

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RICHARD DENNIS and PORT 22, LLC, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

THE ANDERSONS, INC., and CARGILL,
INC., and JOHN/JANE DOES NOS. 1-50
Defendants.

Case No.: 1:20-cv-4090

Honorable Robert W. Gettleman
Magistrate Judge Keri L. Holleb Hotaling

**DECLARATION OF DARYL F. SCOTT FILED ON BEHALF OF
SCOTT+SCOTT ATTORNEYS AT LAW LLP IN SUPPORT OF
MOTION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES**

I, Daryl F. Scott, declare as follows:

1. I am a partner at Scott+Scott Attorneys at Law LLP (“Scott+Scott” or the “Firm”). I am submitting this declaration in support of the motion for an award of attorneys’ fees and reimbursement of litigation expenses (“expenses”) incurred in connection with services rendered in the above-entitled action.

2. This Firm is counsel of record for plaintiffs Richard Dennis, Michael Glass, and Port 22, LLC.

3. The statements herein are true to the best of my personal knowledge, information, and belief based upon the books and records of Scott+Scott and information received from my Firm’s attorneys and staff.

4. The schedule attached as **Exhibit A** summarizes the hours and lodestar of Scott+Scott. The total hours were determined by examining contemporaneous daily time records regularly prepared and maintained by the Firm. Lodestar calculations for the time incurred are based on the Firm’s current hourly rates and were prepared based upon daily time records maintained by attorneys and professional support staff at the Firm. Lodestar figures do not include charges for expense items. Scott+Scott’s time records have been reviewed to confirm both the accuracy of the entries and the necessity for and reasonableness of the time expended in this litigation. As a result of this review, certain reductions were made to time and lodestar either in the exercise of judgment or to conform with my Firm’s practice. Time spent by attorneys and staff who worked fewer than 10 hours on the case has been omitted from the lodestar calculation. In addition, all time spent on the motion for attorneys’ fees and expenses has been excluded from the lodestar calculation.

5. After the reductions referred to above, the number of hours spent on the litigation by my Firm is **208**. A breakdown of the lodestar by timekeeper is provided in **Exhibit A**. The

lodestar amount for attorney/paralegal (or attorney/paraprofessional) time based on the Firm's current rates is **\$201,917.50**.

6. The hourly rates shown in **Exhibit A** for the attorneys and other professional support staff at the Firm are the same as the usual and customary hourly rates used for their services in other contingent class action litigation. For personnel no longer employed by Scott+Scott, the lodestar calculation is based on the hourly rates for such personnel in his or her final year of employment with the Firm.

7. Scott+Scott has grown into one of the most respected U.S.-based law firms specializing in the investigation and prosecution of complex securities, antitrust, and consumer-focused class actions in both the United States and Europe. Today, Scott+Scott is comprised of 12 office locations worldwide, which allows the Firm to stay current on federal and state law developments concerning attorneys' fees. Accordingly, Scott+Scott is familiar with the prevailing market rates for leading attorneys in complex class action litigation addressing important issues.

8. The Firm's hourly rates are set periodically, based on an analysis of hourly rates by law firms performing comparable work and that have been approved by courts. Different timekeepers within the same employment category (e.g., partners, associates, paralegals, etc.) may have different rates based on a variety of factors, including years of practice, years at the Firm, year in their current position (e.g., years as a partner), relevant experience, relative expertise, and the rates of similarly experienced peers at our Firm or other law firms. Scott+Scott's hourly rates applied here are fully commensurate with the hourly rates of prominent firms, and as such, are reasonable for each professional who performed work in this litigation. The hourly rates for the attorneys and other professional support staff at the Firm are the same as the usual and customary hourly rates used for their services in other contingent class action litigation.

9. Scott+Scott's hourly rates have been approved by federal courts in Illinois as well as in other federal courts across the country in contingent-fee class action litigations in connection with the lodestar cross-check applied to percentage-of-the-fund fee awards. *See, e.g., Russo v. Walgreen Co.*, 2026 WL 878331, at *21 (N.D. Ill. Mar. 30, 2026) (approving fee award with Scott+Scott's rates ranging from \$400 and \$1420); *In re Surescripts Antitrust Litig.*, No. 1:19-cv-06627, ECF No. 421, slip op. ¶4 (N.D. Ill. Dec. 18, 2025) (approving fee award with Scott+Scott's rates ranging from \$415 to \$1900); *Conlon v. The Northern Trust Co.*, ECF No. 149, slip op. ¶8 (N.D. Ill. Sept. 16, 2025) (approving fee award with Scott+Scott's rates ranging from \$415 to \$1,300); *Lopez v. Apple, Inc.*, No. 4:19-cv-04577, ECF No. 429, slip op. (N.D. Cal. Oct. 16, 2025) (approving fee award with Scott+Scott's rates ranging from \$415 and \$1,420); *Barrett v. Apple Inc.*, 2025 WL 1002786, at *3 (N.D. Cal. Apr. 3, 2025) (approving Scott+Scott attorney hourly rates between \$400 and \$1,545); *In Re: Robinhood Outage Litig.*, No. 3:20-cv-01626-JD, ECF No. 203, slip op. ¶¶6-9 (N.D. Cal. July 28, 2023), (approving attorneys' fees, including Scott+Scott partner rates ranging between \$395 and \$1,295 and specifically finding that plaintiffs' counsel "applied their customary professional rates" and that "the rates billed are consistent with rates that have been awarded in this District"); *In re Vaxart, Inc. Sec. Litig.*, No. 20 Civ. 05949-VC, ECF No. 274, slip op. ¶3 (N.D. Cal. Jan. 25, 2023), (approving fee award with Scott+Scott's rates ranging from \$395 to \$1,395); *Steamship Trade Ass'n of Balt. – Int'l Longshoremen's Ass'n Pension Fund v. Olo Inc.*, No. 1:22-cv-08228, ECF No. 128, slip op. ¶¶6-7 (S.D.N.Y. June 11, 2024), (approving fee award with Scott+Scott's rates ranging from \$395 to \$1,975).

10. My Firm seeks an award of **\$3,572.12** in expenses and charges in connection with the prosecution of the litigation. Those expenses and charges are summarized by category in **Exhibit B**.

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

(a) **Court Fees and Process Service: \$3,075.00.** These expenses have been paid to the Court for *pro hac vice* fees and Class Action Research & Litigation Support Services, an attorney service firm engaged to serve subpoenas.

(b) **Online Legal and Financial Research: \$497.12.** This category includes vendors such as Thomson Reuters/Westlaw and PACER. These resources were used to obtain access to legal research and for cite-checking. This expense represents the expense incurred by Scott+Scott for use of these services in connection with this litigation. The charges for these vendors vary depending upon the type of services requested.

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

13. The identification and background of my Firm and the attorneys who worked on this matter is attached hereto as **Exhibit C**.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 31st day of August, 2026, at Richmond, Virginia.

A handwritten signature in black ink, appearing to read 'D. F. Scott', is written over a horizontal line.

DARYL F. SCOTT

EXHIBIT A**LODESTAR SUMMARY
SCOTT+SCOTT ATTORNEYS AT LAW LLP**

PROFESSIONAL	YEAR	STATUS	HOURLY RATE	TOTAL HOURS	TOTAL LODESTAR AT HOURLY RATES
Amanda Lawrence	2004	P	\$1,230.00	12.6	\$15,498.00
Michelle Conston	2013	SA	\$990.00	14.7	\$14,553.00
Tom Boardman	2010	A	\$1,095.00	115.7	\$126,691.50
Anna Hunanyan	2017	A	\$675.00	13	\$8,775.00
Daniel Brockwell	2021	A	\$700	52	\$36,400.00
TOTAL				208	\$201,917.50

Partner (P), Senior Associate (SA), Associate (A)

EXHIBIT B

**EXPENSE SUMMARY
SCOTT+SCOTT ATTORNEYS AT LAW LLP**

EXPENSE CATEGORIES	AMOUNT
Court Fees and Process Service	\$3,075.00
Online Legal and Financial Research	\$497.12
TOTAL	\$3,572.12

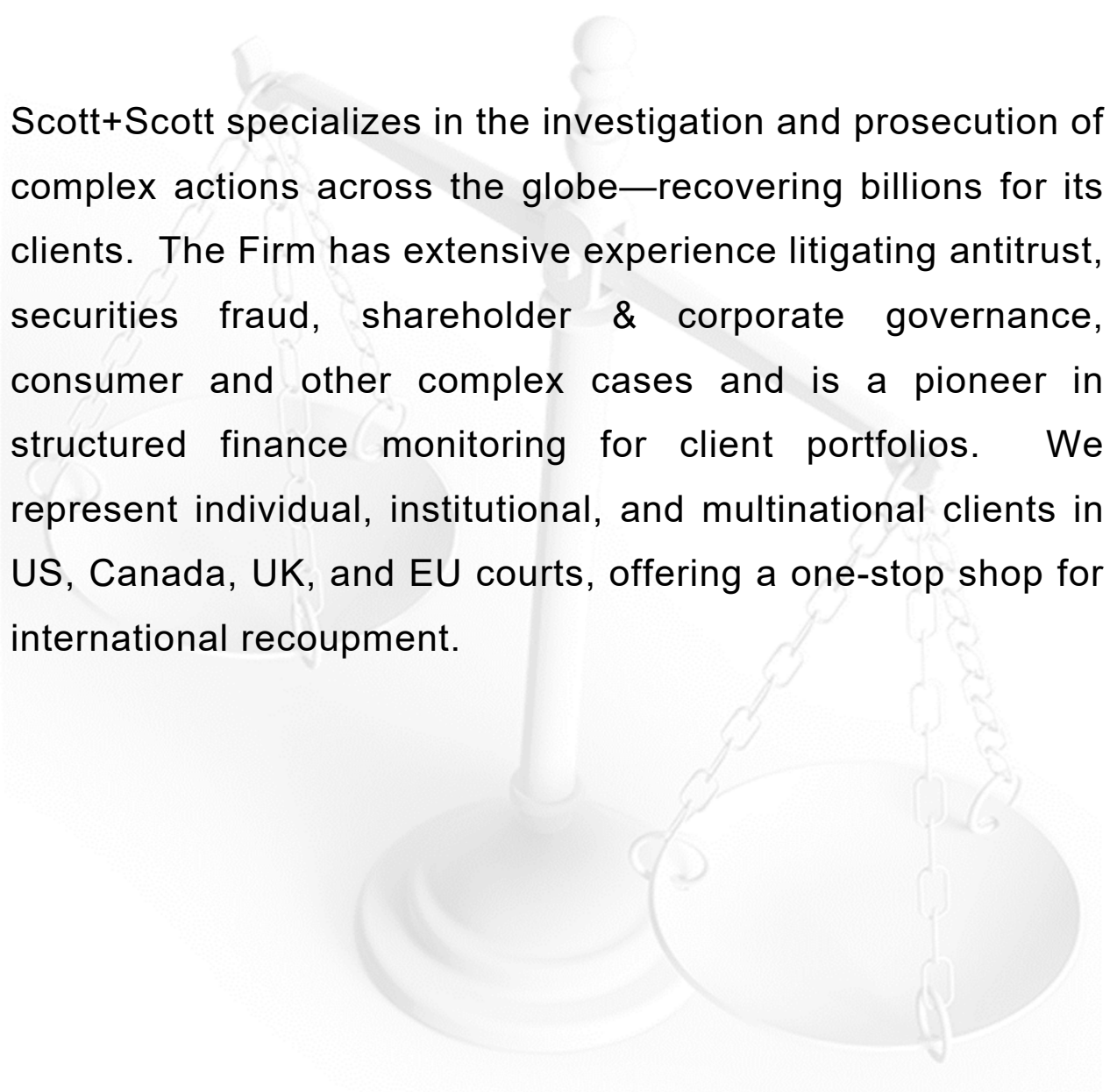
EXHIBIT C

**FIRM RESUME
SCOTT+SCOTT ATTORNEYS AT LAW LLP**



FIRM RESUME

www.scott-scott.com

A faint, light gray background image of a balance scale, symbolizing justice and equity. The scale is centered behind the text.

Scott+Scott specializes in the investigation and prosecution of complex actions across the globe—recovering billions for its clients. The Firm has extensive experience litigating antitrust, securities fraud, shareholder & corporate governance, consumer and other complex cases and is a pioneer in structured finance monitoring for client portfolios. We represent individual, institutional, and multinational clients in US, Canada, UK, and EU courts, offering a one-stop shop for international recoupment.



THE FIRM

Scott+Scott was founded in 1975 and has since grown into one of the leading U.S.-headquartered law firms specializing in the investigation and prosecution of complex antitrust, securities, and other commercial actions in both the United States and Europe. Today, the Firm is composed of more than 200 team members, including more than 140 attorneys supported by a seasoned staff of paralegals, IT and document management professionals, financial analysts, and in-house investigators.

Scott+Scott's largest offices are in New York, N.Y. and San Diego, C.A., with additional U.S. offices located in Connecticut, Delaware, Nebraska, Ohio, Texas, and Virginia. The Firm's European offices are located in London, Amsterdam, and Berlin; the Firm's Canadian office is located in Montreal.

Scott+Scott has extensive experience litigating cases on behalf of our institutional and individual clients throughout the United States, having served as court-appointed lead or co-lead counsel in numerous antitrust, securities, and consumer class actions, as well derivative and other complex proceedings, in both state and federal courts. The Firm also represents numerous corporations and large investors in antitrust, commercial, and other litigation in courts within the European Union (EU), Canada and the United Kingdom.

Scott+Scott's attorneys are recognized experts and leaders in complex litigation and corporate governance. They have been regular speakers on CLE panels as well as at institutional investor educational conferences around the world and before boards of directors and trustees responsible for managing institutional investments. Scott+Scott attorneys educate institutional investors and governmental entities on the importance of fulfilling fiduciary obligations through the adoption of appropriate asset recovery services, as well as through the development and enforcement of corporate governance initiatives. The Firm's vast experience in structured debt financial litigation has also enabled us to provide clients with in-depth monitoring of their structured finance products, which often come with substantial undisclosed risks due to investors' limited ability to assess what they are acquiring. The Firm also has experience evaluating and monitoring for our clients' debt and debentures originating from private placements and non-public companies, including municipal bonds and derivatives.



ANTITRUST LITIGATION

Scott+Scott represents investors, businesses, and consumers in price-fixing, bid-rigging, monopolization, and other restraints of trade cases on both a class-wide and individual basis. The Firm's work for its clients helps ensure that markets remain free, open, and competitive. The Antitrust and Competition practice group counts nearly 40 attorneys who work exclusively on antitrust matters, and there are additional lawyers in the Firm who practice both antitrust and other areas of the law.

In 2025 and 2026, our highly experienced attorneys received top Chambers antitrust category rankings and top ranking by The Legal 500 in Antitrust Civil Litigation. They have also been recognized by Lawdragon for being among the top financial lawyers in 2025 and 2026. In addition, the American Antitrust Institute has recognized Scott+Scott for our innovative enforcement of antitrust laws on behalf of private plaintiffs in 2014, 2018, 2020, 2023 and 2024. And, SSRN's 2018 Antitrust Annual Report found that in 2018 the Firm achieved the largest antitrust settlement in the U.S. for its clients and ranked first nationally in aggregate antitrust settlement recoveries obtained from 2013 to 2018. In 2025 and 2026, Scott+Scott attorneys were recognized by Lawdragon as being among the 500 Leading Global Antitrust Lawyers and America's Leading Lawyers.

Our dedicated team of antitrust partners have built one of the nation's top plaintiffs' firms for antitrust actions. Furthermore, our European and Canadian expansion reflects a commitment and ability to pursue claims on a global basis. With offices in Montreal, London, Amsterdam, and Berlin, Scott+Scott pursues antitrust class actions against global corporations within an evolving class action jurisdictional environment.

Scott+Scott brings antitrust cases on behalf all types of victims of anticompetitive conduct—from individuals to small business to institutional investors. Scott+Scott has been at the forefront of technology-related antitrust cases, with cases against some of the world's largest tech companies, as well as cases challenging the use of algorithms and artificial intelligence to fix prices. Scott+Scott pioneered the application of antitrust laws to recover for misconduct in the financial sector, including in credit default swaps, private equity, bonds, interest rate derivatives and foreign exchange. We continue to challenge anticompetitive conduct wherever it may be found—from big ag to big oil to consumer credit scores.

Scott+Scott is able to remain a leader in the antitrust arena in part because we invest up front in economists and investigators to supplement the in-depth analysis of our experienced attorneys. We identify and file meritorious (and often novel) cases *before* they are brought by others in the antitrust bar, rather than simply following on the heels of government enforcement actions.



ANTITRUST CASE EXAMPLES

Antitrust actions in which Scott+Scott currently serves as lead or co-lead counsel include:

- *In re HVAC Equip. Antitrust Litigation*, No. 2:26-cv-10949 (E.D. Mich) (alleging that HVAC manufacturers conspired to inflate the prices of HVAC equipment in the United States);
- *In re RealPage, Inc., Rental Software Antitrust Litigation*, No. 3:23-md-03071 (M.D. Tenn.) (alleging price-fixing among developer of AI/algorithmic pricing software and property managers in the multifamily rental housing markets; defeated Defendants' motion to dismiss in December 2023 and have achieved multiple settlements in principle to-date);
- *In re PVC Pipe Antitrust Litig.*, No. 1:24-cv-07639 (N.D. Ill.) (challenging cartel and information exchange conduct in the PVC pipe market, \$3 million ice-breaker settlement preliminarily approved);
- *In re Shale Oil Antitrust Litigation*, No. 24-md-3119 (D.N.M.) (appointed as co-lead counsel after investigating and filing the first complaint alleging a cartel among U.S. shale producers, preceding parallel investigation by the FTC);
- *Klein v. Meta Platforms, Inc.*, 3:20-cv-08570-JD (N.D. Cal.) (alleging that Facebook orchestrated a years-long scheme to monopolize the social advertising market and charge supracompetitive prices to its advertising customers);
- *In re Cattle Antitrust Litigation*, No. 19-cv-1222 (D. Minn.) (representing ranchers against the big four packers who control approximately 80% of the market, that the packers conspired to drive down the prices paid for cattle, preliminary approval of an \$83.5 million settlement with a single defendant to date);
- *Sky Federal Credit Union v. Fair Isaac Corp.*, No.1:20-cv-02114 (N.D. Ill.) (alleging on behalf of credit unions and other direct purchasers of credit scores from Fair Isaac and the credit bureaus (Experian, Equifax, and TransUnion), that Fair Isaac and the three major credit bureaus entered into anticompetitive agreements concerning credit-scoring services and, *inter alia*, conspired to maintain Fair Isaac's monopoly in the credit-score market);
- *Oklahoma Firefighters Pension and Retirement System v. Deutsche Bank Aktiengesellschaft, et al.*, No. 1:23-cv-05095 (S.D.N.Y.) (alleging price-fixing conspiracy among dealers of United



Kingdom government bonds (Gilt Bonds), \$12 million in settlements preliminarily approved to date);

- *In re Frozen Potato Products Antitrust Litigation*, No. 1:24-cv-11801(N.D. Ill.) (alleging that the largest processors of frozen potato products in the United States have conspired to artificially inflate prices causing a more than 40% cost increase for purchasers since at least since 2021);
- *Mendez et al. v. Optimal Blue, LLC et al.*, No. 3:25-cv-1140 (M.D. Tenn.) (acting for homeowners impacted by mortgage price fixing);
- *Normandin v. JPMorgan Chase Bank, NA, et al.*, No. 3:25-cv-1749 (D. Conn.) (representing class of HELOC borrowers against the nation's largest banks for fixing WSJ Prime); and
- *Albert v. American Society of Health-System Pharmacists, Inc.*, No. 8:25-cv-00673 (D. Md.) (representing class of pharmacy residents alleging conspiracy to restrain and suppress competition for their wages).

Antitrust cases that have been resolved in which Scott+Scott served as lead or co-lead counsel include:

- *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-07789 (S.D.N.Y.) (challenging price-fixing of foreign exchange rates; over \$2.3 billion in final-approved settlements. The largest antitrust settlement of 2018 according to the American Antitrust Institute);
- *Dahl v. Bain Capital Partners, LLC*, No. 07-cv-12388 (D. Mass.) (challenging bid rigging and market allocation of leveraged buyouts by private equity firms; \$590.5 million in settlements);
- *Alaska Electrical Pension Fund v. Bank of America Corp.*, No. 14-cv-07126 (S.D.N.Y.) (challenging price-fixing of the ISDAfix benchmark interest rate; case resulted in \$504.5 million in settlements, the third largest antitrust settlement of 2018 according to the American Antitrust Institute);
- *In re GSE Bonds Antitrust Litigation*, No. 19-cv-01704 (S.D.N.Y.) (challenging manipulation in the market for bonds issued by Government-Sponsored Entities, e.g., Freddie Mac and Fannie Mae; \$386 million settlements);
- *In re Disposable Contact Lens Antitrust Litigation*, No. 15-md-02626 (M.D. Fla.) (class action alleging illegal anticompetitive policies to eliminate discount pricing by the major manufacturers and distributors of disposable contact lenses; obtained \$75 million settlement on the eve of trial, for a total of \$118 million in settlements);



- *In re European Gov't Bonds Antitrust Litigation.*, No. 19-cv-02601 (S.D.N.Y.) and *Ohio Carpenters' Pension Fund v. Deutsche Bank*, No. 1:22-cv-10462 (S.D.N.Y.) (challenging manipulation in the market for European Government Bonds; settled for a total of \$120 million);
- *Powell Prescription Ctr., et al. v. Surescripts, LLC et al.*, No. 1:19-cv-06627 (N.D. Ill.) (alleging that pharmacists were harmed by e-prescriptions routed through Surescripts' electronic network and securing \$49.75 million in settlements);
- *Othart Dairy Farms, LLC, et al v. Dairy Farmers of America, Inc., et al*, No. 2:22-cv-00251-SMD-DLM (D.N.M.) (alleging DFA and Select Milk conspired to reduce the price paid to dairy farmers for raw milk; settled for a total of \$34.4 million plus significant injunctive relief); and
- *In re Korean Air Lines Co., Ltd. Antitrust Litigation*, MDL No. 1891 (C.D. Cal.) (challenging price-fixing/illegal surcharging of ticket prices; \$86 million in cash and travel voucher settlements).

The Firm has aided in the recovery for class members by serving on the executive leadership committees in numerous other antitrust class actions, including:

- *In re Payment Card Interchange Fee & Merchant Discount Antitrust Litigation*, No. 05-md-01720 (E.D.N.Y.) (challenging price-fixing in the payment cards industry; \$5.5 billion in settlements);
- *Kleen Products LLC v. Int'l Paper Co.*, No. 10-cv-05711 (N.D. Ill.) (challenging price-fixing of containerboard products; over \$376 million in settlements);
- *In re Lithium Ion Batteries Antitrust Litigation*, No. 13-md-02420 (N.D. Cal.) (challenging price-fixing of lithium-ion batteries on behalf of indirect purchaser class; over \$113 million in settlements); and
- *In re Mexican Gov't Bonds Antitrust Litigation*, No. 18-cv-02830 (S.D.N.Y.) (challenging collusion in the market for 2006-17 Mexican Government debt securities; \$20.7 million in settlements preliminarily approved to date).

Scott+Scott's class action antitrust experience includes serving as co-trial counsel in:

- *In re Scrap Metal Antitrust Litigation*, No. 02-cv-00844 (N.D. Ohio) (helped obtain \$34.5 million jury verdict, which was later affirmed by the U.S. Court of Appeals for the Sixth Circuit); and
- *Ross v. Bank of America N.A.*, MDL No. 1409 (S.D.N.Y.) (bench trial involving agreement among payment cards to impose arbitration terms on cardholders).



Prior to joining the Firm, Scott+Scott partners achieved recent successes in the following cases, among others:

- *Borozny v. Pratt & Whitney*, 3:21-CV-01657 (D. Conn.) (served as co-lead counsel in a no-poach antitrust class action against major aerospace companies and obtained partial settlements of \$26.5 million);
- *Fusion Elite All Stars v. Varsity Brands, LLC*, No. 20-cv-02600 (W.D. Tenn.) (served as co-lead counsel in antitrust class action against an alleged monopolist and the supposed independent governing body in the all-star cheer market and settled case for \$43.5 million plus significant injunctive relief for the class);
- *In re Novartis and Par Antitrust Litigation*, No. 18-cv-04361 (S.D.N.Y.) (served as sole lead counsel for the proposed end-payor class in a pay-for-delay litigation against a branded drug company and its would-be generic competitor; settled with branded firm for \$30 million); and
- *In re Opana ER Antitrust Litigation*, No. 14-cv-1015 (N.D. Ill.) (served as co-lead counsel for the end-payor class in a pay-for-delay litigation against a branded drug company and its would-be generic competitor; tried case to verdict and settled with the generic drug company for \$15 million).



ACCOLADES

Chambers And Partners

In 2025 and 2026, Chambers and Partners ranked Scott+Scott as Band 2 in the Antitrust: Mainly Plaintiff, category in New York as well as nationwide, elevating the firm and its antitrust team for the first time to a top position for its outstanding achievements on behalf of clients. In 2026, Scott+Scott San Diego's office was also ranked for the first time in the California Antitrust: Mainly Plaintiffs category (Band 3). In addition, antitrust practice group partner Karin Garvey was ranked in Band 2 and antitrust practice group partner Robin van der Meulen was ranked in Band 3 in the Antitrust: Mainly Plaintiff, New York category. Of Counsel Patrick Coughlin was recognized in Band 2 in the California Antitrust: Mainly Plaintiff category.

Chambers and Partners' peer review describes the Firm as follows:

- "Their lawyers show an excellent understanding of legal antitrust principles and are very good at negotiating and pushing for effective and efficient discovery in large cases."
- "Their focus on efficiency and their strategic mindset sets them apart from many of their peers."

Legal 500

In 2025 and 2026, Legal 500 recognized Scott+Scott as Band 2 in Civil Litigation/Class Actions: Plaintiffs, and partners Karin Garvey as a Leading Lawyer, Robin van der Meulen as a Next Generation Partner, and Matthew Perez as a Rising Star in the same category. Partner Patrick McGahan was recognized as Connecticut Elite in White Collar.

Lawdragon

In 2025 and 2026, U.S. partners David Scott, Karin Garvey, Patrick McGahan, Sylvia Sokol and Robin van der Meulen were named among the Lawdragon 500 Leading Global Antitrust & Competition Lawyers. In 2026, antitrust practice group partners David Scott, Karin Garvey and Sylvia Sokol were named among the Lawdragon 500 Leading Plaintiff Financial Lawyers. In the same year, David Scott and Sylvia Sokol were also recognized as being among Lawdragon's 500 Leading Lawyers in America.

American Antitrust Institute

The 2021 Antitrust Annual Report recognized *In re Foreign Currency Benchmark Rates Antitrust Litigation* as the #1 Largest Antitrust Recovery, as well as ranking the Firm #1 overall in the past decade with the largest average settlement dollar amount per settlement of \$84,825,543. The



firm was also recognized as #2 overall in the past decade for Lead Counsel in Class Recovery in terms of aggregate class settlements in total dollar value.

Benchmark Litigation

In 2025 and 2026, Managing Partner David Scott was recognized by Benchmark as “Litigation Star.”

Global Competition Review

At the 6th Annual Global Competition Review (“GCR”) Awards, Scott+Scott won for Litigation of the Year—Cartel Prosecution, which recognized the Firm’s efforts in the foreign exchange settlements in the United States, a landmark case in which major banks conspired to manipulate prices paid in the \$5.3 trillion-per-day foreign exchange market and settled for more than \$2 billion.

Law 360 Glass Ceiling Report

Scott+Scott is recognized as one of the top law firms in the nation for female attorneys by the legal publication Law360. The Glass Ceiling Report honors firms that “are demonstrating that the industry’s gender diversity goals can turn into a measurable result and boost the number of women at all levels of a law firm.”¹ This selection highlights the importance Scott+Scott places on diversity and inclusion within the Firm.

Best Lawyers:

In 2026, the Firm was ranked as “Best Law Firm” by Best Lawyers. Individual attorneys at the Firm have been recognized as Best Lawyers dating back to 2013.

Center for Constitutional Rights

Scott+Scott was the recipient of the 2010 Center for Constitutional Rights’ Pro Bono Social Change Award for its representation of the Vulcan Society, an association of African American firefighters, in challenging the racially discriminatory hiring practices of the New York City Fire Department.

¹ <https://www.law360.com/articles/1310926>; <https://www.law360.com/articles/1162859/the-best-law-firms-for-female-attorneys>.



WORLD-CLASS ATTORNEYS

We pride ourselves on the caliber of legal talent on our team. In addition to some of the best and brightest rising stars, we have attorneys who have served with distinction in the U.S. Department of Justice, been admitted to the U.S. Supreme Court, served in OAGs at the state level, argued before the UK's CAT and High Courts, and received virtually every accolade offered in our profession.





ADMISSIONS

U.S. Admissions: United States Supreme Court; United States Courts of Appeal for the First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, and Eleventh Circuits; United States District Courts for the Districts of California (Northern, Southern, Eastern, and Central), Colorado, Connecticut, Florida (Northern), Illinois (Northern), Maryland, Massachusetts, Michigan (Eastern and Western), Minnesota, New Jersey, New York (Northern, Southern, Eastern, and Western), Ohio (Northern and Southern), Pennsylvania (Eastern and Western), Texas (Northern, Western, and Southern), West Virginia (Northern and Southern), Wisconsin (Eastern and Western), and the District of Columbia; and the courts of the States of Arizona, California, Colorado, Connecticut, Delaware, Florida, Illinois, Maryland, Pennsylvania, Massachusetts, Nebraska, New Jersey, New York, Ohio, Oklahoma, West Virginia, Texas, and the District of Columbia.



DIVERSITY, EQUITY & INCLUSION STATEMENT

At Scott+Scott we are deeply committed to fostering a diverse and inclusive workplace as we prioritize recruiting, promoting, and mentoring talent from a broad range of backgrounds.

Managing Partner [David R. Scott](#) as well as practice group leaders and attorneys across all Firm levels, authentically embrace a work environment that is welcoming for everyone— not only because it is crucial for attorneys and supporting legal staff to proactively create a sense of belonging within the workplace but also because it is even more important for all stakeholders at Scott+Scott to continue to build a Firm that represents the makeup of the American people.

In 2024 alone, the Firm added diverse talent across offices and practice groups, including Partners [Sindhu S. Daniel](#) and [Justin Reliford](#), both attorneys of color, in its Delaware office.

In May 2024, the Firm added Partner [Karin Garvey](#) as co-lead of its U.S. Antitrust Practice Group. This group currently has a 60% to 40% male-female ratio, with three team members identifying as having an ethnic-minority background and three identifying as LGBTQ+.

Scott+Scott is also committed to a diverse leadership structure across its other practice groups with Partner [Thomas Laughlin](#) chairing the Firm's Securities Litigation Practice, and Partners [Erin Green Comite](#) and [Joseph P. Guglielmo](#) co-chairing the Firm's Consumer Litigation Practice Group. Partner [Sylvia M. Sokol](#), is also head of the Firm's European teams with offices in Amsterdam, London, and Berlin. In that role, she also co-chairs the global Corporate Cartel Recoupment Practice Group.

In addition, the Firm continues to support attorneys' speaking engagements to advance the public debate on DE&I. Partner [Fatima Brizuela](#) currently serves as Chair of the [Committee to Support the Antitrust Laws](#) (COSAL's) DEI Committee, and has been actively involved as a panelist, as well as planning and organizing panels for the annual DEI Summit hosted by COSAL, since 2024. In 2025, the [Practising Law Institute \(PLI\) hosted a panel](#) featuring Scott+Scott attorney [Kristen Anderson](#), and will host another panel in September 2026 featuring Partner [Fatima Brizuela](#).

It is our belief that the continued success of Scott+Scott is intricately linked to giving people from all ethnic and gender identity backgrounds a voice that is heard and understood. We continue to hold ourselves accountable to foster transparency and open discussion to strengthen a more inclusive workplace.

ATTORNEY BIOGRAPHIES

DAVID R. SCOTT

PRACTICE EMPHASIS

Managing Partner David R. Scott represents multinational corporations, hedge funds, and institutional investors in high-stakes, complex litigation, including antitrust, commercial, and securities actions.

ADMISSIONS

States of New York, Pennsylvania, and Connecticut; United States Tax Court; United States Courts of Appeal: Second, Third, and Fifth Circuits; United States District Courts: Southern District of New York, Connecticut, Eastern District of Pennsylvania, Northern and Southern Districts of Texas, and Colorado

EDUCATION

New York University School of Law (LL.M. in taxation); Temple University School of Law (J.D., Moot Court Board, 1989); St. Lawrence University (B.A., *cum laude*, 1986)

HIGHLIGHTS

Mr. Scott is the Managing Partner of Scott+Scott with offices in New York, California, Connecticut, Delaware, Virginia, Nebraska, Texas, Ohio, Montreal, London, Amsterdam, and Berlin.

In addition to managing the firm's lawyers worldwide, Mr. Scott advises some of the world's largest multinational corporations in cartel damages and other complex matters. He has been retained to design corporate policies for the global recoupment of losses, and transatlantic private enforcement programs.

He currently represents multinational companies and hedge funds in cases involving, among other things, price-fixing in the trucks, foreign exchange, high voltage power cables, cardboard, and payment card sectors.

Mr. Scott's antitrust cases in the United States have resulted in significant recoveries for victims of price-fixing cartels. Among other cases, Mr. Scott served as co-lead counsel in ***Dahl v Bain Cap. Partners***, No. 1:07-cv-12388 (D. Mass.), an action alleging that the largest private equity firms in the United States colluded to suppress prices that shareholders received in leveraged





buyouts and that the defendants recently agreed to settle for \$590.5 million. He was lead counsel in Red Lion Medical

Safety v. Ohmeda, No. 06-cv-1010 (E.D. Cal.), a lawsuit alleging that Ohmeda, one of the leading manufacturers of medical anesthesia equipment in the United States, excluded independent service organizations from the market for servicing its equipment. The case was successfully resolved in settlement negotiations before trial.

Other representative matters include:

- ***In re Foreign Exchange Benchmark Rates Antitrust Litigation***, No. 12-cv-07789 (S.D.N.Y.), a high-stakes litigation against some of the world's largest banks centering on alleged price-fixing of foreign exchange transactions. The case settled for \$2.3 billion.
- Multiple cases against Visa and Master Card filed in the United States and in the UK for individual merchants, alleging illegal manipulation of interchange fees which settled for a record setting total of \$5.5 billion.
- ***In re Cattle Antitrust Litigation***, 22-md-03031 (D. Minn.), a litigation filed on behalf of cattle ranchers and futures traders alleging a conspiracy among the nation's meatpackers to suppress fed cattle prices. The case received preliminary approval of a proposed \$83.5 million settlement with a single defendant (as of August 2025 pending final court approval).
- ***Alaska Electrical Pension Fund v. Bank of America***, 1:14-cv-07126-JMF-OTW (S.D.N.Y), a derivatives case alleging seven major banks conspired to rig the ISDAfix benchmark. The case settled for \$325 million.
- ***In re Micro Focus Int'l PLC Sec. Litig. and Okla. Fire Pension & Ret. Sys. v. Newell Brands Inc.***, 18-cv-01549 (Cal. Super. Ct. San Mateo Cnty.), where he served as lead counsel and secured settlements of \$107.5 million and \$102.5 million.
- ***In re Alphabet Inc. Shareholder Derivative Litig.***, 3:21-cv-09388 (N.D. Cal.), where he established a \$310 million fund and achieved the adoption of board and executive level reforms relating to the company's mishandling of sexual harassment allegations against a senior executive (as of August 2025 pending final court approval).



- ***In re Facebook Inc. Derivative Litigation, Consol., C.A. No. 2018-0307-KSJM (Del. Ch.)*** where he reached a historic \$190 million mid-trial settlement in a long-running stockholder derivative lawsuit against Mark Zuckerberg, Sheryl Sandberg, and other current and former Meta directors and officers, including former White House Chief of Staff Jeffrey Zients, Palantir co-founder Peter Thiel, and Andreessen Horowitz co-founder Marc Andreessen.

Mr. Scott has received widespread recognition for his antitrust and competition law work. He has also been recognized by Lawdragon as being among the 500 Leading Global Antitrust & Competition Lawyers, Leading Lawyers in America, Leading Plaintiff Financial Lawyers and Leading Global Plaintiff Lawyers (2025 / 2026). He has been elected to Who's Who Legal: Competition 2015-2024, which lists the world's top antitrust and competition law lawyers, selected based on comprehensive, independent survey work with both general counsel and lawyers in private practice around the world. He has also received "highly recommended" as well as "Litigation Star" ratings by Benchmark Litigation for each of the years 2013 to 2025. Mr. Scott is continually recognized in the U.S. by Best Lawyers and Super Lawyers. He has also been recognized by Lawdragon as being among the 500 Leading Global Antitrust & Competition Lawyers, Leading Lawyers in America, Leading Plaintiff Financial Lawyers and Leading Global Plaintiff Lawyers (2025 / 2026).

In addition to his extensive competition law work, Mr. Scott has also taken the lead in bringing claims on behalf of institutional investors, such as sovereign wealth funds, corporate pension schemes, and public employee retirement funds. For example, he has been retained to pursue losses against mortgaged-backed securities trustees for failing to protect investors. He also represented a consortium of regional banks in litigation relating to toxic auction rate securities ("ARS") and obtained a sizable recovery for the banks in a confidential settlement. This case represents one of the few ARS cases in the country to be successfully resolved in favor of the plaintiffs.

Mr. Scott is frequently quoted in the press, including in publications such as The Financial Times, The Economist, Bloomberg, The Daily Telegraph, The Wall Street Journal, and Law360. He is regularly invited to speak at conferences around the world and before Boards of Directors and trustees responsible for managing institutional investments.



AMANDA LAWRENCE

PRACTICE EMPHASIS

Amanda F. Lawrence is actively engaged in the Firm's complex securities, corporate governance, consumer, and antitrust litigation.

ADMISSIONS

States of Connecticut and Massachusetts; ; United States District Courts: Southern District of New York, District of Connecticut, Eastern District of Wisconsin, and District of Massachusetts United States Courts of Appeal: First, Second, Seventh, and Ninth Circuits

EDUCATION

Yale Law School (J.D., 2002); Dartmouth College (B.A., *cum laude*, 1998)

HIGHLIGHTS

Ms. Lawrence is a partner in our Connecticut office. In the antitrust realm, Ms. Lawrence served as co-lead counsel in the matter, ***In re: GSE Bonds Antitrust Litigation***, No. 1:19-cv-01704-JSR (S.D.N.Y.) which alleged manipulation of the prices in the \$550 billion government sponsored entities bond market by some of the largest banks in the world. The case settled for \$386.5 million as well as requiring injunctive relief. Ms. Lawrence was also intricately involved in the "ISDAFix case"—***Alaska Electrical Pension Fund v. Bank of America***, No. 1:14-cv-07126-JMF-OTW (S.D.N.Y.). That achieved over \$504.5 million in recovery from large financial institutions for investors. Currently, Ms. Lawrence also works on ***In Re Cattle Antitrust Litig.***, No. 0:22-md-03031-JRT-JFD (D. Minn.) and ***In re European Governments Bonds Antitrust Litig.***, No. 1:19-cv-2601 (S.D.N.Y.), two large international antitrust actions.

In her securities practice, Ms. Lawrence has worked on numerous Exchange Act and 1933 Act cases that have resulted in substantial settlements. For example, she served as co-lead counsel in ***In re: Micro Focus International PLC Securities Litigation***, No. 18-cv-01549 (Cal. Super. Ct. San Mateo Cnty.), a California 1933 Act that settled for \$107.5 million. Other securities cases Ms. Lawrence has worked on include: ***Police and Fire Retirement System of the City of Detroit v. Crane***, No. 13-cv-00945-VC (N.D. Cal.) (\$5.1 million securities class action settlement); ***Rubenstein v. Oilsands Quest Inc.***, No. 11-1288 (S.D.N.Y.) (securities settlement of \$10.235 million); ***Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass-Through Certificates***, No. 09-cv-00037 (W.D. Wash.) (\$26 million securities class action settlement); ***In re Fireeye, Inc. Securities Litigation***, No. 14-cv-266866 (Cal. Super. Ct. Santa Clara Cnty.); ***St. Lucie Cnty. Fire Dist. Firefighters' Pension Trust v. Southwestern Energy Co.***, No. 4:16-cv-569 (S.D. Tex.); ***In re***



LendingClub Corp. Shareholder Litig., No. CIV537300 (Cal. Super. Ct San Mateo Cnty.); and ***In re TETRA Technologies, Inc. Securities Litig.***, No. 4:07-cv-00965 (S.D. Tex.) (\$8.25 million securities class action settlement).

In addition to antitrust and securities matters, Ms. Lawrence has also worked on consumer cases that have resulted in significant settlements for the affected classes. For example, Ms. Lawrence helped achieve a settlement in the ***The United States v. The City of New York***, No. 07-CV-2067 (E.D.N.Y.) that awarded back pay and lost fringe benefits to a class of African American and Hispanic firefighters in New York City, as well as a settlement in ***In re Prudential Life Insurance Co. of America SGLI/VGLI Contract Litig.***, No. 11-02208 (D. Mass.) that brought a \$39 million settlement on behalf of families of deceased servicemen and women against Prudential.

Ms. Lawrence has taught Trial Practice at the University of Connecticut School of Law and is very actively involved in her community, particularly in recreational organizations and events.

A five-time NCAA National Champion cyclist who raced throughout the United States, Europe, Bermuda, and Pakistan, Ms. Lawrence is now an avid endurance athlete. Ms. Lawrence has competed in dozens of marathons, including the New York Marathon and the Boston Marathon, and in 18 full-distance ironman competitions—five of which were at the Ironman World Championships in Kona, Hawaii.



MICHELLE CONSTON

PRACTICE EMPHASIS

Michelle Conston's practice focuses on antitrust litigation and consumer protection.

ADMISSIONS

States of New York, New Jersey, and Florida; The Second Circuit Court of Appeals; The Sixth Circuit Court of Appeals; Southern District of New York; Eastern District of Michigan; District of New Jersey.

EDUCATION

University of Miami School of Law (J.D., *magna cum laude*, 2013); Marist College (B.A. Journalism, *magna cum laude*, 2010)

ACCOLADES

Super Lawyers Rising Star in Antitrust Litigation in 2018-2024.

HIGHLIGHTS

Ms. Conston is a senior associate in Scott+Scott's New York office that has recovered billions of dollars on behalf of investors for manipulation of financial benchmarks by numerous major banks. ***In re Foreign Exchange Benchmark Rates Antitrust Litig.***, No. 13-cv-7789 (S.D.N.Y.) (\$2.3 billion settlement); ***In re GSE Bonds Antitrust Litig.***, No. 19-cv-01704 (S.D.N.Y.) (\$386 million settlement); and ***In re European Government Bonds Antitrust Litig.***, No. 19-cv-2601 (S.D.N.Y.) (\$120 million settlement). Ms. Conston is presently part of the team serving as Co-Lead Counsel for the producers and exchange classes in ***In re Cattle and Beef Antitrust Litigation***, No. 0:22-md-03031 (D. Minn.) and serves as interim Lead Class Counsel for the Direct Purchaser Plaintiffs in ***Sky Federal Credit Union v. Fair Isaac Corp.***, No. 1:20-cv-02114 (N.D. Ill.). Ms. Conston also currently works on consumer cases against drug manufacturers alleging on behalf of a class of third-party payers that their drugs were contaminated by carcinogenic and genotoxic impurities and were therefore adulterated, unapproved, and should not have been sold. ***In re: Metformin Marketing and Sales Practices Litig.***, No.: 2:20-cv-02324 (D.N.J.) and ***In re: Chantix (Varenicline) Marketing, Sales Practices and Products Liability Litig. (No. II)***, No. 22-mc-03050 (S.D.N.Y.). In addition, Ms. Conston is continually recognized by Best Lawyers and Super Lawyers.

During law school, Ms. Conston served as a judicial intern for the Honorable Stephen T. Brown, the Chief Magistrate Judge of the United States District Court for the Southern District of Florida. Ms. Conston also served as a certified legal intern for the United States Attorney's Office for the Southern District of Florida.



Prior to joining Scott+Scott, Ms. Conston represented institutional investors, hedge funds, and individual investors in complex class action litigation arising under the Commodity Exchange Act, Sherman Act, RICO Act, and common law. She was heavily involved in litigating actions alleging the manipulation of the London Interbank Offered Rate ("LIBOR") for several currencies by large financial institutions (e.g., **Laydon v. Mizuho Bank, Ltd.**, No. 12-cv-3419 (S.D.N.Y.) and **Sullivan v. Barclays plc**, No. 1:13-cv-02811 (S.D.N.Y.)), as well as an action alleging manipulation of the daily London Silver Fixing by the Fixing Banks and several other financial institutions (**In re London Silver Fixing, Ltd., Antitrust Litig.**, No. 1:14-md-02573 (S.D.N.Y.)).



DANIEL BROCKWELL

PRACTICE EMPHASIS

Mr. Brockwell is an associate in the firm's San Diego office and prosecutes complex consumer class actions with a focus on antitrust and unfair competition violations.

ADMISSIONS

State of California; United States District Court, Northern District of California

EDUCATION

University of San Diego School of Law (J.D., 2020); Northeastern University (B.S., Criminal Justice, 2015)

HIGHLIGHTS

Mr. Brockwell is a leading litigator in antitrust class actions involving the price-fixing of financial instruments, representing U.S. investors in high-profile cases challenging collusive conduct in global bond markets. In ***In re European Government Bonds Antitrust Litigation***, he was a key member of the litigation team that recovered \$120 million from some of the world's largest banks, including Citigroup, UBS, NatWest, Bank of America, and Meryll Lynch, on behalf of a class of U.S. investors.

Mr. Brockwell received his Bachelor of Science in Criminal Justice from Northeastern University in 2015, where he also played on the men's lacrosse team. He gained early experience in investigation and litigation support roles in government and private practice. He joined Scott+Scott in 2019 as a Summer Associate and became an official member of the Antitrust Team upon graduating from the University of San Diego School of Law and passing the California Bar in 2020.

Outside of work, Mr. Brockwell enjoys spending time with his family and friends, reading fantasy and science fiction novels, attending concerts, and golfing.

REPRESENTATIVE CASES

- ***In re: European Government Bonds Antitrust Litigation***, No. 19-cv-02601 (S.D.N.Y.): secured \$120 million in recovery on behalf of a class of U.S. investors who alleged that Defendants conspired and agreed to fix the prices of bonds issued by various European governments.
- ***In re: Mexican Government Bonds Antitrust Litigation***, 1:15-cv-02830 (S.D.N.Y.): represents class of U.S. investors alleging Defendant banks conspired and agreed to fix the prices of bonds issued by the Mexican government.



- ***Oklahoma Firefighters Pension and Retirement System v. Deutsche Bank Aktiengesellschaft***, No. 23-cv-05095 (S.D.N.Y.): represents class of U.S. investors alleging Defendant banks conspired and agreed to fix the prices of UK gilt bonds.
- ***Klein v. Meta, Inc.***, No. 20-cv-08570 (N.D. Cal.): represents classes of advertisers alleging that Facebook monopolized the social advertising market and charged inflated prices for advertising.
- ***In re: Shale Oil Antitrust Litigation***, 1:24-md-03119 (D.N.M.): represents classes of purchasers of gasoline and other oil-derivative products alleging that, after the COVID pandemic, Defendants conspired to restrict production of shale oil produced in the U.S. and inflate the price of oil.
- ***In re: PVC Pipe Antitrust Litigation***, 1:24-cv-07639 (N.D. Ill.): represents class of consumers alleging Defendants, the largest producers of PVC pipe in the U.S., conspired and agreed to fix the price of PVC pipes post-COVID.

