EXHIBIT 1

SCOTT+SCOTT ATTORNEYS AT LAW LLP
William C. Fredericks (*pro hac vice*)
Thomas L. Laughlin, IV (*pro hac vice*)
The Helmsley Building
230 Park Avenue, 24th Floor
New York, NY 10169

SCHALL BROWN & SCHWARTZ LLP
Brian J. Schall
David Schwartz
Brian R. England (AZ Bar No. 024888)
2049 Century Park East, Suite 2460
Los Angeles, CA 90067

On behalf of the Lead Plaintiff, Peter Frouws

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

PETER FROUWS, Individually and on Behalf of All Others Similarly Situated, Plaintiff, v. ROBERT LYONS; DANIEL BONCEL; and STEPHEN CUMMING, Defendants.	)	No. 2:23-cv-00691-PHX-DJH <u>CLASS ACTION</u> **DECLARATION OF DARYL F. SCOTT IN SUPPORT OF LEAD PLAINTIFF'S CO-LEAD COUNSEL'S FEE AND EXPENSE APPLICATION**

I, DARYL F. SCOTT, hereby declare as follows:

1. I am a Partner and the Chief Financial Officer of the law firm of Scott+Scott Attorneys at Law LLP ("Scott+Scott" or the "Firm"), counsel for Plaintiff Peter Frouws ("Lead Plaintiff"). Together with Schall, Brown & Schwarz LLP ("SBS"), Scott+Scott has served as Co-Lead Counsel for the putative Class in the above-captioned Action. I submit this declaration in support of Co-Lead Counsel's Motion for an Award of Attorneys' Fees and Litigation Expenses including Lead Plaintiff's request for an award in connection with services rendered in the above-captioned action (collectively, the "Fee and Expense Application").[1] I have personal knowledge of the facts stated in this declaration and, if called upon, could and would testify to these facts.

2. My Firm was involved in all aspects of the prosecution and resolution of the Action, as set forth below and in the Joint Declaration of William C. Fredericks and Brian J. Schall, filed herewith.

3. The schedules attached hereto as **Exhibit 1** and **Exhibit 2** summarize the hours and lodestar of Scott+Scott from inception of this Action through and including June 15, 2026 (the date that the Court entered its amended Preliminary Approval Order), including a breakdown of hours by category of work. The time set forth in this Declaration does not include the hours Scott+Scott has (and will continue to) spend after June 15, 2026, on this matter, including all time it has already spent on briefing final approval of the Settlement, and the additional time in the future it will spend on communicating with Settlement Class members about the claims process, on preparing for and attending the Settlement Hearing on September 14, 2026, on working with the Claims Administrator (A.B. Data) on matters relating to the administration of the Settlement, assuming it is approved by the Court (including the preparation of final distribution motion papers). The lodestar calculations for the individuals in **Exhibit 1** and **Exhibit 2** are based on my Firm's

[1] All capitalized terms that are not otherwise defined herein shall have the same meanings provided in the Stipulation of Settlement dated February 11, 2026 ("Stipulation" or "Stip."), filed as Doc. 80-3.

current hourly rates, as explained in ¶6 below. For personnel who are no longer employed by my Firm, the lodestar calculation is based on the hourly rates for such personnel in their final year of employment. The schedules were prepared from contemporaneous daily time records regularly prepared and maintained by my Firm.

4. Attorneys at Scott+Scott carefully reviewed these time and expense records before preparing this Declaration. The purpose of this review was to confirm both the accuracy of the time entries and expenses, as well as the appropriateness and reasonable necessity of the time and expenses committed to the Action. As a result of this review (in addition to excluding all time billed after entry of the Preliminary Approval Order on June 15, 2026), further reductions were made in the exercise of counsel's judgment. In addition, all time expended in preparing this application for fees and expenses, and all time spent by attorneys and staff working fewer than 10 hours on the case have been excluded.

5. Following this review and the adjustments made, I believe that the time reflected in the Firm's lodestar calculation, and the amount of the expenses for which reimbursement is sought are reasonable and were appropriate and reasonably necessary for the effective and efficient prosecution and resolution of the Action.

6. My 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, years 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 other national firms with specialized expertise in complex securities and other commercial class action practices 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 my firm are the same as the usual and customary hourly rates used for their services in other contingent complex class action litigation. 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 keep current on 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.

7. Scott+Scott's hourly rates have been approved by federal courts within the Ninth Circuit, as well as in other federal courts across the country, in contingent-fee class action litigation 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 *22 (N.D. Ill. Mar. 30, 2026) (approving fee award with Scott+Scott's rates ranging from $400 and $1420); *Lopez v. Apple, Inc.*, No. 4:19-cv-04577, (N.D. Cal. Oct. 16, 2025), ECF No. 426 (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 $500 and $1,545); *Abadilla v. Precigen, Inc*, 2023 WL 7305053, at *15 (N.D. Cal. Nov. 6, 2023) (approving fee award with Scott+Scott's rates ranging from $1,095 to $1,595 for partners or senior counsel, from $625 to $795 for associates, and $395 to $675 for paralegals and professional support staff (investigators)); *Pompano Beach Police and Firefighters Ret. Sys. Fund v. Olo Inc.*, No. 1:22-cv-08228 (S.D.N.Y. June 11, 2024), ECF Nos. 123-2, 125-5 (approving fee award with Scott+Scott's rates ranging from $1,150 to $1,975 for partners or senior counsel, $525 to $675 for associates, and roughly $435 for paralegals).

8. The total number of hours expended on this Action by my Firm from its inception through and including June 15, 2026, is *3,036.10* hours. The total lodestar for my Firm for that period is $2,922,624.00. My Firm's lodestar figures are based on the Firm's hourly rates, which do not include costs for expenses.

9. The services Scott+Scott performed on behalf of the putative Class include, but are not limited to:

- **Factual Investigation:** investigated and analyzed Edgio's public disclosures in connection with preparing the Amended Complaint, including collecting and reviewing large numbers of Edgio's SEC filings, press releases, and conference call transcripts; reviewed numerous analyst reports and news stories concerning the Company; and identified over 300 former Edgio employees (both in the U.S. and overseas) and then ultimately located and interviewed over 50 of those former employees.
- **Pleadings & Briefing:** researched the viability of the claims asserted here under §10(b) and §20(a) of the Exchange Act; drafted and filed the detailed Amended Complaint; and researched, prepared, and filed comprehensive opposition briefing to Defendants' motion to dismiss, ultimately prevailing in full on all disputed issues, as reflected in the Court's August 25, 2025 Order denying dismissal.
- **Discovery:** following the dissolution of the PSLRA discovery stay by virtue of the Court's August 25, 2025 Order, negotiated the terms of the Joint Case Management and the terms of orders governing confidentiality and production of ESI; commenced fact discovery through the preparation and service of Rule 26(a) disclosures, interrogatories, document requests, and third-party subpoenas; and prepared for the commencement of expert class certification discovery by retaining a financial economics firm to begin work preparing an expert report on the efficiency of the market for Edgio stock (relevant to proof of class-wide reliance).
- **Work With Damages and Liability Experts:** consulted with and retained experts to analyze and estimate class-wide damages, and to later develop the Plan of Allocation (in consultation with Co-Lead Counsel) based on the relative economic losses sustained by Settlement Class Members; also retained and consulted with forensic accounting experts on the nature of the

accounting rules and internal control procedures that Defendants allegedly violated.

- **Work With Bankruptcy Experts:** consulted with and retained counsel to analyze risks posed to the Class's ability to recover damages following Edgio's Chapter 11 filing, and to monitor developments in those proceedings (including as they related to the ability of the bankruptcy trustee and/or creditors' committee to bring competing breach of fiduciary duty claims against the Individual Defendants here).
- **Mediation & Settlement Negotiations:** retained David Murphy, Esq. of Phillips Alternative Dispute Resolution as mediator (the "Mediator"); prepared and exchanged with Defendants comprehensive mediation statements; prepared and exchanged additional mediation briefing addressing the import of the Court's August 25, 2025 Order; participated in a full-day, in-person mediation session on September 8, 2025 with the Defendants and the Mediator; and pursued continued Settlement negotiations through the Mediator while simultaneously litigating the Action (which culminated in the Mediator's "double-blind" proposal and the parties' agreement-in-principle of December 9, 2025); and thereafter negotiated, drafted, and finalized the terms of the detailed Stipulation of Settlement (including all of its accompanying exhibits), which was executed on February 11, 2026; drafted the motion for preliminary approval of the Settlement together with supporting papers and declarations (and which also set forth the bases for certifying the Class for settlement purposes); retained (with the Court's approval) an Escrow Agent and Claims Administrator; and worked with the Claims Administrator to supervise the implementation of the Court-approved Notice Program.

- **Other Current and Future Work that Is Not Reflected In Counsel's Lodestar:** In addition to the foregoing, as noted above Co-Lead Counsel have also spent significant additional time preparing the papers in support of Plaintiff's Motion for Final Approval of the Stipulation of Settlement; in addition, Co-Lead Counsel anticipate performing substantial additional work for the benefit of the Settlement Class for which no hours are included in the current application, including preparing for and attending the Settlement Hearing, supervising the Claims Administrator's administration of claims, and preparing future any motions regarding the distribution of the Net Settlement Fund to Authorized Claimants.

10. Over the course of litigation, Scott+Scott assigned a team of attorneys to work on the Action, diligently ensuring that assignments were handled by attorneys with the appropriate level of experience and minimizing duplication of efforts. The following are the primary attorneys assigned to work on the Action, with their year of graduation from law school and the general subject matter of the tasks performed in this case:

- **Partners:**
  - **Deborah Clark-Weintraub** (Partner, 1987). Ms. Clark-Weintraub supervised the extensive pre-filing investigation work of the firm's in-house investigation department and led the pleading and motion-to-dismiss phases, which included directing the drafting of the amended complaint and supervising the research and preparation of Lead Plaintiff's opposition to the motion to dismiss. Ms. Clark-Weintraub retired from the Firm in 2025.
  - **Thomas Laughlin** (Partner, 2007). Mr. Laughlin directed the Lead-Plaintiff briefing and later played a leading role in mediation efforts, overseeing the preparation of relevant damages analyses and helping set settlement strategy.

- o **William Fredericks** (Partner, 1988). Mr. Fredericks, together with Mr. Laughlin, assumed overall oversight of this matter after the retirement of Ms. Clark-Weintraub, and led the implementation of Plaintiffs' "dual track" approach (following the issuance of the Court's decision denying Defendants' motion to dismiss) of actively pursuing mediation discussions while also initiating an aggressive program of formal discovery and expedited resolution of class certification; in addition to supervising the settlement phase, thereafter the negotiation and drafting of the Stipulation of Settlement, the Court approved Notices and Notice Plan, and the preparation of preliminary approval papers.

- **Associates:**
  - o **Karolina Klyuchnikova** (Associate, 2014). Ms. Klyuchnikova succeeded Ms. Kokmanian as the senior associate on this matter, and as such monitored ongoing bankruptcy issues in consultation with bankruptcy experts; updated legal research on falsity, scienter, and loss causation; drafted Plaintiff's mediation statement and subsequent supplemental submissions; worked with Plaintiff's experts on damages analysis; drafted written interrogatories, document requests, and third-party subpoenas; assisted with the negotiation, drafting, and finalization of the Stipulation of Settlement and related exhibits, and prepared the initial drafts of the preliminary approval papers. Ms. Klyuchnikova left the Firm in 2026.
  - o **Cornelia Gordon** (Associate, 2016). Ms. Gordon primarily assisted in the drafting of portions of the opposition to Defendants' motion to dismiss and of portions of Plaintiff's various mediation submissions; also prepared substantial portions of Plaintiff's document requests,

interrogatories, and third-party subpoenas. Ms. Gordon left the Firm in 2026.

11. With respect to the standing of my Firm within the bar, attached hereto as **Exhibit 4** is a biography of my Firm and the attorneys currently employed by the Firm who have been most involved in this matter.

12. As detailed in **Exhibit 3**, my Firm is seeking payment for a total of $210,039.30 in expenses incurred in connection with the prosecution of this Action from its inception, reflecting its share of the total litigation expenses of $385,874.44 requested by the two Co-Lead Counsel firms in this Action.

13. Because this Action has been prosecuted by two Co-Lead Counsel firms, litigation expenses were incurred and paid in three ways. First, my Firm paid certain expenses directly to third-party vendors out of my Firm's own funds. Second, in instances where my Firm and SBS agreed to share the cost of a particular vendor or invoice, SBS remitted its share to my Firm, and my Firm then paid the vendor the full invoiced amount. Third, SBS separately paid certain expenses directly to third-party vendors.

14. My Firm disbursed a total of $384,874.44 to third-party vendors in connection with the Action. Of that amount, $209,039.30 was paid from my Firm's own funds, and $134,845.47 was funded by remittances from SBS that my Firm applied to the invoices designated for those remittances. My Firm seeks payment only for the $209,039.30 it paid from its own funds, plus a travel allowance of $1,000 that it expects to incur in connection with Co-Lead Counsel's upcoming travel to the Settlement Hearing on September 14, 2026, resulting in a total requested expense award to my Firm of *$210,039.30*. The remaining $134,845.47 in expenses that were paid for by SBS via their remittances to Scott+Scott, and these expenses are sought by SBS through its own declaration, together with the $40,989.67 in expenses that SBS paid directly to third-party vendors. In short, no expense is being sought twice or "double-counted" as part of either counsel's expense reimbursement application.

15. Additional information on the details of the litigation expenses incurred in this Action is set forth in the separately filed Joint Declaration of William C. Fredericks and Brian J. Schall, and the separate Declaration of Brian J. Schall, as well as in counsel's accompanying brief in support of their Fee and Expense Application.

16. The expenses incurred in this Action by my Firm are reflected in my Firm's records, which are regularly prepared and maintained in the ordinary course of business. These records are prepared from expense vouchers, check records, vendor invoices, and other source materials, and accurately reflect the expenses incurred, including the amounts remitted to my Firm by SBS and the vendor payments to which those amounts were applied.

I declare, under penalty of perjury, that to the best of my knowledge, the foregoing is true and correct. Executed on the 14th day of August, 2026.

/s/ Daryl F. Scott
Daryl F. Scott

EXHIBIT 1

Frouws v. Lyons, et al.
No. 2:23-cv-00691-PHX-DJH (D. Ariz.)

SCOTT+SCOTT ATTORNEYS AT LAW LLP
TIME REPORT
From Inception through June 15, 2026

PROFESSIONAL	STATUS	HOURLY RATE	TOTAL HOURS	TOTAL LODESTAR AT HOURLY RATES
Deborah Clark-Weintraub	P	$1,900	345.80	$ 657,020.00
Thomas Laughlin	P	$1,185	243.70	$ 288,784.50
William Fredericks	P	$1,960	70.00	$ 137,200.00
Michael Burnett	P	$1,445	28.50	$ 41,182.50
Amanda Lawrence	P	$1,230	17.80	$ 21,894.00
Jonathan Zimmerman	P	$910	18.50	$ 16,835.00
Kristen Anderson	OC	$1,135	25.60	$ 29,056.00
Karolina Klyuchnikova	A	$960	511.80	$ 491,328.00
Emilie Kokmanian	A	$865	542.70	$ 469,435.50
Cornelia Gordon	A	$910	244.70	$ 222,677.00
Rhiana Swartz	A	$850	52.80	$ 44,880.00
Quinn Bessette	A	$640	18.00	$ 11,520.00
Diana Vegas	PL	$450	94.50	$ 42,525.00
Kim Jager	PL	$450	29.50	$ 13,275.00
Tony Haro	PL	$415	18.30	$ 7,594.50
Ellen DeWan	PL	$450	13.00	$ 5,850.00
Jenna Goldin	I	$560	421.10	$ 235,816.00
Robin Barnier	I	$560	200.30	$ 112,168.00
Josephine Marrocco	I	$560	69.40	$ 38,864.00
Keelin Tweedy	O	$450	42.50	$ 19,125.00
Dhhyey Shah	O	$565	27.60	$ 15,594.00
TOTAL			**3,036.10**	**$ 2,922,624.00**

Partner (P), Of Counsel (OC), Associate (A), Paralegal (P), Investigator (I), Other Support Staff (O)

EXHIBIT 2

Frouws v. Lyons, et al.
No. 2:23-cv-00691-PHX-DJH (D. Ariz.)

SCOTT+SCOTT ATTORNEYS AT LAW LLP
CATEGORIZED TIME SUMMARY
From Inception through June 15, 2026

Categories: 1. Fact Investigation and Development (including identifying and interviewing witnesses, locating and analyzing public information); 2. Lead Plaintiff Motion; 3. Amended Complaint; 4. Opposing Defendants' Motion to Dismiss (research and drafting); 5. Discovery (including Rule 26(f) mtg and report, stipulations re confidentiality and ESI productions, offensive discovery requests, preparing Lead Plaintiff's production and disclosures); 6. Consulting with accounting, bankruptcy and loss causation & damages experts; 7. Mediation (including drafting mediation briefs, attending mediation, and pre- and post-mediation communications with Mediator); 8. Documenting the Settlement in Principle (including drafting and negotiating the Stipulation of Settlement and all required ancillary documents); 9. Preliminary Approval & Class Certification Motions (including implementing notice and administration processes w/ A.B. Data; 10. Client communications, litigation analysis & strategy, procedural filings, misc. case administration.

Name	Status	1	2	3	4	5	6	7	8	9	10	Hourly Rate	Total Hours	Total Lodestar
Deborah Clark-Weintraub	P	1.80	1.20	144.10	190.10	6.30	0.90	1.10		0.30		$1,900	345.80	$657,020.00
Thomas Laughlin	P	8.20	48.00	109.50			19.50	58.50				$1,185	243.70	$288,784.50
William Fredericks	P				4.00	4.70	3.70	45.80	9.80	2.00		$1,960	70.00	$137,200.00
Michael Burnett	P		28.50									$1,445	28.50	$41,182.50
Amanda Lawrence	P				1.50	4.00					12.30	$1,230	17.80	$21,894.00
Jonathan Zimmerman	P	4.00	5.80	5.40	1.50		0.80				1.00	$910	18.50	$16,835.00
Kristen Anderson	OC								11.70	9.50	4.40	$1,135	25.60	$29,056.00
Karolina Klyuchnikova	A	67.20	10.90	3.70	14.30	100.50	43.90	116.00	44.70	69.30	41.30	$960	511.80	$491,328.00
Emilie Kokmanian	A	334.30	19.20	9.60	168.50	9.70					1.40	$865	542.70	$469,435.50
Cornelia Gordon	A	15.40	2.70	4.90	78.70	42.10	6.80	86.20	2.10	5.10	0.70	$910	244.70	$222,677.00
Rhiana Swartz	A	2.30	50.50									$850	52.80	$44,880.00
Quinn Bessette	A					17.50				0.50		$640	18.00	$11,520.00
Diana Vegas	PL	7.50	26.90		2.00	24.20		6.00	2.80	12.80	12.30	$450	94.50	$42,525.00
Kim Jager	PL			21.00	8.00					0.50		$450	29.50	$13,275.00
Tony Haro	PL	3.50	14.00			0.80						$415	18.30	$7,594.50
Ellen DeWan	PL		5.50		7.50							$450	13.00	$5,850.00
Jenna Goldin	I	419.10			0.60	0.20	1.20					$560	421.10	$235,816.00
Robin Barnier	I	196.30				4.00						$560	200.30	$112,168.00
Josephine Marrocco	I	58.90	10.50									$560	69.40	$38,864.00
Keelin Tweedy	O	42.50										$450	42.50	$19,125.00
Dhhyey Shah	O						27.60					$565	27.60	$15,594.00
TOTALS		**1161.00**	**223.70**	**298.20**	**476.70**	**214.00**	**104.40**	**313.60**	**71.10**	**100.00**	**73.40**		**3,036.10**	**$2,922,624.00**

Partner (P), Of Counsel (OC), Associate (A), Paralegal (P), Investigator (I), Other Support Staff (O)

EXHIBIT 3

Frouws v. Lyons, et al.
No. 2:23-cv-00691-PHX-DJH (D. Ariz.)

SCOTT+SCOTT ATTORNEYS AT LAW LLP
EXPENSE REPORT

CATEGORY	TOTAL	PAID BY SCOTT+SCOTT (OWN FUNDS)	PAID BY SCOTT+SCOTT (SCHALL REMITANCES)	PAID DIRECTLY BY SCHALL
Experts / Consultants – Crowninshield Financial Research, Inc.	$118,263.00	$59,131.50	$59,131.50	
Experts / Consultants – Hemming Morse, LLC	$6,286.00	$3,143.00		$3,143.00
Experts / Consultants – ValueScope, Inc.	$9,675.00	$9,675.00		
Professional Fees – Lowenstein Sandler LLP	$182,381.80	$94,373.97	$56,963.97	$31,043.86
Professional Fees – McManis Faulkner	$640.00	$640.00		
Mediation – David Murphy, Esq. of Philips ADR	$44,312.50	$22,187.50	$18,750.00	$3,375.00
Court Costs / Filing Fees / Fees	$1,566.69	$1,566.69		
Document Hosting/Storage	$691.16	$691.16		
Online Research - Lexis / Westlaw	$11,897.41	$11,600.41		$297.00
Photocopies	$1,772.75	$1,772.75		
Travel	$7,388.13	$4,257.32		$3,130.81
TOTAL	**$384,874.44**	**$209,039.30**	**$134,845.47**	**$40,989.67**
Travel Allowance	$1,000.00			
GRAND TOTAL	**$385,874.44**			

EXHIBIT 4
Frouws v. Lyons, et al.
No. 2:23-cv-00691-PHX-DJH (D. Ariz.)

SCOTT+SCOTT ATTORNEYS AT LAW LLP
FIRM RESUME

SCOTT + SCOTT

FIRM RESUME

www.scott-scott.com

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 securities fraud, antitrust, consumer and other complex cases and is a pioneer in structured finance monitoring for client portfolios. We represent individual, institutional, and multinational clients in the United States, United Kingdom, and European courts, offering a one-stop shop for international recoupment.

THE FIRM

Scott+Scott was founded in 1975 and began its securities litigation practice in 1997. The Firm has since grown into one of the most respected U.S.-based law firms specializing in the investigation and prosecution of complex securities, antitrust and other commercial actions in both the United States and Europe. Today, the Firm is comprised 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 currently located in London, Amsterdam, and Berlin and 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 securities, antitrust, and consumer class actions, as well derivative and other complex proceedings, in both state and federal courts. The Firm also represents large investors and numerous corporations in commercial and other litigation in courts within the European Union (EU) 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.

SECURITIES AND CORPORATE GOVERNANCE

Scott+Scott has extensive experience litigating claims for violations of the federal securities laws on behalf of our municipal, institutional, and individual investor clients, serving as lead counsel in numerous securities class actions brought under the Securities Act of 1933, the Securities Exchange Act of 1934, and other statutes.

Scott+Scott recognizes that, particularly since the passage of the Private Securities Litigation Reform Act of 1995, bringing successful claims for violations of the federal securities laws requires not only significant litigation experience, but also the ability to bring to bear the skills of its in-house investigators and financial analysts (and often outside consultants) to build a case that can survive both early-stage motions to dismiss and later-stage motions for summary judgment. Our philosophy is also based on our view that efforts to negotiate a successful settlement are typically built on the quality of pre-filing investigation diligence, and our willingness to litigate deep into discovery and, if necessary, through summary judgment and trial.

Our securities litigators have experience practicing in state and federal courts across the country. The Firm's attorneys have regularly retained and worked with leading accounting experts, damages experts, and relevant industry experts to build their clients' cases against defendants involved in virtually every type of industry, from pharmaceuticals to dot.coms, from retailers to manufacturers, and from investment banks to accounting firms. The Firm has also submitted *amicus curiae* briefs to the United States Supreme Court on behalf of its clients on important securities laws issues, including in support of the plaintiffs in *California Public Emps.' Ret. Sys. ANZ Securities, Inc.*, 137 S. Ct. 2042 (2017) and *Cyan Inc. v. Beaver County Emp. Ret. Fund*, 138 S. Ct. 1061 (2018).

When appropriate, Scott+Scott prosecutes actions on a class or individual basis. Through our commitment to the best interests of those the Firm represents, Scott+Scott has successfully obtained exceptional monetary results and precedent-setting corporate governance reforms on behalf of investors.

SECURITIES CASE EXAMPLES

Securities class actions where Scott+Scott currently serves as lead or co-lead counsel include:

- *Severt v. UiPath, Inc.*, No. 1:23-cv-07908 (S.D.N.Y.);
- *City of Southfield Fire and Police Retirement System v. Hayward Holdings, Inc.*, No. 2:23-cv-04146 (D.N.J.);
- *Eric White v. Brooge Energy Limited*, No. 2:24-cv-00959 (C.D. Cal.);
- *In re SentinelOne, Inc. Sec. Litig.*, No. 4:23-cv-02786 (N.D. Cal.);
- *Sundaram v. Freshworks, Inc.*, No. 3:22-cv-06750 (N.D. Cal.);
- *Strezsak v. Ardelyx Inc.*, No. 4:21-cv-05868 (N.D. Cal.);
- *Golubowski v. Robinhood Mkts.*, No. 3:21-cv-09767 (N.D. Cal.);
- *City of Birmingham Relief and Ret. Sys. v. Acadia Pharms. Inc.*, No. 3:21-cv-00762 (S.D. Cal.);
- *Frouws v. Edgio, Inc.*, No. 2:23-cv-00691 & No. 2:23-cv-01170 (D. Ariz.);
- *Patel v. Viatris, Inc.*, No. GD-21-13314 (Pa. Ct. Com. Pl.);
- *In re Slack Techs., Inc. S'holder Litig.*, No. 19CIV05370 (Cal. Super. Ct. San Mateo Cnty.);
- *Mancour v. SmileDirectClub, Inc.*, No.: 19-1169-IV (Tenn. Chancery Ct., Davidson Cnty.);
- *Rondini v. Kyverna Therapeutics, Inc.*, No.: 24-cv-08869 (N.D. Cal.);
- *Giraudon v. Innovative Industrial Properties, Inc.*, No. 1:25-cv-00182 (D. MD.);
- *Jewik v. TransMedics Group, Inc.*, No. 1:25-cv-10385 (D. Mass.);
- *In re Actinium Pharmaceuticals, Inc. Sec. Litig.*, No. 1:25-cv-02553 (S.D.N.Y.);
- *Tcherkezian v. Ibotta, Inc.*, No. 1:25-cv-01213 (D. Col.);
- *Zanol v. Quanex Building Products Corp.*, No. 4:25-cv-04453 (S.D. Tex.);
- *Siverd v. Camping World Holdings, Inc.*, No. 1:26-cv-02710 (D. Ill.); and
- *Potter v. monday.com Ltd.*, No. 1:26-cv-01956 (S.D.N.Y.).

Securities class actions which have been resolved where Scott+Scott served as lead or co-lead counsel include:

• *Alaska Elec. Pension Fund v. Pharmacia Corp.*, No. 03-cv-01519 (D.N.J.) ($164 million settlement);

• *Thurber v. Pharmacia, Inc.*, No. 2:99-cv-10368 (C.D. Cal.) ($122 million);

• *In re LendingClub Corp.S'holder Litig.,* No. CIV 537300 (Cal. Super. Ct, San Mateo Cnty.) (part of $125 global settlement);

• *In re Micro Focus Int'l plc Sec. Litig.*, Lead Case No. 18CIV01549 (CA Super. Ct. San Mateo Cnty.) ($107.5 million settlement);

• *Okla. Firefighters Pens. vs. Newell Brands Inc*., No. L-003492-18 (N.J. Sup. Ct. Hudson Cnty.) ($102.5 million settlement);

• *In re Priceline.com, Inc. Sec. Litig.*, No. 00-cv-01884 (D. Conn.) ($80 million settlement);

• *Irvine v. ImClone Sys., Inc.*, No. 02-cv-00109 (S.D.N.Y.) ($75 million settlement);

• *Cornwell v. Credit Suisse Grp.*, No. 08-cv-03758 (S.D.N.Y.) ($70 million settlement);

• *Policemen's Annuity & Benefit Fund of Chi. v. Bank of Am., N.A.*, No. 12-cv-02865 (S.D.N.Y.) ($69 million settlement);

• *In re Nw. Corp. Sec. Litig.*, No. 4:03-cv-04049 (D.S.D.) ($61 million);

• *In re SanDisk LLC Sec. Litig.*, No. 15-cv-01455 (N.D. Cal.) ($50 million settlement);

• *In re Sprint Sec. Litig.*, No. 00-230077 (Mo. Cir. Ct., Jackson Cnty.) ($50 million);

• *In re Emulex Corp. Sec. Litig.*, No. 8:01-cv-00219 (C.D. Cal.) ($39 million);

• *Weston v. RCS Cap. Corp.*, No. 14-cv-10136 (S.D.N.Y.) ($31 million settlement);

• *In re Greensky Sec. Litig.,* No. 1:18 Civ. 11071 (S.D.N.Y.) ($27.5M settlement);

• *Schnall v. Annuity & Life Re (Holdings) Ltd.*, No. 3:02-cv-02133 (D. Conn.) ($27 million);

• *In re Wash. Mut. Mortg.-Backed Sec. Litig.*, No. 2:09-cv-00037 (W.D. Wash.) ($26 million recovery);

• *ATRS v Insulet Corp*., No. 15-12345 (D. Mass.) ($19.5 million settlement);

• *In re King Digit. Ent. PLC S'holder Litig.*, No. CGC-15-544770 (Cal. Sup. Ct. San Francisco Cnty.) ($18.5 million settlement);

• *In re Evoqua Water Corp. Sec. Litig.*, No. 1:18-cv-10320 (S.D.N.Y) ($16.65 million settlement);

• *In re Conn's, Inc. Secs. Litig.*, No. 4:14-cv-00548 (S.D. Tex.) ($22.5 million settlement);

• *In re DouYu Int'l Hold'gs Ltd. Sec. Litig.*, No. 651703/2020 (N.Y. Supr. Ct. N.Y. Cnty.) ($15 million settlement);

• *Abadilla v. Precigen, Inc.*, No. 5:20-cv-06936 (N.D. Cal.) ($13 million settlement);

• *Collins v. Oilsands Quest Inc.*, No. 11 Civ. 1288 (S.D.N.Y.) ($10.235 million settlement);

• *Kaplan v. S.A.C. Cap. Advisors, L.P.*, No. 1:12cv-9350 (S.D.N.Y.) ($10 million settlement);

• *Rosenberg v. Cliffs Natural Res. Inc.*, No. CV 14 828140 (Ct. Common Pleas Cuyahoga Cnty. Ohio) ($10 million settlement);

• *Erie Cnty. Emp. Ret. Sys. v. NN, Inc.*, No. 656462/2019 (N.Y. Supr. Ct., N.Y. Cnty.) ($9.5 million settlement);

• *In re Endochoice Holdings, Inc., Sec. Litig.*, No. 2016 CV 277772 (Ga. Sup. Ct. Fulton Cnty) ($8.5 million settlement);

• *Okla. Police Pension Fund & Ret. Sys. v. Jagged Peak Energy, Inc.*, No. 2017 CV 31757 (Colo. Dist. Ct., Denver Cnty.) ($8.25 million settlement);

• *In re Netshoes Secs. Litig.*, No. 157435/2018 (N.Y. Sup. Ct. N.Y. Cnty.) ($8 million settlement);

• *City of Omaha Police & Fire Ret. Sys. v. LHC Grp, Inc.*, No. 6:12-CV-01609 (W.D. La.) ($7.85 million settlement);

• *In re Pac. Coast Oil Trust Secs. Litig.*, No. BC550418 (Cal. Sup. Ct. Los Angeles Cnty.) ($7.6 million settlement);

• *In re Pacific Biosci. of C.A., Inc. Sec. Litig.* (Cal. Sup. Ct. San Mateo Cnty.) ($7.6 million recovery);

• *Plymouth Cnty. Contributory Ret. Sys. v. Adamas Pharms., Inc.*, No. RG19018715 (Cal. Sup. Ct. Alameda Cnty.) ($7.5M settlement);

• *St. Lucie Cnty. Fire Dist. Firefighters' Pens. Trust v. Southwestern Energy Co.*, No. 2016-70651 (Tex. Dist. Ct. Harris Cnty.) ($7 million settlement);

• *Jochims v. Oatly Group AB*, No. 1:21-cv-06360 (S.D.N.Y.);

• *In re Infinity Q Divers. Alpha Fund Sec. Lit.*, No. 651295/2021 (N.Y. Supr. Ct. N.Y. Cnty.);

• *Pompano Beach Police and Firefighters Ret. Sys. v. Olo Inc.*, No. 1:22-cv-08228 (S.D.N.Y.); and

• *Mo-Kan Iron Workers Pension Fund v. Teligent, Inc.*, No. 1:19-cv-03354 (S.D.N.Y.) ($6 million settlement).

SHAREHOLDER DERIVATIVE CASE EXAMPLES

Shareholder derivative actions where Scott+Scott currently serves in a sole or leadership role include:

• *In re The Boeing Co. Derivative Litig.*, Consol. C.A. No. 2024-1210-MTZ (Del. Ch.);

• *Okla. Firefighters Pension and Ret. Sys. v. Calhoun*, No. 1:24-cv-01200 (E.D. Va.);

• *In re Abbott Labs Infant Formula S'holder Derivative Litig.*, No. 1:22-cv-05513 (N.D. Ill.);

• *Omaha Police & Firefighters Ret. Sys. v. deSouza*. C.A. No. 2024-0172-PAF (Del. Ch.)

• *Iron Workers Local No. 55 Pension Fund v. Rapino*, 2:25-cv-05538-KK-ASx (C.D. Cal.);

• *In re Upstart Holdings, Inc. Derivative Litig.*, Consol C.A. No. 2023-0401-BWD (Del. Ch.);

• *Presura v. Casey*, Consol. C.A. Nos. 2023-0708-NAC, 2024-0308-NAC (Del. Ch.);

• *Trimm v. Schultz*, No. 23-2-12444-8 (Wash. Sup. Ct., Kings County);

• *Lindsey v. Immelt*, Index No. 2020/19718 (N.Y. Sup. Ct.); and

• *In re Exelon Corp. Derivative Litig.*, No. 1:21-cv-03611 (N.D. Ill.).

Representative shareholder derivative actions litigated by Scott+Scott which have been successfully resolved include:

• *In re Alphabet, Inc., S'holder Derivative Litig.*, No. 3:21-cv-09388-RS (N.D. Cal.) ($500 million in funding for an overhaul of the company's corporate compliance and risk management programs);

• *In re Facebook Derivative Litig.*, Consol. C.A. No. 2018-0307 (Del. Ch.) ($190 million cash recovery and corporate reforms concerning an internal whistleblower program, director conflicts of interest, and insider trading policies);

• *Irving Firemen's Relief & Ret. Fund v. Page*, C.A. No. 2019-0355-Sg (Del. Ch.) ($310 million in funding for corporate governance reform programs over 10 years);

• *In re DaVita Healthcare Partners Derivative Litig.*, No. 13-cv-01308 (D. Colo.) (corporate governance reforms valued at $100 million);

• *Buffalo Grove Police Pension Fund v. Diefenderfer*, No. 19-cv-00062 (E.D. Pa.) (claims vs. Navient Corp. officers & directors settled for corporate governance reforms valued at $139 million);

• *Tharp v. Acacia Commc'ns, Inc.*, No 1:17-cv-11504 (D. Mass.) (claims vs. company and corporate officers & directors settled for corporate governance reforms valued at $57-$71 million);

• *N. Miami Beach Gen. Emps. Ret. Fund v. Parkinson*, No. 10-cv-06514 (N.D. Ill.) (corporate governance reforms valued between $50 and $60 million);

• *In re Marvell Tech. Grp. Ltd. Derivative Litig.*, No. 06-cv-03894 (N.D. Cal.) ($54.9 million settlement and corporate governance reforms);

•*Rudi v. Wexner*, No. 2:20-cv-3068 (S.D. Ohio) ($90 million in funding for corporate governance reform programs over at least 5 years);

•*In re Universal Health Servs., Inc. Derivative Litig.*, No. 2:17-cv-02187 (E.D. Pa.) (settled for corporate governance reforms conservatively valued at $110 million);

• *In re Altria Group, Inc. Deriv. Litig.*, Consol. No. 3:20-cv-00772 (E.D. Va.) (successfully resolved for corporate governance reforms with multi-year funding commitment of $117 million);

• *In re Symantec Corp. S'holder Deriv. Litig.*, Consol. C.A. No. 2019-0224-JTL (Del. Ch.) (successfully resolved for $12 million cash payment to company and corporate governance reforms);

• *Bottoni v. Hernandez*, No. 20-cv-01442 (S.D. Tex.) (claims vs. Fluor Corporation officers & directors settled for corporate governance reforms with four years of funding estimated at $10 million); and

• *In re World Wrestling Ent., Inc. Derivative S'holder Litig.*, Consol. C.A. No. 2023-0039-JTL (Del. Ch.)

SCOTT+SCOTT TECHNICAL CAPABILITIES

In complex litigation, the greatest discovery often lies hidden within terabytes of raw, sensitive data. Traditional review methods risk data breach, regulatory sanction, or spoliation. Scott+Scott has eliminated that risk.

Scott+Scott has built proprietary, secure, and regulatorily compliant data enclaves specifically designed for the analysis of highly sensitive data. These parallel environments allow our internal Litigation Support team and our retained external experts to perform their respective roles without ever exposing case data to external networks.

Our secure analysis environments include:

- 3rd-Party Expert Environment (financial analysis): We provide and maintain read-only access to case data for qualified external financial experts (each bound by any applicable protective order). All analysis occurs inside a closed virtual environment where external data transfer is disabled at the gateway/firewall. Within this environment, experts model economic harm, quantify damages from market manipulation, front-running, mis-selling, or other financial misconduct, and produce court-ready reports. Access is provided via encrypted VPN tunnels that are activated and de-activated per session, restricted to static IP addresses of pre-approved users. Experts never take possession of any data; they analyze it entirely within our secure enclave.

- Internal Litigation Support Environment (discovery analysis): We maintain a separate, similarly hardened environment dedicated exclusively to our internal Litigation Support team. Across securities fraud, antitrust, and consumer class action cases, our team identifies, flags, and processes data responsive to specific discovery orders, tracks chain of custody, manages privilege reviews, and prepares appropriate data productions—all without altering, downloading, or transferring the underlying client data. This environment operates under the same firewall restrictions and encrypted VPN protocols, with role-based permissions and full activity logging for evidentiary and compliance purposes.

Both environments share the same underlying infrastructure:

- Hardened, bank-grade infrastructure: Our dedicated server rackspace resides within an SSAE 18/SOC 2 certified data center operated by a leading enterprise co-location provider. This facility is used by several of the largest U.S. financial institutions for their East Coast operations and meets or exceeds all financial industry security standards for physical hardening, access control, and regulatory compliance.

- Read-only, non-destructive review across both environments: In no instance is case data copied out of these environments for analysis, downloaded, or transferred to personal devices or external systems. All work—whether discovery analysis in securities fraud, antitrust, or consumer matters by our internal team, or financial modeling by external experts—occurs inside the firewalled virtual environment.

The result: A legally defensible, chain-of-custody-secure process that allows Scott+Scott to both manage discovery obligations and quantify economic damages from market misconduct—without ever taking possession of client data in a traditional sense, and without compromising regulatory or evidentiary standards.

In all scenarios, these security models remain compliant, consistent, and auditable.

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.

U.S. News & World Report "Best Law Firms"

The Firm is currently ranked by U.S. News & World Report as a "Best Law Firm" in commercial litigation in the New York region.

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-attorney.

WORLD-CLASS ATTORNEYS

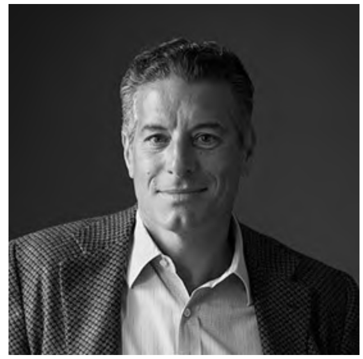
We pride ourselves on the caliber of legal talent on our team. In addition to some of the best and brightest rising stars, we have attorneys who have served with distinction in the U.S. Department of Justice, been admitted to the U.S. Supreme Court, served in OAGs at the state level, argued before the 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, Eastern, 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, Michigan, Minnesota, Mississippi, Missouri, Nebraska, New Jersey, New York, Ohio, Oklahoma, West Virginia, Texas, and the District of Columbia.

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 derivates 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 Laywers (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.

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.

THOMAS LAUGHLIN

PRACTICE EMPHASIS

Thomas Laughlin's practice focuses on securities class action, shareholder derivative, ERISA, and other complex commercial litigation.

ADMISSIONS

State of New York; United States Courts of Appeal: First, Second, Third, Fourth, Sixth, Seventh, and Ninth Circuits; United States District Courts: Southern and Eastern Districts of New York, Northern District of Florida, District of Colorado, Eastern District of Wisconsin, and Eastern District of Michigan

EDUCATION

New York University School of Law (J.D., *cum laude*, 2005); Yale University (B.A. History, *cum laude*, 2001)

HIGHLIGHTS

Mr. Laughlin is a partner in the New York office and focuses on securities class action, shareholder derivative, ERISA, and other complex commercial litigation. After graduating from law school, Mr. Laughlin clerked for the Honorable Irma E. Gonzalez, United States District Court Judge for the Southern District of California.

While at Scott+Scott, Mr. Laughlin has worked on several cases that have achieved notable victories, including ***Cornwell v. Credit Suisse***, No. 1:08-cv-03758 (S.D.N.Y.) (securities settlement of $70 million), ***In re SanDisk LLC Securities Litigation***, No. 3:15-CV-01455 (N.D. Cal.) (securities settlement of $50 million); ***Weston v. RCS Capital Corp.***, No. 1:14-cv-10136 (S.D.N.Y.) (securities settlement of $31 million); ***In re King Digital Entertainment plc Shareholder Litigation***, No. CGC-15-544770 (Cal. Super. Ct. San Francisco Cnty.) (securities settlement of $18.5 million); and ***Rubenstein v. Oilsands Quest Inc.***, No. 1:11-cv-01288 (S.D.N.Y.) (securities settlement of $10.235 million).

Mr. Laughlin also has significant appellate experience, having represented clients in connection with several appellate victories, including ***Cottrell v. Duke***, 737 F.3d 1238 (8th Cir. 2013); ***Westmoreland County Employee Ret. Sys. v. Parkinson***, 727 F.3d 719 (7th Cir. 2013); ***Pfeil v. State Street Bank and Trust Co.***, 671 F.3d 585 (6th Cir. 2012); *and* ***King v. VeriFone Holdings, Inc.***, 12 A.3d 1140 (Del. Sup. 2011).

In 2014, Mr. Laughlin was co-chair of a 13-day bench trial in ***Bankers' Bank Northeast v. Berry, Dunn, McNeil & Parker, LLC***, No. 12-cv-00127 (D. Me.). He represented a consortium of 10 community banks asserting negligence and professional malpractice claims against the former officers and directors of a bank and its auditor in connection with an $18 million loan made to that bank in September 2008. Among other things, Mr. Laughlin conducted the cross-examination of all three witnesses from the defendant's auditing firm and the direct examination of plaintiff's auditing expert. The parties to the action succeeded in resolving the action after trial.

Mr. Laughlin has also been named a Super Lawyer for 2021 through 2025.

WILLIAM C. FREDERICKS

PRACTICE EMPHASIS

William Fredericks' practice focuses primarily on litigating securities and other complex commercial class actions.

ADMISSIONS

New York state; United States Supreme Court; United States District Courts for the Southern and Eastern Districts of New York, and for the District of Colorado; United States Courts of Appeal for the First, Second, Third, Fourth, Sixth, Ninth and Tenth Circuits

EDUCATION

Columbia University Law School, (J.D., 1988); University of Oxford (M. Litt. in International Relations, 1985); Swarthmore College (B.A. in Political Science, high honors, 1983)

HIGHLIGHTS

Mr. Fredericks is a partner in the firm's New York office. In addition to serving as lead counsel on behalf of investors in several pending securities fraud actions (including cases against Acadia Pharmaceuticals, SentinelOne, Kyverna, Freshworks, and Ibotta, as well as against Armistice Capital's flagship hedge fund). Mr. Fredericks also represented investors in the now-settled FX antitrust litigation brought against over a dozen leading banks based on their involvement in manipulating foreign exchange ("FX") rates and spreads, and in derivative proceedings brought against the directors of FaceBook, Inc. on behalf of the company.

Previously, Mr. Fredericks has represented investors as a lead or co-lead counsel for plaintiffs in dozens of securities class actions, including ***In re Wachovia Preferred Securities and Bond/Notes Litigation*** (S.D.N.Y.) (total settlements of $627 million, reflecting the largest r ecovery ever in a pure Securities Act case not involving any parallel government fraud claims); ***In re Rite Aid Securities Litigation*** (E.D. Pa.) (total settlements of $323 million, including the then-second largest securities fraud settlement ever against a Big Four accounting firm); ***In re Sears Roebuck & Co. Sec. Litigation*** (N.D. Ill.) ($215 million settlement, representing the then-largest §10(b) class action recovery in an action that did not involve either a financial restatement or parallel government fraud claims); ***In re State Street Bank and Trust Co. ERISA Litigation*** (S.D.N.Y.) (one of the largest ERISA class settlements to date); ***In re King Digital Sec. Enter. PLC Shareholder Litigation*** (Super. Ct. San Fran. Cty.) ($18.5 million settlement, representing one of the largest state court §11 class action recoveries to date); ***Irvine v. ImClone Systems, Inc.*** (S.D.N.Y.) ($75 million §10b settlement); ***In re Insulet Sec. Litigation*** (D. Mass) ($19.75 million §10b settlement), and ***In re LendingClub Sec. Litigation*** ($125 million §10b and §11 settlement). A consortium of plaintiffs' counsel also chose Mr. Fredericks to present the (successful) oral argument in opposition to defendants' efforts to dismiss (on grounds of standing) over fifteen separate securities fraud cases before a three judge panel in ***In re Mutual Fund Investing Litigation*** (*see* 519 F. Supp. 2d 580 (D. Md. 2007)), which later settled for a combined total of several hundred million dollars. Mr. Fredericks also played a leading role on the team that obtained a rare 9-0 decision for securities fraud plaintiffs in the U.S. Supreme Court in ***Merck & Co., Inc. v. Reynolds*** (which later settled for $1.052 billion), and he has also co-authored amicus briefs on behalf of clients in a number of other Supreme Court cases (including ***Halliburton***, ***Amgen***, ***ANZ Securities*** and ***Cyan***) involving various significant securities law issues.

Mr. Fredericks has also represented clients in litigating claims in federal bankruptcy court proceedings, and obtained substantial recoveries from a bankrupt corporation's officers, law firm and outside auditors on behalf of a court-appointed Trustee of a creditor's trust. *See* ***In re Friedman's, Inc.***, 394 B.R. 623 (S.D. Ga. 2008). He has also successfully represented a class of large commercial customers of a bankrupt utility in breach of contract proceedings in ***In re FirstEnergy Corp.,*** which settled in the U.S. Bankruptcy Court for the Northern District of Ohio.

At Columbia Law School, Mr. Fredericks was a three-time Harlan Fiske Stone Scholar, a Columbia University International Fellow, Articles Editor of *The Columbia Journal of Transnational Law*, and winner of Columbia's Beck Prize (property law), Toppan Prize (advanced constitutional law) and Greenbaum Prize (written advocacy). A three-judge panel chaired by the late Justice Antonin Scalia also awarded Mr. Fredericks the Thomas E. Dewey Prize for best oral argument in the final round of Columbia's Stone Moot Court Honor Competition. After clerking for the Hon. Robert S. Gawthrop III (E.D. Pa.) in Philadelphia, Mr. Fredericks spent seven years practicing securities and complex commercial litigation at Simpson Thacher & Bartlett LLP and Willkie Farr & Gallagher LLP in New York before moving to the plaintiffs' side of the bar in 1996.

Mr. Fredericks has been recognized in the 2012-24 editions of "America's Best Lawyers" in the field of commercial litigation, in "Who's Who in American Law" (Marquis), and in the New York City "Super Lawyers" listings for securities litigation (2013-24). In 2020 (inaugural) and in each subsequent year he been named to the LawDragon 500 Leading Plaintiff Financial Attorneys list. He has been a frequent panelist on various securities litigation programs sponsored by the Practising Law Institute (PLI) – including ten years as a panelist on civil liabilities under the federal Securities Act – and has lectured overseas on American class action litigation on behalf of the American Law Institute/American Bar Association (ALI/ABA). He is also the former chairman of the New York City Bar Association's Committee on Military Affairs and Justice, and a member of the Federal Bar Council.

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.

EMILIE B. KOKMANIAN

PRACTICE EMPHASIS

Ms. Kokmanian is an associate in the Firm's New York office where she specializes in both federal and state securities litigation on behalf of individual and institutional shareholders.

Prior to joining Scott+Scott, Ms. Kokmanian spent seven years as a litigation associate at a leading class action law firm in Québec where she represented aggrieved shareholders in several high-profile securities class actions pertaining to corporate fraud in the securities markets. Ms. Kokmanian also practiced in civil and commercial litigation.

ADMISSIONS

State of New York; United States District Court for the Southern District of New York; United States Court of Appeals for the Ninth Circuit; Law Society of British Columbia; Québec

EDUCATION

Université de Montréal (J.D., 2013 & L.L.B., 2011)

HIGHLIGHTS

Co-authored with Anais Kadian; Canada: *Human Rights Champion or Pawn to Autocratic Regimes in the Global Arms Trade?*, Response to the "Final report: Review of export permits to Turkey" published by Global Affairs Canada, House of Commons – Standing Committee on Foreign Affairs and International Development, May 4, 2021

Co–authored with Michael Miarmi*; Investigations in Securities Litigation in the U.S.: A Deep Dive Into the Role and Impact of Confidential Witnesses*, Développements récents en enquêtes internes et réglem entaires, vol. 522 (2022).

Co–authored with Caroline Larouche, Michael Miarmi and Jonathan S. Carter; *The Realities of "Reliance": Understanding Its Role in U.S. and Canadian Securities Class Actions*, Colloque national sur l'action collective, vol. 544 (2023).

REPRESENTATIVE CASES

Ms. Kokmanian has been involved in several cases, including ***Bausch Health Companies Inc. c. California State Teachers' Retirement System***, 2021 QCCA 1547; ***California States Teachers' Retirement System c. Bausch Health Companies Inc.***, 2020 QCCS 275; and ***Amaya inc. c. Derome***, 2018 QCCA 120.

KRISTEN ANDERSON

ADMISSIONS

States of California, New York, Illinois, District of Columbia; United States Courts of Appeal: Second Circuit and Ninth Circuit; United States District Court: Southern District of California, Central District of California, Northern District of California, Eastern District of California, Eastern District of New York, Southern District of New York, Northern District of Illinois.

EDUCATION

University of California College of the Law, San Francisco (J.D., 2006); Rosalind Franklin University of Medicine & Science (M.S., Psychology: Clinical Counseling, 2024); St. Louis University (B.A., Philosophy, 2003)

ASSOCIATIONS

- Member of the American Bar Association's Antitrust Section
- Past Vice Chair of the Antitrust Section's Trial Practice Committee
- Past Vice Chair of the Antitrust Section's Books & Treatises Committee

HIGHLIGHTS

Ms. Anderson represents plaintiffs in high stakes, complex litigation in federal and state courts. She has worked on antitrust class action cases recovering over $9 billion. She served as co-lead counsel in ***Klein v. Meta Platforms, Inc.***, No. 20-cv-8570 (N.D. Cal.) and ***In re European Government Bonds Antitrust Litig.***, No. 19-cv-2601 (S.D.N.Y.). Ms. Anderson was a contributing author to the American Bar Association Antitrust Section's Proof of Conspiracy Under Federal Antitrust Laws (3d ed.), Antitrust Discovery Handbook (2d ed.), Joint Venture Handbook (2d ed.), and the 2010 Annual Review of Antitrust Law Developments. In addition, Ms. Anderson served as an editor for Model Jury Instructions in Civil Antitrust Cases (2016 ed.) and numerous other publications. During law school, Ms. Anderson was as an extern at the U.S. Department of Justice, Antitrust Division, in San Francisco and an extern to Justice Kathryn Mickle Werdegar of the Supreme Court of California. She was also a research assistant to Professor James R. McCall in the areas of antitrust and comparative antitrust law.

Recognized as a Rising Star in the 2014-21 editions of Super Lawyers; and a Super Lawyer in the 2022-2025 editions.

Frequent speaker on women in the law, mental health, and antitrust topics through the American Bar Association, Practicing Law Institute, and other organizations.

Co-author of The Misapplication of Associated General Contractors to Cartwright Act Claims, 23 COMPETITION: J. ANTI. & UNFAIR COMP. L. SEC. ST. B. CAL. 120 (2014).

REPRESENTATIVE CASES

- ***In re Foreign Exchange Benchmark Rates Antitrust Litig.***, No. 13-cv-7789 (S.D.N.Y.) ($2.3 billion settlement)
- ***In re European Government Bonds Antitrust Litig.***, No. 19-cv-2601 (S.D.N.Y.) ($120 million settlement)
- ***In re GSE Bonds Antitrust Litig.***, No. 19-cv-1704 (S.D.N.Y.) ($386.5 million settlement)
- ***Alaska Electrical Pension Fund v. Bank of America, N.A.***, No. 14-cv-7126 (S.D.N.Y.) ($504.5 million settlement)
- ***Axiom Investment Advisors, LLC, by and through its Trustees, Gildor Management LLC v. Barclays Bank PLC***, No. 15-cv-9323 (S.D.N.Y.) ($50 million settlement)
- ***Dahl v. Bain Capital Partners, LLC***, No. 07-cv-12388 (D. Mass.) ($590.5 million settlement)
- ***In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.***, MDL No. 1720 (E.D.N.Y.) ($5.54 billion settlement)

JONATHAN M. ZIMMERMAN

PRACTICE EMPHASIS

Jonathan ("Jono") Zimmerman represents and counsels individual and institutional clients, including public pension funds, Taft-Hartley funds, family offices and hedge funds, in complex state and federal securities class actions, shareholder derivative actions, and other complex commercial matters throughout the United States. Jono also works closely with the Firm's dedicated case starting team to help identify, investigate and initiative complex securities and related actions in the United States and abroad.

ADMISSIONS

States of New Jersey and Pennsylvania; United States District Courts: District of New Jersey and Eastern District of Pennsylvania; United States Court of Appeals for the Third Circuit

EDUCATION

Temple University, Beasley School of Law (J.D); McGill University, Desautels School of Management (Bachelor of Commerce)

REPRESENTATIVE CASES

- ***Boston Retirement System v. Uber Technologies, Inc.***, Case No. 3:19-cv-06361-RS (represented state plaintiffs and helped achieve **$200 million settlement**)
- ***In re SanDisk LLC Sec. Litig.***, No. 15-cv-01455 (N.D. Cal.) (**$50 million settlement**)
- ***Patel v. Viatris Inc.***, No. GD-21-13314 (Pa. Super. Ct., Allegheny Cnty.) (**$16 million settlement**)
- ***In re Douyu International Holdings Limited Securities Litigation***, No. 651703/2020 (**$15 million settlement**)
- ***Sonny St. John v. Cloopen Group Holding Limited et al.***, No. 652617/2021 (N.Y. Sup. Ct. N.Y. Cnty.) (**$12 million settlement**)
- ***In re Oatly Group AB Securities Litigation***, No. 1:21-cv-06360-AKH (**$9.2 million settlement**)
- ***Steamship Trade Association of Baltimore – Int. Longshoremen's Association Pension Fund, et al. v. Olo Inc. et al.***, No. 1:22-cv-08228-JSR (S.D.N.Y.) (**$9 million settlement**)

- ***City of Birmingham Relief and Retirement System v. Hastings***, No. 5:18-cv-02107-BL (N.D. Cal.)
- ***In re Universal Health Services, Inc. Derivative Litigation***, No. 2:17-cv-02187 (E.D. Pa.)

HIGHLIGHTS

Jono is a partner in the Firm's New York office. He was recognized as a Next Generation Leader in the 2025 Lawdragon 500 X, and has spoken on securities litigation trends and trustee fiduciary obligations at pension fund conferences throughout the United States. During law school, Jono served as a Staff Editor of Temple's *International and Comparative Law Journal* and he was the recipient of the Best Paper Award in Advanced Financial Regulations for his work entitled *Corporate Diversions: Short-Term Tax Savings at the Expense of Shareholder Rights*.

Jono is also a former two-time All-Canadian collegiate lacrosse player and co-captain of McGill University's men's varsity team.

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CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2026, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ William C. Fredericks
William C. Fredericks