

**IN THE 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 JENNIFER W. SPRENGEL FILED ON BEHALF OF CAFFERTY
CLOBES MERIWETHER & SPRENGEL LLP IN SUPPORT OF MOTION FOR
AWARD OF ATTORNEYS' FEES AND EXPENSES**

I, Jennifer W. Sprengel, declare as follows:

1. I am member of the firm Cafferty Clobes Meriwether & Sprengel LLP (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 served as Co-Lead counsel and then transitioned to an Executive Committee position on behalf of plaintiffs.

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

4. After the reductions referred to above, the number of hours spent on the litigation by my Firm is 641.3. A breakdown of the lodestar is provided in Exhibit A. The lodestar amount for attorney/paralegal time based on the Firm’s current rates is \$578,825.00. The hourly rates shown in Exhibit A are consistent with hourly rates submitted by the Firm in other antitrust and CEA class action litigation. The Firm’s rates are set based on periodic analysis of rates charged by firms performing comparable work both on the plaintiff and defense side. 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, years in the current position (*e.g.*, years as a partner), relevant experience, relative expertise, and the rates of similarly experienced peers at this Firm or other firms. For personnel who are no longer employed by the Firm, the “current rate” used for the lodestar calculation is based upon the rate for that person in his or her final year of employment with the Firm.

5. My Firm seeks an award of \$10,627.88 in expenses and charges in connection with the prosecution of the litigation. Those expenses and charges are summarized by category in Exhibit B.

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

(a) Filing, Witness, and Other Fees: \$9,072.20. These expenses have been paid to the Court for filing fees and for the service of numerous third party subpoenas. The vendors who were paid for these services are set forth in Exhibit C.

(b) Transportation, Hotels, and Meals: \$247.83. In connection with the prosecution of this case, the Firm paid for travel expenses in connection with A. Fata’s travel to New York to attend a discovery meeting. The breakdown of that expense is reflected in Exhibit D.

(c) Online Legal and Financial Research: \$1,307.85. Westlaw resources were used to obtain access to SEC filings, factual databases, and legal research. This expense represents the expense incurred by the Firm for use of these services in connection with this litigation.

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 27th day of August, 2026, at Chicago, IL.

s/ Jennifer W. Sprengel

Jennifer W. Sprengel

EXHIBIT A*Dennis, et al. v. The Andersons, Inc., et al.,*

No. 1:20-cv-4090

CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP

Inception through July 31, 2026

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Sprengel, Jennifer	(P)	58.5	1,400.00	81,900.00
Naughton, Kaitlin	(A)	218.8	900.00	196,920.00
Fata, Anthony*	(P)	247.7	950.00	235,315.00
O'Connell, Brian*	(A)	65.4	600.00	39,240.00
Sweatman, Alexander*	(A)	26.8	500.00	13,400.00
Paralegals				
McDonald, Kelly	(P)	24.1	500.00	12,050.00
<i>TOTAL</i>		<i>641.3</i>		<i>578,825.00</i>

(P) Partner

(A) Associate

* As noted in the Declaration (¶ 4), for personnel who are no longer employed by the Firm, the "current rate" used for the lodestar calculation is based upon the rate for that person in his or her final year of employment with the Firm

EXHIBIT B*Dennis, et al. v. The Andersons, Inc., et al.,*

No. 1:20-cv-4090

CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP

Inception through July 31, 2026

<i>CATEGORY</i>		<i>AMOUNT</i>
Filing, Witness, and Other Fees		9,072.20
Notices		
Transportation, Hotels, and Meals		247.83
E-Discovery		
Telephone, Facsimile		
Postage		
Messenger, Overnight Delivery		
Court Hearing Transcripts and Deposition Reporting, Transcripts and ideography		
Experts/Consultants/Investigators		
Global Economics Group	\$	
Name		
Name		
Photocopies		
Outside:	\$	
In-House: (204 copies at \$0.25 per page)		
Online Legal and Financial Research		1,307.85
Miscellaneous		
<i>TOTAL</i>		10,627.88

EXHIBIT C

Dennis, et al. v. The Andersons, Inc., et al.,
No. 1:20-cv-4090
CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP
Inception through July 31, 2026

Filing, Witness, and Other Fees: \$9,072.20

<i>DATE</i>	<i>VENDOR</i>	<i>PURPOSE</i>
8/17/2020	United States District Court for the Northern District of Illinois	Complaint Filing Fee
4/6/2023	It's Your Serve	Service of Subpoenas
4/6/2023	It's Your Service	Service of Subpoenas

EXHIBIT D

Dennis, et al. v. The Andersons, Inc., et al.,
No. 1:20-cv-4090
CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP
Inception through July 31, 2026

Transportation, Hotels, and Meals: \$ 247.83

<i>NAME</i>	<i>DATE</i>	<i>DESTINATION</i>	<i>PURPOSE</i>
Anthony F. Fata	12/15/21	New York	Discovery Meeting

EXHIBIT E

FIRM RESUME



Cafferty Clobes
Meriwether & Sprengel LLP



Successful Solutions for Complex Litigation



Firm Overview

Cafferty Clobes Meriwether & Sprengel LLP combines the talents of attorneys with a wide range of experience in complex civil litigation. The skill and experience of CCMS attorneys has been recognized on repeated occasions by courts that have appointed these attorneys to major positions in complex multidistrict or consolidated litigation. As the representative sampling of cases listed below demonstrates, these attorneys have taken a leading role in numerous important actions on behalf of investors, employees, consumers, businesses and others. In addition, CCMS attorneys are currently involved in a number of pending class actions, as described on the Firm's web page.

Antitrust Class Actions and Commodities Litigation

- ***In re Cattle Antitrust Litig., No. 19-cv-01222 (D. Minn.)***

CCMS is serving as Co-Lead counsel on behalf of a proposed class of cattle ranchers and industry trade groups alleging that some of the country's largest meatpacking companies, including Tyson, Cargill, JBS, and National Beef, have colluded to suppress the prices paid for cattle used in beef production. As discussed in a recent National Law Journal article, a successful outcome in this matter would ensure that cattle ranchers are paid what they deserve for their labor in raising live-fed cattle and bringing them to market. CCMS and its co-counsel have already secured a \$83.5 million settlement from JBS. Litigation continues against the remaining Defendants, and Plaintiffs expect a ruling on their pending motion for class certification shortly.

- ***In re Apartment Rental Software Antitrust Litig. No. 23-md-3071 (M.D. Tenn.)***

CCMS serves on the Plaintiffs Steering Committee on behalf of renters alleging that the nation's largest property owners and managers conspired to inflate rental prices using rental "optimization" software offered by Defendant RealPage. Plaintiffs have secured more than \$200 million in settlements to date in this groundbreaking litigation challenging Defendants' use of algorithmic pricing software to share proprietary data and minimize price competition in residential rental markets. Class certification proceedings are expected to commence shortly.



- ***In re Deutsche Bank Spoofing Litig., No. 20-cv-03638 (N.D. Ill.)***
 CCMS serves on the executive committee in this case involving alleged manipulation through spoofing of Treasury and Eurodollar Futures.
- ***In re Libor-Based Financial Instruments, No. 11-md-2262 (S.D.N.Y)***
 CCMS served as class counsel for exchange trader plaintiffs in claims involving manipulation in violation of the Commodity Exchange Act against many of the world's largest financial institutions.
- ***Hershey/Kohen v. Pacific Investment Management Co. LLC, No. 05 C 4681 (N.D. Ill.)***
 As liaison and class counsel in action arising from PIMCO's manipulation of 10-year treasury notes futures traded on the Chicago Board of Trade, CCMS helped secure a \$118 million settlement for the class.
- ***In re Crude Oil Commodity Futures Litig., No. 11-cv-03600 (S.D.N.Y.)***
 As class counsel in action arising from manipulation of NYMEX West Texas Intermediate grade crude oil futures contracts, CCMS expended significant resources assisting the class with investigation and discovery. The collective efforts resulted in a \$16.5 million settlement for the class.
- ***In re Foreign Exchange Benchmark Rates Antitrust Litig., 13-cv-7789 (S.D.N.Y.)***
 As class counsel in this action arising from manipulation of foreign exchange rates by international banks and others, CCMS has devoted significant resources toward investigation, discovery, and allocation of more than \$2 billion in settlements for the class.
- ***In re Sumitomo Copper Litig., 96 Civ. 4584(MP) (S.D.N.Y.)***
 As class counsel in action arising out of manipulation of the world copper market, CCMS helped achieve settlements aggregating \$134.6 million. In awarding attorneys' fees, Judge Milton Pollack noted that it was "the largest class action recovery in the 75 plus year history of the Commodity Exchange Act." 74 F. Supp. 2d 393 (S.D.N.Y. Nov. 15, 1999).
- ***In re Soybean Futures Litig., No. 89 C 7009 (N.D. Ill.)***
 As class counsel in this action against Ferruzzi Finanziaria SpA and related companies for unlawfully manipulating the soybean futures market, CCMS helped recover a \$21.5 million settlement.



- ***Lawrence E. Jaffe Pension Plan v. Household International, Inc.*, No. 1:02-cv-05893 (N.D. Ill.)**

Securities fraud class action. CCMS served as local counsel and helped recover a settlement of approximately \$1.6 billion.

- ***Danis v. USN Communications, Inc.*, No. 98 C 7482 (N.D. Ill.)**

Securities fraud class action arising out of the collapse and eventual bankruptcy of USN Communications, Inc. On May 7, 2001, the court approved a \$44.7 million settlement with certain control persons and underwriters. Reported decisions: 73 F. Supp. 2d 923 (N.D. Ill. 1999); 189 F.R.D. 391 (N.D. Ill. 1999); 121 F. Supp. 2d 1183 (N.D. Ill. 2000).

- ***In re Insurance Brokerage Antitrust Litig.*, MDL No. 1663 (D.N.J.)**

CCMS served as Co-Lead Counsel for plaintiffs in this class case alleging that insurance brokers and insurers conspired to allocate customers in a complicated scheme to maximize their own revenues at the expense of class members. The litigation concluded in 2013 with final approval of the last of five separate settlements that, in total, exceeded \$270 million. Judge Cecchi observed that “Class counsel include notably skilled attorneys with experience in antitrust, class actions and RICO litigation.” *In re Insurance Brokerage Antitrust Litig.*, 297 F.R.D. 136, 153 (D.N.J. 2013); see also *In re Insurance Brokerage Antitrust Litig.*, MDL No. 1663, 2007 WL 1652303, at *6 (D.N.J. June 5, 2007).

- ***VisaCheck/MasterMoney Antitrust Litig.*, Master File No. 96-5238 (E.D.N.Y.)**

CCMS’s client, Burlington Coat Factory Warehouse, and the other plaintiffs, alleged that Visa and MasterCard violated the antitrust laws by forcing retailers to accept all of their branded cards as a condition of acceptance of their credit cards. The parties entered into settlement agreements that collectively provided for the payment of over \$3.3 billion, plus widespread reforms and injunctive relief.

- ***In Re VisaCheck/MasterMoney Antitrust Litig.*, Master File No. 96-5238 (E.D.N.Y.)**

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- ***In re National Collegiate Athletic Association Athletic Grant-in-Aid Cap Antitrust Litig.*, No. 4:14-md-02541 (N.D. Cal.)**

CCMS represented a former Division 1 college basketball player in this antitrust litigation challenging the cap imposed by the NCAA on grant-in-aid packages. The efforts of the firm and its co-counsel resulted in certification of an injunctive class and a settlement of \$209 million.

- ***Kamakahi v. American Society for Reproductive Medicine*, No. 3:11-cv-01781 (N.D. Cal.)**

CCMS served as Co-Lead Counsel in a cutting edge antitrust case challenging the legality of ethical guidelines promulgated by two professional associations that limited the compensation members were permitted to pay to women providing donor services for in-vitro fertilization. Without the benefit of a parallel government case or investigation, CCMS achieved a groundbreaking settlement that required defendants to eliminate the compensation caps and to refrain from imposing similar caps in the future.

- ***In re New Motor Vehicles Canadian Export Antitrust Litig.*, MDL No. 1532 (D. Me.)**

CCMS served as Class Counsel in multidistrict litigation alleging that automobile manufacturers and other parties conspired to prevent lower priced new motor vehicles from entering the American market thereby artificially inflating prices. The court approved a \$37 million settlement with Toyota and the Canadian Automobile Dealers' Association.

- ***In re TriCor Indirect Purchaser Antitrust Litig.*, No. 05-360 (D. Del)**

CCMS served as Lead Counsel for consumer and third-party payor plaintiffs who alleged that defendants engaged in unlawful monopolization in the market for fenofibrate products, which are used to treat high cholesterol and high triglyceride levels. The court approved to a \$65.7 million settlement (an amount that excludes an initial payment to opt-out insurance companies).

- ***In re Prandin Direct Purchaser Antitrust Litig.*, Civ. No. 10-12141 (E.D. Mich.)**

CCMS served as Co-Lead counsel for a plaintiff class of direct purchasers of the prescription drug repaglinide, which is manufactured and marketed by Novo Nordisk under the brand-name Prandin. Plaintiffs alleged that Novo Nordisk blocked FDA approval of generic versions of the drug by



wrongfully manipulating the language of the “use code” filed with the FDA in connection with a method of use patent. The court approved a \$19 million settlement.

- ***In re Disposable Contact Lens Antitrust Litigation*, MDL No. 2626 (M.D. Fla.)**

CCMS served on the Defendant Discovery Committee, which was tasked with overseeing all aspects of discovery pertaining to Defendants, who are alleged to have conspired to implement retail price maintenance agreements intended to inflate the prices of disposable contact lenses to supracompetitive levels. The district court certified several horizontal and vertical nationwide antitrust classes, and settlements recovering \$118 million for consumers were reached.

- ***In re Automotive Parts Antitrust Litig.*, MDL No. 2311 (E.D. Mich.)**

CCMS has served as a member of Plaintiffs’ Executive Committee representing the end-payor class in one of the largest civil antitrust actions in US history. As a member of the Executive Committee, CCMS has played an important role in this groundbreaking litigation in which plaintiffs have recovered over \$1 billion on behalf of end-payor consumers and businesses who allege they purchased or leased new automobiles at prices that were artificially inflated as a result of automotive component manufacturers’ anticompetitive conduct.

- ***Nichols v. SmithKline Beecham Corp.*, No. Civ.A.00-6222 (E.D. Pa.)**

CCMS served as Co-Lead Counsel for consumers and third-party payors who alleged that the manufacturer of the brand-name antidepressant Paxil misled the U.S. Patent Office into issuing patents that protected Paxil from competition from generic substitutes. The court approved a \$65 million class action settlement for the benefit of consumers and third-party payors who paid for Paxil.

- ***In re Relafen Antitrust Litig.* No. 01-12239 (D. Mass.)**

The court approved a \$75 million class action settlement for the benefit of consumers and third-party payors who paid for branded and generic versions of the arthritis medication Relafen. In certifying an exemplar class of end-payors, the court singled out our Firm as experienced and vigorous advocates. *See In re Relafen Antitrust Litig.*, 221 F.R.D. 260, 273 (D. Mass. 2004). In the opinion granting final approval to the settlement, the court commented that “Class counsel here exceeded my expectations in these



respects [*i.e.*, experience, competence, and vigor] in every way.” *In re Relafen Antitrust Litig.*, 231 F.R.D. 52, 85 (D. Mass. 2005); *see also id.* at 80 (“The Court has consistently noted the exceptional efforts of class counsel.”).

- ***In re Warfarin Sodium Antitrust Litig.*, MDL 98-1232 (D. Del.)**

Multidistrict class action on behalf of purchasers of Coumadin, the brand-name warfarin sodium manufactured and marketed by DuPont Pharmaceutical Company. Plaintiffs alleged that the defendant engaged in anticompetitive conduct that wrongfully suppressed competition from generic warfarin sodium. The Court approved a \$44.5 million settlement.

- ***In re Cardizem CD Antitrust Litig.*, MDL No. 1278 (E.D. Mich.)**

Multidistrict class action on behalf of purchasers of Cardizem CD, a brand-name heart medication. Plaintiffs alleged that an agreement between the brand manufacturer and a generic manufacturer unlawfully stalled generic competition. The court approved an \$80 million settlement for the benefit of consumers, third-party payors and state attorneys general.

- ***In re Synthroid Marketing Litig.*, MDL No. 1182 (N.D. Ill.)**

This multidistrict action arose out of alleged unlawful activities with respect to the marketing of Synthroid, a levothyroxine product used to treat thyroid disorders. The court approved a consumer settlement in the amount of \$87.4 million.

Consumer Class Actions

- ***Skeen v. BMW of N. Amer., LLC*, No. 13-cv-1531 (D.N.J.)**

CCMS served as co-lead counsel in an action brought on behalf of owners of certain MINI Cooper-brand vehicles that contained a latent defect in a part of the engine known as the “timing chain tensioner” which caused the part to fail prematurely, eventually requiring replacement of that part or the entire engine. Following extensive discovery and mediation, the parties reached a global settlement on behalf of a nationwide class of vehicle owners. The efforts of the firm and its co-lead counsel resulted in a settlement which significantly extended warranty coverage, and reimbursed vehicle owners for tens of millions of dollars in out-of-pocket expenses incurred for repair and/or replacement.



- ***Ponzo v. Watts Regulator Company*, No. 1:14-cv-14080 (D. Mass.); *Klug v. Watts Regulator Company*, No. 15-cv-00061 (D. Neb.)**

These consumer class cases, first brought by CCMS (D. Mass.) addressed defective water heater and “Floodsafe” branded connectors. The plaintiffs in both cases alleged that the water heater connectors were made of a material that would break down during regular use, causing leaks and ruptures that flooded class members’ homes. The efforts of the firm and its co-lead counsel resulted in a settlement that provides \$14 million to affected homeowners.

- ***Hough v. Navistar, Inc.*, No. 20-cv-00063 (D. Colo.)**

CCMS served as co-lead counsel in action arising out of a data breach of Navistar’s computer systems that resulted in a settlement that provided \$1.25 million to affected current and former employees, as well as significant non-monetary compensation.

- ***Bromley v. SXSW LLC*, No. 20-cv-439 (W.D. Tex.)**

CCMS served as co-lead counsel in action securing an uncapped settlement entitling class members to refunds in connection with a canceled festival.

- ***Compo v. United Airlines, Inc., et al.*, No. 1:20-cv-02166 (N.D. Ill.)**

CCMS serves as interim co-lead counsel in action alleging United has wrongfully refused to issue refunds for flights cancelled as a direct and proximate result of the COVID-19 crisis.

- ***Traxler v. PPG Industries, Inc.*, No. 15-cv-00912 (N.D. Ohio)**

CCMS served as lead counsel in this action challenging defective deck resurfacing products. The products peeled, cracked, and damaged the surfaces to which they were applied. In February 2017 the parties reached an agreement in principle to settle the case on behalf of a nationwide class. The efforts of the firm and its co-counsel resulted in a settlement that provides \$6.5 million to affected homeowners.

- ***In re Apple iPhone/iPod Warranty Litig.*, No. 3:10-cv-01610 (N.D. Cal.)**

This case challenged Apple’s policy of denying warranty claims based on liquid contact indicators located in headphone jacks and dock connector ports of iPhones and iPod touches. Similar class actions were subsequently filed in federal courts on behalf of Apple consumers. CCMS helped



negotiate and achieve a \$53 million settlement of the state and federal cases.

- ***In re Volkswagen “Clean Diesel” Marketing, Sales Practices and Prod. Liability Litig., MDL No. 2672 (N.D. Cal.)***

CCMS worked closely with lead counsel and other class counsel in this class case challenging unlawful actions by the manufacturer defendants to mask the actual diesel emission levels in various vehicle makes and models. Judge Breyer approved a class settlement with defendants worth billions of dollars.

- ***In re Takata Airbag Prod. Liability Litig., MDL No. 2599 (S.D. Fla.)***

CCMS represents six named Class Plaintiffs and has been and continues to work closely with lead counsel on this multi-billion dollar case involving defective airbags installed in tens of millions of affected vehicles manufactured by most major manufacturers. Class settlements with Honda and BMW providing class members with hundreds of millions of dollars and substantial programmatic relief have been finally approved and are the subject of pending appeals.

- ***In re General Motors Corp. Air Conditioning Marketing and Sales Practices Litig., MDL No. 2818 (E.D. Mich.)***

After conducting a significant pre-suit investigation, CCMS filed the first class action in the Eastern District of Michigan seeking relief on behalf of owners of GM vehicles suffering from a defect in the air conditioning system which typically results in total system failure, necessitating significant repairs thereto. Since commencing the action, CCMS has communicated with dozens of affected consumers and worked with GM assess the scope and nature of an extended warranty program GM implemented in a purported effort to resolve the claims of certain vehicle owners. On April 11, 2018, the Court appointed CCMS co-lead counsel.

- ***Squires et al., v. Toyota Motor Corp., et al., No. 18-cv-00138 (E.D. Tex.)***

CCMS investigated, originated and filed the first and only consumer class action brought on behalf of owners of multi-model year Toyota Prius vehicles that suffer from a defect that causes windshields to crack and fail in ordinary and foreseeable driving conditions. Plaintiffs allege that



Defendants have breached express and implied warranties, and have violated the consumer protection statutes of various States.

- ***Gonzalez, et al., v. Mazda Motor Corp., et al., No. 16-cv-2087 (N.D. Cal.)***
CCMS is lead counsel in a consumer class action brought on behalf of owners of Model Year 2010-15 Mazda3 vehicles with defective clutch assemblies that cause them to prematurely fail. Plaintiffs allege that Defendants have breached express and implied warranties, and have violated the consumer protection statutes of various states. See, e.g., *Gonzalez v. Mazda Motor Corp.*, No. 16-CV-02087-MMC, 2017 WL 345878 (N.D. Cal. Jan. 5, 2017) (denying and granting in part Defendants' motion to dismiss).
- ***Albright v. The Sherwin-Williams Company, No. 17-cv-02513 (N.D. Ohio)***
CCMS is serving as Co-Lead Counsel in this class action concerning deck resurfacing products sold under the Duckback and SuperDeck brand names. Plaintiffs allege that defendants have breached express and implied warranties, and have violated the consumer protection statutes of various states.
- ***Bergman v. DAP Products, Inc., No. 14-cv-03205 (D. Md.)***
CCMS served as lead counsel in this class action on behalf of consumers who purchased various models of "XHose" garden hoses, which were flexible outdoor hoses that were predisposed to leaking, bursting, seeping, and dripping due to design defects. The court approved a nationwide settlement providing hundreds of thousands of consumer class members with the opportunity to recover a substantial portion of their damages.
- ***Anderson v. Behr Process Corp., No. 1:17-cv-08735 (N.D. Ill.)***
CCMS is serving as Co-Lead Counsel in this class action brought on behalf of purchasers of various deck coating products from 2012 through the present. After many months of mediation and settlement negotiations, and successfully opposing efforts by other plaintiffs and firms to have the JPML centralize pending cases, the parties have agreed to a proposed Class settlement which will provide substantial valuable monetary relief to Class members to refund the cost of product purchased as well as compensate them for damage to their decks and the costs of restoring and repairing the same.



- ***In re Midway Moving & Storage, Inc.'s Charges to Residential Customers, No. 03 CH 16091 (Cir. Ct. Cook Cty., Ill.)***

On the eve of trial, the case settled on a class-wide basis. The court stated that CCMS is “highly experienced in complex and class action litigation, vigorously prosecuted the Class’ claims, and achieved an excellent Settlement for the Class under which Class members will receive 100% of their alleged damages.”

- ***Walter Cwietniewicz d/b/a Ellis Pharmacy, et al. v. Aetna U.S. Healthcare, June Term, 1998, No. 423 (Pa. Common Pleas)***

On May 25, 2006, the court granted final approval to a settlement of a class action brought on behalf of pharmacies that participated in U.S. Healthcare’s capitation program seeking to recover certain required semi-annual payments. At the final approval hearing, the court found that “this particular case was as hard-fought as any that I have participated in” and with respect to the Class’s reaction to the settlement achieved as a result of our firm’s work: “. . . a good job, and the reason there should be no objection, they should be very very happy with what you have done.”

Data Privacy Class Actions

- ***Hough v. Navistar, Inc., No. 21L1161 (Circ. Ct. DuPage Cnty., IL)***

CCMS served as co-lead counsel in action arising out of a data breach of Navistar’s computer systems that resulted in a settlement that provided \$1.25 million to affected current and former employees, as well as significant non-monetary compensation.

- ***Rentschler et al. v. Atlantic General Hospital (D. Md.)***

CCMS appointed co-lead in class action rising out of a data breach at the Atlantic General Hospital which compromised private information belonging to 136,981 individuals. CCMS and co-lead counsel successfully negotiated a settlement that provided \$2.25 million in monetary compensation for damages, identity theft protection services, and defendant’s promise to implement cybersecurity changes.

- ***In re Kannact, Inc. Data Security Incident (D. Or.)***

CCMS appointed co-lead in class action arising out of a data breach incident at Kannact, Inc. which compromised private information belonging



to 109,210 individuals. CCMS and co-lead successfully negotiated a \$700,000 settlement that provided monetary compensation to victims, identity theft protection services, and guarantees of cybersecurity changes at Kannact.

- ***Mikulecky et al. v. Lutheran Social Services (Cir. Ct. Cook Cty., IL)***
CCMS worked as plaintiffs' counsel in class action arising from a data breach at Lutheran Social Services of Illinois, involving 184,183 victims, that was resolved through a \$1.35 million settlement that provided monetary compensation to victims.
- ***Cornell v. Michigan Avenue Immediate Care (N.D. Ill.)***
CCMS served as plaintiffs' counsel in class action arising out of a data breach incident at Michigan Avenue Immediate Care, which involved 144,104 victims, and successfully negotiated a settlement that provided \$850,000 in compensation to the victims.
- ***Sherma et al. v. Accutech Systems Corp. (Cir. Ct. Delaware Cty., IN)***
CCMS appointed co-lead counsel in class action arising out of a data breach incident at Accutech in which the private information of 106,078 individuals was exposed. CCMS and co-lead successfully negotiated a settlement through which Accutech agreed to compensate victims for up to \$5,000 in losses resulting from the data breach and provide credit monitoring and identity theft services alongside implementing more robust cybersecurity measures.
- ***Woods et al. v. Albany ENT & Allergy Servs. (Sup. Ct. Albany Cty, N.Y.)***
CCMS appointed co-lead counsel in action arising out of breach of Albany ENT's computer systems in which the private information of 224,486 individuals was exposed. CCMS and co-lead successfully negotiated a settlement through which Albany ENT agreed to compensate victims for up to \$7,500 in losses resulting from the data breach and provide credit monitoring and identity theft services alongside instituting more stringent cybersecurity measures.
- ***In re California Pizza Kitchen Data Breach (C.D. Cal.)***
CCMS appointed co-lead counsel in action arising out of cybersecurity incident at the California Pizza Kitchen in which the private information of 103,767 individuals was exposed. CCMS and co-lead successfully negotiated a settlement through which California Pizza Kitchen agreed to compensate victims for up to \$5,000 in losses resulting from the data



breach and provide credit monitoring and identity theft services as well as implementing major improvements to its cybersecurity measures.

- ***Smith et al v. Hawaii Federal Credit Union (1st Cir. Ct., HI)***

CCMS appointed co-lead counsel in action arising out of cybersecurity incident at the Hawaii Federal Credit Union in which the private information of 21,411 individuals was exposed. CCMS and co-lead successfully negotiated a settlement through which the Hawaii Federal Credit Union agreed to compensate victims for up to \$4,000 in losses resulting from the data breach and provide credit monitoring and identity theft services.

- ***Spencer et al v. Aloha Nursing Rehab Centre (1st Cir. Ct., HI)***

CCMS appointed co-lead counsel in action arising out of cybersecurity incident at the Aloha Nursing Rehab Center in which the private information of 20,599 individuals was exposed. CCMS and co-lead successfully negotiated a settlement through which Defendant agreed to compensate victims for up to \$2,000 in losses resulting from the data breach and provide credit monitoring and identity theft services.

- ***Gates v. Western Washington Medical Group (Dist. Ct. Snohomish Cty., WA)***

CCMS appointed co-lead in class action arising out of data breach at the Western Washington Medical Group.

- ***Wilkins et al v. Mulkey Cardiology Consults. (Sup. Ct. Bergen Cty., NJ)***

CCMS appointed co-lead in class action arising out of data breach at Mulkey Cardiology Consultants.

- ***In Re Francesca's Acquisition LLC Data Security Breach Litigation (S.D. Tex.)***

CCMS appointed co-lead in class action arising out of data breach incident at Francesca's Acquisition LLC.

- ***Martemucci et al v. Peachtree Orthopaedic Clinic (Sup. Ct. Forsyth Cty., GA)***

CCMS appointed co-lead in class action arising out of data breach incident at the Peachtree Orthopaedic Clinic.

- ***In re Movelt Customer Data Security Breach Litigation (MDL 3083) (D. Mass.)***



CCMS representing plaintiffs in the *MoveIt* MDL, which has been described as the largest data breach in history.

- ***Israel v. Medical Management Resource Group (D. Ariz.)***
CCMS representing plaintiff in class action arising from data breach incident at the Medical Management Resource Group.
- ***Bracy et al v. Americold Logistics, LLC (D. Georgia)***
CCMS representing plaintiff in class action arising from data breach incident at Americold Logistics, LLC.
- ***Clauson et al v. Arrowhead Regional Computing Consortium (D. Minn.)***
CCMS representing plaintiff in class action arising from data breach incident at the Arrowhead Regional Computing Consortium.
- ***Quaife et al v. Brady, Martz, & Associates, P.C. (D. N.D.)***
CCMS representing plaintiff in class action arising from data breach incident at Brady, Martz, and Associates.
- ***Stroup et al v. Cardiovascular Consultants (Sup. Ct. Maricopa Cty., AZ)***
CCMS representing plaintiffs in class action arising from data breach incident at the Cardiovascular Consultants.
- ***Cahill et al v. Memorial Heart Institute, LLC (E.D. Tenn.)***
CCMS representing plaintiff in class action arising from data breach incident at the Memorial Heart Institute.
- ***In re: Clarke County Hospital (Dist. Ct. Clarke Cty., IA)***
CCMS representing plaintiffs in class action arising from data breach incident at the Clarke County Hospital.
- ***Francis v. Continuum Health Alliance (D. N.J.)***
CCMS representing plaintiff in class action arising from data breach incident at Continuum Health Alliance.
- ***Cortrecht v. DePauw University (Cir. Ct. Putnam Cty., IN)***
CCMS representing plaintiffs in class action arising from data breach incident at DePauw University.



- ***Rogers et al v. Des Moines Orthopaedic Surgeons* (Dist. Ct. Dallas City., IA)**
CCMS representing plaintiff in class action arising from data breach incident at the Des Moines Orthopaedic Surgeons.
- ***Powers et al. Eastern Radiologists, Inc.* (E.D.N.C.)**
CCMS representing plaintiff in class action arising from data breach incident at Eastern Radiologists.
- ***In re Emmanuel College Data Security Incident* (D. Mass.)**
CCMS representing plaintiff in class action arising from data breach incident at Emmanuel College.
- ***Martinez v. Earnest Health, Inc.* (N.D. Tex.)**
CCMS representing plaintiff in class action arising from data breach incident at Earnest Health.
- ***Jenich et al v. Group Health Cooperative of South Central Wisconsin* (W.D. Wis.)**
CCMS representing plaintiffs in class action arising from data breach incident at the Group Health Cooperative of South Central Wisconsin.
- ***Hood v. Educational Computer Systems, Inc.* (W.D. Penn.)**
CCMS representing plaintiff in class action arising from data breach incident at the Educational Computer Systems, Inc.
- ***Matney v. Kansas Joint & Spine Specialists* (D. Kan.)**
CCMS representing plaintiff in class action arising from data breach incident at Kansas Joint & Spine Specialists.
- ***In re Keenan & Associates Data Breach* (C.D. Cal.)**
CCMS representing plaintiff in class action arising from data breach incident at Keenan & Associates.
- ***Unsworth v. Lewis and Clark College* (D. Or.)**
CCMS representing plaintiff in class action arising from data breach incident at Lewis & Clark College.
- ***In re McPherson Hospital Data Security Litigation* (Dist. Ct. McPherson Cty., KS)**



CCMS representing plaintiffs in class action arising from data breach incident at the McPherson Hospital.

- ***In re Purfoods, Inc. Data Security Litigation (S.D. Iowa)***

CCMS representing plaintiffs in class action arising from data breach incident at Purfoods/Mom's Meals.

- ***In re Morrison Community Hospital Data Breach (Cir. Ct. Whiteside Cty., IL)***

CCMS representing plaintiffs in class action arising from data breach incident at the Morrison Community Hospital.

- ***In re Mount Desert Island Hospital Data Security Incident Litigation (Cumberland Cty. Sta. Ct., ME)***

CCMS representing plaintiff in class action arising from data breach incident at the Mount Desert Island Hospital.

- ***Oche v. National Math and Science Initiative (Sup. Ct. Kings Cty., NY)***

CCMS representing plaintiff in class action arising from data breach incident at the National Math and Science Center.

- ***Corbett v. Northeast Orthopedics and Sports Medicine (Sup. Ct. Rockland Cty., NY)***

CCMS representing plaintiffs in class action arising from data breach incident at Northeast Orthopedics and Sports Medicine.

- ***Salerno v. OrthoConnecticut (Sup. Ct. Fairfield Dist., CT)***

CCMS representing plaintiff in class action arising from data breach incident at OrthoConnecticut.

- ***Fields v. Otolaryngology Associates (Cir. Ct. Hamilton Cty., IN)***

CCMS representing plaintiff in class action arising from data breach incident at Otolaryngology Associates.

- ***Hardy v. Pacific Guardian Life Insurance Co. (D. Haw.)***

CCMS representing plaintiff in class action arising from data breach incident at the Pacific Guardian Life Insurance Company.

- ***Henderson et al v. Reventics et al (D. Colo.)***



CCMS representing plaintiff in class action arising from data breach incident at Reventics.



Individual Biographies

PARTNERS



BRYAN L. CLOBES is a 1988 graduate of the Villanova University School of Law and received his undergraduate degree from the University of Maryland. Mr. Clobes clerked for Judge Arlin M. Adams of the United States Court of Appeals for the Third Circuit, Judge Mitchell H. Cohen of the United States District Court for the District of New Jersey, and Judge Joseph Kaplan of the Maryland Circuit Court in Baltimore. From 1989 through June, 1992, Mr. Clobes served as Trial Counsel to the Commodity Futures

Trading Commission in Washington, D.C. Mr. Clobes has served as lead counsel in many of the firm's class cases covering all areas of the firm's practice, and is widely recognized as an expert in class action litigation. Mr. Clobes has authored briefs filed with the Supreme Court in a number of class cases, served as a panelist for class action, consumer and antitrust CLE programs, has sustained and maintained the highest rating, AV®, from Martindale-Hubbell, and has been named a "Super Lawyer" for the past twelve years. Mr. Clobes is admitted to the bar in New Jersey and Pennsylvania, and admitted to practice in several federal district and appellate court admissions.



NICKOLAS J. HAGMAN received his undergraduate degree, *magna cum laude*, from the University of Minnesota in 2008. Mr. Hagman earned his law degree from Marquette University Law School, *cum laude*, in 2013, with a Certificate in Litigation. During law school, Mr. Hagman served as an associate editor of the Marquette Law Review, was a member of the Pro Bono Society, and worked as an intern for the late Wisconsin Supreme Court Justice N. Patrick Crooks, and current Wisconsin Supreme Court

Justice Rebecca Dallet. Following law school, Mr. Hagman served as a judicial clerk in the Milwaukee County Circuit Court for two years. Prior to joining CCMS in 2019, Mr. Hagman was an associate at a plaintiff-side consumer class action firm for five years. Mr. Hagman is licensed to practice in Illinois and Wisconsin,



and before the United State District Courts for the Northern District of Illinois, the Eastern District of Wisconsin, and the District of Colorado. Mr. Hagman authored the 2024 Edition of the IICLE Class Actions handbook chapter: *Settlement Procedures, Negotiations, and Agreements Under State and Federal Rules*, CLASS ACTIONS (IICLE, 2024). He is also a member of the Wisconsin Bar Association and Chicago Bar Association, where he is a member of the Class Action and Consumer Committees.



DANIEL O. HERRERA received his law degree, *magna cum laude*, and his MBA, with a concentration in finance, from the University of Illinois at Urbana-Champaign in 2008. Mr. Herrera received his bachelor's degree in economics from Northwestern University in 2004. Mr. Herrera joined CCMS as an associate in 2011 and is resident in its Chicago, Illinois Office. Since joining CCMS, Mr. Herrera has successfully prosecuted a wide range of antitrust, consumer and commodities class action. Mr. Herrera

leads the firm's Consumer Class Action and Data Privacy practices, but also is active in the firm's antitrust matters, leading its ongoing efforts in *In re Cattle and Beef Antitrust Litigation* and *In re Apartment Rental Software Antitrust Litig. No. 23-md-3071 (M.D. Tenn.)*. Prior to joining CCMS, Mr. Herrera was an associate in the trial practice of Mayer Brown LLP, a Chicago-based national law firm, where he defended corporations in securities and antitrust class actions, as well as SEC and DOJ investigations and enforcement actions. Mr. Herrera, a first generation Cuban-American, is licensed to practice in Illinois, holds several federal district and appellate court admissions, and is an active member of the Hispanic Bar Association



NYRAN ROSE RASCHE received her undergraduate degree *cum laude* from Illinois Wesleyan University in 1995, was awarded a graduate teaching fellowship for law school, and earned her law degree from the University of Oregon School of Law in 1999. Following law school, Ms. Rasche served as a law clerk to the Honorable George A. Van Hoomissen of the Oregon Supreme Court. She is the author of *Protecting Agricultural Lands: An Assessment of the Exclusive Farm Use Zone System*, 77 Oregon Law

Review 993 (1998) and *Market Allocation through Contingent Commission*



Agreements: Strategy and Results in In re Insurance Brokerage Antitrust Litigation (with Ellen Meriwether), *The Exchange: Insurance and Financial Services Developments* (Spring 2015). Since joining CCMS, Ms. Rasche has successfully prosecuted a wide range of antitrust, consumer class, securities and commodities class actions. Ms. Rasche has been admitted to practice in the state courts of Oregon and Illinois, as well as the United States District Courts for the Northern District of Illinois, the Southern District of Illinois, and the District of Colorado. She is also a member of the American and Chicago Bar Associations.



JENNIFER WINTER SPRENGEL received her law degree from DePaul University College of Law, where she was a member of the DePaul University Law Review. Her undergraduate degree was conferred by Purdue University. Ms. Sprengel is an experienced litigator in matters involving commodities, antitrust, insurance and the financial industries. In addition, Ms. Sprengel is a committee member of the Seventh Circuit Electronic eDiscovery Pilot Program and is a frequent speaker regarding issues of discovery. Links to some of her presentations and articles can be found on the firm's website. She also serves as co-chair of the Antitrust Law subcommittee of the ABA Class Action and Derivative Suits committee. She is admitted to practice law in Illinois, holds several federal district and appellate court admissions, and has attained the highest rating, AV®, from Martindale-Hubbell. Ms. Sprengel serves as the managing partner of the Firm.

SENIOR COUNSEL



PATRICK E. CAFFERTY graduated from the University of Michigan, with distinction, in 1980 and obtained his J.D., *cum laude*, from Michigan State University College of Law in 1983. From 1983 to 1985, he served as a prehearing attorney at the Michigan Court of Appeals and as a Clerk to Judge Glenn S. Allen, Jr. of that Court. Mr. Cafferty is an experienced litigator in matters involving antitrust, securities, commodities, and the pharmaceutical industry. In 2002, Mr. Cafferty was a speaker at a forum in Washington D.C. sponsored by Families USA and Blue Cross/Blue Shield styled "Making the



Drug Industry Play Fair.” At the Health Action 2003 Conference in Washington D.C., Mr. Cafferty was a presenter at a workshop titled “Consumers’ Access to Generic Drugs: How Brand Manufacturers Can Derail Generic Drugs and How to Make Them Stay on Track.” In 2010, Mr. Cafferty made a presentation on indirect purchaser class actions at the American Antitrust Institute’s annual antitrust enforcement conference. See *Indirect Class Action Settlements* (Am. Antitrust Inst., Working Paper No. 10-03, 2010). Mr. Cafferty is admitted to the state bars of Michigan and Illinois, and holds several federal district and appellate court admissions. Mr. Cafferty has attained the highest rating, AV®, from Martindale-Hubbell and is a top rated SuperLawyer®.



ELLEN MERIWETHER received her law degree from George Washington University, *magna cum laude*, in 1985. She was a member of the *George Washington Law Review* and was elected to the Order of the Coif. Ms. Meriwether received a B.A. degree, *with highest honors*, from LaSalle University in 1981. Ms. Meriwether is on the Board of Directors of the American Antitrust Institute (AAI), is Editorial Board Co-Chair of ANTITRUST, a publication by the section of Antitrust Law of the American Bar Association and serves as

Vice-Chair of the Board of Directors of the Public Interest Law Center, in Philadelphia. Since 2010, Ms. Meriwether has been included in the US News and World Report Publication of “Best Lawyers in America” in the field of Antitrust. She has been named a “Pennsylvania Super Lawyer” since 2005 and has attained the highest rating, “AV”, from Martindale-Hubbell. She is a frequent presenter on topics relating to complex, class action and antitrust litigation and has published a number of articles on subjects relating to class actions and antitrust litigation, including, among others: “The Fiftieth Anniversary of Rule 23: Are Class Actions on the Precipice?,” *Antitrust*, (Vol. 30, No. 2, Spring 2016); “Motorola Mobility and the FTAIA: If Not Here, Then Where?,” *Antitrust*, Vo. 29, No.2 Spring 2015); “*Comcast Corp. v. Behrend*: Game Changing or Business as Usual?,” *Antitrust*, (Vol. 27, No. 3, Summer 2013). Links to these articles and others authored by Ms. Meriwether can be found on the firm’s website. Ms. Meriwether is admitted to the bar of Supreme Court of Pennsylvania and is admitted in a number of federal district court and appellate court jurisdictions.



DOM J. RIZZI received his B.S. degree from DePaul University in 1957 and his J.D. from DePaul University School of Law in 1961, where he was a member of the *DePaul University Law Review*. From 1961 through 1977, Judge Rizzi practiced law, tried at least 39 cases, and briefed and argued more than 100 appeals. On August 1, 1977, Judge Rizzi was appointed to the Circuit Court of Cook County by the Illinois Supreme Court. After serving as circuit court judge for approximately one year, Judge Rizzi was elevated to the Appellate Court of Illinois, First District, where he served from 1978 to 1996. Judge Rizzi became counsel to the firm in October 1996.

OF COUNSEL



CHRISTOPHER P. DOLOTOSKY joined Cafferty Clobes Meriwether & Sprengel LLP as Of Counsel in 2024. He is a commercial litigation attorney with 20 years' experience in working on a variety of complex legal cases. He has participated in trials and conducted depositions in several cases. He is involved with the firm's antitrust practice. Prior to joining to our firm, he worked for several law firms and boutique firms in the Philadelphia area. Mr. Dolotosky received his law degree from the Villanova University School of Law in

2001 where he was a Board Member of the *Villanova Law Review*. He obtained his bachelor's degree in political science from the University of Delaware in 1998 where he was a member of *Phi Beta Kappa*. Mr. Dolotosky is licensed to practice in Pennsylvania and New Jersey. He is admitted to practice before the U.S. District Courts for the Eastern District of Pennsylvania and the District of New Jersey.



ASSOCIATES



ALEX LEE graduated *cum laude* from the University of Illinois College of Law in 2020. While at law school, he was a staff writer for the *Illinois Business Law Journal* and served in the Illinois Innocence Project where he worked to investigate and exonerate wrongfully convicted individuals in Illinois. Mr. Lee received his BA in political science from Boston College in 2017. While at university, Mr. Lee worked in special needs education for three years. Alex Lee joined Cafferty Clobes Meriwether Sprengel's Chicago

office as an associate attorney in 2023. Prior to joining Cafferty Clobes, Mr. Lee worked at several law firms in Chicago and Champaign and worked on cases in consumer law, employment law, civil rights, commercial litigation, and complex litigation.

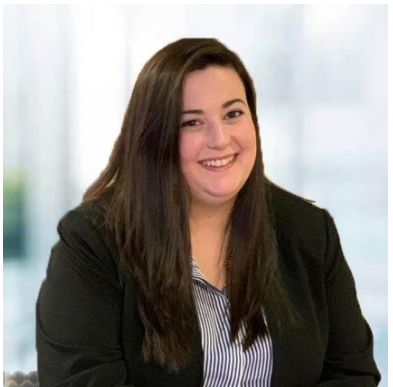


NABIHAH MAQBOOL is an Associate at Cafferty Clobes Meriwether & Sprengel LLP. Ms. Maqbool has experience leading matters in state and federal courts at every stage of litigation. Prior to joining Cafferty Clobes she was an associate at boutique litigation firms in Washington D.C. and Chicago, with cases ranging from complex commercial and arbitral matters, civil rights, plaintiff-side employment disputes, to serving as outside counsel for non-profit organizations. Ms. Maqbool began her career as a litigation fellow and as

a staff attorney at national impact litigation organizations focused on vindicating plaintiffs' constitutional rights. Ms. Maqbool earned her law degree from the University of Chicago in 2018, where she received the Thomas R. Mulroy Prize for Excellence in Appellate Advocacy and Oral Argument, the Edwin F. Mandel Award for Exceptional Contributions to the Law School Clinical Education Program, and with pro bono honors. Ms. Maqbool graduated from the University of Missouri Honors College with a Bachelor of Science in Biological Sciences, a Bachelor of Arts in Political Science, and a Master of Public Health with Delta Omega Honors. Ms. Maqbool is licensed to practice in New York, and before the United States District Courts for the Northern, Central, and Southern Districts of Illinois.



HENRY VISSER MELVILLE is an Associate at Cafferty Clobes Meriwether & Sprengel LLP. Mr. Melville earned a Bachelor of Arts in economics from the University of Colorado Boulder and a law degree from the University of Chicago. Prior to joining our firm in 2024, he was a transactional associate at a national law firm for three years.



KAITLIN NAUGHTON received her law degree from the George Washington University Law School in 2019, where she served as managing editor for the *George Washington Journal of Energy & Environmental Law*. Ms. Naughton earned her bachelor's degree in political science and sociology with distinction from Purdue University in 2015. Ms. Naughton joined CCMS in 2019 and is resident in its Chicago, Illinois office. She is licensed to practice in Illinois and before the United State District Court for the Northern District of Illinois.



MOHAMMED A. RATHUR is an Associate at Cafferty Clobes Meriwether & Sprengel LLP's Chicago office. Prior to joining Cafferty Clobes, Mr. Rathur worked at a boutique class action law firm specializing in employment and data privacy rights. Mr. Rathur's prior experience includes serving as a judicial law clerk in the Chancery Division of the Circuit Court of Cook County for two years. Mr. Rathur earned his law degree from the American University Washington College of Law in 2019, where he served as a Student Attorney for the International Human Rights Law Clinic. Mr. Rathur graduated from Michigan State University with a B.A. in International Relations.



Staff Attorney



ANDREW MORRIS joined Cafferty Clobes Meriwether & Sprengel LLP in 2021. His experience includes a broad range of litigation matters. He graduated from Widener University School of Law in Delaware, cum laude in 2006. Mr. Morris is admitted to practice in Pennsylvania.