Funding LLC, a peer-to-peer loan and financial company, for its failure to protect their sensitive personal information from a data breach that involved their Social Security numbers and bank account information.

Professional Affiliations

American Association for Justice
Asian American Bar Association
Federal Bar Association

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Education

University of California,
Berkeley, School of Law, J.D.,
2023

University of Pennsylvania,
B.A., 2014

Admissions

California



Wynne Tidwell | Associate

Wynne Tidwell represents consumers and investors, with a focus on representing plaintiffs harmed by financial fraud.

Wynne is experienced in all stages of litigation, from case development to trial and settlement administration. She has particular experience with developing evidence and preparing clients for their testimony, whether at deposition or trial.

As a member of the trial team in *Camenisch v. Umpqua Bank*, Wynne prepared class representatives for trial testimony, conducted direct examinations, briefed evidentiary motions, and developed illustrative aids. The team ultimately secured a \$55 million settlement for the class.

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Education

University of California,
Berkeley, School of Law, J.D.,
2022

College of William & Mary, B.A.,
summa cum laude, 2017

Admissions

California

Wynne graduated from the University of California, Berkeley, School of Law in 2022.

During law school, she served as an Editor for the California Law Review and participated in the Veterans Law Practicum, where she advocated on behalf of veterans facing homelessness or recovering from sexual abuse and/or PTSD. Additionally, she externed for the District Court for the District of Columbia and for the Consumer Protection Section of the Office of the California Attorney General.

Before law school, Wynne worked in public policy and communications in Washington, D.C.

Litigation Highlights

Camenisch v. Umpqua Bank – One of the trial lawyers who represented over 1,200 class members in a four-week jury trial against Umpqua Bank (now known as Columbia Bank). The plaintiff class alleged that Umpqua aided and abetted a fraudulent investment scheme by Professional Financial Investors (PFI). Plaintiffs argued that PFI ran a fraudulent scheme that used investor money to personally benefit PFI’s executives, including its principals Ken Casey and Lewis Wallach, pay other investors, and cover recurring shortages across its dozens of accounts at Umpqua. Ultimately, the jury could not reach a unanimous decision. Later, the parties reached a \$55 million settlement weeks later, and the Court granted final approval on September 11, 2025. Judge P. Casey Pitts, who oversaw the trial, called the settlement an “excellent” outcome for the class.

Kaiser Whistleblower Qui Tam Lawsuit – Part of the litigation team representing a whistleblower client against Kaiser Permanente for allegedly defrauding the United States through a sophisticated scheme to up-code diagnoses to ensure Medicare payments for reimbursable, high-value conditions. On July 31, 2021, the Attorney General’s office and the Department of Justice elected to intervene in this litigation, and it was brought out from under seal into the public record. The litigation is ongoing.

Cadena v. American Honda Motor Co. – Part of the litigation team representing eight certified classes of vehicle owners who allege that their 2017-2019 Honda CR-Vs and 2018-2020 Honda Accords contain a defective automatic emergency braking system.

Grubhub Fraudulent Restaurant Listing Litigation – Represents 380,000+ restaurants alleging that Grubhub fraudulently listed their businesses on its delivery and takeout website without permission. Plaintiffs bring claims under the Lanham Act for false affiliation, false advertising, and trademark infringement.



Zeke Wald | Associate

Zeke specializes in representing plaintiffs in complex litigation against the world's largest and most powerful companies, focusing on consumers' rights, products liability, privacy law, and constitutional law. In 2023, he won a California Lawyer Attorney of the Year Award, which recognizes outstanding California lawyers "whose extraordinary work and cases had a major impact on the law."

Zeke specializes in legally and factually complex class action and multi-district litigation against Big Tech and other economic power players. He has taken and supported depositions of multi-national corporate executives, managed expert and fact discovery, certified classes in federal and state courts, and litigated post-trial and appellate proceedings. Recently, Zeke helped achieve a \$27.5 million settlement against a major technology company on behalf of millions of Californians alleging privacy violations for the company's sale of access to their personal information through an online platform.

Zeke's trial experience includes both class and multi-district cases. He supported the law and briefing team for three in-person bellwether trials in multi-district litigation against 3M regarding defective earplugs for service members, was a member of the trial team for two state court class actions resulting in plaintiff verdicts against utility service providers for unconstitutional charges, and is a member of the Social Media Adolescent Addiction trial teams proceeding in the federal multi-district consolidated action.

Zeke graduated from the University of California, Berkeley, School of Law in 2021, where he was an Articles editor for the California Law Review, a research assistant for Professor Sean Farhang's work on complex litigation, and an advocate with the East Bay Community Law Center's Community Economic Justice clinic. Zeke also co-founded the Law and Political Economy society and served as a leader of Berkeley's Gun Violence Prevention Project.

Litigation Highlights

Brooks v. Thomson Reuters Corporation – Zeke served as court-appointed class counsel in this data privacy case against Thomson Reuters for its CLEAR product. The lawsuit alleged that Thomson Reuters collected millions of California residents' personal and confidential information and then sold access to it without their knowledge or consent. After the court granted plaintiffs' motion for class certification, the parties reached a class settlement for \$27.5 million and substantial injunctive relief. The court granted final approval of the settlement on February 21, 2025.

In re Social Media Adolescent Addiction/Personal Injury Products Liability Litigation – Zeke is a key member of the multi-district consolidation of lawsuits against Instagram, Facebook, Snapchat, TikTok, and YouTube. Zeke works with Andre Mura and the MDL team on a wide range of responsibilities, including law and briefing, discovery, and liability as to the TikTok defendants.

San Diego and Otay Water District Tiered Water Rates Lawsuits – Key member of the litigation team achieving a \$79.5 million verdict on behalf of single-family customers in a lawsuit charging the City of San Diego with setting water rates that are noncompliant with the California Constitution. Zeke was a member of the trial team at the remedies stage, a part of the appellate team defending the Court's judgment in favor of the class, and a member of the trial team on remand. Zeke was also a key member of the litigation team achieving a verdict on behalf of single-family residential customers in a lawsuit challenging the Otay Water District with setting unconstitutional water rates, and the appellate team defending that verdict. Both cases are currently on limited remand in San Diego.

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Education

University of California,
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University of California, Santa
Barbara, B.A., highest honors,
2016

Admissions

California

In re: 3M Combat Arms Earplug Products Liability Litigation – This multi-district litigation concerned allegations that 3M’s dual-ended Combat Arms earplugs were defective and caused servicemembers and civilians to develop hearing loss or tinnitus. Zeke was a member of the team supporting the Law, Briefing, and Legal Drafting Committee, and supported the trial teams for three bellwether trials.

Awards & Honors

California Lawyer Attorney of the Year (CLAY) Award, *Daily Journal* (2023)

Presentations and Articles

Presenter, “Data Security and Privacy Issues in 2024,” Practising Law Institute’s 29th Annual Consumer Financial Services Institute, September 23, 2024.



Kate Walford | Associate

Kate advocates on behalf of consumers in class action and complex litigation, with a particular focus on data privacy and data breach cases.

Kate graduated from the University of California, Berkeley School of Law in 2024, *Order of the Coif*, with a certificate in Public Interest & Social Justice. While in law school, Kate was Co-President of the Berkeley Plaintiffs' Law Association, a Research Assistant for Professor David Oppenheimer, a tutor in the Legal Research & Writing Program, and participated in Moot Court. Kate also completed externships with Public Advocates, Equal Rights Advocates and the Equal Employment Opportunity Commission. Kate was on the founding Board of the National Plaintiffs' Law Association and is passionate about developing stronger pathways for students to enter the plaintiffs' bar. Before joining Gibbs Mura, Kate was a law clerk for U.S. District Judge Anne R. Traum of the District of Nevada.

Prior to law school, Kate received a Masters in Educational Leadership and Policy and spent several years working in higher education administration and student support roles, including service in AmeriCorps VISTA at a community college site. Kate's experience working with students and student-workers inspired her journey to the legal profession to advocate for workers and consumers.

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Education

University of California,
Berkeley, School of Law, J.D.,
Order of the Coif, 2024

Portland State University,
M.A., 2017

University of Washington,
B.A., *magna cum laude*, 2014

Admissions

California



Tayler Walters | Associate

Tayler works with employees and consumers in mass arbitrations and mass torts to combat unfair business practices by corporations. She represents gig workers who have been misclassified and denied fair pay and consumers whose personal information has been compromised in large-scale data breaches. Tayler specializes in developing scalable systems to improve client communication and legal processes so her case teams can provide high quality representation to over 50,000 clients.

Previously, she coordinated case management and client outreach efforts for hundreds of lawsuits against dozens of national banks who have charged customers improper overdraft fees. Her efforts helped recover millions of dollars for bank customers across the country.

Before Gibbs Mura, Tayler worked in a plaintiff's law firm advocating for consumers in a range of areas, including personal injury, product liability, premises liability, employment law, and elder abuse. Tayler is a 2020 graduate, *magna cum laude*, of the University of San Francisco School of Law. In law school, she served on the Moot Court Board where she coached her fellow students and competed in the National Appellate Advocacy Competition. Tayler received a Merit Scholarship, earned CALI awards for receiving the highest grade in Professional Responsibility and in Contracts Law, and externed for California Supreme Court Chief Justice Tani Cantil-Sakauye.

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Education

University of San Francisco
School of Law, J.D., *magna cum laude*, 2020
University of Colorado
Boulder, B.A., 2017

Admissions

California

Professional Affiliations

American Association for Justice, Mass Arbitration Group



Dorry Gardner | Staff Attorney

Dorry reviews and researches documents for e-discovery in a wide range of complex class actions cases involving products liability and mass torts. She is highly experienced in review for e-discovery in cases concerning various issues, including breach of contract, securities, antitrust civil and regulatory matters, and FCPA investigations.

Dorry attended law school at Fordham University, where she was Stein Scholar for public interest law and recipient of the esteemed Archibald R. Murray award as servant for social justice.

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Education

Fordham School of Law, J.D.

Admissions

New York



Sierra Morris | Staff Attorney

Sierra advocates for consumers harmed by corporate misconduct in class action litigation. She coordinates case management and client outreach efforts for lawsuits against dozens of banks and credit unions who have charged customers improper overdraft fees.

Prior to joining Gibbs Mura, Sierra worked at a leading plaintiff-side firm on matters ranging from securities fraud to holding corporations accountable for injuries caused by environmental hazards.

Sierra graduated from Tulane University Law School in 2020 with a certificate in International and Comparative Law and a CALI award in International Protection of Human Rights. While there, she was a student attorney in the Juvenile Law Clinic, an executive board member of the Public Interest Law Foundation, and a research assistant for Professor David Katner's work on child abuse. She also worked as a law clerk at the ACLU Foundation of Louisiana on issues including immigration, prison reform and the First Amendment, and as a legal volunteer for several other non-profit organizations.

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Education

Tulane University Law School,
J.D., 2020

College of Charleston, B.A.,
2016

Admissions

District of Columbia



Alyssa Prothero | Staff Attorney

Alyssa works on class action and complex litigation cases involving privacy law, workers' rights, and consumer protection.

Alyssa attended law school at the Quinnipiac University School of Law where she graduated *cum laude* in 2018. While in law school, Alyssa served as the Executive Managing Editor for the Quinnipiac Probate Law Journal. Alyssa also worked for the Quinnipiac Tax Clinic as a legal intern where she helped low-income individuals with tax disputes against the IRS and the Connecticut Department of Revenue Services. For her interest in tax law and her work with the Tax Clinic, she received awards for Excellence in Tax Controversy and Excellence in Clinical Work.

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Education

Quinnipac University School of Law, J.D., *cum laude*, 2020
Virginia Tech, B.A., *summa cum laude*, 2015

Admissions

Connecticut
Washington

After law school, Alyssa was a Legal Research Law Clerk for the Superior Court of Connecticut. While working for the Superior Court, Alyssa worked on a variety of cases with issues that included employment discrimination, premises liability, foreclosures, class certification, and governmental and sovereign immunity.

Alyssa completed her undergraduate degree, *summa cum laude* and Phi Beta Kappa, from Virginia Tech in 2015. She majored in Psychology and had minors in Sociology and Political Science.

SIGNIFICANT RECOVERIES

Some examples of the cases in which our lawyers played a significant role are described below:

Deceptive Marketing

Hyundai and Kia Fuel Economy Litigation, No. 2:13-md-2424 (C.D. Cal.). In a lawsuit alleging false advertising of vehicle fuel efficiency, the court appointed Eric Gibbs as liaison counsel. Mr. Gibbs regularly reported to the Court, coordinated a wide-ranging discovery process, and advanced the view of plaintiffs seeking relief under the laws of over twenty states. Ultimately Mr. Gibbs helped negotiate a revised nationwide class action settlement with an estimated value of up to \$210 million. The Honorable George H. Wu wrote that Mr. Gibbs had “efficiently managed the requests from well over 20 different law firms and effectively represented the interests of Non-Settling Plaintiffs throughout this litigation. This included actively participating in revisions to the proposed settlement in a manner that addressed many weaknesses in the original proposed settlement.”

In re Mercedes-Benz Tele Aid Contract Litigation, MDL No. 1914, No. 07-cv-02720 (D.N.J.). Gibbs Mura attorneys and co-counsel served as co-lead class counsel on behalf of consumers who were not told their vehicles’ navigation systems were on the verge of becoming obsolete. Counsel successfully certified a nationwide litigation class, before negotiating a settlement valued between approximately \$25 million and \$50 million. In approving the settlement, the court acknowledged that the case “involved years of difficult and hard-fought litigation by able counsel on both sides” and that “the attorneys who handled the case were particularly skilled by virtue of their ability and experience.”

In re Providian Credit Card Cases, JCCP No. 4085 (Cal. Super. Ct. San Francisco Cty). Mr. Gibbs played a prominent role in this nationwide class action suit brought on behalf of Providian credit card holders. The lawsuit alleged that Providian engaged in unlawful, unfair and fraudulent business practices in connection with the marketing and fee assessments for its credit cards. The Honorable Stuart Pollack approved a \$105 million settlement, plus injunctive relief—one of the largest class action recoveries in the United States arising out of consumer credit card litigation.

In re Hyundai and Kia Horsepower Litigation, No. 02CC00287 (Cal. Super. Ct. Orange Cty). In a class action on behalf of U.S. Hyundai and Kia owners and lessees, contending that Hyundai advertised false horsepower ratings in the United States, attorneys from Gibbs Mura negotiated a class action settlement valued at between \$75 million and \$125 million which provided owners nationwide with cash payments and dealer credits.

Skold v. Intel Corp., No. 1-05-cv-039231 (Cal. Super. Ct. Santa Clara Cty.). Gibbs Mura attorneys represented Intel consumers through a decade of hard-fought litigation, ultimately certifying a nationwide class under an innovative “price inflation” theory and negotiating a settlement that provided refunds and \$4 million in cy pres donations. In approving the settlement, Judge Peter Kirwan wrote: “It is abundantly clear that Class Counsel invested an incredible amount of time and costs in a case which lasted approximately 10 years with no guarantee that they would prevail.... Simply put, Class Counsel earned their fees in this case.”

Steff v. United Online, Inc., No. BC265953 (Cal. Super. Ct. Los Angeles Cty.). Mr. Gibbs served as lead counsel in this nationwide class action suit brought against NetZero, Inc. and its parent, United Online, Inc., by former NetZero customers. Plaintiffs alleged that defendants falsely advertised their internet service as unlimited and guaranteed for a specific period of time. The Honorable Victoria G. Chaney of the Los Angeles Superior Court granted final approval of a settlement that provided full refunds to customers whose services were cancelled and which placed restrictions on Defendants’ advertising.

Khaliki v. Helzberg's Diamond Shops, Inc., No. 11-cv-00010 (W.D. Mo.). Gibbs Mura attorneys and co-counsel represented consumers who alleged deceptive marketing in connection with the sale of princess-cut diamonds. The firms achieved a positive settlement, which the court approved, recognizing “that Class Counsel provided excellent representation” and achieved “a favorable result relatively early in the case, which benefits the Class while preserving judicial resources.” The court went on to recognize that “Class Counsel faced considerable risk in pursuing this litigation on a contingent basis, and obtained a favorable result for the class given the legal and factual complexities and challenges presented.”

Defective Products

In re Pacific Fertility Center Litigation, Case No. 3:18-cv-01586 (N.D. Cal). Gibbs Mura attorneys served as co-lead trial counsel in an almost three-week trial on behalf of several patients who tragically lost eggs and embryos in a catastrophic cryo-preservation tank failure at San Francisco’s Pacific Fertility Center in 2018. The jury found cryogenic tank manufacturer, Chart Inc., liable on all claims, determining that the tank contained manufacturing and design defects, and that Chart had negligently failed to recall or retrofit the tank’s controller, despite having known for years that the controller model was prone to malfunction. For each claim, the jury found that the deficiency was a substantial factor in causing harm to the plaintiffs, and the jury awarded \$14.975 million in aggregate damages. The trial addressed claims for four families and was the first trial in consolidated litigation that included claims for over 150 families, with five additional trials for 25 more families scheduled for 2022 and 2023. All cases in the consolidated federal litigation were settled in early 2023. Claims against the IVF clinic and its laboratory were pursued separately through arbitration and settled in 2022.

In re: American Honda Motor Co., Inc., CR-V Vibration Marketing and Sales Practices Litigation, No. 2:15-md-02661 (S.D. Ohio) Gibbs Mura attorneys served as co-lead counsel in this multidistrict litigation on behalf of Honda CR-V owners who complained that their vehicles were vibrating excessively. After several lawsuits had been filed, Honda began issuing repair bulletins, setting forth repairs to address the vibration. Honda did not publicize the repairs well and as a result, Plaintiffs’ alleged many CR-V owners and lessees—including those who had previously been told that repairs were unavailable—continued to experience the vibration. In early 2018, the parties negotiated a comprehensive settlement to resolve the multidistrict litigation on a class-wide basis. The settlement ensured that all affected vehicle owners were made aware of the free warranty repairs, including requiring Honda to proactively reach out to CR-V owners and dealers in several ways to publicize the repair options available.

Glenn v. Hyundai Motor America, Case No. 8:15-cv-02052 (C.D. Cal.). Gibbs Mura attorneys represented drivers from six states who alleged their vehicles came with defective sunroofs that could shatter without warning. The case persisted through several years of fiercely contested litigation before resolving for a package of class-wide benefits conservatively valued at over \$30 million. In approving the settlement, U.S. District Court Judge David O. Carter praised the resolution: “[T]his is an extraordinarily complex case and an extraordinarily creative solution.

Amborn et al. v. Behr Process Corp., No. 17-cv-4464 (N.D. Ill.) Gibbs Mura served as co-lead counsel in this coordinated lawsuit against Behr and Home Depot alleging that Behr's DeckOver deck resurfacing product is prone to peeling, chipping, bubbling, and degrading soon after application. The team negotiated a class-wide settlement, which provided class members who submitted claims with 1) a refund for their purchase; and 2) substantial compensation for money spent removing DeckOver or repairing their deck. The settlement was granted final approval on December 19, 2018.

In re Hyundai Sonata Engine Litigation, Case No. 5:15-cv-01685 (N.D. Cal.). Gibbs Mura attorneys served as court-appointed co-lead class counsel on behalf of plaintiffs who alleged their 2011-2014 Hyundai Sonatas suffered premature and catastrophic engine failures due to defective rotating assemblies. We negotiated a comprehensive settlement providing for nationwide recalls, warranty extensions, repair reimbursements, and compensation for class members who had already traded-in or sold their vehicles at a loss. The average payment to class members exceeded \$3,000.

Sugarman v. Ducati North America, Inc., No. 10-cv-05246 (N.D. Cal.). Gibbs Mura attorneys served as class counsel on behalf of Ducati motorcycle owners whose fuel tanks on their motorcycles degraded and deformed due to incompatibility with the motorcycles' fuel. In January 2012, the Court approved a settlement that provided an extended warranty and repairs, writing, "The Court recognizes that class counsel assumed substantial risks and burdens in this litigation. Representation was professional and competent; in the Court's opinion, counsel obtained an excellent result for the class."

Parkinson v. Hyundai Motor America, No. 06-cv-00345 (C.D. Cal.). Gibbs Mura attorneys served as class counsel in this class action featuring allegations that the flywheel and clutch system in certain Hyundai vehicles was defective. After achieving nationwide class certification, our lawyers negotiated a settlement that provided for reimbursements to class members for their repairs, depending on their vehicle's mileage at time of repair, from 50% to 100% reimbursement. The settlement also provided full reimbursement for rental vehicle expenses for class members who rented a vehicle while flywheel or clutch repairs were being performed. After the settlement was approved, the court wrote, "Perhaps the best barometer of ... the benefit obtained for the class ... is the perception of class members themselves. Counsel submitted dozens of letters from class members sharing their joy, appreciation, and relief that someone finally did something to help them."

Browne v. Am. Honda Motor Co., Inc., No. 09-cv-06750 (C.D. Cal.). Gibbs Mura attorneys and co-counsel represented plaintiffs who alleged that about 750,000 Honda Accord and Acura TSX vehicles were sold with brake pads that wore out prematurely. We negotiated a settlement in which improved brake pads were made available and class members who had them installed could be reimbursed. The settlement received final court approval in July 2010 and provided an estimated value of \$25 million.

In re General Motors Dex-Cool Cases., No. HG03093843 (Cal. Super Ct. Alameda Cty). Gibbs Mura attorneys served as co-lead counsel in these class action lawsuits filed throughout the country, where plaintiffs alleged that General Motors' Dex-Cool engine coolant damaged certain vehicles' engines, and that in other vehicles, Dex-Cool formed a rusty sludge that caused vehicles to overheat. After consumer classes were certified in both Missouri and California, General Motors agreed to cash payments to class members nationwide. On October 27, 2008, the California court granted final approval to the settlement.

In re iPod Cases, JCCP No. 4355 (Cal. Super. Ct. San Mateo Cty). Mr. Gibbs, as court appointed co-lead counsel, negotiated a settlement that provided warranty extensions, battery replacements, cash payments, and store credits for class members who experienced battery failure. In approving the settlement, the Hon. Beth L. Freeman said that the class was represented by "extremely well qualified" counsel who negotiated a "significant and substantial benefit" for the class members.

Roy v. Hyundai Motor America, No. 05-cv-00483 (C.D. Cal.). Gibbs Mura attorneys served as co-lead counsel in this nationwide class action suit brought on behalf of Hyundai Elantra owners and lessees, alleging that an air bag system in vehicles was defective. Our attorneys helped negotiate a settlement whereby Hyundai agreed to repair the air bag systems, provide reimbursement for transportation expenses, and administer an alternative dispute resolution program for trade-ins and buy-backs. In approving the settlement, the Honorable Alicemarie H. Stotler presiding, described the settlement as "pragmatic" and a "win-win" for all involved.

Velasco v. Chrysler Group LLC (n/k/a FCA US LLC), No. 2:13-cv-08080 (C.D. Cal.). In this class action, consumers alleged they were sold and leased vehicles with defective power control modules that caused vehicle stalling. Gibbs Mura attorneys and their co-counsel defeated the majority of Chrysler's motion to dismiss and engaged in extensive deposition and document discovery. In 2015, the parties reached a settlement contingent on Chrysler initiating a recall of hundreds of thousands of vehicles, reimbursing owners for past repairs, and extending its warranty for the repairs conducted through the recall. When he granted final settlement approval, the Honorable Dean D. Pregerson acknowledged that the case had been "hard fought" and "well-litigated by both sides."

Edwards v. Ford Motor Co., No. 11-cv-1058 (S.D. Cal.). This lawsuit alleged that Ford sold vehicles despite a known safety defect that caused them to surge into intersections, through crosswalks, and up on to curbs. The litigation twice went to the U.S. Court of Appeals for the Ninth Circuit, with plaintiff prevailing in both instances. In the first instance, the appellate court reversed the trial court's denial of class certification. In the second, the Ninth Circuit affirmed the ruling below that plaintiff's efforts had generated free repairs, reimbursements, and extended warranties for the class.

Sanborn, et al. v. Nissan North America, Inc., No. 00:14-cv-62567 (S.D. Fla.). Gibbs Mura litigated this action against a vigorous defense for two years, seeking relief for Nissan Altima owners whose dashboards were melting into a sticky, shiny, gooey surface that they alleged caused a substantial and dangerous glare. After largely prevailing on a motion to dismiss, Gibbs Mura attorneys and their co-counsel prepared the case to the brink of trial, reaching a settlement just ten days before the scheduled trial start. The settlement allowed class members to obtain steeply discounted dashboard replacements and reimbursement toward prior replacement costs.

Bacca v. BMW of N. Am., No. 2:06-cv-6753 (C.D. Cal.) In a class action alleging that BMW vehicles suffered from defective sub-frames, we negotiated a settlement with BMW in which class members nationwide received full reimbursement for prior sub-frame repair costs as well as free nationwide inspections and program.

Antitrust and Unfair Business Practices

In re: Wells Fargo Collateral Protection Insurance Litigation, MDL Case No.: 8:17-ML-2797 (C.D. Cal.). Eric Gibbs was appointed to the three-firm Plaintiffs' Steering Committee in this multi-district litigation on behalf of consumers who took out car loans from Wells Fargo and were charged for auto insurance they did not need. The parties announced a proposed settlement of at least \$393.5 million for affected consumers and the Court granted final approval in November 2019.

In re TFT-LCD (Flat Panel) Antitrust Litigation, MDL 1827 (N.D. Cal.). Gibbs Mura attorneys were among the team serving as liaison counsel in this multi-district antitrust litigation against numerous TFT-LCD (Flat Panel) manufacturers alleging a conspiracy to fix prices, which has achieved settlements of more than \$400 million to date.

In re Natural Gas Antitrust Cases I, II, III and IV, JCCP No. 4221 (Cal. Super. Ct. San Diego Cty). Gibbs Mura attorneys served in a leadership capacity in this coordinated antitrust litigation against numerous natural gas companies for manipulating the California natural gas market, which has achieved settlements of nearly \$160 million.

Beaver v. Tarsadia Hotels, No. 11-cv-1842 (S.D. Cal.); Gibbs Mura attorneys served as co-lead counsel representing buyers of San Diego Hard Rock Hotel condominium units in this class action lawsuit against real estate developers concerning unfair competition claims. The lawsuit settled for \$51.15 million.

LLE One, LLC et al. v. Facebook, Inc., No. 4:16-cv-6232 (N.D. Cal.); Gibbs Mura attorneys represent small businesses and other advertisers in a class action lawsuit alleging that Facebook overstated its metrics for the average time spent watching video ads on its platform. The Court granted final approval to a \$40 million class action settlement on June 26, 2020.

Hernandez v. Wells Fargo Bank, N.A., No. 3:18-cv-07354-WHA (N.D. Cal.); Gibbs Mura attorneys served as court-appointed co-lead counsel representing a certified class of more than 1,200 home mortgage borrowers who lost their homes to foreclosure after Wells Fargo erroneously denied them trial mortgage modifications. The case settled in two phases for a total of \$40.3 million. Class members received significant compensation payments of up to \$120,000.

In re LookSmart Litigation, No. 02-407778 (Cal. Super. Ct. San Francisco Cty). This nationwide class action suit was brought against LookSmart, Ltd. on behalf of LookSmart's customers who paid an advertised "one time payment" to have their web sites listed in LookSmart's directory, only to be later charged additional payments to continue service. Plaintiffs' claims included breach of contract and violation of California's consumer protection laws. On October 31, 2003, the Honorable Ronald M. Quidachay granted final approval of a nationwide class action settlement providing cash and benefits valued at approximately \$20 million.

Lehman v. Blue Shield of California, No. CGC-03-419349 (Cal. Super. Ct. S.F. Cty.). In this class action lawsuit alleging that Blue Shield engaged in unlawful, unfair and fraudulent business practices when it modified the risk tier structure of its individual and family health care plans, Gibbs Mura attorneys helped negotiate a \$6.5 million settlement on behalf of former and current Blue Shield subscribers residing in California. The Honorable James L. Warren granted final approval of the settlement in March 2006.

Wixon v. Wyndham Resort Development Corp., No. 07-cv-02361 (N.D. Cal.). Gibbs Mura attorneys served as class and derivative counsel in this litigation brought against a timeshare developer and the directors of a timeshare corporation for violations of California state law. Plaintiffs alleged that the defendants violated their fiduciary duties as directors by taking actions for the financial benefit of the timeshare developer to the detriment of the owners of timeshare interests. On September 14, 2010, Judge White granted approval of a settlement of the plaintiffs' derivative claims.

Berrien, et al. v. New Raintree Resorts, LLC, et al., No. 10-cv-03125 (N.D. Cal.). Gibbs Mura attorneys filed this class action on behalf of timeshare owners, challenging the imposition of unauthorized special assessment fees. On November 15, 2011, the parties reached a proposed settlement of the claims asserted by the plaintiffs on behalf of all class members who were charged the special assessment. On March 13, 2012, the Court issued its Final Class Action Settlement Approval Order and Judgment, approving the proposed settlement.

Benedict, et al. v. Diamond Resorts Corporation, et al., No. 12-cv-00183 (D. Hawaii). In this class action on behalf of timeshare owners, Gibbs Mura attorneys represented plaintiffs challenging the imposition of an unauthorized special assessment fee. On November 6, 2012, the parties reached a proposed settlement of the claims asserted by the plaintiffs on behalf of all class members who were charged the special assessment. On June 6, 2013, the Court approved the settlement.

Allen Lund Co., Inc. v. AT&T Corp., No. 98-cv-1500 (C.D. Cal.). This class action lawsuit was brought on behalf of small businesses whose long-distance service was switched to Business Discount Plan, Inc. Gibbs Mura attorneys served as class counsel and helped negotiate a settlement that provided full cash refunds and free long-distance telephone service.

Mackouse v. The Good Guys - California, Inc., No. 2002-049656 (Cal. Super Ct. Alameda Cty). This nationwide class action lawsuit was brought against The Good Guys and its affiliates alleging violations of the Song-Beverly Warranty Act and other California consumer statutes. The Plaintiff alleged that The Good Guys failed to honor its service contracts, which were offered for sale to customers and designed to protect a customer's purchase after the manufacturer's warranty expired. In May 9, 2003, the Honorable Ronald M. Sabraw granted final approval of a settlement that provides cash refunds or services at the customer's election.

Mitchell v. Acosta Sales, LLC, No. 11-cv-01796 (C.D. Cal. 2011). Gibbs Mura attorneys and co-counsel served as class counsel representing Acosta employees who alleged that they were required to work off-the-clock and were not reimbursed for required employment expenses. We helped negotiate a \$9.9 million settlement for merchandiser employees who were not paid for all the hours they worked. The Court granted final approval of the settlement in September 2013.

Rubaker v. Spansion, LLC, No. 09-cv-00842 (N.D. Cal. 2009). Gibbs Mura attorneys and co-counsel filed a class action lawsuit on behalf of former Spansion employees that alleged that the company had failed to provide terminated employees from California and Texas with advance notice of the layoff, as required by the Workers Adjustment and Retraining Notification Act (WARN Act). The bankruptcy court approved the class action settlement we and co-counsel negotiated in 2010. The settlement was valued at \$8.6 million and resulted in cash payments to the former employees.

Securities and Financial Fraud

Camenisch v. Umpqua Bank, No. 3:20-cv-05905-RS (AGT) (N.D. Cal.) – Gibbs Mura served as lead trial counsel in a four-week jury trial on behalf of over 1,200 class members who alleged that Umpqua Bank (now known as Columbia Bank) aided and abetted a fraudulent investment scheme by Professional Financial Investors (PFI). Plaintiffs argued that PFI ran a fraudulent scheme that used investor money to personally benefit PFI's executives, including its principals Ken Casey and Lewis Wallach, pay other investors, and cover recurring shortages across its dozens of accounts at Umpqua. Ultimately, the jury could not reach a unanimous decision, and the court declared a mistrial. The parties reached a \$55 million settlement weeks later, and the Court granted final approval on September 11, 2025. Judge P. Casey Pitts, who oversaw the trial, called the settlement an "excellent" outcome for the class.

Todd Benjamin International, Ltd. v. Grant Thornton International, No. 1:20-cv-21808-RNS (S.D. Fla.) – Gibbs Mura served as class counsel for investors in TCA Global Credit Master Fund L.P. and its feeder funds. The investors alleged that the funds' management inflated assets and earnings, and that the funds' auditors knew about the overstatement but failed to take appropriate action. After multiple years of litigation, Gibbs Mura helped secure settlements of \$26.5 million for investors. At the hearing granting final approval on May 20, 2025, Judge Scola thanked counsel for their "excellent work in the case."

Deora v. NantHealth, No. 2:17-cv-1825 (C.D. Cal.) – Gibbs Mura served as Co-lead Counsel for certified classes of investors in litigation alleging violations of federal securities laws related to the healthcare technology company's statements in connections with its initial public offering in 2016 and afterward. In September 2020, the Court granted final approval to a \$16.5 million class action settlement.

In re Peregrine Financial Group Customer Litigation, No. 12-cv-5546 (N.D. Ill.). Mr. Stein was among the attorneys serving as co-lead counsel for futures and commodities investors who lost millions of dollars in the collapse of Peregrine Financial Group, Inc. Through several years of litigation, counsel helped deliver settlements worth more than \$75 million from U.S. Bank, N.A., and JPMorgan Chase Bank, N.A.

In re Chase Bank USA, N.A. "Check Loan" Contract Litigation, No. 09-2032 (N.D. Cal.). Gibbs Mura attorneys and counsel from several firms led this nationwide class action lawsuit alleging deceptive marketing and loan practices by Chase Bank USA, N.A. After a nationwide class was certified, U.S. District Court Judge Maxine M. Chesney granted final approval of a \$100 million settlement on behalf of Chase cardholders.

Mitchell v. American Fair Credit Association, No. 785811-2 (Cal. Super. Ct. Alameda Cty); *Mitchell v. Bankfirst, N.A.*, No. 97-cv-01421 (N.D. Cal.). This class action lawsuit was brought on behalf of California members of the American Fair Credit Association (AFCA). Plaintiffs alleged that AFCA operated an illegal credit repair scheme. The Honorable James Richman certified the class and appointed the firm as class counsel. In February 2003, Judge Ronald Sabraw of the Alameda County Superior Court and Judge Maxine Chesney of the U.S. District Court for the Northern District of California granted final approval of settlements valued at over \$40 million.

Data Breach and Privacy

Brooks et al. v. Thomson Reuters Corporation, Case No. 21-cv-01418-EMC (N.D. Cal.) Gibbs Mura attorneys serve as court-appointed class counsel in this data privacy case against Thomson Reuters for its CLEAR product. The lawsuit alleged that Thomson Reuters collected millions of California residents' personal and confidential information and then sold access to it without their knowledge or consent. After the court granted plaintiffs' motion for class certification, the parties reached a class settlement for \$27.5 million and substantial injunctive relief. The court granted final approval of the settlement on February 21, 2025.

In re Equifax, Inc. Customer Data Security Breach Litig., MDL No. 2800, No. 1:17-md-2800 (N.D. Ga.) Gibbs Mura attorneys served on the Plaintiffs' Executive Committee in this nationwide class action stemming from a 2017 data breach that exposed social security numbers, birth dates, addresses, and in some cases, credit card numbers of more than 147 million consumers. On January 13, 2020, the Court granted final approval to a settlement valued at \$1.5 billion. Gibbs Mura attorneys played an integral role in negotiating key business practice changes, including overhauling Equifax's handling of consumers' personal information and data security.

In re Anthem, Inc. Data Breach Litig., MDL No. 2617, No. 15-md-02617 (N.D. Cal.). Gibbs Mura attorneys served as part of the four-firm leadership team in this nationwide class action stemming from the largest healthcare data breach in history affecting approximately 80 million people. On August 15, 2018, the Court granted final approval to a \$115 million cash settlement.

In re: Vizio, Inc. Consumer Privacy Litigation, MDL No. 8:16-ml-02963 (C.D. Cal.). Gibbs Mura attorneys served as co-lead counsel in this multi-district lawsuit alleging that Vizio collected and sold data about consumers' television viewing habits and their digital identities to advertisers without consumers' knowledge or consent. Counsel achieved an important ruling on the application of the Video Privacy Protection Act (VPPA), a 1988 federal privacy law, which had never been extended to television manufacturers. The firm negotiated a settlement providing for class-wide injunctive relief transforming the company's data collection practices, as well as a \$17 million fund to compensate consumers who were affected. In granting preliminary approval, Judge Josephine Staton stated, "I'm glad I appointed all of you as lead counsel, because -- it probably is the best set of papers I've had on preliminary approval." She also noted "[E]very class member will benefit from the injunctive relief." On July 31, 2019, the Court granted final approval of the settlement.

In re Adobe Systems Inc. Privacy Litig., No. 13-cv-05226 (N.D. Cal.). In this nationwide class action stemming from a 2013 data breach, attorneys from Gibbs Mura served as lead counsel on behalf of the millions of potentially affected consumers. Counsel achieved a landmark ruling on Article III standing (which has since been relied upon by the Seventh Circuit Court of Appeals and other courts) and then went on to negotiate a settlement requiring Adobe to provide enhanced security relief—including the implementation and maintenance of enhanced intrusion detection, network segmentation, and encryption.

Whitaker v. Health Net of Cal., Inc., et al., No. 11-cv-00910 (E.D. Cal.); *Shurtleff v. Health Net of Cal., Inc.*, No. 34-2012-00121600 (Cal. Super Ct. Sacramento Cty). Gibbs Mura attorneys served as co-lead counsel in this patient privacy case. On June 24, 2014, the court granted final approval of a settlement that provided class members with credit monitoring, established a \$2 million fund to reimburse consumers for related identity theft incidents, and instituted material upgrades to and monitoring of Health Net’s information security protocols.

Smith v. Regents of the University of California, San Francisco, No. RG-08-410004 (Cal. Super Ct. Alameda Cty). Gibbs Mura attorneys represented a patient who alleged that UCSF’s disclosure of its patients’ medical data to outside vendors violated California medical privacy law. The firm succeeded in negotiating improvements to UCSF’s privacy procedures on behalf of a certified class of patients of the UCSF medical center. In approving the stipulated permanent injunction, Judge Stephen Brick found that “plaintiff Smith has achieved a substantial benefit to the entire class and the public at large.”

Mass Tort

In re Actos Pioglitazone-Products Liability Litigation, No. 6:11-md-2299 (W.D. La.). Gibbs Mura partners represented individuals who were diagnosed with bladder cancer after taking the oral diabetic drug Actos. The federal litigation resulted in a \$2.37 billion settlement.

In re Yasmin and Yaz (Drospirenone) Marketing, Sales, Practices and Products Liability Litigation, MDL No. 2385, No. 3:09-md-02100 (S.D. Ill.). Gibbs Mura attorneys represented women throughout the country who suffered serious side effects after taking Yaz, Yasmin and Ocella birth control. The federal litigation resulted in settlements worth approximately \$1.6 billion.

In re Pradaxa (Dabigatran Etexilate) Products Liability Litigation, MDL No. 2385, No. 3:12-md-02385 (S.D. Ill.), Gibbs Mura attorneys represented patients who suffered irreversible internal bleeding after taking Pradaxa blood thinners. Lawsuit resolved for settlements of approximately \$650 million.

Sexual Assault Litigation

A.B. v. Regents of the University of California No. 2:20-cv-9555 (C.D. Cal.) – Gibbs Mura represents former patients of UCLA OB-GYN Dr. James Heaps in a class action lawsuit alleging assault, abuse and harassment violations, and accusing UCLA of failing to protect patients after first becoming aware of the doctor’s misconduct. Final settlement approval was granted on November 10, 2021, providing \$73 million in compensation to former patients of Dr. Heaps as well as requiring a series of business practice reforms by UCLA for better handling of sexual assault investigations and practices going forward. The settlement is innovative for its flexible, tiered, trauma-informed approach, which allowed women to choose their own level of engagement in a non adversarial process.

Government Reform

Paeste v. Government of Guam, No. 11-cv-0008 (D. Guam); Gibbs Mura attorneys and co-counsel served as Class Counsel in litigation alleging the Government of Guam had a longstanding practice of delaying tax refunds for years on end, with the Government owing over \$200 million in past due refunds. After certifying a litigation class, Plaintiffs prevailed on both of their claims at the summary judgment stage, obtaining a permanent injunction that reformed the government's administration of tax refunds. The judgment and injunction were upheld on appeal in a published decision by the Ninth Circuit. *Paeste v. Gov't of Guam*, 798 F.3d 1228 (9th Cir. 2015).

TAB 6

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14 *Co-Lead Counsel for Plaintiffs*

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF SANTA CLARA**

17 IN RE HPE ENTERPRISE SERVICES-DXC
18 TECHNOLOGY CO. MERGER
19 LITIGATION

Case No. 19CV353132

**DECLARATION OF ROSS D. MURRAY
REGARDING: (A) NOTICE
DISSEMINATION; (B) PUBLICATION;
(C) ESTABLISHMENT OF CALL
CENTER SERVICES AND WEBSITE;
AND (D) REQUESTS FOR EXCLUSION
AND PROOFS OF CLAIM RECEIVED
TO DATE**

20 This Document Relates to:
21 ALL ACTIONS

Assigned for All Purposes to:

22 Judge: Honorable Beth McGowen
23 Dept: 22
24 Date Action Filed: August 20, 2019
25 Hearing: June 11, 2026, 1:30 p.m.

26
27
28 **DECLARATION OF ROSS D. MURRAY REGARDING: (A) NOTICE DISSEMINATION; (B)
PUBLICATION; (C) ESTABLISHMENT OF CALL CENTER SERVICES AND WEBSITE; AND
(D) REQUESTS FOR EXCLUSION AND PROOFS OF CLAIM RECEIVED TO DATE**

1 I, ROSS D. MURRAY, declare and state as follows:

2 1. I am employed as a Vice President by Verita Global (“Verita,” formerly Gilardi & Co.
3 LLC), located at 1 McInnis Parkway, Suite 250, San Rafael, California. The following statements
4 are based on my personal knowledge and information provided to me by others, and if called to testify,
5 I could and would do so competently.

6 2. Pursuant to the Court’s December 12, 2025 Order Granting Plaintiffs’ Motion for
7 Preliminary Approval of Class Action Settlement (the “Notice Order”), Verita was appointed as the
8 settlement administrator in connection with the proposed Settlement of the above-captioned action
9 (the “Action”).¹ I oversaw the notice services that Verita provided in accordance with the Notice
10 Order.

11 3. I submit this declaration in order to provide the Court and the parties to the Action
12 with information regarding: (i) mailing and emailing of the Court-approved Notice of Proposed
13 Settlement of Class Action (the “Notice”) and Proof of Claim and Release form (the “Proof of Claim”)
14 (collectively, the “Claim Package,” attached hereto as Exhibit A); (ii) publication of the Summary
15 Notice of Proposed Settlement of Class Action (the “Summary Notice”); (iii) establishment of the
16 website and toll-free telephone number dedicated to this Settlement; (iv) the number of requests for
17 exclusion received to date by Verita; and (v) the number of Proofs of Claim from potential Class
18 Members received to date by Verita.

19 **DISSEMINATION OF NOTICE**

20 4. Pursuant to the Notice Order, Verita is responsible for disseminating notice of the
21 Settlement to potential Class Members. The Class consists of all Persons who acquired DXC
22 Technology Company (“DXC”) common stock in direct exchange for CSC securities in the April 1,
23 2017 Merger Exchange. Excluded from the Class are: Defendants and their families; the officers,
24 directors, and affiliates of Defendants, at all relevant times; members of Defendants’ immediate

25 _____
26 ¹ Any capitalized terms used that are not otherwise defined herein shall have the meanings ascribed
27 to them in the Stipulation of Settlement, finalized on October 17, 2025 (the “Stipulation”), which is
28 available on the website established for the Action at www.DXCLitigation.com.

1 families and their legal representatives, heirs, successors, or assigns; and any entity in which
2 Defendants have or had a controlling interest. Also excluded from the Class are those Persons who
3 would otherwise be Class Members but who timely and validly excluded themselves therefrom.

4 5. Verita used the previous list of stockholders compiled in connection with
5 dissemination of the Notice of Class Action (“Notice of Pendency”) as the basis for the mailing list
6 for the Claim Package, as the Class definition and Class Period have not changed since the mailing
7 list was compiled for the Notice of Pendency. The list was reviewed to identify and eliminate
8 duplicate entries and incomplete data, resulting in a usable mailing list of 10,842 unique names and
9 addresses. On January 5, 2026, Verita caused the Claim Package to be sent by First-Class Mail to
10 10,842 potential Class Members.

11 6. On January 5, 2026, as part of its normal mailing procedures, Verita mailed, by First-
12 Class Mail, Claim Packages and cover letters to 256 brokerages, custodial banks, and other
13 institutions (“Nominee Holders”) that hold securities in “street name” as nominees for the benefit of
14 their customers who are the beneficial owners of the securities. The Nominee Holders also include a
15 group of filers/institutions who have requested notification of every securities case. These Nominee
16 Holders are included in a proprietary database created and maintained by Verita. In our experience,
17 the Nominee Holders included in this proprietary database represent a significant majority of the
18 beneficial holders of securities. The cover letter accompanying the Claim Packages advised the
19 Nominee Holders of the proposed Settlement and requested their cooperation in forwarding the Claim
20 Packages to potential Class Members. In the more than four decades that we have been providing
21 notice and claims administration services in securities class actions, we have found that the majority
22 of potential class members hold their securities in street name and are notified through the Nominee
23 Holders. Verita also mailed Claim Packages and cover letters to 4,413 institutions included on the
24 U.S. Securities and Exchange Commission’s (“SEC”) list of active brokers and dealers at the time of
25 mailing. A sample of the cover letter mailed to Nominee Holders and the institutions included on the
26 SEC’s list of active brokers and dealers is attached hereto as Exhibit B.

1 **PUBLICATION OF THE SUMMARY NOTICE**

2 12. In accordance with the Notice Order, on January 15, 2026, Verita caused the Summary
3 Notice to be published in the national edition of *The Wall Street Journal* and transmitted over *Business*
4 *Wire*, as shown in the confirmations of publication attached hereto as Exhibit C.

5 **ESTABLISHMENT OF CALL CENTER SERVICES AND SETTLEMENT WEBSITE**

6 13. On July 18, 2024, in conjunction with the mailing of the Notice of Pendency, Verita
7 established and continues to maintain a case-specific, toll-free telephone number, 1-888-726-1699, to
8 accommodate potential Class Member inquiries. The toll-free telephone number is set forth in the
9 Notice and on the case website. Verita has been and will continue to promptly respond to all inquiries
10 to the toll-free telephone helpline.

11 14. On September 19, 2025, in conjunction with the mailing of the Notice of Pendency,
12 Verita established and continues to maintain a website dedicated to this Settlement
13 (www.DXCLitigation.com) to provide additional information to Class Members and to provide
14 answers to frequently asked questions. The web address is set forth in the Notice, Proof of Claim,
15 and Summary Notice. The website includes information regarding the Action and the Settlement,
16 including the objection and claim filing deadlines, and details about the Court’s Settlement Fairness
17 Hearing. Copies of the Notice, Proof of Claim, Stipulation, Notice Order, and Second Amended
18 Consolidated Complaint are posted on the website and are available for downloading. In addition,
19 the website provides Class Members with the ability to submit their Proofs of Claim online.

20 **REQUESTS FOR EXCLUSION RECEIVED TO DATE**

21 15. The Notice of Pendency informed potential Class Members that written requests for
22 exclusion from the Class were to be sent to Verita, such that they were received no later than
23 September 16, 2024.

24 16. The Notice of Pendency also set forth the information that must be included in each
25 request for exclusion. Verita received 15 requests for exclusion in response to the Notice of
26 Pendency, a list of which is attached hereto as Exhibit D. As an update, as of the date of this
27 declaration, Verita has not received any additional requests for exclusion from the Class.

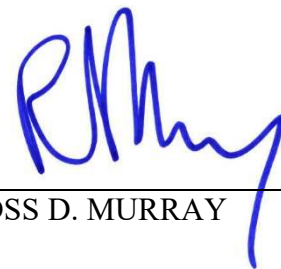
1 17. Although the Notice Order (and the Notice) provides that Class Members who wish to
2 file objections must file them with the Court and copy them to relevant counsel (rather than to Verita),
3 I also note for the sake of completeness that, as of the date of this declaration, Verita has not received
4 any objections.

5 **PROOFS OF CLAIM RECEIVED TO DATE**

6 18. The deadline to submit a Proof of Claim was April 6, 2026. As of the date of this
7 declaration, Verita has received 89,321 claims; 66,580 of these claims were filed electronically by
8 financial institutions or other third-party filers, 736 were filed by postal mail, and 22,005 were filed
9 online via the settlement website.² Verita is currently validating the Proofs of Claim submitted. Upon
10 final Court approval and entry of judgment, and after Verita has fully processed the Proofs of Claim
11 (and the responses to its deficiency-and-cure notifications), performed quality assurance reviews, and
12 made final administrative determinations as to which Proofs of Claim are valid, Verita will distribute
13 the Net Settlement Fund to eligible Class Members pursuant to the Plan of Allocation.

14 I declare under penalty of perjury that the foregoing is true and correct and that this declaration
15 was executed this 6th day of May, 2026, at San Rafael, California.

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ROSS D. MURRAY

26 ² Verita believes, based on robust security measures that are instituted in all such settlement
27 administrations, as well as various suspect data points related to the claims filed, that well over 90%
of the 22,005 claims filed online are fraudulent, and those claims will be rejected on that basis.

EXHIBIT A

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

In re HPE ENTERPRISE SERVICES-DXC)	Lead Case No. 19CV353132
TECHNOLOGY CO. MERGER LITIGATION)	<u>CLASS ACTION</u>
)	Assigned for All Purposes to:
<hr/> This Document Relates To:)	Judge: Honorable Charles F. Adams
ALL ACTIONS.)	Dept. 7
)	Date Action Filed: August 20, 2019

NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION

TO: ALL PERSONS WHO ACQUIRED DXC TECHNOLOGY COMPANY (“DXC”) COMMON STOCK IN DIRECT EXCHANGE FOR COMPUTER SCIENCES CORPORATION, INC. (“CSC”) SECURITIES IN THE APRIL 1, 2017 MERGER BETWEEN CSC AND THE ENTERPRISE SERVICES BUSINESS SEGMENT OF HEWLETT PACKARD ENTERPRISE COMPANY (“HPE”)

TO QUALIFY FOR A SETTLEMENT PAYMENT, YOU MUST TIMELY SUBMIT A PROOF OF CLAIM AND RELEASE FORM (“PROOF OF CLAIM”) BY APRIL 6, 2026, AS MORE FULLY DESCRIBED BELOW.

THIS NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER SOLICITATION. PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOUR RIGHTS MAY BE AFFECTED BY A CLASS ACTION CASE PENDING IN COURT.

WHY SHOULD I READ THIS NOTICE?

This Notice is given pursuant to an order issued by the Superior Court of California, County of Santa Clara (“Court”) in a lawsuit captioned *In re HPE Enterprise Services-DXC Technology Co. Merger Litigation*, Lead Case No. 19CV353132 (the “Action”). This Notice serves to inform you of the proposed settlement of the Action (the “Settlement”) and the hearing (the “Settlement Fairness Hearing”) to be held by the Court to consider the fairness, reasonableness, and adequacy of the Settlement, as set forth in the Stipulation of Settlement dated October 15, 2025 (the “Stipulation”), by and between Plaintiffs Jason McLees and Palm Tran, Inc. Amalgamated Transit Union Local 1577 Pension Plan (“Plaintiffs”), on behalf of themselves and the Class (as defined below), and Defendants HPE, DXC, Rishi Varma, Timothy C. Stonesifer, Jeremy K. Cox, Mukesh Aghi, Amy E. Alving, David Herzog, Sachin Lawande, J. Michael Lawrie, Julio A. Portalatin, Peter Rutland, Manoj P. Singh, Margaret C. Whitman, and Robert F. Woods (collectively, the “Individual Defendants” and, together with HPE and DXC, the “Defendants”).¹

This Notice is intended to inform you of how this lawsuit and proposed Settlement may affect your rights and what steps you may take in relation to it. This Notice is NOT an expression of any opinion by the Court as to the merits of the claims or defenses asserted in the lawsuit or whether the Defendants engaged in any wrongdoing.

WHAT IS THIS LAWSUIT ABOUT?

I. THE ALLEGATIONS

DXC provides information technology services to businesses worldwide. Plaintiffs allege that Defendants violated Sections 11, 12, and 15 of the Securities Act of 1933 (the “Securities Act”) by reason of material misrepresentations and omissions in the Offering Materials, including the Form S-4 registration statement, Form 424B3 prospectus, and materials incorporated therein, issued in connection with the April 1, 2017 Merger Exchange, which was a stock-for-stock exchange by which HPE’s Enterprise Services segment was spun off and merged with CSC to form DXC.

Specifically, Plaintiffs allege that the Offering Materials misrepresented and omitted material facts regarding the nature, timing, and scope of a so-called “workforce optimization” plan, described as a plan to, among other things, eliminate duplicative employees and “optimize” the workforce in order to achieve expected merger “synergies.” Instead, Defendants allegedly planned and carried out layoffs of older, more experienced employees, which allowed Defendants to offload higher salaried employees, cut costs in the short term, and enhance reported earnings. Plaintiffs allege that as DXC terminated employees with longstanding customer relationships, DXC began to lose customers and business. Plaintiffs allege that the eventual disclosure of this workforce plan caused DXC’s stock price to decline sharply, damaging investors who acquired DXC common stock in the April 1, 2017 Merger Exchange.

Defendants have expressly denied, and continue to expressly deny, each and all of Plaintiffs’ allegations and expressly deny that the Offering Materials contained any material misrepresentations or omissions or otherwise violated the Securities Act in any respect. Defendants have asserted and continue to assert that the Offering Materials were true, accurate, and complete in compliance with the law.

¹ The Stipulation can be viewed and/or downloaded at www.DXCLitigation.com. All capitalized terms used herein have the same meaning as the terms defined in the Stipulation.

THE COURT HAS NOT RULED AS TO WHETHER DEFENDANTS ARE LIABLE TO PLAINTIFFS OR TO THE CLASS. THIS NOTICE IS NOT INTENDED TO BE AN EXPRESSION OF ANY OPINION BY THE COURT WITH RESPECT TO THE TRUTH OF THE ALLEGATIONS IN THIS ACTION OR THE MERITS OF THE CLAIMS OR DEFENSES ASSERTED. THIS NOTICE IS SOLELY TO ADVISE YOU OF THE PROPOSED SETTLEMENT OF THIS ACTION AND YOUR RIGHTS IN CONNECTION WITH THAT SETTLEMENT.

II. PROCEDURAL HISTORY

Plaintiff McLees filed an initial complaint on August 20, 2019, against HPE, DXC, and certain current and former officers and directors of DXC and HPE, alleging violations of Sections 11, 12, and 15 of the Securities Act in the Offering Materials issued in connection with the April 1, 2017 Merger Exchange that formed DXC. Plaintiff Palm Tran filed a complaint on November 26, 2019, alleging violations of the same sections of the Securities Act against the same defendants. By court order on December 9, 2019, the two cases were consolidated, and Girard Sharp LLP, Hedin Hall LLP (now known as The Hall Firm, Ltd.), and Robbins Geller Rudman & Dowd LLP were appointed co-lead counsel for Plaintiffs, with Gibbs Law Group LLP and Sugarman & Susskind, P.A. (now known as Sugarman Susskind Braswell & Herrera, P.A.) designated as members of Plaintiffs' Executive Committee.

On January 31, 2020, Plaintiffs filed a Consolidated Complaint. Between February 2020 and June 2020, the Parties briefed a motion to stay this Action in favor of a putative class action pending in the U.S. District Court for the Northern District of California regarding similar alleged misstatements in the Offering Materials (the "Federal Case"). The Court denied that motion on July 15, 2020, and the Parties thereafter briefed Defendants' demurrer. Following the conclusion of demurrer briefing, the Action remained dormant for almost two years, as the Federal Case proceeded through multiple rounds of motion to dismiss briefing. The federal court ultimately dismissed the Federal Case on December 14, 2021, leaving this Action as the only remaining proceeding involving claims by CSC's former shareholders against Defendants related to the Merger.

On March 7, 2022, Plaintiffs filed the First Amended Consolidated Complaint ("FAC"), which contained additional allegations regarding the alleged misstatements and omissions in the Offering Materials. The Parties engaged in another round of demurrer briefing. The Court dismissed the FAC, with leave to amend.

Plaintiffs filed the Second Amended Consolidated Complaint ("SAC") on September 21, 2022, including allegations intended to address the concerns that the Court raised in its demurrer decision. Defendants filed demurrers to the SAC. On January 23, 2023, the Court overruled the demurrer, and discovery commenced.

During discovery, the Parties engaged in extended negotiations that resulted in the production of millions of pages of documents, the exchange of written discovery, and the pursuit of third-party discovery. Plaintiffs conducted ten depositions. Additional depositions were noticed or pending scheduling at the time the Settlement was reached.

While discovery was ongoing, Plaintiffs moved in July 2023 to certify a class of all persons who acquired DXC common stock in direct exchange for their shares of CSC securities in the April 1, 2017 Merger Exchange. On May 2, 2024, the Court issued a decision granting Plaintiffs' motion to certify the Class and appointing Girard Sharp LLP, Hedin Hall LLP (now known as The Hall Firm, Ltd.), and Robbins Geller Rudman & Dowd LLP as Class Counsel. On June 28, 2024, the Court entered the Parties' stipulation to provide notice to Class Members of the pendency of this class action, and advise Class Members of their right to exclude themselves from the Class.

On January 3, 2025, the HPE Defendants moved for judgment on the pleadings to Plaintiffs' causes of action under Sections 11 and 12, which the Court granted in part as to the Section 12 cause of action and denied in part as to the Section 11 cause of action on June 24, 2025.

On March 10, 2025, the Parties participated in an all-day mediation session in California, before the Honorable Layn R. Phillips (Ret.), at which they discussed the strengths and weaknesses of the claims and defenses in this Action. The Parties exchanged confidential opening and reply mediation statements in advance of the mediation.

Notwithstanding their efforts, the Parties were unable to reach a resolution during the mediation. Although the Parties did not reach an agreement to settle the Action then, negotiations continued through Judge Phillips. Thereafter, Judge Phillips issued a "mediator's proposal" for the monetary terms of a settlement for this Action on a class-wide basis. The Parties accepted the mediator's proposal subject to the negotiation of a Stipulation of Settlement and approval by the Court.

HOW DO I KNOW IF I AM A CLASS MEMBER?

You are a Class Member if you acquired DXC common stock in direct exchange for CSC securities in the April 1, 2017 Merger Exchange. As set forth in the Stipulation, excluded from the Class are: Defendants; the officers, directors, and affiliates of Defendants, at all relevant times; members of Defendants' immediate families and their legal representatives, heirs, successors, or assigns; and any entity in which Defendants have or had a controlling interest. Also excluded from the Class are those Class Members who timely and validly requested exclusion in response to the notice of pendency previously mailed to the Class. Anyone with questions as to whether or not they are excluded from the Class may call the Claims Administrator toll-free at 1-888-726-1699.

PLEASE NOTE: Receipt of this Notice does not mean that you are a Class Member or that you will be entitled to receive a payment from the Settlement. If you are a Class Member and you wish to be eligible to participate in the distribution of the proceeds from the Settlement, you are required to submit the Proof of Claim that is being distributed with this Notice and the required supporting documentation as set forth therein, so that it is postmarked, received (if no postmark), or submitted online on or before April 6, 2026.

WHAT IF I ACQUIRED DXC COMMON STOCK BY SPIN-OFF FROM HPE?

This lawsuit only concerns the shares of DXC common stock that were issued in direct exchange for CSC shares in the April 1, 2017 Merger Exchange. Persons who acquired DXC common stock solely by other means (such as, for example, by spin-off from HPE shares) are not Class Members and are not entitled to participate in the Settlement with respect to those shares acquired otherwise than in direct exchange for CSC shares.

WHAT IS THE MONETARY VALUE OF THE PROPOSED SETTLEMENT?

The Settlement, if approved, will result in the creation of a cash settlement fund of \$47,500,000.00 (the "Settlement Amount"). The Settlement Amount, plus accrued interest, is the Settlement Fund. The Settlement Fund, minus the costs of this Notice and all costs associated with the administration of the Settlement, Taxes and Tax Expenses, attorneys' fees and expenses, and any award to Plaintiffs in connection with their representation of the Class, as approved by the Court (the "Net Settlement Fund"), will be distributed to eligible Class Members pursuant to the Plan of Allocation that is described in the next section of this Notice.

WHAT IS THE PROPOSED PLAN OF ALLOCATION?

The objective of the Plan of Allocation is to equitably distribute the Net Settlement Fund among Class Members based on their respective alleged economic losses resulting from the securities law violations alleged in the Action.

The Claims Administrator shall determine each Class Member's share of the Net Settlement Fund based on the recognized loss formula (the "Recognized Claim") described below. A Recognized Claim will be calculated for each share of DXC common stock acquired in the April 1, 2017 Merger Exchange. The calculation of a Recognized Claim will depend upon several factors, including the number of shares acquired, whether the shares were ever sold, and, if so, when they were sold and for what amounts. The Recognized Claim is not intended to estimate the amount a Class Member might have been able to recover after a trial, nor to estimate the amount that will be paid to Class Members pursuant to the Settlement. The Recognized Claim is the basis upon which the Net Settlement Fund will be proportionately allocated to Class Members.

Your share of the Net Settlement Fund will depend on, among other things, the number of valid Proofs of Claim that Class Members submit, how many DXC shares you acquired in the Merger, whether you sold any of those shares, when you sold them, and, if so, the sales price.

The calculation of claims below is not an estimate of the amount you will receive. It is a formula for allocating the Net Settlement Fund among all Authorized Claimants. Furthermore, if a Recognized Claim calculates to a negative number or zero under any of the formulas set forth below, the Recognized Claim will be zero.

For each share of DXC common stock acquired in direct exchange for CSC securities pursuant to the Offering Materials issued in connection with the April 1, 2017 Merger Exchange, and:

- a. sold prior to November 7, 2018, the claim per DXC share is \$0.00;
- b. sold from November 7, 2018, through August 8, 2019, the claim per DXC share is the lesser of:
 - i. \$4.50 per DXC share, or
 - ii. the amount paid of \$69.01 per DXC share less the sales price per DXC share; or
- c. retained at the end of August 8, 2019, the claim per DXC share is \$6.07 per DXC share.

Any sale of DXC common stock shall be deemed to have occurred on the "contract" or "trade" date as opposed to the "settlement" or "payment" date. All sale prices shall exclude any fees and commissions. The receipt or grant by gift, devise, or operation of law of DXC common stock shall not be deemed a sale of DXC common stock for the calculation of a claimant's Recognized Claim nor shall it be deemed an assignment of any claim relating to the acquisition of such shares unless specifically provided in the instrument of gift or assignment. The receipt of DXC common stock in exchange for securities of any other corporation or entity other than CSC shall not be deemed an acquisition of DXC common stock.

The total of all profits shall be subtracted from the total of all losses from transactions during the relevant period to determine if a Class Member has a Recognized Claim. Only if a Class Member had an overall market loss, after all profits from transactions in DXC common stock during the relevant period are subtracted from all losses, will such Class Member be eligible to receive a distribution from the Net Settlement Fund.

If an Authorized Claimant has an overall market gain, the Recognized Claim for that Authorized Claimant will be \$0.00. If an Authorized Claimant has an overall market loss, that Authorized Claimant's Recognized Claim will be limited to the amount of overall market loss. The Claims Administrator shall allocate to each Authorized Claimant a *pro rata* share of the Net Settlement Fund based on his, her, or its Recognized Claim as compared to the total Recognized Claims of all Authorized Claimants. No distribution shall be made to Authorized Claimants who would otherwise receive a distribution of less than \$10.00.

Distributions will be made to Authorized Claimants after all claims have been processed, after the Court has finally approved the Settlement, and after any appeals are resolved. If there is any balance remaining in the Net Settlement Fund after a reasonable amount of time from the initial date of distribution of the Net Settlement Fund (whether by reason of tax refunds, uncashed checks, or otherwise), the Claims Administrator shall, if economically feasible, reallocate such balance among Authorized Claimants in an equitable and economic fashion. These redistributions shall be repeated until the balance remaining in the Net Settlement Fund is no longer economically feasible to distribute to Class Members. Thereafter, subject to distribution to state entities, as required by California Code of Civil Procedure §384(b)(3), any balance that remains in the Net Settlement Fund shall be donated to Council of Institutional Investors.

Please contact the Claims Administrator or Plaintiffs' Counsel if you disagree with any determinations made by the Claims Administrator regarding your Proof of Claim. Any claimant whose timely claim has been rejected in whole or in part for a curable deficiency who desires to contest such rejection, may ask Plaintiffs' Counsel to request that the Court, which retains jurisdiction over all Class Members and the claims administration process, decide the issue.

The Court has reserved jurisdiction to allow, disallow, or adjust the claim of any Class Member on equitable grounds.

Payment pursuant to the Plan of Allocation set forth above shall be conclusive against all Authorized Claimants. No Person shall have any claim against Plaintiffs, Plaintiffs' Counsel, any Claims Administrator, any other Person designated by Plaintiffs' Counsel, or any of the Released Persons or Defendants' Counsel based on the distributions made substantially in accordance with the Stipulation and the Settlement contained therein, the Plan of Allocation, or further orders of the Court. All Class Members who fail to complete and submit a valid and timely Proof of Claim shall be barred from participating in distributions from the Net Settlement Fund (unless otherwise ordered by the Court), but otherwise shall be bound by the terms of the Stipulation, including the terms of any judgment entered and the releases given.

Persons and entities that excluded themselves from the Class will not be eligible to receive a distribution from the Net Settlement Fund and should not submit Proof of Claim forms.

DO I NEED TO CONTACT PLAINTIFFS' COUNSEL IN ORDER TO PARTICIPATE IN DISTRIBUTION OF THE NET SETTLEMENT FUND?

No. If you have received this Notice and timely submit your Proof of Claim along with the required documentation to the designated address, you need not contact Plaintiffs' Counsel. If your address changes, please contact the Claims Administrator at:

DXC Technology Co. Merger Litigation
Claims Administrator
c/o Verita Global
P.O. Box 301170
Los Angeles, CA 90030-1170
Telephone: 1-888-726-1699
www.DXCLitigation.com

THERE WILL BE NO PAYMENTS IF THE STIPULATION IS TERMINATED

The Stipulation may be terminated under several circumstances outlined in it. If the Stipulation is terminated, the Action will proceed as if the Stipulation had not been entered.

WHAT ARE THE REASONS FOR SETTLEMENT?

The Settlement was reached after highly contested litigation and motion practice directed at the sufficiency of Plaintiffs' claims. The Parties also conducted document discovery and numerous depositions. Nevertheless, the Court has not reached any final decisions in connection with Plaintiffs' claims against Defendants. Instead, Plaintiffs and Defendants have agreed to this Settlement, which was reached with the substantial assistance of the Honorable Layn R. Phillips (Ret.), a highly respected former federal district court judge with extensive experience in the mediation of complex class actions. In reaching the Settlement, the Parties have avoided the cost, delay, and uncertainty of further litigation.

As in any litigation, Plaintiffs and the Class would face an uncertain outcome if they did not agree to the Settlement. The Parties expected that the case could continue for a lengthy period of time and that even if Plaintiffs succeeded, Defendants could file appeals that would postpone final resolution of the case. Continuing the Action could also result in no recovery at all for Plaintiffs and the Class or a judgment that is less than the amount of the Settlement. Conversely, with regards to Defendants, continuing the Action could result in a judgment in an amount greater than this Settlement. Accordingly, both Plaintiffs and Defendants have determined that Settlement on the terms set forth in the Stipulation was in their best interests in light of the facts and procedural posture of the Action and the uncertainty of continued litigation.

Plaintiffs and Plaintiffs' Counsel believe that this Settlement is fair and reasonable to the members of the Class. They have reached this conclusion for several reasons. Specifically, if the Settlement is approved, the Class will receive a certain and immediate monetary recovery. Additionally, Plaintiffs' Counsel believe that the significant and immediate benefits of the Settlement, when weighed against the significant risk, delay, and uncertainty of continued litigation, are a very favorable result for the Class.

WHO REPRESENTS THE CLASS?

The following attorneys are counsel for the Class:

James I. Jaconette
ROBBINS GELLER RUDMAN & DOWD LLP
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 1-800-449-4900
settlementinfo@rgrdlaw.com

Adam E. Polk
GIRARD SHARP LLP
601 California Street, Suite 1400
San Francisco, CA 94108
Telephone: 1-415-981-4800
apolk@girardsharp.com

David W. Hall
THE HALL FIRM, LTD.
One Embarcadero Center, Suite 1200
San Francisco, CA 94111
Telephone: 1-415-426-5648
dhall@hallfirmlltd.com

If you have any questions about the Action, or the Settlement, you are entitled to consult with Plaintiffs' Counsel by contacting counsel at the phone numbers listed above.

You may obtain a copy of the Stipulation by contacting the Claims Administrator at:

DXC Technology Co. Merger Litigation
Claims Administrator
c/o Verita Global
P.O. Box 301170
Los Angeles, CA 90030-1170
Telephone: 1-866-726-1699
www.DXCLitigation.com

HOW WILL THE PLAINTIFFS' LAWYERS BE PAID?

Lead Counsel will file a motion for an award of attorneys' fees and expenses that will be considered at the Settlement Fairness Hearing. Lead Counsel will apply for an award of attorneys' fees of up to one-third of the Settlement Amount, plus payment of Plaintiffs' Counsel's expenses incurred in connection with this Action in an amount not to exceed \$1,200,000.00. In addition, Plaintiffs may each seek a payment of up to \$15,000.00 for their efforts in representing the Class. Such sums as may be approved by the Court will be paid from the Settlement Fund. Class Members are not personally liable for any such fees or expenses.

The attorneys' fees and expenses requested will be the only payment to Plaintiffs' Counsel for their efforts in achieving this Settlement and for their risk in undertaking this representation on a wholly contingent basis. The fees requested will compensate Plaintiffs' Counsel for their work in achieving the Settlement. The Court will decide what constitutes a reasonable fee award and may award less than the amount requested by Plaintiffs' Counsel.

CAN I OBJECT TO THE SETTLEMENT, THE REQUESTED ATTORNEYS' FEES, THE REQUESTED PAYMENT OF COSTS AND EXPENSES, AND/OR THE PLAN OF ALLOCATION?

Yes. If you are a Class Member, you may object to the terms of the Settlement. Whether or not you object to the terms of the Settlement, you may also object to the requested attorneys' fees and expenses, Plaintiffs' request for awards for representing the Class, and/or the Plan of Allocation.

You may also appear at the Settlement Fairness Hearing at your expense, either in person, telephonically, or through an attorney, provided you notify the Court of your intention to do so.

All written objections, supporting papers, and/or notices of intent to appear at the Settlement Fairness Hearing must: (a) clearly identify the case name and number (*In re HPE Enterprise Services-DXC Technology Co. Merger Litigation*, Lead Case No. 19CV353132); (b) be submitted to the Court either by mailing the objection to: Clerk of the Court, Superior Court of California, County of Santa Clara, 191 N. 1st Street, San Jose, CA 95113, or by filing in person at the same location; (c) be mailed to Lead Counsel's address at Robbins Geller Rudman & Dowd LLP, 655 West Broadway, Suite 1900, San Diego, CA 92101, c/o James I. Jaconette; DXC Defendants' Counsel's address at Latham & Watkins LLP, 1271 Avenue of the Americas, New York, NY 10020, c/o Jamie L. Wine; and HPE Defendants' Counsel's addresses at Wilson Sonsini Goodrich & Rosati, One Market Plaza, Spear Tower, Suite 3300, San Francisco, CA 94105, c/o Katherine L. Henderson, and Morgan, Lewis & Bockius LLP, One Market, Spear Street Tower, 28th Floor, San Francisco, CA 94105, c/o Joseph E. Floren; and (d) be submitted to the Court and received by Lead Counsel and Defendants' Counsel on or before May 21, 2026.

The objection must include documentation establishing the objecting Person's membership in the Class, including the number of shares of DXC common stock acquired in connection with the April 1, 2017 Merger Exchange, and contain a statement of reasons for the objection, copies of any papers, briefs, or other documents upon which the objection is based, a statement of whether the objector intends to appear at the Settlement Fairness Hearing, and the objector's signature, even if represented by counsel. The objection must identify all class action settlements to which the objector and his, her, or its counsel have previously objected. Documentation establishing membership in the Class must consist of copies of brokerage confirmation slips or monthly brokerage account statements, or an authorized statement from the objector's broker containing the transactional and holding information found in a broker confirmation slip or account statement.

If you submit a written objection, attendance at the Settlement Fairness Hearing is not necessary; however, persons wishing to be heard orally at the Settlement Fairness Hearing are required to indicate in their written objection their intention to appear at the hearing and identify any witnesses they may call to testify and exhibits, if any, they intend to introduce into evidence.

If you hire an attorney (at your own expense) to represent you for purposes of objecting, your attorney must serve a notice of appearance on counsel listed above and file it with the Court (at the address set out above) by no later than May 21, 2026.

Unless otherwise directed by the Court, any Class Member who does not make his, her, or its objection in the manner provided shall be deemed to have waived all objections to this Settlement and shall be foreclosed from raising (in this or any other proceeding or on any appeal) any objection and any untimely objection shall be barred.

WHAT ARE MY RIGHTS AND OBLIGATIONS UNDER THE SETTLEMENT?

If you are a Class Member and you did not exclude yourself from the Class, you may receive the benefit of, and you will be bound by, the terms of the Settlement described in this Notice, upon approval by the Court.

HOW CAN I GET A PAYMENT?

To qualify for a payment, you must timely complete and return the Proof of Claim that accompanies this Notice. A Proof of Claim is enclosed with this Notice and also may be downloaded at www.DXCLitigation.com. Read the instructions carefully; fill out the Proof of Claim; sign it; and mail or submit it online (at www.DXCLitigation.com) along with supporting documentation so that it is **postmarked (if mailed) or received (if no postmark or if submitted online) no later than April 6, 2026**. If you do not submit a timely Proof of Claim with all the required information, you will not receive a payment from the Net Settlement Fund; however, you will still be bound in all other respects by the Settlement, the Judgment, and the releases contained in them.

WHAT CLAIMS WILL BE RELEASED BY THE SETTLEMENT?

If the Settlement is approved by the Court, the Court will enter a Judgment. If the Judgment becomes final pursuant to the terms of the Stipulation, all Class Members shall be deemed to have, and by operation of the Final Judgment shall have, fully, finally, and forever waived, released, compromised, settled, resolved, relinquished, and discharged any and all of the Released Persons from all Released Plaintiffs' Claims. As set forth in the Stipulation:

"Released Plaintiffs' Claims" means any and all claims, demands, losses, rights, liability, and causes of action of every nature and description whatsoever, asserted or unasserted, including Unknown Claims as defined below, whether arising under federal, state, local, common, statutory, administrative, or foreign law, or any other law, rule, or regulation, at law or in equity, whether fixed or contingent, whether foreseen or unforeseen, whether accrued or unaccrued, whether liquidated or unliquidated, whether matured or unmatured, whether direct, representative, class, or individual in nature, that either were or

could have been asserted in this Action, or could be in the future asserted in any forum, arising out of, relating to, or in connection with (a) the acquisition of DXC common stock in the April 1, 2017 Merger Exchange, and (b) the allegations, acts, facts, transactions, events, matters, occurrences, disclosures, filings, representations, or omissions that were or could have been involved, set forth, alleged, or referred to by Plaintiffs and all other members of the Class in this Action.

“Released Persons” means Defendants and each and all of their Related Persons.

“Related Persons” means each Defendant’s respective past, present, or future parents, subsidiaries, joint ventures, joint venturers, divisions, and affiliates, and their respective current, former, and future directors, officers, employees, partners, members, principals, agents, underwriters, insurers, co-insurers, reinsurers, majority ownership shareholders, controlling shareholders, attorneys, accountants or auditors, financial or investment advisors or consultants, banks or investment bankers, personal or legal representatives, predecessors, successors, assigns, spouses, heirs, related or affiliated entities; any entity in which a Defendant holds a controlling interest; and the predecessors, successors, estates, immediate family members, spouses, heirs, executors, trusts, trustees, administrators, agents, legal, or personal representatives, assigns, and assignees of each Individual Defendant, all in their capacities as such.

“Unknown Claims” means: (a) any and all Released Plaintiffs’ Claims and potential Released Plaintiffs’ Claims against the Released Persons which Plaintiffs or any Class Member does not know or suspect to exist in their, his, her, or its favor as of the Effective Date, including, without limitation, those that, if known by such Plaintiffs or Class Members, might have affected their, his, her, or its decision(s) with respect to the Settlement or the releases, including their, his, her, or its decision(s) to object or not to object to the Settlement or to exclude themselves, himself, herself, or itself from the Class, and (b) any Released Defendants’ Claims against Plaintiffs, which Defendants do not know or suspect to exist in their, his, her, or its favor, which if known by them, him, her, or it might have affected their, his, her, or its decision(s) with respect to the Settlement. With respect to any and all Released Plaintiffs’ Claims and Released Defendants’ Claims, the Parties stipulate and agree that by operation of the Final Judgment, upon the Effective Date, Plaintiffs and all Class Members and Defendants shall have expressly waived and by operation of the Final Judgment shall have expressly waived, the provisions, rights, and benefits of Cal. Civ. Code §1542, which provides:

A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS THAT THE CREDITOR OR RELEASING PARTY DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE AND THAT, IF KNOWN BY HIM OR HER, WOULD HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR OR RELEASED PARTY.

Additionally, with respect to any and all Released Plaintiffs’ Claims and Released Defendants’ Claims, the Parties stipulate and agree that by operation of the Final Judgment, upon the Effective Date, Plaintiffs and all Class Members and Defendants shall have expressly waived any and all provisions, rights, and benefits conferred by any law of any state or territory of the United States, or principle of common law, which is similar, comparable, or equivalent to Cal. Civ. Code §1542. Plaintiffs and all Class Members and Defendants may hereafter discover facts in addition to or different from those which they, he, she, or it now knows or believes to be true with respect to the subject matter of the Released Plaintiffs’ Claims and Released Defendants’ Claims, but the Parties shall expressly fully, finally, and forever settle and release, and, upon the Effective Date, shall be deemed to have, and by operation of the Final Judgment shall have, fully, finally, and forever settled and released, any and all Released Plaintiffs’ Claims and Released Defendants’ Claims, known or unknown, suspected or unsuspected, contingent or non-contingent, whether or not concealed or hidden, which now exist, or heretofore have existed, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct which is negligent, intentional, with or without malice, or a breach of any duty, law or rule, without regard to the subsequent discovery or existence of such different or additional facts. The Parties acknowledge that the inclusion of “Unknown Claims” in the definition of Released Plaintiffs’ Claims and Released Defendants’ Claims was separately bargained for and is an essential element of the Settlement.

THE ABOVE DESCRIPTION OF THE PROPOSED SETTLEMENT AND THE RELEASES IS ONLY A SUMMARY.

The complete terms are set forth in the Stipulation (including its exhibits), which may be obtained at www.DXCLitigation.com or by contacting Plaintiffs’ Counsel listed on page 5 above.

THE SETTLEMENT FAIRNESS HEARING

The Court will hold a Settlement Fairness Hearing on June 11, 2026, at 1:30 p.m., before the Honorable Charles F. Adams at the Superior Court of California, County of Santa Clara, Department 7, 191 N. First Street, San Jose, CA 95113, for the purpose of determining whether: (1) the Settlement as set forth in the Stipulation for \$47,500,000.00 in cash should be approved by the Court as fair, reasonable, and adequate; (2) Judgment as provided under the Stipulation should be entered; (3) to award Plaintiffs’ Counsel attorneys’ fees and expenses out of the Settlement Fund and, if so, in what amounts; (4) to pay Plaintiffs for their efforts in representing the Class out of the Settlement Fund and, if so, in what amount; and (5) the Plan of Allocation should be approved by the Court. The Court may adjourn or continue the Settlement Fairness Hearing without further notice to members of the Class. Although Class Members may appear in person, the judge overseeing this case encourages remote appearances. (As of August 15, 2022, the Court’s remote platform is Microsoft Teams.) Class Members who wish to appear remotely should contact Plaintiffs’ Counsel at least three days before the hearing if possible. Instructions for appearing remotely are

provided at https://www.scscourt.org/general_info/ra_teams/video_hearings_teams.shtml and should be reviewed in advance. Class Members may appear remotely using the Microsoft Teams link for Department 7 (Afternoon Session) or by calling the toll free conference call number for Department 7.

HOW DO I OBTAIN ADDITIONAL INFORMATION?

This Notice contains only a summary of the terms of the proposed Settlement. The pleadings and other records in this litigation, including the Stipulation, may be examined: (a) online on the Superior Court of California, County of Santa Clara's Electronic Filing and Service Website at www.scscourt.org, or through the Santa Clara Superior Court Portal at <https://portal.scscourt.org>; or (b) in person at Records, Superior Court of California, County of Santa Clara, 191 N. First Street, San Jose, California 95113, between the hours of 8:30 a.m. and 3:00 p.m., Monday through Thursday and 8:30 a.m. and 12:00 p.m. on Friday, excluding Court holidays and closures. In addition, all the Settlement documents, including the Stipulation, this Notice, the Proof of Claim, and proposed Judgment may be obtained by contacting the Claims Administrator at:

DXC Technology Co. Merger Litigation
Claims Administrator
c/o Verita Global
P.O. Box 301170
Los Angeles, CA 90030-1170
Telephone: 1-888-726-1699
Email: info@DXCLitigation.com
www.DXCLitigation.com

In addition, you may contact Greg Wood, Shareholder Relations, Robbins Geller Rudman & Dowd LLP, 655 West Broadway, Suite 1900, San Diego, CA 92101, 1-800-449-4900, settlementinfo@rgrdlaw.com, if you have any questions about the Action or the Settlement.

SPECIAL NOTICE TO BANKS, BROKERS, AND OTHER NOMINEES

If you hold any shares of DXC common stock acquired in the April 1, 2017 Merger Exchange, as a nominee for a beneficial owner, then, within ten (10) calendar days after you receive this Notice, you must either: (1) send a copy of this Notice and the Proof of Claim (collectively, "Notice Packet") by First-Class Mail to all such Persons; or (2) provide a list of the names and addresses of such Persons to the Claims Administrator:

DXC Technology Co. Merger Litigation
Claims Administrator
c/o Verita Global
P.O. Box 301170
Los Angeles, CA 90030-1170
Email: notifications@veritaglobal.com

If you choose to mail the Notice Packet yourself, you may obtain from the Claims Administrator (without cost to you) as many additional copies of these documents as you will need to complete the mailing.

Regardless of whether you choose to complete the mailing yourself or elect to have the mailing performed for you, you may obtain reimbursement for reasonable administrative costs actually incurred in connection with forwarding the Notice Packet, or providing names and addresses to the Claims Administrator, upon submission of appropriate documentation to the Claims Administrator. Reasonable administrative costs actually incurred in connection with the foregoing includes up to \$0.03 for providing names, addresses, and email addresses to the Claims Administrator per record; up to \$0.03 per Notice Packet mailed by you, plus postage at the rate used by the Claims Administrator. Such properly documented expenses incurred by nominees in compliance with the terms of these instructions will be paid from the Settlement Fund. Any dispute concerning the reasonableness of reimbursement costs shall be resolved by the Court.

PLEASE DO NOT TELEPHONE THE COURT OR DEFENDANTS' COUNSEL FOR INFORMATION REGARDING THIS SETTLEMENT OR THE CLAIM PROCESS.

DATED: December 15, 2025

BY ORDER OF THE SUPERIOR COURT OF
CALIFORNIA, COUNTY OF SANTA CLARA
HONORABLE CHARLES F. ADAMS

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

In re HPE ENTERPRISE SERVICES-DXC TECHNOLOGY CO. MERGER LITIGATION)	Lead Case No. 19CV353132
)	<u>CLASS ACTION</u>
<hr/>		
This Document Relates To:)	Assigned for All Purposes to:
ALL ACTIONS.)	Judge: Honorable Charles F. Adams
)	Dept. 7
<hr/>		
)	Date Action Filed: August 20, 2019

PROOF OF CLAIM AND RELEASE

I. GENERAL INSTRUCTIONS

1. To recover as a Class Member based on the claims in the action entitled *In re HPE Enterprise Services-DXC Technology Co. Merger Litigation*, Lead Case No. 19CV353132 (the “Action”),¹ you must complete and, on page 6 hereof, sign this Proof of Claim. If you fail to submit a properly addressed (as set forth in paragraph 3 below) Proof of Claim, your claim may be rejected and you may be precluded from any recovery from the Net Settlement Fund created in connection with the proposed Settlement.

2. Submission of this Proof of Claim, however, does not assure that you will share in the proceeds of the Settlement of the Action.

3. YOU MUST MAIL OR SUBMIT ONLINE YOUR COMPLETED AND SIGNED PROOF OF CLAIM, ACCOMPANIED BY COPIES OF THE DOCUMENTS REQUESTED HEREIN, **ON OR BEFORE APRIL 6, 2026**, ADDRESSED AS FOLLOWS:

DXC Technology Co. Merger Litigation
Claims Administrator
c/o Verita Global
P.O. Box 301170
Los Angeles, CA 90030-1170
Online Submissions: www.DXCLitigation.com

If you are NOT a Class Member, as defined in the Notice of Proposed Settlement of Class Action (“Notice”), DO NOT submit a Proof of Claim.

4. If you are a Class Member and you did not timely request exclusion, you are bound by the terms of any judgment entered in the Action, including the releases provided therein, WHETHER OR NOT YOU SUBMIT A PROOF OF CLAIM.

II. CLAIMANT IDENTIFICATION

You are a Class Member if you acquired shares of DXC Technology Company (“DXC”) common stock in direct exchange for Computer Sciences Corporation, Inc. (“CSC”) securities pursuant to the registration statement and prospectus issued in connection with the April 2017 merger transaction that formed DXC (the “April 1, 2017 Merger Exchange” or the “Merger”).²

Use Part I of this form entitled “Claimant Identification” to identify each acquirer of record (“nominee”) of the DXC common stock that forms the basis of this claim. THIS CLAIM MUST BE FILED BY THE ACTUAL BENEFICIAL ACQUIRER(S) OR THE LEGAL REPRESENTATIVE OF SUCH ACQUIRER(S) OF THE DXC COMMON STOCK UPON WHICH THIS CLAIM IS BASED.

All joint acquirers must sign this claim. Executors, administrators, guardians, conservators, and trustees must complete and sign this claim on behalf of persons represented by them and their authority must accompany this claim and their titles or capacities must be stated. The last four digits of the Social Security (or full Taxpayer Identification) Number and telephone number of the beneficial owner may be used in verifying the claim. Failure to provide the foregoing information could delay verification of your claim or result in rejection of the claim.

¹ This Proof of Claim and Release (“Proof of Claim”) incorporates by reference the definitions in the Stipulation of Settlement (“Stipulation”), which can be obtained at www.DXCLitigation.com. All capitalized terms used herein have the same meaning as the terms defined in the Stipulation.

² As set forth in the Stipulation, excluded from the Class are Defendants; the officers, directors, and affiliates of Defendants, at all relevant times; members of Defendants’ immediate families and their legal representatives, heirs, successors, or assigns; and any entity in which Defendants have or had a controlling interest. Also excluded from the Class are those Persons who would otherwise be Class Members but who timely and validly excluded themselves therefrom.

One claim should be submitted for each separate legal entity. Separate Proofs of Claim should be submitted for each separate legal entity (e.g., a claim from joint owners should not include separate transactions of just one of the joint owners, and an individual should not combine his or her IRA transactions with transactions made solely in the individual's name). Conversely, a single Proof of Claim should be submitted on behalf of one legal entity including all transactions made by that entity on one Proof of Claim, no matter how many separate accounts that entity has (e.g., a corporation with multiple brokerage accounts should include all transactions made in all accounts on one Proof of Claim).

III. CLAIM FORM

Use Part II of this form entitled "Schedule of Transactions in DXC Common Stock" to supply all required details of your transaction(s). If you need more space or additional schedules, attach separate sheets giving all of the required information in substantially the same form. Sign and print or type your name on each additional sheet.

On the schedules, provide all of the requested information with respect to **all** of your acquisitions of DXC common stock that you received in the Merger and **all** of your sales of DXC common stock between April 1, 2017, and August 8, 2019, inclusive, whether such transactions resulted in a profit or a loss. You must also provide all of the requested information with respect to the number of shares of DXC common stock you held at the close of trading on August 8, 2019. Failure to report all such transactions may result in the rejection of your claim.

List each transaction separately and in chronological order, by trade date, beginning with the earliest. You must accurately provide the month, day, and year of each transaction you list.

COPIES OF BROKER CONFIRMATIONS OR OTHER DOCUMENTATION OF YOUR TRANSACTIONS IN DXC COMMON STOCK SHOULD BE ATTACHED TO YOUR CLAIM. FAILURE TO PROVIDE THIS DOCUMENTATION COULD DELAY VERIFICATION OF YOUR CLAIM OR RESULT IN REJECTION OF YOUR CLAIM.

PLEASE NOTE: As set forth in the Plan of Allocation, each Authorized Claimant shall receive his, her, or its *pro rata* share of the Net Settlement Fund. If the prorated payments to any Authorized Claimant calculates to less than \$10.00, it will not be included in the calculation and no distribution will be made to that Authorized Claimant.

NOTICE REGARDING INSTITUTIONAL FILERS: Certain filers submitting claims on behalf of other beneficial owners ("Representative Filers") with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in electronic files. (This is different than the online claims portal on the website for the Settlement.) All such Representative Filers **MUST** also submit a manually signed paper Proof of Claim, whether or not they also submit electronic copies. Claims should be combined on a legal entity basis, where applicable. Sub-accounts should be rolled up into a parent account if the sub-accounts contain the same tax identification number. To obtain the **mandatory** electronic filing requirements and file layout, you may email the Claims Administrator's electronic filing department at edata@veritaglobal.com. **Any file not in accordance with the required electronic filing format will be subject to rejection.** Only one Proof of Claim should be submitted for each separate legal entity and the **complete** name of the beneficial owner(s) of the securities must be entered where called for. Distribution payments must be made by check or electronic payment payable to the Authorized Claimant (beneficial account owner). The third-party filer shall not be the payee of any distribution payment check or electronic distribution payment. No electronic files will be considered to have been submitted unless the Claims Administrator issues an email to that effect. **Do not assume that your file has been received until you receive this email. If you do not receive such an email within 10 days of your submission, you should contact the electronic filing department at edata@veritaglobal.com to inquire about your file and confirm it was received.**

Official
Office
Use
Only

SUPERIOR COURT OF THE STATE OF
CALIFORNIA COUNTY OF SANTA CLARA

*In re HPE Enterprise Services-DXC
Technology Co. Merger Litigation*

Lead Case No. 19CV353132

PROOF OF CLAIM AND RELEASE

**Must Be Postmarked (if Mailed)
or Received (if Submitted Online)
No Later Than April 6, 2026**

DXL2

Please Type or Print in the Boxes Below
Must use Black or Blue Ink or your
claim may be deemed deficient.

**REMEMBER TO ATTACH COPIES OF BROKER CONFIRMATIONS OR OTHER DOCUMENTATION OF YOUR TRANSACTIONS
IN DXC COMMON STOCK. FAILURE TO PROVIDE THIS DOCUMENTATION COULD DELAY VERIFICATION OF YOUR CLAIM
OR RESULT IN REJECTION OF YOUR CLAIM.**

PART I. CLAIMANT IDENTIFICATION

Last Name M.I. First Name

Last Name (Co-Beneficial Owner) M.I. First Name (Co-Beneficial Owner)

IRA Joint Tenancy Employee Individual Other _____

Company Name (Beneficial Owner - If Claimant is not an Individual) or Custodian Name if an IRA (specify)

Trustee/Asset Manager/Nominee/Record Owner's Name (If Different from Beneficial Owner Listed Above)

Account#/Fund# (Not Necessary for Individual Filers)

Social Security Number (Last 4 digits) Taxpayer Identification Number

Telephone Number (Primary Daytime) Telephone Number (Alternate)

Email Address

MAILING INFORMATION

Address

Address (cont.)

City State ZIP Code

Foreign Province Foreign Postal Code Foreign Country Name/Abbreviation

FOR CLAIMS PROCESSING ONLY	OB <input type="text"/>	CB <input type="text"/>	<input type="radio"/> ATP <input type="radio"/> KE <input type="radio"/> ICI	<input type="radio"/> BE <input type="radio"/> DR <input type="radio"/> EM	<input type="radio"/> FL <input type="radio"/> ME <input type="radio"/> ND	<input type="radio"/> OP <input type="radio"/> RE <input type="radio"/> SH	MM / DD / YYYY	FOR CLAIMS PROCESSING ONLY
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IV. SUBMISSION TO JURISDICTION OF COURT AND ACKNOWLEDGMENTS

1. I (We) submit this Proof of Claim under the terms of the Stipulation described in the Notice. I (We) also submit to the jurisdiction of the Superior Court of the State of California, County of Santa Clara, with respect to my (our) claim as a Class Member and for purposes of enforcing the release set forth herein. I (We) further acknowledge that I am (we are) bound by and subject to the terms of any judgment that may be entered in the Action. I (We) agree to furnish additional information to the Claims Administrator to support this claim if requested to do so. I (We) have not submitted any other claim covering the same acquisitions or sales of DXC common stock between April 1, 2017, and August 8, 2019, and know of no other person having done so on my (our) behalf.

V. RELEASE

1. I (We) hereby acknowledge full and complete satisfaction of, and do hereby fully, finally, and forever settle, release, and discharge from the Released Plaintiffs' Claims each and all of the "Released Persons," defined as Defendants and each and all of their Related Persons, as defined below.

2. "Related Persons" means each Defendant's respective past, present, or future parents, subsidiaries, joint ventures, joint venturers, divisions, and affiliates, and their respective current, former, and future directors, officers, employees, partners, members, principals, agents, underwriters, insurers, co-insurers, reinsurers, majority ownership shareholders, controlling shareholders, attorneys, accountants or auditors, financial or investment advisors or consultants, banks or investment bankers, personal or legal representatives, predecessors, successors, assigns, spouses, heirs, related or affiliated entities; any entity in which a Defendant holds a controlling interest; and the predecessors, successors, estates, immediate family members, spouses, heirs, executors, trusts, trustees, administrators, agents, legal, or personal representatives, assigns, and assignees of each Individual Defendant, all in their capacities as such.

3. "Released Plaintiffs' Claims" means any and all claims, demands, losses, rights, liability, and causes of action of every nature and description whatsoever, asserted or unasserted, including Unknown Claims as defined below, whether arising under federal, state, local, common, statutory, administrative, or foreign law, or any other law, rule, or regulation, at law or in equity, whether fixed or contingent, whether foreseen or unforeseen, whether accrued or unaccrued, whether liquidated or unliquidated, whether matured or unmatured, whether direct, representative, class, or individual in nature, that either were or could have been asserted in this Action, or could be in the future asserted in any forum, arising out of, relating to, or in connection with (a) the acquisition of DXC common stock in the April 1, 2017 Merger Exchange, and (b) the allegations, acts, facts, transactions, events, matters, occurrences, disclosures, filings, representations, or omissions that were or could have been involved, set forth, alleged, or referred to by Plaintiffs and all other members of the Class in this Action.

4. "Unknown Claims" means: (a) any and all Released Plaintiffs' Claims and potential Released Plaintiffs' Claims against the Released Persons which Plaintiffs or any Class Member does not know or suspect to exist in their, his, her, or its favor as of the Effective Date, including, without limitation, those that, if known by such Plaintiffs or Class Members, might have affected their, his, her, or its decision(s) with respect to the Settlement or the releases, including their, his, her, or its decision(s) to object or not to object to the Settlement or to exclude themselves, himself, herself, or itself from the Class; and (b) any Released Defendants' Claims against Plaintiffs, which Defendants do not know or suspect to exist in their, his, her, or its favor, which if known by them, him, her, or it might have affected their, his, her, or its decision(s) with respect to the Settlement. With respect to any and all Released Plaintiffs' Claims and Released Defendants' Claims, the Parties stipulate and agree that by operation of the Final Judgment, upon the Effective Date, Plaintiffs and all Class Members and Defendants shall have expressly waived and by operation of the Final Judgment shall have expressly waived, the provisions, rights, and benefits of Cal. Civ. Code §1542, which provides:

A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS THAT THE CREDITOR OR RELEASING PARTY DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE AND THAT, IF KNOWN BY HIM OR HER, WOULD HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR OR RELEASED PARTY.

Additionally, with respect to any and all Released Plaintiffs' Claims and Released Defendants' Claims, the Parties stipulate and agree that by operation of the Final Judgment, upon the Effective Date, Plaintiffs and all Class Members and Defendants shall have expressly waived any and all provisions, rights, and benefits conferred by any law of any state or territory of the United States, or principle of common law, which is similar, comparable, or equivalent to Cal. Civ. Code §1542. Plaintiffs and all Class Members and Defendants may hereafter discover facts in addition to or different from those which they, he, she, or it now knows or believes to be true with respect to the subject matter of the Released Plaintiffs' Claims and Released Defendants' Claims, but the Parties shall expressly fully, finally, and forever settle and release, and, upon the Effective Date, shall be deemed to have, and by operation of the Final Judgment shall have, fully, finally, and forever settled and released, any and all Released Plaintiffs' Claims and Released Defendants' Claims, known or unknown, suspected or unsuspected, contingent or non-contingent, whether or not concealed or hidden, which now exist, or heretofore have existed, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct which is negligent, intentional, with or without malice, or a breach of any duty, law or rule, without regard to the subsequent discovery or existence of such different or additional facts. The Parties acknowledge that the inclusion of "Unknown Claims" in the definition of Released Plaintiffs' Claims and Released Defendants' Claims was separately bargained for and is an essential element of the Settlement.



5. I (We) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to this release or any other part or portion thereof. I (We) hereby warrant and represent that I (we) have included information about all of my (our) transactions in DXC common stock that occurred during the relevant period as well as the number of shares of DXC common stock held by me (us) at the close of trading on August 8, 2019.

6. I (We) declare under penalty of perjury under the laws of the State of California that all of the foregoing information supplied on this Proof of Claim by the undersigned is true and correct.

Executed this _____ day of _____ in _____
(Month/Year) (City/State/Country)

(Sign your name here)

(Sign your name here)

(Type or print your name here)

(Type or print your name here)

(Capacity of person(s) signing, e.g.,
Beneficial Acquirer, Executor or Administrator)

(Capacity of person(s) signing, e.g.,
Beneficial Acquirer, Executor or Administrator)

**ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME.
THANK YOU FOR YOUR PATIENCE.**

Reminder Checklist:

1. Please sign the above release and acknowledgment.
2. Remember to attach copies of supporting documentation.
3. **Do not send** originals of certificates or other documentation as they will not be returned.
4. Keep a copy of your Proof of Claim and all supporting documentation for your records.
5. If you desire an acknowledgment of receipt of your Proof of Claim, please send it Certified Mail, Return Receipt Requested.
6. If you move, please send your new address to the address below.
7. **Do not use red pen or highlighter** on the Proof of Claim or supporting documentation.
8. If this claim is being made on behalf of Joint Claimants, both must sign.

**THIS PROOF OF CLAIM MUST BE SUBMITTED ONLINE OR MAILED
NO LATER THAN APRIL 6, 2026, ADDRESSED AS FOLLOWS:**

Written Submissions:
DXC Technology Co. Merger Litigation
Claims Administrator
c/o Verita Global
P.O. Box 301170
Los Angeles, CA 90030-1170
Online Submissions: www.DXCLitigation.com



EXHIBIT B



1 McInnis Parkway
Suite 250
San Rafael, CA 94903
P: (415) 458-3015

January 5, 2026

«FirstName» «LastName»
«Company»
«Addr1»
«Addr2»
South Bend, IN 46601
«FCountry»

Re: DXC Technology Co. Merger Litigation

Dear «GENDER» «LastName»:

Please find enclosed Notice of Proposed Settlement of Class Action (“Notice”) for the above referenced litigation. Please note the designated eligible securities described on page one of the Notice, specifically the inclusion of all persons who acquired DXC Technology Company (“DXC”) common stock in direct exchange for Computer Sciences Corporation, Inc. (“CSC”) securities in the April 1, 2017 merger between CSC and the Enterprise Services Business segment of Hewlett Packard Enterprise Company (“HPE”). In addition, **the Notice provides that the Claim Filing Deadline is April 6, 2026.**

If you provided a data file of names and addresses for mailing in response to the previous Notice of Class Action sent to you in July 2024, you should not provide those names and addresses again as we have already mailed the Notice to those beneficial owners. Please only provide new names and addresses for your clients who may be Class Members.

Please pay particular attention to the "Special Notice to Banks, Brokers and Other Nominees" on page eight of the Notice which states, in part: If you hold any shares of DXC common stock acquired in the April 1, 2017 Merger Exchange, as a nominee for a beneficial owner, then, within ten (10) calendar days after you receive this Notice, you must either: (1) send a copy of this Notice and the Proof of Claim (collectively, “Notice Packet”) by First-Class Mail to all such Persons; or (2) provide a list of the names and addresses of such Persons to the Claims Administrator: DXC Technology Co. Merger Litigation, Claims Administrator, c/o Verita Global, P.O. Box 301170, Los Angeles, CA 90030-1170. Email: notifications@veritaglobal.com. If you choose to mail the Notice Packet yourself, you may obtain from the Claims Administrator (without cost to you) as many additional copies of these documents as you will need to complete the mailing.

Please do not make your own copies of the Proof of Claim Form, as copies may not be accepted for processing. Additional copies of the appropriate documents may be requested by contacting us at notifications@veritaglobal.com. If we conduct the necessary mailing on your behalf, please submit names and addresses either via email to notifications@veritaglobal.com, via CD Rom to the above address or contact us to obtain secure FTP transmission instructions. Mailing labels will be accepted, but you may be requested to provide an additional copy of the address information you send. Do not include any confidential information that should not appear on a mailing label.

The data provided must be in one of the following formats: ASCII Fixed Length file, ASCII Tab Delimited file, or Microsoft Excel spreadsheet. Your request must also specify the case name and Control Total(s) (for example, the total number of name and address records provided) for each file submission.

If you have any questions, please email notifications@veritaglobal.com.

Sincerely,

Verita Global

EXHIBIT C

BIGGEST 1,000 STOCKS

How to Read the Stock Tables

The following explanations apply to NYSE, NYSE Arca, NYSE American and Nasdaq Stock Market listed securities. Prices are consolidated from trades reported by various market centers, including securities exchanges, FINRA, electronic communications networks and other broker-dealers. The list comprises the 1,000 largest companies based on market capitalization.

Underlined quotations are those stocks with large changes in volume compared with the issue's average trading volume.

Boldfaced quotations highlight those issues whose price changed by 5% or more if their previous closing price was \$2 or higher.

Footnotes: F=New 52-week high; T=New 52-week low; dd=Indicates loss in the most recent four quarters.

Stock tables reflect composite regular trading as of 4 p.m. ET and changes in the official closing prices from 4 p.m. ET the previous day.

Table with columns: Stock, Sym, Close, Net Chg. Lists various stocks like AECOM, AES, Affix, AGNC, APA, ASML, etc.

Table with columns: Stock, Sym, Close, Net Chg. Lists various stocks like BostonSci, BridgeBioPharma, BristolMyers, etc.

Table with columns: Stock, Sym, Close, Net Chg. Lists various stocks like FiveBelow, Flex, Flowserve, etc.

New Highs and Lows

Table with columns: Stock, Sym, Hi/Lo, Chg. Lists various stocks like AgriCo, AirProducts, AirProducts, etc.

Table with columns: Stock, Sym, Hi/Lo, Chg. Lists various stocks like AgriCo, AirProducts, AirProducts, etc.

Table with columns: Stock, Sym, Hi/Lo, Chg. Lists various stocks like AgriCo, AirProducts, AirProducts, etc.

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CLASS ACTION

Legal notice for Superior Court of the State of California, County of Santa Clara. Case No. 19CV353132. In re HPE ENTERPRISE SERVICES-DXC TECHNOLOGY CO. MERGER LITIGATION. SUMMARY NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION.

CLASS ACTION

Legal notice for United States District Court, District of Massachusetts. Case No. 1:23-cv-13065-WGY. NORTH COLLIER FIRE CONTROL AND RESCUE DISTRICT FIREFIGHTERS' PENSION PLAN, Individually and on Behalf of All Others Similarly Situated, vs. MERCURY SYSTEMS, INC., et al. SUMMARY NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION.

Declaration of Publication

I, Jonathan D. Carameros, as Senior Vice President, Settlement Administration at Verita Global LLC f/k/a Gilardi Settlement Administration Company in San Rafael, California, hereby certify that I caused the attached notice to be printed in said publication on January 15, 2026:

Name of Publication: The Wall Street Journal

Address: 1211 Avenue of the Americas

City, State, Zip: New York, NY 10036

Phone #: 1-800-568-7625

State of: New York

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 15th day of January 2026, at Danville, California.

A handwritten signature in black ink, appearing to read "Carameros", with a large, stylized initial "J" on the left side.

Jonathan D. Carameros

Robbins Geller Rudman & Dowd LLP, Girard Sharp LLP, and The Hall Firm, Ltd. Announce Proposed Settlement in the DXC Technology Co. Merger Litigation

RELEASE VERSIONS

[English](#)

CONTACTS

Media Contact:
Robbins Geller Rudman & Dowd LLP
Shareholder Relations Department
Greg Wood
(619) 231-1058

SAN DIEGO--(BUSINESS WIRE)--The following statement is being issued by Robbins Geller Rudman & Dowd LLP, Girard Sharp LLP, and The Hall Firm, Ltd. regarding the DXC Technology Co. Merger Litigation:

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

In re HPE ENTERPRISE SERVICES-DXC
TECHNOLOGY CO. MERGER LITIGATION

Lead Case No. 19CV353132

CLASS ACTION

This Document Relates To:
ALL ACTIONS

SUMMARY NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION

TO: ALL PERSONS WHO ACQUIRED DXC TECHNOLOGY COMPANY ("DXC") COMMON STOCK IN DIRECT EXCHANGE FOR COMPUTER SCIENCES CORPORATION, INC. ("CSC") SECURITIES IN THE APRIL 1, 2017 MERGER BETWEEN CSC AND THE ENTERPRISE SERVICES BUSINESS SEGMENT OF HEWLETT PACKARD ENTERPRISE COMPANY ("HPE")

A CALIFORNIA COURT AUTHORIZED THIS NOTICE. THIS IS NOT A SOLICITATION FROM A LAWYER.

PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOUR RIGHTS MAY BE AFFECTED BY A CLASS ACTION CASE PENDING IN COURT.

YOU ARE HEREBY NOTIFIED that a hearing will be held on June 11, 2026, at 1:30 p.m., before the Honorable Charles F. Adams at the Superior Court of California, County of Santa Clara, Department 7, 191 N. First Street, San Jose, CA 95113, to determine whether: (1) the proposed settlement (the "Settlement") of the above-captioned action as set forth in the Stipulation of Settlement ("Stipulation")¹ for \$47,500,000.00 in cash should be approved by the Court as fair, reasonable, and adequate; (2) the Judgment as provided under the Stipulation should be entered; (3) to award Plaintiffs' Counsel attorneys' fees and expenses out of the Settlement Fund (as defined in the Notice of Proposed Settlement of Class Action ("Notice"), which is discussed below) and, if so, in what amounts; (4) to pay Plaintiffs an incentive award for representing the Class out of the Settlement Fund and, if so, in what amount; and (5) the Plan of Allocation should be approved by the Court as fair, reasonable, and adequate.

This Action is a consolidated securities class action lawsuit pending in the Superior Court of the State of California, County of Santa Clara (the "Court"), against DXC, HPE, Rishi Varma, Timothy C. Stonesifer, Jeremy K. Cox, Mukesh Aghi, Amy E. Alving, David Herzog, Sachin Lawande, J. Michael Lawrie, Julio A. Portalatin, Peter Rutland, Manoj P. Singh, Margaret C. Whitman, and Robert F. Woods (collectively, "Defendants"). In April 2017, HPE spun off its Enterprise Services business segment and merged it with CSC, forming DXC (the "April 1, 2017 Merger Exchange" or the "Merger"). Plaintiffs allege that in connection with the Merger, DXC issued approximately 140 million new shares of common stock pursuant to a materially false and misleading registration statement and prospectus. Plaintiffs allege that these purportedly false and misleading statements resulted in damage to Class Members. Defendants expressly deny all of Plaintiffs' allegations.

IF YOU ACQUIRED DXC COMMON STOCK IN THE APRIL 1, 2017 MERGER EXCHANGE, YOUR RIGHTS MAY BE AFFECTED BY THE SETTLEMENT OF THIS ACTION.

To share in the distribution of the Net Settlement Fund, you must establish your rights by submitting a Proof of Claim and Release form ("Proof of Claim"), along with the required supporting documentation, by mail (postmarked, or received if no postmark, no later than April 6, 2026) or online (no later than April 6, 2026). Your failure to submit your Proof of Claim by April 6, 2026, will subject your claim to rejection and preclude you from receiving any of the recovery in connection with the Settlement of this Action. If you are a member of the Class and did not request exclusion therefrom, you will be bound by the Settlement and any judgment and release entered in the Action, including, but not limited to, the Judgment, whether or not you submit a Proof of Claim.

If you have not received a copy of the Notice, which more completely describes the Settlement and your rights thereunder, and a Proof of Claim, you may obtain these documents, as well as a copy of the Stipulation (which, among other things, contains definitions for the defined terms used in this Summary Notice) and other settlement documents, online at www.DXCLitigation.com, or by writing to:

DXC Technology Co. Merger Litigation
Claims Administrator
c/o Verita Global
P.O. Box 301170
Los Angeles, CA 90030-1170

The pleadings and other records in this litigation, including the Stipulation, may also be examined (a) online on the Superior Court of California, County of Santa Clara's Electronic Filing and Service Website at www.sccourt.org, or through the Santa Clara Superior Court Portal at <https://portal.sccourt.org>; or (b) in person at Records, Superior Court of California, County of Santa Clara, 191 N. First Street, San Jose, California 95113, between the hours of 8:30 a.m. and 3:00 p.m., Monday through Thursday and 8:30 a.m. and 12:00 p.m. on Friday, excluding Court holidays and closures.

Inquiries should NOT be directed to Defendants, the Court, or the Clerk of the Court.

Inquiries, other than requests for the Notice or for a Proof of Claim, may be made to Plaintiffs' Counsel:

ROBBINS GELLER RUDMAN & DOWD LLP
James I. Jaconette
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 1-800-449-4900
settlementinfo@rgrdlaw.com

GIRARD SHARP LLP
Adam E. Polk
601 California Street, Suite 1400
San Francisco, CA 94108
Telephone: 1-415-981-4800
apolk@girardsharp.com

THE HALL FIRM, LTD.
David W. Hall
One Embarcadero Center, Suite 1200
San Francisco, CA 94111
Telephone: 1-415-426-5648
dhall@hallfirmtd.com

If you are a Class Member, you have the right to object to the Settlement, the Plan of Allocation, the request by Plaintiffs' Counsel for an award of attorneys' fees and expenses, and/or the payment to Plaintiffs for their representation of the Class. Any objections must be submitted to the Court and sent to Plaintiffs' Counsel and Defendants' Counsel so that they are received by **May 21, 2026**, in the manner and form explained in the Notice.

DATED December 15, 2025

BY ORDER OF THE SUPERIOR COURT OF
CALIFORNIA, COUNTY OF SANTA CLARA
THE HONORABLE CHARLES F. ADAMS

¹The Stipulation can be viewed and/or obtained at www.DXCLitigation.com. All capitalized terms used herein have the same meaning as the terms defined in the Stipulation.

Contacts

Media Contact:

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Greg Wood
(619) 231-1058

Declaration of Publication

I, Jonathan D. Carameros, as Senior Vice President, Settlement Administration at Verita Global LLC f/k/a Gilardi Settlement Administration Company in San Rafael, California, hereby certify that I caused the attached notice to be published as a press release by the following wire service:

Name of Publication: BusinessWire
Address: 101 California Street 20th Floor
City, ST Zip: San Francisco, CA 94111
Phone #: 415-986-4422
State of: California

The press release was distributed on January 15, 2026 to the following media circuits offered by the above-referenced wire service:

1. National Newslite

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 15th day of January 2026, at Danville, California.



Jonathan D. Carameros

EXHIBIT D

DXC Technology Co. Merger Litigation

Requests for Exclusion as of April 23, 2026

Exclusion #	Name	Share Count	Timely?
DXL-EXCL00001	Thomas E Leftwich		Yes
DXL-EXCL00002	Beverly Gin		Yes
DXL-EXCL00003	Malta Pension Investments	21,521	Yes
DXL-EXCL00004	Wyatt T Wallace		Yes
DXL-EXCL00005	Robert J Frankenburg		Yes
DXL-EXCL00006	David L Samuelson		Yes
DXL-EXCL00007	Naomi M Judy		Yes
DXL-EXCL00008	Robert H Clark		Yes
DXL-EXCL00009	Roger Deminna		Yes
DXL-EXCL00010	Monica M Pollich		Yes
DXL-EXCL00011	Evelyn C Todd		Yes
DXL-EXCL00012	Steve J Pavlina		Yes
DXL-EXCL00013	Charles E Ohman		Yes
DXL-EXCL00014	Evangeline W Cooper		Yes
DXL-EXCL00015	Anneliese M Polich		Yes