UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JAMES TUCCORI *et al.*, individually and on behalf of similarly situated individuals,	)	No. 1:24-cv-00150
Plaintiffs,	)	Hon. Lindsay C. Jenkins
v.	)	Consolidated with:
AT WORLD PROPERTIES, LLC *et al.*,	)	No. 24-cv-02399 No. 24-cv-03160
Defendants.	)	No. 24-cv-3356 No. 24-cv-9039 No. 24-cv-11735 No. 25-cv-04207

PLAINTIFFS' *CORRECTED* MOTION AND MEMORANDUM IN SUPPORT OF AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND APPROVAL OF CLASS REPRESENTATIVE SERVICE AWARDS

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I. INTRODUCTION

Plaintiffs are pleased to report that pursuant to the Court's Order granting Plaintiffs' Notice Motion (Dkt. 184), class notice has commenced on schedule and the Settlement Class Members[1] have begun submitting claims. In advance of the final approval hearing set for November 2, 2026, Plaintiffs submit this Motion in support of an award of reasonable attorneys' fees and reimbursable litigation expenses for Class Counsel, as well as service awards to Plaintiffs in recognition of their service as class representatives.

As the Court is aware, this antitrust matter was particularly complex. After filing the *Tuccori* action in 2023, Class Counsel brought seven additional cases against numerous defendants, briefed four lengthy motions to dismiss as well as motions to strike class allegations, conducted mediations with more than 20 brokerages and other alleged co-conspirators, engaged in formal and informal confirmatory discovery, and ultimately achieved excellent settlements with the National Association of REALTORS® ("NAR") and 25 of the most prominent real estate brokerages in the country. Achieving these settlements did not come quickly or easily; Class Counsel have expended thousands of hours of attorney time and incurred more than one million dollars in current and ongoing costs prosecuting the Litigation and reaching the settlements, primarily due to professional, expert, and consultant fees, mediation and Special Master fees, and travel, among other costs reasonably expended in advancing the Litigation. (Declaration of Paul T. Geske ¶¶ 31-33, attached hereto and hereinafter the "Geske Decl."); (Declaration of Jonathan M. Jagher ¶¶ 10-11, attached hereto and hereinafter the "Jagher Decl.").

Success here was far from certain. Most of the homebuyer claims arising out of the antitrust conspiracy at issue were released under prior court-approved settlements, leaving only a small

[1] Unless stated otherwise, capitalized terms used in this Motion are intended to be interpreted in accordance with the definitions in the Court-approved Class Settlement Agreement. (Dkt. 58-1).

subset of "buyer-only" claims remaining. These remaining claims have been deemed "indirect purchaser" claims, which involve difficult merits challenges, problems of proof, and impediments to class certification. In short, this was a complex matter with a serious risk of zero recovery. Class Counsel took these risks head on and succeeded where many others failed.[2] Class Counsel's relentless efforts and capable lawyering led to a set of very favorable settlements that promise to deliver outstanding compensation to the Settlement Class Members.

Class Counsel are experienced class action and antitrust litigators. (Jagher Decl. ¶¶ 4-8); (Geske Decl. ¶¶ 4-11). Their firms and their attorneys have been appointed to numerous leadership roles, including in three of the four largest antitrust class action settlements in Seventh Circuit history. (Jagher Decl. ¶ 4). Class Counsel brought this experience to bear here, and the quality of their representation is evident in the exceptional results they've achieved. As explained in prior filings, the Settlement favorably resolves the indirect purchaser (homebuyer) claims here for amounts that are commensurate on a per-claim basis with settlements the direct purchaser (home seller) plaintiffs negotiated after they prevailed at trial. As such, the Settlement recovers essentially the full value of what Plaintiffs and the Settlement Class Members could have realistically hoped to achieve even if they were to prevail at trial. This result would be remarkable in any case, but it is especially noteworthy here given the complexity and obstacles inherent to the Settlement Class Members' indirect purchaser claims.

With this Motion, Plaintiffs respectfully request an award of attorneys' fees and litigation expenses to Class Counsel in the amount of $37.9 million (31.5% of the gross Global Settlement

[2] *See, e.g.*, *Homie Tech., Inc. v. Nat'l Ass'n of Realtors*, No. 25-4101, 2026 WL 2321409, at *1 (10th Cir. Aug. 11, 2026) (affirming dismissal of antitrust claims against the NAR and several brokerages on statute of limitations grounds); *Grace v. RE/MAX Holdings, Inc.*, No. 23-cv-06352-HSG, 2024 WL 2761188, at **2-4 (N.D. Cal. May 29, 2024) (dismissing antitrust claims against a NAR MLS for failure to plausibly allege an anticompetitive agreement).

Fund) and service awards totaling $32,500 (.027%) for Plaintiffs. Importantly, the fee award sought for Class Counsel is fully inclusive of Class Counsel's current, ongoing, and anticipated future litigation expenses. Although Class Counsel's costs are already substantial and will continue to increase through final approval and implementation of the Settlement, Class Counsel have incorporated their costs into their requested fee award in order to provide certainty to the Settlement Class Members, whose individual payments will not be reduced by Class Counsel's future expenses. Instead, any further increase in Class Counsel's expenses will be borne by Class Counsel.

As explained below, the requested awards are well-earned and amply justified given Class Counsel's efforts and the exceptional outcome they achieved; and the amounts are eminently reasonable in light of the market rate for fee awards established through prior antitrust class actions in this Circuit. Plaintiffs and Class Counsel have devoted substantial time and effort to prosecuting the Settlement Class Members' claims in the face of staunch defenses and an uncertain outcome. Given the magnitude of the risk assumed, the complexity of the factual and legal issues, and the quality of the work performed by Class Counsel, as well as the commitment of Plaintiffs and the excellent results achieved for the benefit of the Settlement Class, the requested fee award and service awards should be granted.

II. DISCUSSION[3]

A. Legal Standard.

Under Federal Rule 23, courts may "award reasonable attorney's fees . . . that are authorized by law or by the parties' agreement." Fed. R. Civ. P. 23(h). Where, as here, "a case

[3] For the sake of brevity and to avoid repetition, Plaintiffs incorporate by reference the factual background, procedural history, and settlement summary sections of their preliminary approval filings. (Dkt. Nos. 58 at 2-11, 98 at 1-4, 168 at 3-15).

results in the creation of a common fund for the benefit of a plaintiff class, a court will exercise its equitable powers to award plaintiffs' attorneys' fees out of the fund." *Skelton v. General Motors Corp.*, 860 F.2d 250, 252 (7th Cir. 1988). This approach is "based on the equitable notion that those who have benefited from litigation should share its costs." *Id.* (citations and quotation marks omitted) ("Similar to the way a plaintiff's attorney may be compensated by a contingent fee, a plaintiff class pays its attorneys by sharing its recovery with them.").

When determining a fee award for class counsel, the Seventh Circuit has consistently directed "that attorneys' fees in class actions should approximate the market rate that prevails between willing buyers and willing sellers of legal services," *Silverman v. Motorola Sols., Inc.*, 739 F.3d 956, 957 (7th Cir. 2013), taking into account "the risk of nonpayment and the normal rate of compensation in the market at the time." *Sutton v. Bernard*, 504 F.3d 688, 692 (7th Cir. 2007); *see also In re Synthroid Mktg. Litig.*, 264 F.3d 712, 719 (7th Cir. 2001). Ultimately, courts "must set a fee by approximating the terms that would have been agreed to *ex ante*, had negotiations [between the class and class counsel] occurred." *Americana Art China Co., Inc. v. Foxfire Printing & Packaging, Inc.*, 743 F.3d 243, 246-47 (7th Cir. 2014).

B. The Requested Fee Award To Class Counsel Is Fair, Reasonable, And Well-Earned.

1. A fee award based on a percentage of the fund is proper.

The Court should apply the percentage-of-the-fund approach to determine Class Counsel's fee award, because that approach is the best method of approximating the market rate for Class Counsel's services here. Under the commonly-used percentage-of-the-fund method, plaintiffs' attorneys petition the court to recover their fees as a percentage of the settlement fund made available to the class. *Gaskill v. Gordon*, 160 F.3d 361, 362 (7th Cir. 1998) ("When a class suit produces a fund for the class, it is commonplace to award the lawyers for the class a percentage of the fund"); *Florin v. Nationsbank of Ga., N.A.*, 34 F.3d 560, 563 (7th Cir. 1994).

The percentage method has been applied in most antitrust class action settlements in the Seventh Circuit. *In re Broiler Chicken Antitrust Litig.*, No. 16 C 8637, 2021 WL 5709250, at *4 (N.D. Ill. Dec. 1, 2021) ("Most persuasive are the large number of antitrust cases in this circuit that have awarded one-third of the common fund as attorney's fees. . . . There is simply little to no precedent recommending anything other than an award of 33 percent."); Brian T. Fitzpatrick, *An Empirical Study of Class Action Settlements & Their Fee Awards*, 7 J. Empirical L. Stud. 811, 814 (2010) ("Most federal judges chose to award fees by using the highly discretionary percentage-of-the-settlement method."); *see also Kolinek v. Walgreen Co.*, 311 F.R.D. 483, 501 (N.D. Ill. 2015) ("the normal practice in consumer class actions is to negotiate a fee arrangement based on a percentage of the plaintiffs' ultimate recovery.").

The prevalence of the of the percentage-based approach makes sense because it not only "align[s] the incentives of the class and its counsel," *In re Capital One Tel. Consumer Protection Act Litig*., 80 F. Supp. 3d 781, 795 (N.D. Ill. 2015), but also approximates what the Settlement Class Members and Class Counsel would have agreed to at the outset in a hypothetical, *ex ante* negotiation for prosecuting a complex antitrust case like this one. *In re FedEx Ground Package Sys., Inc., Emp't Practices Litig.*, 251 F. Supp. 3d 1225, 1236 (N.D. Ind. 2017) ("Our court of appeals favors the percentage-of-the-fund fee in common fund cases because it provides the best hope of estimating what a willing seller and a willing buyer seeking the largest recovery in the shortest time would have agreed to *ex ante*."); *Hale v. State Farm Mut. Auto. Ins. Co*., No. 12-0660-DRH, 2018 WL 6606079, at *7 (S.D. Ill. Dec. 16, 2018) ("'it is essentially unheard of for sophisticated lawyers to take on a case of this magnitude and type on any basis other than a contingency fee, expressed as a percentage of the relief obtained.'" (quoting *In re Payment Card*

Interchange Fee & Merch. Discount Antitrust Litig., 991 F. Supp. 2d 437, 440 (E.D.N.Y. 2014))).

Although courts also have discretion to use the lodestar method to calculate fee awards to class counsel, the lodestar approach is neither required nor the normal practice in this Circuit. *Williams v. Rohm & Haas Pension Plan*, 658 F.3d 629, 636 (7th Cir. 2011) (explaining that "consideration of a lodestar check is not an issue of required methodology"); *Spano v. Boeing Co.*, No. 06-CV-743, 2016 WL 3791123, at **2, 3 (S.D. Ill. Mar. 31, 2016) ("When determining a reasonable fee in common fund cases, the Seventh Circuit Court of Appeals uses the percentage basis rather than a lodestar or other basis. . . . The use of a lodestar cross-check is no longer recommended in the Seventh Circuit."). The percentage approach is both "more efficient for the court and more likely to yield an accurate approximation of the market rate." *In re Capital One*, 80 F. Supp. 3d at 795; *Kolinek*, 311 F.R.D. at 501 ("fee arrangements based on the lodestar method require plaintiffs to monitor counsel and ensure that counsel are working efficiently on an hourly basis, something a class of nine million lightly-injured plaintiffs likely would not be interested in doing."). Therefore, the percentage-of-the-fund method should be applied here. *Kirchoff v. Flynn*, 786 F.2d 320, 324 (7th Cir. 1986) ("When the prevailing method of compensating lawyers for similar services is the contingent fee, then the contingent fee *is* the market rate.") (internal quotation marks omitted).

2. Plaintiffs' requested percentage is eminently reasonable given the market rate established through prior antitrust settlements.

Plaintiffs' requested fee award of $37.9 million—inclusive of expenses—is amply justified in light of the market rate for fee awards in complex antitrust cases. As noted above, fee awards in comparable class action settlements are the best indication of the market rate for legal services. *Montgomery v. Aetna Plywood, Inc.*, 231 F.3d 399, 408 (7th Cir. 2000) ("the measure of what is reasonable is what an attorney would receive from a paying client in a similar case."). And in most common fund class action settlements in this Circuit, "[t]he typical contingent fee is between 33 and 40 percent." *Gaskill*, 160 F.3d at 362; *Pearson v. NBTY, Inc.*, 772 F.3d 778, 782 (7th Cir. 2014) ("the presumption should . . . be that attorneys' fees awarded to class counsel should not exceed a third or at most a half of the total amount of money going to class members and their counsel."); *Taubenfeld v. AON Corp.*, 415 F.3d 597, 600 (7th Cir. 2005) (affirming fee award based on consideration of "attorneys' fees from analogous class action settlements" where "counsel was awarded fees amounting to 30–39% of the settlement fund"); *Leung v. XPO Logistics, Inc.*, 326 F.R.D. 185, 201 (N.D. Ill. 2018) ("a typical contingency agreement in this circuit might range from 33% to 40% of recovery." (collecting cases)); *Retsky Family Ltd. P'ship v. Price Waterhouse LLP*, No. 97 C 7694, 2001 WL 1568856, at *4 (N.D. Ill. Dec. 10, 2001) (noting that a "customary contingency fee" ranges "from 33 1/3% to 40% of the amount recovered") (citing *Kirchoff*, 786 F.2d at 324).

In antitrust cases in particular, "[t]here is simply little to no precedent recommending anything other than an award of 33 percent." *In re Broiler Chicken*, 2021 WL 5709250, at *4 ("The fact that fee awards in antitrust cases in this circuit are almost always one-third is a strong indication that this should be considered the 'market rate.'"); *Corzo v. Brown Univ.*, No. 1:22-cv-00125, 2024 WL 3506498, at *7 (N.D. Ill. July 20, 2024) (awarding "attorneys' fees totaling $94,666,666.70 (representing one-third of the Settlement Fund)" and finding that "one-third of the Settlement Fund is within the ordinary range of contingency fee arrangements actually negotiated *ex ante* between parties, and awarded, in complex antitrust actions."); *In re Lithotripsy Antitrust Litig.*, No. 98 C 8394, 2000 WL 765086, at *2 (N.D. Ill. June 12, 2000) ("33.3% of the fund plus expenses is well within the generally accepted range of the attorneys fee awards in class-action antitrust lawsuits."). This precedent demonstrates that a hypothetical *ex ante* negotiation would have resulted in a contingency fee of at least 33.3% of the portion of the Gross Settlement Fund being distributed to the Settlement Class.[4]

Against this backdrop, Plaintiffs' requested fee award is more than reasonable and appropriate here. The requested award of $37.9 million is 31.5% of the Gross Settlement Fund (37,900,000/120,334,500) and 33.25% of the Net Settlement Fund[5] (37,900,000/113,971,442), which is well-within "the ordinary range of contingency fee arrangements actually negotiated *ex ante* between parties, and awarded, in complex antitrust actions." *Corzo*, 2024 WL 3506498, at *7.

Further supporting the reasonableness of Plaintiffs' requested fee award, the amount sought is inclusive of Class Counsel's current *and* anticipated future litigation expenses. As noted above, Class Counsel have incurred current and ongoing expenses in excess of one million dollars for professional, expert, and consultant costs, mediation and Special Master fees, travel, and other ordinary litigation costs. (Geske Decl. ¶ 33); (Jagher Decl. ¶ 11). These costs are among the types of litigation expenses regularly reimbursed out of a common fund in addition to any fee award for class counsel. *Beesley v. Int'l Paper Co.*, 3:06-CV-703-DRH-CJP, 2014 WL 375432, *3 (S.D. Ill.

[4] Although some courts have applied a tiered or declining percentage approach to fee awards in so-called "megafund" cases, that approach would be a poor fit for this Litigation. In the Seventh Circuit, fee awards try to "capture how clients pay lawyers in the market[.]" *In re Broiler Chicken*, 2021 WL 5709250, at *3. Accordingly, "[t]he Seventh Circuit has expressly rejected a megafund rule because it is a perverse incentive. Clients generally want to incentivize their counsel to pursue every last settlement dollar, and a declining percentage award operates to the contrary." *Id.* (citing *Synthroid*, 264 F.3d at 718) (reversing district court's fee award in part because it imposed a lower fee percentage because the settlement fund was more than $100 million, holding that "[m]arkets would not tolerate that effect").

[5] Pursuant to the Seventh Circuit's decisions in *Pearson*, 772 F.3d at 781 and *Redman v. RadioShack Corp.*, 768 F.3d 622, 630 (7th Cir. 2014), courts also assess the reasonableness of a requested fee award by calculating the award as a percentage of the net funds available for distribution to the class after subtracting incentive awards and the costs of notice and administration. Here, after subtracting the requested service awards ($32,500) and the Settlement Administrator's estimated notice and administration costs ($6,318,058), the net amount, or "Net Settlement Fund," equals $113,983,942. Plaintiffs' requested fee award of $37.9 million is 33.25% of the net amount.

Jan. 31, 2014) ("It is well established that counsel who create a common fund . . . are entitled to the reimbursement of litigation costs and expenses" (citing Fed. R. Civ. P. 23 and *Boeing v. Van Gemert*, 444 U.S. 472, 478 (1980)); *In re AT & T Mobility Wireless Data Servs. Sales Tax Litig.*, 792 F. Supp. 2d 1028, 1040-41 (N.D. Ill. 2011) (citing "empirical study, which found that costs and expenses for the sample as a whole were, on average 4 percent of the relief for the class" (cleaned up)).

Even so, Class Counsel have chosen to incorporate their costs into their fee request here in order to provide certainty to the Settlement Class Members. Class Counsel are continuing to incur significant costs as they shepherd the Settlement through final approval and defend it on appeal. But by incorporating their costs into their requested fee award, Class Counsel, rather than the Settlement Class Members, will bear any further expenses incurred, and the Settlement Class Members' payments will not be reduced by future expenses. With this in mind, the Court may confidently award attorneys' fees without being concerned with the possibility that unexpected additional expenses may come up later that change the amount of funds available for distribution.

Lastly, although any award of attorneys' fees from the Global Settlement Fund will likely need to be paid over time—as a result of the installment payments that some of the Settling Defendants and Opt-In Settlors required due to ability-to-pay issues—Class Counsel do not intend to seek interest earned on their fee award. *See Corzo*, 2024 WL 3506498, at *7 (awarding class counsel "a proportionate share of the interest earned" on their attorneys' fees, costs, and expenses "from the date the funds are deposited in the Escrow Accounts until payment"). Instead, all interest will remain in the Global Settlement Fund for the benefit of the Settlement Class Members.

Accordingly, Plaintiffs' requested fee award of $37.9 million falls well within the range approved by the Seventh Circuit, is consistent with the market rate for fee awards in antitrust cases, and is reasonable and should be approved.[6]

3. The significant risk of non-payment supports the reasonableness of Plaintiffs' fee request.

The magnitude, complexity, and costs of this Litigation make it especially risky and further justify Plaintiffs' requested fee award. "When determining the reasonableness of a fee request, courts put a fair amount of emphasis on the severity of the risk (read: financial risk) that class counsel assumed in undertaking the lawsuit. This consideration incentivizes attorneys to accept and (wholeheartedly) prosecute the seemingly too-big-to-litigate wrongs hidden within the esoteric recesses of the law, ensuring that the attorneys are compensated for their work at the end of the day." *Hale*, 2018 WL 6606079, at *8 (cleaned up) (quoting *In re Dairy Farmers of Am., Inc.*, 80 F. Supp. 3d 838, 847-48 (N.D. Ill. 2015)). Although there are risks inherent in any contingent-fee litigation, and class actions in particular, the claims in this Litigation involved a well-above-average risk of nonpayment.

First, the stakes of this Litigation were high. The Class Members' claims implicate a nationwide antitrust conspiracy among the NAR and the most prominent real estate brokerages in the country. Given the size of the Class, the scale of the challenged conspiracy, and the number of home transactions at issue, Class Counsel understood that prosecuting this matter would likely be expensive, complex, and lengthy with no guarantee of success. (Geske Decl. ¶¶ 15-16); *In re AT & T Mobility*, 792 F. Supp. 2d at 1037-39 (emphasizing that "the stakes in the case are exceptionally large given the scale of the challenged activity, the complexity and costs of the legal proceedings, the amount of money involved, and thus the potential loss to Class Counsel should they have litigated the case to judgment and not prevailed"); *Schulte v. Fifth Third Bank*, 805 F.

[6] If necessary and upon the Court's request, Class Counsel will provide the Court with its time and expense records for *in camera* review.

Supp. 2d 560, 598 (N.D. Ill. 2011).

Second, the Class Members' status as "indirect purchasers" created serious legal obstacles that could have led to no recovery. Specifically, because homebuyers have been deemed "indirect purchasers" of real estate broker services, their claims are more difficult to prosecute compared to direct purchaser (home seller) claims. Homebuyers must prove not only that allegedly anticompetitive practices in the real estate broker market led to elevated buyer-broker commissions, but also that the costs of those commissions were passed through to them via increased prices of the homes they bought. Establishing a "passthrough" theory is challenging in any antitrust case, but it is exceptionally difficult here due to the myriad factors influencing home prices. *See Kansas v. UtiliCorp United, Inc.*, 497 U.S. 199, 206-07 (1990) (because "a wide range of considerations may influence a company's pricing decisions, . . . establishing the amount of an overcharge shifted to indirect purchasers 'would normally prove insurmountable.'"); *In re Fico Antitrust Litig. Related Cases*, No. 1:20-CV-02114, 2023 WL 6388247, at *9 (N.D. Ill. Sept. 28, 2023). Further, indirect purchasers are unable to bring claims for damages under the Sherman Act, so they must look to state laws for monetary relief. *See generally Ill. Brick Co. v. Ill.*, 431 U.S. 720 (1977). State antitrust laws vary from state-to-state, which can introduce individualized issues that pose impediments to certifying a nationwide class. *See In re AT & T*, 792 F. Supp. 2d at 1036. These "legal hurdles" make this case riskier than average. *See Taubenfeld*, 415 F.3d at 600.

Third, the Court has yet to decide whether the alleged conspiracy at issue is subject to the *per se* or rule of reason analysis. *See generally Appraisers Coal. v. Appraisal Inst.*, 845 F. Supp. 592, 605 (N.D. Ill. 1994) ("Despite [the Sherman Act's] broad language, however, only unreasonable restraints violate [Section 1]"); *Evanston Motor Co., Inc. v. Mid-Sou Toyota Distribs., Inc.*, 436 F. Supp. 1370, 1373 (N.D. Ill. 1977). This uncertainty introduces additional risk; if the Court were to conclude that the rule of reason method should apply, Plaintiffs would also need to prove that the anticompetitive effects of the NAR rules at issue outweigh the potential procompetitive benefits for homebuyers.

Fourth, the Settling Defendants and Opt-In Settlors were each represented by experienced antitrust defense counsel who were prepared to defend this Litigation through trial absent a settlement. *In re TikTok, Inc., Consumer Privacy Litig.*, 617 F. Supp. 3d 904, 942 (N.D. Ill. 2022) (finding that "the quality of representation Defendants had for their defense supports the fee request as well."); *In re Broiler Chicken*, 2021 WL 5709250, at *3 ("Plaintiffs have been opposed by many defendants . . . which have retained some of the most prominent and sophisticated law firms in the United States."). Many of the Defendants' counsel and their firms were also involved in the direct purchaser side of this Litigation and thus could bring that experience to bear here.

While Plaintiffs are confident in the merits of their claims, they acknowledge that the Defendants have vehemently denied that they participated in an anticompetitive conspiracy and presented other procedural and merits-based defenses to Plaintiffs' claims.[7] *Hale*, 2018 WL 6606079, at *9 (noting that "Plaintiffs faced significant risks at the outset of this case. Defendants repeatedly advanced a number of strong challenges on complex issues of law, any one of which could have resulted in complete dismissal of the case."). These defenses, if successful, could have resulted in Plaintiffs and the Class Members receiving no recovery whatsoever. That Class Counsel succeeded in securing a favorable settlement notwithstanding this opposition also weighs in favor of the requested fee award. *Id.*; *Taubenfeld*, 415 F.3d at 600.

Finally, many of the Settling Defendants and Opt-In Settlors have experienced significant ability-to-pay issues that amplified the risk of non-payment here. As discussed in Plaintiffs'

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[7] *See, e.g.*, Order, *Zawislak v. Equity Realtors L.L.C. et al.*, No. 1:24-cv-09039 (N.D. Ill. July 17, 2025), ECF No. 73 (granting in part motions to dismiss filed by certain brokerage defendants).

preliminary approval filings, nearly all the Settling Defendants and Opt-In Settlors have already committed to make substantial payments as part of settlements in the direct purchaser (home seller) litigation. (Dkt. 168 at 21). The prior settlements consumed finite resources and exacerbated most of the Settling Defendants' and Opt-In Settlors' financial conditions, which were already strained due to adverse conditions in the real estate broker industry stemming from a multi-year decline in home sales. (*Id.*). These circumstances introduced the real risk that a brokerage might either exhaust its remaining resources defending the Litigation or otherwise become insolvent before the case proceeded through trial to judgment. If this had occurred, the Class Members might have received no recovery whatsoever even if they prevailed on the merits of their claims.

4. Class Counsel provided an excellent quality of representation as demonstrated by the exceptional result achieved for the Class, which also supports the fee requested.

Further supporting Plaintiffs' requested fee award, Class Counsel's work, and the results they obtained, are both excellent. *Taubenfeld*, 415 F.3d at 600 (considering "evidence of the quality of legal services rendered" in determining an appropriate fee award); *Schulte*, 805 F. Supp. 2d at 598 ("the quality of Class Counsel's performance in this litigation favors approval of the fees requested.").

Class Counsel zealously pursued this Litigation on a wholly contingent basis, assuming a significant risk that they would not receive any remuneration for their efforts or the significant expenses they advanced and continue to incur on behalf of the Settlement Class Members. (Geske Decl. ¶¶ 15-16); *Sutton*, 504 F.3d at 694 (noting the "degree of risk that attorneys will receive no fee (or at least not the fee that reflects their efforts) when representing a class because their fee is linked to the success of the suit."); *Florin*, 34 F.3d at 565 ("The lawyers for the class receive no fee if the suit fails, so their entitlement to fees is inescapably contingent.").

Notwithstanding the challenges discussed above, Class Counsel devoted substantial time and effort toward achieving a superior result for the Class—which they ultimately did. Class Counsel secured 25 settlements totaling $120,334,500 in compensation for the Class. As explained in Plaintiffs' preliminary approval filings, this monetary relief is commensurate on a per claim basis with the settlements the home seller plaintiffs negotiated after they prevailed at trial. (Dkt. 168 at 17-19); (Dkt. 177 ¶ 3). In other words, the settlements negotiated by Class Counsel capture what the Settlement Class Members could realistically hope to achieve after a complete victory at trial with basically no discounts for the relative merits of their indirect purchaser claims, litigation risks, and the procedural posture of the Litigation. (*Id.*).

The results achieved would not be possible were it not for the substantial work that Class Counsel undertook on behalf of the Class. Class Counsel conducted a robust pre-filing investigation; prepared and filed pleadings and amended pleadings in the seven cases consolidated before this Court as well as *Cwynar v. The Real Brokerage, Inc. et al.*, 25-cv-07289 (N.D. Ill.) (Alexakis, J.); briefed four lengthy motions to dismiss in addition to motions to strike class allegations across the *Tuccori*, *Zawislak*, and *Cwynar* cases; organized and coordinated the proceedings in multiple cases against numerous defendants; and engaged in months of complex settlement negotiations with the 26 Settling Defendants and Opt-In Settlors, which involved numerous separate mediation sessions, preparation of mediation submissions, detailed research into brokerages' relevant financial information, reviewing publicly available transaction data for each brokerage, studying each brokerage's home seller settlement, comparing each brokerage with similarly situated brokerages to assess settlement values, and robust confirmatory discovery. (Geske Decl. ¶¶ 17-31); (Jagher Decl. ¶¶ 10-11). The confirmatory discovery included voluminous productions from a number of the Opt-In Settlors in response to subpoenas issued by Plaintiffs.

Collectively, these productions contain millions of pages of documents. For instance, Defendant NAR provided an extensive production of 1,176,890 pages of documents with a total production size of over 200 gigabytes, which included the NAR's productions from the direct purchaser litigation. Similarly, Defendant Anywhere Real Estate Inc. provided 7,076 documents totaling 155,874 pages and 2,496 native documents with a production size of 57.27 gigabytes.

In sum, Class Counsel performed substantial work, capably and efficiently navigated the complexity and uncertainty of this Litigation, and delivered an excellent outcome for the Class. *See Taubenfeld*, 415 F.3d at 600 ("Given the legal hurdles that lead counsel faced in proving liability, the . . . settlement obtained for the class at a relatively early point in time also seems reasonable and bears a rational relationship to the amount of attorneys' fees awarded"); *see also Snyder v. Ocwen Loan Servicing, LLC*, No. 14 C 8461, 2019 WL 2103379, at *4 (N.D. Ill. May 14, 2019) ("class counsel fought hard throughout the litigation and pursued mediation when it appeared to be an advisable and feasible alternative."). Accordingly, Plaintiffs' requested fee award is reasonable and well-earned.

C. The Court Should Also Approve Service Awards to The Class Representatives.

Finally, Plaintiffs also respectfully request service awards totaling $32,500 to be paid from the Settlement Fund, consisting of $7,500 to Plaintiff Tuccori and $5,000 to Plaintiffs Foregger, Cwynar, Zawislak, D'Acquisto, and Lopez in recognition of their service as class representatives. Courts commonly grant service awards in class actions to compensate the named plaintiffs for stepping up to protect the interests of other class members and to reward them for the benefits they've conferred upon the class. *Cook v. Niedert*, 142 F.3d 1004, 1016 (7th Cir. 1998) ("because a named plaintiff is an essential ingredient of any class action, an incentive award is appropriate if it is necessary to induce an individual to participate in the suit"); *In re Synthroid*, 264 F.3d at 722 (same).

Here, it is both reasonable and appropriate to compensate Plaintiffs for the risks and responsibilities they undertook to benefit the Class Members, especially in light of the exceptional results obtained. *Charvat v. Valente*, No. 12-cv-05746, 2019 WL 5576932, at *10 (N.D. Ill. Oct. 28, 2019) ("an [incentive] award compensates a named plaintiff for subjecting himself to various risks, including the burdens of discovery and potential responsibility for a defendant's costs or attorneys' fees should the suit fail." (citing *Espenscheid v. DirectSat USA, LLC*, 688 F.3d 872, 875 (7th Cir. 2012))). Although no award of any sort was promised to Plaintiffs prior to the commencement of the Litigation or at any time thereafter, Plaintiffs nonetheless contributed their time and effort to serving as representatives on behalf of the Class Members. (Geske Decl. ¶¶ 43-48). Were it not for Plaintiffs' willingness to pursue their claims on a class basis, their assistance to Class Counsel with the investigation and filing of the Litigation, and their continued participation and monitoring of the Litigation through settlement, the substantial benefits to the Class Members afforded under the Settlement would not exist. (*Id.*). Further, Plaintiffs were willing to attach their names to this Litigation, subjecting them to "scrutiny and attention" which is "certainly worth some remuneration." *Schulte*, 805 F. Supp. 2d at 601.

The amounts of the service awards requested are also reasonable and below the range of typical service awards granted in many class actions. Numerous courts have awarded service awards that are significantly larger than the amount sought here. *See, e.g., In re Broiler Chicken Antitrust Litig.*, 2021 WL 5709250, at *5 ("Empirical evidence shows that incentive awards are now paid in most class suits and average between $10-$15,000 per class representative."); *Cook*, 142 F.3d at 1016 (granting a $25,000 service award); C*raftwood Lumber Co. v. Interline Brands, Inc.*, No. 11-cv-4462, 2015 WL 1399367, at **6-7 (N.D. Ill. March 23, 2015) (awarding $25,000 incentive award); *Spano*, 2016 WL 3791123, at *4 (approving incentive awards of $25,000 and $10,000 for the class representatives). And, collectively, the service awards make up only a fraction of a percent (.027%) of the Global Settlement Fund. Accordingly, the requested service awards are reasonable, justified by the results achieved, and should be approved.

III. CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that the Court enter an order: (1) granting an award of attorneys' fees and litigation expenses to Class Counsel in the amount of $37.9 million; (2) awarding the requested service awards to Plaintiffs; and (3) granting such further and additional relief as the Court deems reasonable and just.

Dated: August 19, 2026

Respectfully Submitted,

JAMES TUCCORI, COURTNEY FOREGGER, KEVIN CWYNAR, DAWID ZAWISLAK, MICHAEL D'ACQUISTO, and ALEJANDRO LOPEZ A/K/A ALEANDRO LOPEZ, individually and on behalf of similarly situated individuals

By: */s/ Paul T. Geske*
One of Plaintiffs' attorneys

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 19, 2026 the foregoing *Plaintiffs'* Corrected *Motion and Memorandum in Support of Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Approval of Class Representative Service Awards* was electronically filed with the Clerk of the Court using the CM/ECF system, which will cause a copy of said document to be electronically transmitted to all counsel of record.

/s/ *Paul T. Geske*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JAMES TUCCORI *et al.*, individually and on behalf of similarly situated individuals,	)	No. 1:24-cv-00150
Plaintiffs,	)	Hon. Lindsay C. Jenkins
v.	)	Consolidated with:
AT WORLD PROPERTIES, LLC, *et al.*,	)	No. 24-cv-02399 No. 24-cv-03160
Defendants.	)	No. 24-cv-3356 No. 24-cv-9039 No. 24-cv-11735 No. 25-cv-04207

DECLARATION OF PAUL T. GESKE IN SUPPORT OF PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND APPROVAL OF CLASS REPRESENTATIVE SERVICE AWARDS

I, Paul T. Geske, hereby aver pursuant to 28 U.S.C. § 1746 that I am fully competent to make this Declaration, I have personal knowledge of all matters set forth herein unless stated otherwise, and I would testify to all such matters if called as a witness.

1. I am a licensed attorney and a partner at McGuire Law, P.C., and I am admitted to practice in Illinois and before numerous federal courts throughout the country, including the U.S. District Court for the Northern District of Illinois and the U.S. Supreme Court.

2. I, along with my colleagues Myles McGuire and Evan M. Meyers at McGuire Law, P.C. and my co-counsel at Justice Jagher London & Millen LLC, are counsel of record for Plaintiffs and have been appointed Settlement Class Counsel[1] for Plaintiffs and the certified Settlement Class in this matter.

[1] Unless stated otherwise, capitalized terms used in this Declaration are intended to be interpreted in accordance with the definitions in the Court-approved Class Settlement Agreement. (Dkt. 58-1).

3. This Declaration is being submitted in support of Plaintiffs' Motion for Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Approval of Class Representative Service Awards being filed herewith.

Qualifications & Experience

4. McGuire Law, P.C. is a law firm based in Chicago, Illinois that focuses its practice on class actions and complex litigation, representing clients in state and federal trial and appellate courts throughout the country.

5. I, along with the other McGuire Law, P.C. attorneys representing Plaintiffs and the putative class members regularly handle complex litigation on behalf of plaintiffs and have extensive experience in class action lawsuits similar in size and complexity to the instant case.

6. McGuire Law, P.C. attorneys regularly handle cases involving matters of first impression and issues of national significance, and we have developed a long track-record of success at both the trial and appellate levels. For example, McGuire Law, P.C. attorneys served as class counsel in *Rogers v. BNSF Ry. Co.*, No.: 1:19-cv-03083 (N.D. Ill.), where we obtained a $228 million jury verdict on behalf of a certified class of more than 45,000 truck drivers in the first-ever class action trial involving claims brought under the Illinois Biometric Information Privacy Act, 740 ILCS 14/1, *et seq.* We have also secured many appellate rulings that have protected the rights of consumers to bring class actions. *See, e.g., Campbell-Ewald Co. v. Gomez*, 136 S. Ct. 663 (2016) (issuing a landmark decision regarding the doctrine of mootness in class actions); *Guertin v. Michigan*, 912 F.3d 907 (6th Cir. 2019) (sustaining novel claims for violation of the Due Process right to bodily integrity based on delivery of lead-contaminated drinking water during the Flint Water crisis), *reh'g en banc denied*, 924 F.3d 309 (6th Cir. 2019), *cert. denied*, *City of Flint v. Guertin*, 140 S. Ct. 933 (2020).

7. McGuire Law, P.C. attorneys and their firms have been appointed as class counsel in numerous class action cases.[2] McGuire Law, P.C. attorneys are also often appointed as interim

[2] *See, e.g., Gray v. Mobile Messenger Americas, Inc.* (S.D. Fla. 2008); *Gresham v. Keppler & Associates, LLC* (Sup. Ct. Los Angeles Cnty., Cal. 2008); *Sims v. Cellco Partnership* (N.D. Cal. 2009); *Van Dyke v. Media Breakaway, LLC* (S.D. Fla. 2009); *Paluzzi v. mBlox, Inc.* (Ill. Cir. Ct. Cook Cnty. 2009); *Ryan v. Snackable Media, LLC* (Ill. Cir. Ct. Cook Cnty. 2011); *Parone v. m-Qube, Inc.* (Ill. Cir. Ct. Cook Cnty. 2010); *Valdez v. Sprint Nextel Corp.* (N.D. Cal. 2010); *Lozano v. Twentieth Century Fox* (N.D. Ill. 2011); *Kramer v. Autobytel* (N.D. Cal. 2011); *Walker v. OpenMarket, Inc.* (Ill. Cir. Ct. Cook Cnty. 2011); *Schulken v. Washington Mutual Bank* (N.D. Cal. 2011); *In re Citibank HELOC Reduction Litig.* (N.D. Cal 2012); *Murray v. Bill Me Later, Inc.* (N.D. Ill. 2014); *Valladares v. Blackboard, Inc*. (Ill. Cir. Ct. Cook Cnty. 2016); *Hooker v. Sirius XM Radio, Inc.* (E.D. Va. 2017); *Flahive v. Inventurus Knowledge Solutions, Inc.* (Ill. Cir. Ct. Cook Cnty. 2017); *Serrano v. A&M (2015) LLC* (N.D. Ill. 2017); *Seal v. RCN Telecom Servs., LLC* (Ill. Cir. Ct. Cook Cnty. 2017); *Vergara v. Uber Technologies, Inc.* (N.D. Ill. 2018); *Zepeda v. International Hotels Group, Inc.* (Ill. Cir. Ct. Cook Cnty. 2018); *Kovach v. Compass Bank* (Cir. Ct. Jefferson Cnty,. Ala. 2018); *Svagdis v. Alro Steel Corp.* (Ill. Cir. Ct. Cook Cnty. 2018); *Zhirovetskiy v. Zayo Group, LLC* (Ill. Cir. Ct. Cook Cnty. 2019); *Marshall v. Life Time Fitness, Inc.* (Ill. Cir. Ct. Cook Cnty. 2019); *McGee v. LSC Communications, Inc.* (Ill. Cir. Ct. Cook Cnty. 2019); *Prather v. Wells Fargo Bank, N.A.* (N.D. Ill. 2019); *Nelson v. Nissan North America, Inc.* (M.D. Tenn. 2019); *Smith v. Pineapple Hospitality Grp.* (Ill. Cir. Ct. Cook Cnty. 2020); *Garcia v. Target Corp.* (D. Minn. 2020); *Roberts v. Superior Nut and Candy Co., Inc.* (Ill. Cir. Ct. Cook Cnty. 2020); *Rafidia v. KeyMe, Inc.* (Ill. Cir. Ct. Cook Cnty. 2020); *Burdette-Miller v. William & Fudge, Inc.* (Ill. Cir. Ct. Cook Cnty. 2020); *Farag v. Kiip, Inc.* (Ill. Cir. Ct. Cook Cnty. 2020); *Lopez v. Multimedia Sales & Mktg., Inc.* (Ill. Cir. Ct. Cook Cnty. 2020); *Prelipceanu v. Jumio Corp.* (Ill. Cir. Ct. Cook Cnty. 2020); *Williams v. Swissport USA, Inc.* (Ill. Cir. Ct. Cook Cnty. 2020); *Glynn v. eDriving, LLC* (Ill. Cir. Ct. Cook Cnty. 2020); *Pearlstone v. Costco Wholesale Corp.* (E.D. Mo. 2020); *Kusinski v. ADP, LLC* (Ill. Cir. Ct. Cook Cnty. 2021); *Draland v. Timeclock Plus, LLC* (Ill. Cir. Ct. Cook Cnty. 2021); *Harrison v. Fingercheck, LLC* (Ill. Cir. Ct. Lake Cnty. 2021); *Rogers v. CSX Intermodal Terminals, Inc.* (Ill. Cir. Ct. Cook Cnty. 2021); *Gonzalez v. Silva International, Inc.* (Ill. Cir. Ct. Cook Cnty. 2021); *Salkauskaite v. Sephora USA, Inc.* (Ill. Cir. Ct. Cook Cnty. 2021); *Williams v. Inpax Shipping Solutions, Inc.* (Ill. Cir. Ct. Cook Cnty. 2021); *Roberts v. Paramount Staffing, Inc.* (Ill. Cir. Ct. Cook Cnty. 2021); *Roberts v. Paychex, Inc.* (Ill. Cir. Ct. Cook Cnty. 2021); *Zanca v. Epic Games, Inc.* (Sup. Ct. Wake Cnty., N.C. 2021); *Rapai v. Hyatt Corp.*, 2017-CH-14483 (Ill. Cir Ct. Cook Cnty. 2022); *Jackson v. UKG, Inc.* (Ill. Cir. Ct. McLean Cnty. 2022); *Vo v. Luxottica of America, Inc.* (Ill. Cir. Ct. Cook Cnty. 2022); *Rogers v. Illinois Central Railroad Co.* (Ill. Cir. Ct. Cook Cnty. 2022); *Stiles v. Specialty Promotions, Inc.* (Ill. Cir. Ct. Cook Cnty. 2022); *Fongers v. CareerBuilder LLC* (Ill. Cir. Ct. Cook Cnty. 2022); *Vega v. Mid-America Taping & Reeling, Inc.* (Ill. Cir. Ct. DuPage Cnty. 2022); *Wood et al. v. FCA US LLC* (E.D. Mich. 2022); *Marzec v. Reladyne, LLC* (Ill. Cir. Ct. Cook Cnty. 2022); *Komorski v. Polmax Logistics, LLC et al.* (Ill. Cir. Ct. Cook Cnty. 2022); *Wordlaw v. Enterprise Holdings, Inc. et al.* (N.D. Ill. 2023); *McGowan v. Veriff, Inc.* (Ill. Cir. Ct. DuPage Cnty. 2023); *Davis v. Cafeteria Alternatives, Inc.* (Ill. Cir. Ct. Cook Cnty. 2023); *Mahmood v. Berbix, Inc.* (Ill. Cir. Ct. Lake Cnty. 2023); *King v. PeopleNet Corporation* (Ill. Cir. Ct. Cook Cnty. 2023); *McFarland v. SIU Physicians & Surgeons, Inc.* (Ill. Cir. Ct. Jackson Cnty. 2023); *Romero v. Mini Storage Maintenance, LLC* (Ill. Cir. Ct. Cook Cnty. 2023); *Grabowska v. The Millard Group, LLC* (Ill. Cir. Ct. Cook Cnty. 2023); *Fregoso v. American Airlines, Inc.* (Ill. Cir. Ct. Cook Cnty. 2023); *Martinez v. PowerStop, LLC* (Ill. Cir. Ct. Cook Cnty. 2024); *Lumpkins v. R&M Freight, Inc.* (Ill. Cir. Ct. Cook Cnty. 2024); *Wells v. Relish Labs, LLC* (Ill. Cir. Ct. Cook Cnty. 2024); *Coleman v. Farm King Supply, LLC*, (Ill. Cir. Ct. McDonough Cnty. 2024) *Taylor v. 815 Pallets, Inc.* (Ill. Cir. Ct. Cook Cnty. 2024); *Koziol v. Befesa Zinc US Inc.,* No. 1:24-cv-01310 (N.D. Ill. 2025); *Gomez v. Industrial Business Services, LLC* (Ill. Cir. Ct. DuPage Cnty. 2025); *Quinonez v. NEP Electronics, Inc.* (Ill.

class counsel to lead complex class litigation on behalf of consumers against large corporations by courts around the country, such as in *Wood et al. v. FCA US LLC*, 20-cv-11054 (E.D. Mich.) (automotive defect consumer class action) and *Nicholas v. Amazon, Inc.*, 2:22-cv-01616 (W.D. Wash.) (data privacy class action).

8. In my role as an attorney at McGuire Law, P.C., I have served as class counsel in numerous class action cases in state and federal courts across the country. My practice spans a wide variety of different types of litigation, including cases involving employee compensation, data security, privacy protection, consumer fraud, product liability, and product mislabeling claims. My litigation efforts have helped secure many notable class settlements, such as *Koziol v. Befesa Zinc US, Inc.*, No. 1:24-cv-01310 (N.D. Ill.), *Komorski v. Polmax Logistics, LLC*, No. 2021-CH-01601 (Ill. Cir. Ct. Cook Cnty.), *Fongers v. CareerBuilder, LLC*, No. 2019-CH-12804 (Ill. Cir. Ct. Cook Cnty.), *Pearlstone v. Wal-Mart Stores, Inc.*, No. 4:17-cv-02856-HEA (E.D. Mo.), *Burdette-Miller v. Williams & Fudge, Inc.*, No. 2016-M6-000470 (Ill. Cir. Ct. Cook Cnty.), *Farag v. Kiip, Inc.*, 2019-CH-01695 (Ill. Cir. Ct. Cook Cnty.), *Sheeley v. Wilson Sporting Goods, Co.*, 2018-CH-04770 (Ill. Cir. Ct. Cook Cnty.), *Flahive v. Inventurus Knowledge Solutions, Inc.*, 2017-CH-07570 (Ill. Cir. Ct. Cook Cnty.), *Seal v. RCN Telecom Servs., LLC*, 2016-CH-07073 (Ill. Cir. Ct. Cook Cnty.), *Valladares v. Blackboard, Inc.*, 2016-CH-06482 (Ill. Cir. Ct. Cook Cnty.), and *Vergara v. Uber Techs., Inc.*, 15-cv-6942 (N.D. Ill.), among others. I am currently serving on the Plaintiffs' Steering Committee, Law & Briefing Committee, and Consumer Class Committee of the plaintiffs' counsel leadership group appointed in *In re: Valsartan, Losartan, & Irbesartan Products Liability Litigation*, MDL No. 19-2875 (D. N.J.), a large pharmaceutical

Cir. Ct. Cook Cnty. 2025); *Wilson v. Park House Nursing & Rehabilitation Center* (Ill. Cir. Ct. Cook Cnty. 2025); *Koch v. GDB* (Ill. Cir. Ct. Wash. Cnty. 2026); *Green v. Lemont Grove Advisors, LLC.*, No. 2020-CH-000582 (Ill. Cir. Ct. DuPage Cnty. 2026).

drug MDL. I received my B.A. *cum laude* from the University of Illinois at Chicago in 2011 and my J.D. *magna cum laude* from the Chicago-Kent College of Law in 2015.

9. My colleague Myles McGuire is the Managing Partner of McGuire Law. Mr. McGuire has been recognized as a leader among class action attorneys by his peers and courts across the country and has been appointed class counsel in numerous state and federal class actions. Mr. McGuire has successfully prosecuted claims on behalf of his clients in trial and appellate courts at both the state and federal levels throughout the U.S. in cases involving consumer fraud, unfair competition, invasion of privacy, false advertising, and breach of contract, among many others. Mr. McGuire is a graduate of Marquette University and Marquette University Law School and is admitted to practice in the Illinois Supreme Court, Wisconsin Supreme Court, and the U.S. Supreme Court. Prior to founding McGuire Law, P.C. in 2013, Mr. McGuire was a managing member of Edelson McGuire, LLC.

10. My colleague Evan M. Meyers is a partner at McGuire Law, P.C. Mr. Meyers has extensive experience with class action litigation and has served as class counsel in dozens of class actions that have collectively recovered hundreds of millions of dollars in damages on behalf of consumers. Mr. Meyers has served as the lead or co-lead attorney in scores of class action cases pending in state and federal trial and appellate courts across the nation, including in the U.S. District Court for the Northern District of Illinois, the U.S. District Court for the Southern District of Illinois, the Circuit Court of Cook County, the Circuit Court of Lake County, the Seventh Circuit Court of Appeals, the Ninth Circuit Court of Appeals, and the U.S. Supreme Court. Mr. Meyers received his B.A. from the University of Michigan and graduated from the University of Illinois College of Law in 2002.

11. A copy of the McGuire Law, P.C. firm resume is attached hereto.

Class Counsel's Efforts Prosecuting the Litigation

12. My firm began its investigation in this matter nearly three years ago and filed the case captioned *Tuccori v. At World Properties, LLC*, No. 1:24-cv-00150 on December 8, 2023. (Dkt. No. 1).

13. In addition to the *Tuccori* action, my firm and our co-counsel also brought the six other cases consolidated with *Tuccori* before this Court: *Maslanka et al. v. Baird & Warner, Inc.*, No. 1:24-cv-02399, filed on February 22, 2024; *Hartz v. Real Estate One, Inc.*, No. 1:24-cv-03160, filed on March 20, 2024; *Wallach et al. v. Silvercreek Realty Group LLC*, No. 1:24-cv-3356, filed on April 25, 2024; *Zawislak et al. v. Equity Realtors L.L.C. d/b/a Equity Real Estate et al.*, No. 24-cv-9039, filed on September 26, 2024; *Lopez v. NextHome, Inc. et al.*, No. 24-cv-11735 (*Lopez I*), filed on November 14, 2024; and *Lopez v. Jennifer Ames Chicago, Inc.*, No. 1:25-cv-04207 (*Lopez II*), filed on April 17, 2025. (*See* Dkt. Nos. 43, 51).[3]

14. Each of the cases comprising this Litigation involves claims that real estate brokerages, brokerage franchisors, and other real estate companies joined a conspiracy with the National Association of REALTORS® (the "NAR") and its members to implement and follow anticompetitive practices in the market for real estate broker services that restrained competition nationwide and kept real estate agents' commissions artificially elevated at the expense of consumers who were forced to pay those commissions.

15. Class Counsel assumed a significant risk of nonpayment in bringing this Litigation due to the scope of the alleged conspiracy and the number of alleged co-conspirators; the complexity of Plaintiffs' antitrust claims and the time and expenses required to succeed with

[3] Class Counsel also filed an eighth case, *Cwynar v. The Real Brokerage, Inc. et al.*, 25-cv-07289 (N.D. Ill.) (Alexakis, J.), which has not been consolidated with *Tuccori*. *Cwynar* is presently stayed pending final approval of this Settlement because all of the *Cwynar* defendants have opted into the Settlement through the Court-approved opt-in procedures.

those claims; and the likelihood of facing staunch defenses from some of the most prominent brokerages in the country. From the outset of this Litigation, the attorneys and support staff of McGuire Law, P.C. understood that this Litigation would require that other work be foregone and that they would need to devote thousands, if not tens of thousands, of hours prosecuting the claims in this matter with no guarantee of success.

16. Class Counsel also recognized that there was significant uncertainty surrounding how a court would resolve the legal and factual issues in this Litigation given that Plaintiffs have been deemed "indirect purchasers" of real estate broker services for purposes of their antitrust claims, which introduces difficult merits challenges, problems of proof, and potential impediments to class certification.

Class Counsel's Efforts Leading to this Settlement

17. Following initial proceedings in the *Tuccori* matter, the earliest-filed case, the Parties in *Tuccori* conferred in April 2024 and, recognizing the costs and risks of litigation, determined that it was in their mutual best interests to explore whether there was any possibility of reaching a resolution. To that end, the *Tuccori* Parties agreed to attend a private mediation before former Northern District of Illinois Chief Judge James F. Holderman (Ret.) of JAMS Chicago. In advance of the mediation, the *Tuccori* Parties exchanged information and mediation submissions to facilitate the negotiation process. The *Tuccori* Parties attended the mediation with Judge Holderman on May 21, 2024. That mediation was productive and led to an agreement as to a potential framework for a class settlement.

18. Over the months following the mediation in *Tuccori*, Class Counsel organized and attended nine additional mediations with certain Defendants in the other cases now comprising the Litigation, including:

- With Defendant Baird & Warner, Inc. on August 1, 2024 before Judge Holderman;
- With Defendant Real Estate One, Inc. on June 13, 2024 before Tom McNeill of Tom McNeill ADR;
- With Defendant NextHome, Inc. on February 11, 2025 before Judge Holderman;
- With Defendant Shorewest, Inc. on March 6, 2025 before Judge Holderman;
- With Defendant Realty Executives Intl. Svcs. LLC on July 8, 2025 before the Hon. Morton Denlow (Ret.) of JAMS Chicago;
- With Defendant Side, Inc. on August 21, 2025 before Judge Holderman;
- With The Keyes Company and Illustrated Properties, LLC on August 27, 2025 before Judge Holderman;
- With Vanguard Properties, Inc. on September 25, 2025 before Judge Holderman; and
- With Defendants Engel & Völkers Americas, Inc. and Engel & Völkers GmbH on September 29, 2025 before Judge Holderman.

19. Each of these mediations was conducted at arms' length and involved the exchange of mediation submissions including briefs, position statements, and other information, such as financial information bearing on the particular brokerage's ability to fund a settlement.

20. Over the many months during which these mediations occurred, Class Counsel engaged in ongoing discussions with the Settling Parties over the scope, contours, and terms of a global settlement agreement.

21. Once negotiations concluded, the Settling Parties and their counsel executed the

finalized Class Settlement Agreement submitted to the Court for preliminary approval on October 13, 2025. (Dkt. 58).

22. On October 16, 2025, the Court entered its Preliminary Approval Order granting preliminary approval to the Class Settlement Agreement with the Settling Defendants. (Dkt. 65).

23. Because the claims in the Litigation involve an alleged nationwide conspiracy with many participants, the Court-approved Settlement established a mechanism by which alleged co-conspirators, including "[t]he National Association of REALTORS®, and any real estate brokerage, franchisor, or real estate company that is not a Party to th[e] Settlement Agreement," could elect to opt into the Settlement in exchange for fulfilling certain conditions and making a monetary contribution to the Settlement's Global Settlement Fund, among other things. (Dkt. 58-1 ¶¶ 35-36); (Dkt. 58 at 8) (summarizing the Settlement's opt-in procedure).

24. As part of the Court-approved opt-in procedure, the Court appointed Judge Holderman to serve as the Special Master for Mediation and conduct, supervise, and oversee mediations with non-parties who elected to attend a mediation in an effort to become an Opt-In Settlor. (Dkt. 58-1 ¶¶ 32-34); (Dkt. 65 ¶ 15).

25. Further, the Court-approved Settlement directed Class Counsel to "use their best efforts to resolve Released Claims with the National Association of REALTORS®, and any real estate brokerage, franchisor, or real estate company that is not a Party to this Settlement Agreement during the Opt-In Period." (*Id.* ¶ 36).

26. In accordance with the Settlement Agreement and the Court's Preliminary Approval Order, Class Counsel organized and attended a number of mediations before Judge Holderman with potential Opt-In Settlors, including:

- The Real Brokerage Inc. and Real Broker, LLC conducted by Judge Holderman on December 16, 2025;

- Anywhere Real Estate Inc. conducted by Judge Holderman on February 4, 2026;
- Hanna Holdings, Inc. conducted by Judge Holderman on March 13, 2026;
- Douglas Elliman Inc. conducted by Judge Holderman on March 23, 2026;
- HomeSmart International, LLC conducted by Judge Holderman on March 24, 2026;
- The National Association of Realtors® conducted by Judge Holderman on March 27, 2026;
- HomeServices of America, Inc., BHH Affiliates, LLC, and HSF Affiliates LLC conducted by Judge Holderman on March 30, 2026;
- Compass, Inc. before former Magistrate Judge Michael T. Mason (Ret.), conducted under Judge Holderman's supervision, on April 9, 2026; and
- eXp World Holdings, Inc. conducted by Judge Holderman on April 10, 2026.

27. Like the other mediations, each of these mediations was conducted separately and at arm's length. In many instances, the negotiating parties did not reach an agreement at the mediation itself, and the negotiations continued over the days and weeks following each initial mediation session. Even where the negotiating parties did reach an agreement in principle at the mediation, negotiations continued for an extended period of time over the specific terms and contours of each opt-in agreement.

28. Additionally, Class Counsel engaged in arm's-length negotiations with counsel for the following Opt-In Settlors:

- Fathom Realty, LLC;

- Realty ONE Group Inc. and Kempa and Associates LLC d/b/a Realty ONE Group Excel;
- Umro Realty Corp d/b/a The Agency; and
- United Real Estate Holdings, LLC d/b/a United Real Estate Group.

29. The mediation sessions and direct negotiations outlined above culminated in the execution of an Opt-In Agreement with each Opt-In Settlor, which have been submitted to the Court and preliminarily approved. (Dkt. Nos. 65, 119, 177).

30. Despite the significant risks involved in prosecuting this Litigation, Class Counsel were able to obtain an excellent result for the Settlement Class Members through the Settlement. Further, the Settlement's opt-in procedure succeeded in growing the Global Settlement Fund and delivering additional significant relief to the Settlement Class Members, who will all receive greater compensation by virtue of the contributions of the prospective Opt-In Settlors. The total of payments from the initial Settling Defendants and the Opt-In Settlors is $120,334,500, which I believe is an excellent result for the Settlement Class Members and readily satisfies the fair, reasonable, and adequate standard in light of the risks of further litigation. Namely, when viewed in light of the court-approved settlements reached in the related direct purchaser (home seller) litigation, the settlements here are commensurate on a per-claim basis with the settlements the home seller plaintiffs negotiated after they prevailed at trial.

31. The work that Class Counsel have committed to this Litigation in order to achieve this Settlement has been substantial. Among other things, Class Counsel have:

a. Evaluated the facts giving rise to the Plaintiffs' claims and potential defenses thereto and developed those claims;

b. Investigated business practices in the market for residential real estate broker services and specifically the practices concerning broker commissions;

c. Researched the law applicable to Plaintiffs' claims under the antitrust and consumer protection statutes at issue;

d. Drafted numerous pleadings, amended pleadings, motions, and legal memoranda in the seven cases consolidated before this Court as well as the *Cwynar* action;

e. Briefed three rounds of lengthy pleading motions in the *Tuccori*, *Zawislak*, and *Cwynar* cases, including motions to dismiss for failure to state a claim, motions to dismiss for lack of personal jurisdiction, and motions to strike class allegations;

f. Coordinated and conducted mediations with the Settling Defendants and Opt-In Settlors, which included attending numerous mediation sessions, preparing and reviewing mediation submissions, undertaking thorough and detailed research into brokerages' relevant financial information to assess ability to pay issues, reviewing publicly available transaction data for each brokerage, studying each brokerage's home seller settlement, and comparing each brokerage with similarly situated brokerages to assess settlement values;

g. Engaged in lengthy settlement negotiations over the terms of the Class Settlement Agreement and Opt-In Agreements, including, among other things, the class definition, the settlement administration process, the scope of the class release, and the compensation provided to putative class members;

h. Conducted formal and informal confirmatory discovery, including issuing numerous subpoenas to alleged co-conspirators;

i. Worked closely with the Settlement Administrator to develop a robust notice plan to apprise the Settlement Class Members of the Settlement;

j. Exchanged numerous draft settlement documents with the Settling Defendants' and Opt-In Settlors' counsel, which resulted in the execution of the finalized settlement agreements submitted to the Court;

k. Prepared the final executed settlement agreements and related documents;

l. Drafted and presented the filings in support of approval of the Settlement, including approval of the Opt-In Agreements;

m. Defended the Settlement from proposed intervenors seeking to impede and obstruct the Settlement, including on appeal;

n. Drafted and presented the filings in support of the proposed notice plan; and

o. Fielded inquiries about the Settlement from Settlement Class Members.

32. In carrying out these tasks, my firm's attorneys and staff have expended thousands of hours of time for the benefit of the Settlement Class Members. Based on my experience, I anticipate that my firm will need to undertake a similar amount of attorney and staff time over the remainder of this Litigation relating to the briefing and filing of a motion for final approval of the Settlement, attending the final approval hearing, responding to Settlement Class Members' inquiries regarding the Settlement and advising them how to proceed, responding to proposed intervenors or potential objectors, including handling any appeals, and remaining involved with the Settlement through implementation and disbursement of payments.

33. In addition to attorney time, McGuire Law, P.C. has incurred hundreds of thousands of dollars in current and ongoing expenses related to the Litigation. These include $428,991.50 for

professional, consulting, and expert fees and $337,545.10 in mediation and Special Master fees. Much of the remaining expenses are comprised of thousands of dollars in costs for filing fees, service of process and subpoenas, travel expenses associated with attending mediations and court hearings, including the JPML hearing, and other litigation expenses reasonably expended in prosecuting the Litigation. Every effort was made to keep these expenses at a minimum. Being responsible for advancing all expenses, my firm had a strong incentive not to expend any funds unnecessarily. These expenses are based on McGuire Law, P.C.'s expense records. The records are prepared from expense vouchers, receipts, invoices, check and bank records, and other source materials, and represent an accurate recording of our expenses to date. The expenses reflected in the table above were reasonably incurred and necessary and appropriate in the prosecution of this Litigation and were for the benefit of the Settlement Class Members.

34. I have been informed by the Settlement Administrator, Epiq, that it has estimated that its total costs for carrying out notice and administration of the Settlement will be approximately $6,318,058, which includes, among other things, direct and publication notice and claims processing costs.

Class Counsel's Continuing Efforts Since Preliminary Approval

35. In addition to Class Counsel's efforts to secure the Settlement reached here, we have also been responsible for overseeing the Settlement Administrator's administration of the notice and claims process in this matter in accordance with the terms of the Settlement and this Court's June 29, 2026 Order (Dkt. 184) granting Plaintiffs' Motion for Approval of Form and Manner of Class Notice. (Dkt. 182).

36. From the outset of the notice and claims process, Class Counsel have been actively involved in supervising and managing all aspects of the Settlement Administrator's

administration of the Settlement. To this end, I have been in regular communication with the Settlement Administrator and received and reviewed weekly reports from the Settlement Administrator to keep track of claims data.

37. Following entry of the Court's Orders granting preliminary approval (Dkt. Nos. 65, 119, 177), and prior to the start of the notice and claims period, I reviewed and revised the contents of the notices and the settlement website to ensure that they were accurate and easy to understand.

38. The notices were carefully drafted in straightforward, easy-to-read language in order to apprise the Settlement Class Members of all material aspects of the Settlement, such as the relief being made available, their rights to object to the Settlement or opt-out, and the amount of attorneys' fees that could be sought as an award for Class Counsel.

39. The notices also invite Class Members to visit the settlement website, where they can review more detailed information or submit a claim. The settlement website is presently live and can be reached at the following URL: https://www.homebuyersettlement.com/. The settlement website contains all of the important information about the Settlement, including key dates and deadlines (e.g., objection deadline and final approval hearing date and time), all relevant court documents (e.g., the Preliminary Approval Orders, Settlement Agreements, and relevant court filings), a claims submission module to enable Settlement Class Members to submit claims electronically, and contact information for Class Counsel. In addition, the settlement website gives detailed instructions for opting out or filing objections.

40. The Settlement Administrator has informed me that, in accordance with the Court's June 29, 2026 Order (Dkt. 184), the notice plan approved by the Court began on schedule on July 19, 2026 when the Settlement Administrator launched the settlement website and

commenced issuance of notice.

41. To date, my firm has not received any requests to be excluded from the Settlement nor any formal objections to the Settlement from the Settlement Class Members. The Settlement Administrator has informed me that they, likewise, have not received any formal objections or opt-out requests.

42. Going forward, my colleagues and I will continue to supervise the administration of the Settlement through final approval and will monitor the distribution of payments by the Settlement Administrator.

The Class Representatives' Contributions to the Litigation

43. The requested service awards for Plaintiffs are being sought in recognition of Plaintiffs' time, effort, and contributions to this Litigation on behalf of the Settlement Class Members.

44. Plaintiffs have been closely involved in this Litigation from its outset. They willingly lent their names to the cases comprising this Litigation, contributed their time and effort on behalf of other Settlement Class Members, and have succeeded in helping to obtain relief on behalf of the nationwide Settlement Class.

45. Prior to filing their cases, Plaintiffs were instrumental in assisting Class Counsel's investigation of their claims, and they have remained fully involved in the Litigation through the present. Their efforts and involvement include:

a. Compiling and providing information to support their claims, including detailed information and documents about their individual home purchases;

b. Consistently setting aside time to consult with Class Counsel over the phone and by email on numerous occasions to answer questions about the facts underlying their claims;

c. Reviewing pleadings and other case filings;

d. Reviewing the Settlement documents to ensure that the Settlement terms were in the best interests of their fellow Settlement Class Members; and

e. Committing many hours of their own time for the benefit of the Settlement Class.

46. Further, each of the Plaintiffs was prepared to sit for depositions and provide testimony had this Litigation not reached a resolution.

47. Plaintiffs have not received any payments in this matter, were never promised any payments, and were not guaranteed to receive an award of any kind in this Litigation.

48. Together with Class Counsel, Plaintiffs have succeeded in obtaining substantial monetary relief for the Settlement Class Members. Were it not for Plaintiffs' efforts and contributions to the litigation by assisting Class Counsel with the investigation and prosecution of their claims, and their monitoring of the case throughout the course of litigation and settlement, the substantial benefit to the Settlement Class Members afforded under this Settlement would not have been achieved. They are therefore deserving of the requested service awards.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 18, 2026 in Chicago, Illinois.

/s/ Paul T. Geske
Paul T. Geske, Esq.

MCGUIRE LAW, P.C. FIRM RESUME

MCGUIRE LAW, P.C. is a plaintiffs' class action and complex litigation firm in Chicago, Illinois.

Our attorneys have been recognized as leaders in these fields by state attorneys general, legislatures, national media groups, the courts, and our peers. We have served as lead counsel in many high-profile class action lawsuits, including recently at the U.S. Supreme Court in *Campbell- Ewald v. Gomez* 136 S. Ct. 663 (2016), the mobile content class actions against major cellular telephone carriers and their subcontractors, auto manufacturers, the home equity credit reduction cases against major banks and other financial institutions, and numerous biometric privacy cases, including the first ever biometric privacy settlement involving workers, among many others. We have been asked to submit testimony to Members of Congress on issues related to class actions and have repeatedly worked with federal and state regulatory agencies involving matters at issue in our cases. Our attorneys have developed a strong reputation as capable, experienced litigators, and they are frequently invited to appear on local and national television and radio programs and to speak to the press and others about our cases and about consumer protection and class action issues more generally.

CLASS ACTION PRACTICE

MCGUIRE LAW, P.C. is a leader in plaintiffs' class and mass action litigation, with a particular emphasis on class actions involving emerging technologies and consumer privacy. As has been recognized by federal courts, attorneys at our firm have an extensive history of experience in complex class action litigation and are well-respected in the plaintiffs' class action bar.

We have several sub-groups within our plaintiffs' class practice group:

Biometric Privacy Litigation: MCGUIRE LAW is a national leader in biometric privacy litigation, particularly the distinct subset of BIPA employment litigation. Since the surge in BIPA litigation in 2017, McGuire attorneys have been appointed class counsel in more finally-approved BIPA class action settlements than any other law firm in the nation and have frequently recovered more in cash compensation per class member than many other such settlements.

Representative Settlements:

- *Marshall v. Life Time Fitness, Inc.*, 17-CH-14262 (Ill. Cir. Ct. Cook Cnty.): Lead counsel in $1,700,000 biometric privacy class action settlement.

- *Zhirovetskiy v. Zayo Group, LLC,* 17-CH-09323 (Ill. Cir. Ct. Cook Cnty.): Lead counsel in $990,000 employee biometric privacy class action settlement.

- *Svagdis v. Alro Steel Corp.,* 17-CH-12566 (Ill. Cir. Ct. Cook Cnty.): Lead counsel in $300,000 employee biometric privacy class action settlement.

- *McGee v. LSC Communications, Inc.,* 17-CH-12818 (Ill. Cir. Ct. Cook Cnty.): Lead counsel in $700,000 employee biometric privacy class action settlement.

- *Zepeda v. Intercontinental Hotels Group, Inc.*, 18-CH-2140 (Ill. Cir. Ct. Cook Cnty.): Lead counsel in $500,000 employee biometric privacy class action settlement.

Technology Class Actions: McGuire attorneys have established key precedents in a variety of consumer protection statutes applied to emerging technologies, such as the Telephone Consumer Protection Act ("TCPA"), resulting in the settlement of numerous nationwide class actions involving both cellular and landline telephony, including against industry leaders such as Verizon, AT&T, and many others, and collectively worth over one hundred million dollars.

Representative Settlements:

- *McFerren v. AT&T Mobility, LLC,* No. 08-CV-151322 (Fulton County Sup. Ct., GA): Lead counsel in class action settlement involving 16 related cases against the largest wireless service provider in the nation. The "no cap" settlement fully refunded a nationwide class of consumers who alleged incurring unauthorized mobile content charges on their cell phone bills.

- *Paluzzi v. Cellco Partnership*, No. 07 CH 37213 (Cir. Ct. Cook Cnty., Ill.): Lead counsel in class action settlement involving more than two dozen cases alleging unauthorized mobile content charges. Resulted in class settlement for $36 million.

- *Lozano v. 20th Century Fox*, No. 09-cv-05344 (N.D. Ill): Lead counsel in class action alleging that defendants violated the TCPA by sending unsolicited text messages to consumers' cellular telephones. Resulted in class settlement for $16 million.
- *Gray v. Mobile Messengers America, Inc.*, No. 08-CV-61089 (S.D.

Fla.): Lead counsel in case alleging unauthorized charges placed on cell phone bills. Resulted in class settlement for $12 million.

- *Parone v. m-Qube, Inc.*, No. 08 CH 15834 (Cir. Ct. Cook Cnty., Ill.): Lead counsel in class action involving over two dozen cases alleging the imposition of unauthorized mobile content charges. Resulted in class settlement for $16 million.

- *Rojas v. Career Education Corporation*, No. 1:10-cv-05260 (N.D. Ill): Lead counsel in class action alleging that defendants violated the TCPA by sending unsolicited text messages to cellular telephones of consumers. Resulted in class settlement for $19,999,400.

- *Kramer v. B2Mobile, et al,* No. 0-cv-02722 (N.D. Cal.): Lead counsel in class action alleging violation of the TCPA by sending unsolicited text messages to cellular telephones of consumers. Resulted in class settlement for $12.2 million.

- *Williams, et al. v. Motricity, Inc. et al.*, Case No. 09 CH 19089 (Cir. Ct. Cook Cnty., Ill.): Lead counsel in class action involving more than two dozen cases alleging the imposition of unauthorized mobile content charges. Resulted in class settlement for $10.85 million.

- *VanDyke v. Media Breakaway, LLC*, No. 08 CV 22131 (S.D. Fla.): Lead counsel in class action alleging unauthorized mobile content charges. Resulted in class settlement for $7 million.

- *Weinstein, et al. v. Airit2me, Inc.*, Case No. 06 C 0484 (N.D. Ill): Co-lead counsel in class action alleging violation of federal law by sending unsolicited text messages to cellular telephones of consumers. Resulted in class settlement for $7 million.

- *Gresham v. Cellco Partnership*, No. BC 387729 (Los Angeles Sup. Ct.): Lead counsel in class action alleging unauthorized charges were placed on cell phone bills. Resulted in class settlement providing full refunds.

- *Duffy v. Nevis Mobile, LLC*, No. 08 CH 21376 (Cir. Ct. Cook Cnty., Ill.): Lead counsel in certified class action against mobile content provider for unauthorized mobile content charges resulting in default judgment over
$10 million.

- *Murray v. Bill Me Later, Inc.* No. 12-cv-04789 (N.D. Ill.): Co-lead counsel in class action brought on behalf of consumers for debt collection calls placed in violation of the TCPA. Resulted in class settlement for $9.9 million.

- *Valladares v. Blackboard Connect, Inc*. No. 16-CH-06482 (Cir. Ct. Cook Cnty., Ill.): Lead counsel in $7.5 million TCPA class action settlement.

- *Hooker v. Sirius XM Radio, Inc*., No. 13-cv-00003 (E.D. Va.): Co-lead counsel in $35 million TCPA class action settlement.

- *Truong v. Peak Campus Management, LLC*, No. 16-CH-09735 (Cir. Ct. Cook Cnty., Ill.): Co-lead counsel in $7 million TCPA class action settlement.

- *Kovach v. Compass Bank, N.A*., No. 18-cv-09734 (Cir. Ct. Jefferson County, AL): Lead counsel in $7 million TCPA class action settlement.

- *Garcia v. Target Corporation*, No. 16-cv-09734 (D. Minn.): Co-lead counsel in $7 million TCPA class action settlement.

- *Oliver v. The Mens Wearhouse, Inc.* No. 16-cv-00110 (C.D. Cal.): Lead counsel in $2 million TCPA class action settlement.

- *Manouchehouri v. Styles For Less, Inc.,* No. 15-cv-01234 (S.D. Cal.): Co-lead counsel in $4 million TCPA class action settlement.

- *Vergara v. Uber Technologies, Inc.,* No. 15-cv-06942 (N.D. Ill.): Co-lead counsel in $20 million TCPA class action settlement.

Banking Class Actions: McGuire attorneys were at the forefront of class action litigation in the aftermath of the economic collapse in 2008 and the federal bailouts of the banks, including nationwide class actions based on claims that some of the largest national banks unlawfully suspended home equity lines of credit lines and failed to honor loan modification programs.

Representative Settlements:

- *Hamilton v. Wells Fargo Bank, N.A.*, 09-cv-04512 (N.D. Cal.): Lead Counsel in class actions challenging Wells Fargo's suspensions of home equity lines of credit. Nationwide settlement restored access to over $1 billion in credit and provided industry leading service enhancements and injunctive relief.

- *In re JP Morgan Chase Bank Home Equity Line of Credit Litigation*, 10- cv-3647 (N.D. Ill): Court appointed interim co-lead counsel in nationwide class action alleging illegal suspensions of home equity credit lines. Resulted in a class settlement providing for the reinstatement of more than $2 billion in consumer credit.

- *Levin v. Citibank, N.A.*, C-09-0350 (N.D. Cal.): Court appointed interim co- lead counsel in nationwide class action alleging illegal suspensions of home equity credit lines. Resulted in class settlement providing hundreds of millions of dollars in consumer credit.

General Consumer Protection Class Actions: MCGUIRE LAW has successfully prosecuted class action suits against automotive manufacturers, technology companies, retail chains, and other businesses on behalf of consumers.

Representative Settlements:

- *Nelson v. Nissan North America, Inc.,* No. 17-cv-01140 (M.D. Tenn.): Lead counsel in defective paint class action settlement.

- *Farag v. Kiip, Inc.,* No. 18-CH-31842 (Cir. Ct. Cook Cnty., Ill.): Class counsel in $1 million unlawful smart phone tracking class action settlement.

- *Sheeley v. Wilson Sporting Goods, Inc.* No. 18-CH-04470 (Cir. Ct. Cook Cnty., Ill.): Class counsel in defective baseball equipment class action settlement.

Our cases regularly receive attention from local and national media, including in the Chicago Tribune, USA Today, the Wall Street Journal, the New York Times, the LA Times, by the Reuters and UPI news services, and BBC International. Our cases have appeared in numerous electronic media, including CNN, Fox News, NPR, and CBS, as well as programming outside of the United States.

GENERAL COMMERCIAL LITIGATION

Our attorneys have handled a wide range of general commercial litigation matters, from partnership and business-to-business disputes. We have handled cases involving tens of thousands of dollars to "bet the company" cases involving billions of dollars. We have also represented non- profit corporations and handled numerous matters on a pro bono basis. Our attorneys have collectively prosecuted hundreds of class actions, as well as participated in scores of arbitrations and mediations. All of our attorneys regularly practice in state and federal trial and appellate courts.

OUR ATTORNEYS

MYLES MCGUIRE is Managing Partner of MCGUIRE LAW. He has been recognized as a leader in class actions and technology law by his peers and courts around the country.

Myles has been appointed lead counsel in numerous state and federal class actions resulting in hundreds of millions of dollars for his clients. He is regularly asked to weigh in on state and federal legislation involving his cases. An experienced litigation and appellate attorney, Myles has litigated class actions that have established precedent concerning the legality of converting cellular telephones into credit cards, the applicability of consumer protection statutes to internet businesses, and the interpretation of numerous other state and federal statutes including the Telephone Consumer Protection Act. He has successfully prosecuted numerous claims on behalf of his clients in trial and appellate courts at both the state and federal levels throughout the country involving consumer fraud, unfair competition, invasion of privacy, false advertising and breach of contract, among others.

Myles' practice includes the prosecution of nationwide and regional litigation, including multidistrict and putative class action litigation, and on appeals arising out of such litigation including in the U.S. Supreme Court where he served as lead counsel in a matter of fundamental importance for class action jurisprudence nationwide.

Myles has settled numerous class actions and has served as class counsel to many groundbreaking settlements in state and federal courts. As lead counsel, he has also secured settlements in cases of first impression involving Facebook, AT&T and Interpublic among many others, collectively worth hundreds of millions of dollars.

Myles has been asked by members of Congress to comment on proposed legislation involving the telecommunications industry and has provided testimony on related matters to state regulatory bodies including the California Public Utilities Commission (CPUC) and the Office of the Attorney General of the State of Florida, among others. He has repeatedly been recognized as an Illinois Super Lawyer.

Myles also represents clients in the technology and consumer product industries in a variety of commercial disputes, including intellectual property and employment matters. Myles also advises companies and non-profits on legal compliance and legislative issues in addition to handling many types of complex litigation.

Myles has been admitted to practice in many state and federal courts throughout the country and is a member of the bars of the Illinois Supreme Court, Wisconsin Supreme Court and U.S. Supreme Court.

Myles is a graduate of Marquette University and Marquette University Law School.

EVAN M. MEYERS is a Partner at MCGUIRE LAW. Evan is an experienced trial and appellate litigator who has handled all aspects of the litigation process – from pleadings through trial – for a broad range of complex litigation matters, including product manufacturing defects, healthcare technology, telecommunications, environmental, consumer fraud, and business torts.

Evan has extensive experience with consumer protection class action litigation, including matters involving technology; he has served as a lead attorney in scores of consumer class actions that have recovered hundreds of millions of dollars in damages for consumers across the nation; and has been appointed class counsel in over a dozen class actions involving the Telephone Consumer Protection Act.

Evan serves as proposed class counsel in dozens of BIPA class actions and has been appointed class counsel in several BIPA class action settlements, resulting in millions of dollars of relief for thousands of Illinois workers. *See, e.g.*, *Zhirovetskiy v. Zayo Group, LLC,* 17-CH-09323 (Cir. Ct. Cook Cnty., Ill.); *Svagdis v. Alro Steel Corp.,* 17-CH-12566 (Cir. Ct. Cook Cnty., Ill.); *Marshall v. Life Time Fitness, Inc*., 17-CH-14262 (Cir. Ct. Cook Cnty., Ill.); *Zepeda v. Intercontinental Hotels Group, Inc.*, 18-CH-2140 (Cir. Ct. Cook Cnty., Ill.).

Evan has led litigation against major financial institutions in the wake of the financial crash of 2008. As co-lead counsel, Evan secured settlements with Citibank, Chase and Wells Fargo, among others, restoring hundreds of millions of dollars in credit lines to consumers.

An accomplished oral advocate, Evan has successfully argued before multiple trial and appellate courts, including the Ninth Circuit Court of Appeals in the seminal class action case of *Gomez v. Campbell-Ewald Co*., 768 F.3d 871 (9th Cir. 2014), where he secured reversal of summary judgment prior to grant of a petition for writ of certiorari by the U.S. Supreme Court.

Prior to joining MCGUIRE LAW, Evan was a litigation associate at the national law firm Drinker Biddle & Reath LLP, where he represented a wide range of clients including Fortune 500 companies and municipalities. Additionally, Evan served as a judicial extern for the Hon. Wayne R. Andersen (Ret.) of the U.S. District Court for the Northern District of Illinois. Evan has been admitted to practice in numerous courts including the U.S. Supreme Court, Ninth Circuit Courtof Appeals, the Northern District of Illinois, and the Illinois Supreme Court.

Evan received his J.D., *cum laude*, from the University of Illinois College of Law and his B.A., with distinction, from the University of Michigan.

EUGENE Y. TURIN is a Partner at MCGUIRE LAW. Eugene concentrates his practice on consumer class action litigation as well as civil and commercial litigation. Eugene currently prosecutes class action litigation ongoing in federal district courts across multiple states including California, Minnesota, Indiana and Nevada as well as handling appellate work before the Ninth Circuit Court of Appeals and the Seventh Circuit Court of Appeals. Eugene has been appointed class counsel by numerous federal and state courts across the country, including by the Central District of California (*Oliver v. The Men's Wearhouse*, No. 16-cv-01100 (2019)), District of Minnesota (*Garcia v. Target Corporation*, No. 16-cv-02574 (2019)), Northern District of Illinois (*see, e.g., Zeidel v. A&M (2015) LLC*, No. 13-cv-6989 (2018)), and the Circuit Court of Cook County (*see, e.g., Valladares v. Blackboard, Inc, et al.*, No. 2016-CH-06482 (2017)).

Eugene has been admitted to practice in several courts, including the Ninth Circuit Court of Appeals, the Seventh Circuit Court of Appeals, and the Northern District of Illinois. Eugene received his J.D., *magna cum laude*, from the Loyola University School of Law, where he also received his certificate in trial advocacy and was a member of the Loyola Law Journal and the ABA National Moot Court team. Eugene received his B.A., *summa cum laude*, from Loyola University Chicago.

PAUL T. GESKE is a Partner at MCGUIRE LAW. Paul's practice consists of prosecuting consumer class action litigation in Illinois and throughout the country. In his practice, he primarily represents plaintiffs in consumer class actions and multi-state, complex litigation. He has served as class counsel on behalf of statewide and nationwide classes in a variety of matters, including cases involving emerging technology, privacy issues, consumer fraud, product liability, and product mislabeling claims.

Paul has significant federal appellate experience and routinely handles cases involving matters of first impression and issues of national significance. For example, he was a member of the litigation team that obtained a 6-3 victory before the U.S. Supreme Court in *Campbell-Ewald Co. v. Gomez*, 136 S. Ct. 663 (2016), resulting in a precedent-setting decision regarding the doctrine of mootness in class actions.

Recently, Paul successfully briefed and argued an appeal before the Sixth Circuit Court of Appeals in *Guertin et al. v. Michigan et al*., 912 F.3d 907 (6th Cir. 2019) reh'g en banc denied, 924 F.3d 309, one of the lead cases in the Flint Water Crisis litigation. *Guertin* was the first Flint Water Crisis case to successfully state a claim for violation of the substantive due process right to bodily integrity.

Paul has served as lead counsel or class counsel in numerous successful class actions, such as *Vergara et al. v. Uber Techs., Inc.*, 15-cv-6942 (N.D. Ill.), where he was appointed co-lead counsel to represent three nationwide classes asserting TCPA claims against Uber, culminating in a $20 million nationwide settlement. Paul also recently obtained favorable settlements on behalf of classes of consumers in *Sheeley v. Wilson Sporting Goods, Co.*, 18-

CH-04770 (Cir. Ct. Cook Cnty., Ill.*), Flahive v. Inventurus Knowledge Solutions, Inc.*, 17-CH-07570 (Cir. Ct. Cook Cnty., Ill.), and *Valladares v. Blackboard, Inc.*, 16 CH 06482 (Cir. Ct. Cook Cnty., Ill.), among many others. He has also been appointed to the Plaintiffs Steering Committee in the defective pharmaceutical class action *In re: Valsartan Products Liability Litigation*, MDL No. 19-2875 (D. N.J.).

Paul is an avid writer and he frequently writes articles for legal journals and publications: *Avoiding Pick-Off Moves in Class Actions*, Illinois Bar Journal (September 2017); *Class Actions Back from the Brink: The Future of Mootness and "Pick-Offs" in Class Action Litigation Following Campbell-Ewald Co. v. Gomez*, JURIST.org (March 14, 2016); O*ppress Me No More: Amending the Illinois LLC Act to Provide Additional Remedies for Oppressed Minority Members*, 90 Chi-Kent L. Rev. 185 (2015); *Seventh Circuit Holds that Bankruptcy Trustee's "Strong-Arm" Powers are Not Strong Enough for the IRS*, 10 Seventh Circuit Rev. 1 (2014).

Paul graduated *cum laude* and with distinction from the University of Illinois at Chicago, where he received his B.A. in Political Science with a minor in Economics. He received his J.D., *magna cum laude*, from the Chicago-Kent College of Law, where he was also inducted into the Order of the Coif. During law school, Paul was an executive articles editor of the Chicago-Kent Law Review, an editor for the Seventh Circuit Review, and a judicial extern to the Honorable James R. Epstein (ret.) of the Illinois Appellate Court, First District.

DAVID L. GERBIE is a Partner at MCGUIRE LAW whose practice is focused on civil, commercial, and data privacy class action litigation. David is admitted to practice in Illinois, Wisconsin, the Northern District of Illinois and the Seventh Circuit.

David represents the interests of Illinois residents and workers in dozens of BIPA class actions. David has been appointed class counsel in several BIPA class action settlements, including the first-ever BIPA settlement involving an employer's use of biometric timekeeping devices. *See Zepeda v. Intercontinental Hotels Group, Inc.*, 18-CH-2140 (Cir. Ct. Cook Cnty., Ill.). Through such cases David has been appointed to represent the interests of thousands of employees whose biometrics were obtained in violation of BIPA. *See Marshall v. Life Time Fitness, Inc*., 17-CH- 14262 (Cir. Ct. Cook Cnty., Ill.)

David continues to litigate many BIPA and data breach class actions, as well as cases involving defective products and false advertising. David has served as a guest speaker on biometric privacy on several prestigious panels, including at The Sedona Conference and at the American Bar Association.

David received his J.D. from the University of Wisconsin Law School and received his B.A. from Northern Illinois University.

WILLIAM P. KINGSTON is an Associate at MCGUIRE LAW. William concentrates his practice in consumer class action and data privacy litigation, including biometric privacy litigation. William is admitted to practice law in Illinois and before the U.S. District Court for the Northern District of Illinois. William has been appointed as class counsel in multiple BIPA class action settlements.

Prior to joining MCGUIRE LAW, William advocated for underserved populations while working in a Fair Housing Clinic in Chicago, fighting against racial and income-based discrimination in housing. In furtherance of his public interest efforts, William organized a community outreach program for union members in Chicago as a member of an affiliate of the AFL-CIO.

William received his J.D. from the John Marshall Law School and received his B.A. from Dalhousie University.

ANDREW T. HELDUT is an Associate at MCGUIRE LAW where he concentrates his practice on consumer protection matters. Andrew assists in the prosecution of several consumer class action lawsuits and is admitted to practice law in Illinois and in the Northern District of Illinois.

Prior to joining MCGUIRE LAW, Andrew served as an assistant to various aldermanic and presidential campaigns in Chicago and also interned at the office of U.S. Senator Richard J. Durbin (D-Ill.)

Andrew received his J.D. from the John Marshall Law School and his B.A. from the University of Strathclyde (U.K.) where he founded student organizations focused on achieving economic development in Africa including Ghana. Andrew is a member of American Bar Association and the Chicago Bar Association.

BRENDAN DUFFNER is an Associate at MCGUIRE LAW where he concentrates his practice on biometric privacy and consumer protection matters. Brendan assists in the prosecution of several privacy lawsuits and is admitted to practice law in Illinois and in the Northern District of Illinois.

Brendan joined MCGUIRE LAW in 2017 and has contributed to each of the firm's BIPA settlements as well as its ongoing BIPA litigation. Brendan received his J.D. from Saint Louis University School of Law, where he served a member of the Entrepreneurship and Community Development Clinic, assisting small business owners in entity formation and trademark prosecutions, later earning academic excellence in the area of Trademark and Unfair Competition.

Brendan received his B.A. in economics from the University of Wisconsin-Madison and is a member of Illinois State Bar Association and the Chicago Bar Association.

JORDAN R. FRYSINGER is an Associate at MCGUIRE LAW where he concentrates his practice on consumer protection matters.

Prior to joining McGuire Law, Jordan assisted with litigation defense for firms located in New York and Massachusetts. Jordan received his J.D., *cum laude,* from Loyola University Chicago School of Law where he served as a member of Mediation and Advocacy Clinic representing multiple clients during EEOC and IDHR employment disputes.

Jordan received B.A. from the University of Idaho and is a member of the Illinois State Bar Association.

JOSEPH M. DUNKLIN is an Associate at MCGUIRE LAW where he concentrates his practice on class action and complex litigation related to data privacy and other consumer protection matters. Much of his practice is informed by professional experience in the fields of supply chain management and consumer data analytics.

Prior to joining McGuire Law, Joseph assisted with appellate matters for the Louisiana Capital Assistance Center, participated in Land of Lincoln Legal Aid's expungement summits, and interned within the United States House of Representatives.

Joseph received his J.D. from the University of Illinois College of Law, where he served as an editor of the University of Illinois Law Review. Joseph received his B.B.A. in International Business from Loyola University Chicago. Joseph is a California native and a member of the Illinois State Bar Association.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JAMES TUCCORI *et al.*, individually and on behalf of similarly situated individuals,	)	No. 1:24-cv-00150
	)	Hon. Lindsay C. Jenkins
Plaintiffs,	)	Consolidated with:
v.	)	
AT WORLD PROPERTIES, LLC *et al.*,	)	No. 24-cv-02399 No. 24-cv-03160 No. 24-cv-3356
Defendants.	)	No. 24-cv-9039 No. 24-cv-11735 No. 25-cv-04207

DECLARATION OF JONATHAN M. JAGHER IN SUPPORT OF PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND APPROVAL OF CLASS REPRESENTATIVE SERVICE AWARDS

1. I, Jonathan M. Jagher, hereby aver pursuant to 28 U.S.C. § 1746 that I am fully competent to make this Declaration, I have personal knowledge of all matters set forth herein unless stated otherwise, and I would testify to all such matters if called as a witness.

2. I am a licensed attorney and a partner at Justice Jagher London & Millen LLC ("JJLM"), and I am admitted to practice in Illinois and before numerous federal courts throughout the country, including the U.S. District Court for the Northern District of Illinois.

3. Along with my colleagues at JJLM and my co-counsel at McGuire Law, P.C., I am counsel of record for the Plaintiffs in the above-captioned case and have been appointed Settlement Class Counsel for Plaintiffs and the certified Settlement Class in this matter. This Declaration is being submitted in support of Plaintiffs' Motion and Memorandum for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Approval of Class Representative

Service Awards being filed herewith.

4. My firm, JJLM, is a nationally recognized law firm based in Lincolnshire, Illinois that focuses its practice on class actions and complex litigation, representing clients in state and federal trial and appellate courts throughout the country. JJLM specializes in antitrust and consumer protection class action litigation. JJLM, whose partners have over 50 years of collective experience litigating complex class actions, has been appointed to over a hundred court-appointed leadership roles and has recovered over $5 billion for clients and class members, including three of the four largest antitrust class action settlements in Seventh Circuit history. Notable antitrust matters in which JJLM serves or served as lead or co-lead counsel include: *In re Payment Card Interchange Fee Litigation* (E.D.N.Y.) (preliminary approval pending for class settlement reasonably valued in excess of $200 billion); *In re Peanut Farmers Antitrust Litigation* (E.D. Va.) (recovering $102.75 million); *In re Brand Name Prescription Drugs Antitrust Litigation* (N.D. Ill.) (recovering $715 million); *In re High Fructose Corn Syrup Antitrust Litigation* (C.D. Ill.) (recovering $531 million); *In re Automotive Parts Antitrust Litigation* (E.D. Mich.) (recovering over $550 million); and *Kleen Products v. International Paper (Containerboard)* (N.D. Ill.) (recovering $376 million). In addition, JJLM currently serves as interim lead or co-lead counsel in various pending antitrust matters: *In re Archery Products Antitrust Litigation* (D. Colo.) (JJLM serves as interim co-lead counsel on behalf of direct purchasers); *In re Frozen Potato Products Antitrust Litigation* (N.D. Ill.) (JJLM serves as interim co-lead counsel for the commercial indirect purchaser class); *In re Granulated Sugar Antitrust Litigatio*n (D. Minn.) (JJLM serves as interim co-lead counsel for the commercial indirect purchaser class); and *In re Fragrances Antitrust Litigation* (D.N.J.) (JJLM serves as interim co-lead counsel for the end-user class). A copy of the firm resume is attached hereto as Exhibit 1.

5. In my role as an attorney at JJLM, I have served as class counsel in numerous class action cases in state and federal courts across the country. I have extensive experience litigating class actions of similar, size, scope and complexity to the instant action. I have been appointed as Co-Lead Counsel and to Plaintiffs' Steering and Executive Committees in antitrust and other complex litigation cases. My recent antitrust cases include, *Kent et al. v. Women's Health USA, Inc.* FST-CV21-6054676-S (Ct. Superior Court) where I was appointed as Co-Lead Counsel on behalf of women who were victims of alleged price fixing by IVF clinics leading to a settlement of $2.85 million. I was named to the Executive Committee in *Cameron et. al. v. Apple, Inc*. 4:19-cv-03074 (N.D. Cal.) and helped recover $100 million on behalf of app developers (for this role my firm and I were named as a recipient of the American Antitrust Institute's Award for Outstanding Antitrust Litigation Achievement in Private Law Practice). My firm was appointed Co-Lead Counsel in *In re Automotive Parts Antitrust Litigation*, MDL No. 2311 (E.D. Mich.) (total settlements over $550 million), and I played an active leadership role throughout the 15 years of litigation.

6. Beyond my antitrust matters, I have been appointed Class Counsel and to Plaintiffs' leadership committees in numerous data privacy matters. I was appointed to and served as Co-Lead Counsel in a data privacy case against various Bumble entities that operate popular dating apps. After three years of litigation, on October 24, 2024, Judge Ronald A. Barch granted final approval of a $40 million settlement that I negotiated alongside my Co-Lead Counsel, including Evan M. Meyers of McGuire Law, P.C. (*Dzananovic and Howell v. Badoo Trading Limited and Bumble Trading LLC*, 2021-L-307 (Circ. Ct. Winnebago County, Illinois). I was appointed by Judge Allison D. Burroughs as Co-Chair of the Settlement Committee in *In re: MoveIt Customer Data Security Breach Litigation*, MDL No. 1:23-md-03083-ADB (D. MA),

litigation involving one of the largest data breaches in history involving over 100 defendants. I served as Co-Lead Counsel in *Powe v. Dermalogica, LLC*, 2022-LA-000874 (Circ. Ct. DuPage County, Illinois), a data privacy case resulting in a settlement valued at $8.9 million. Former Northern District of Illinois Justice John Z. Lee (currently serving on the U.S. Court of Appeals for the 7th Circuit) appointed me to serve on the Plaintiffs' Steering Committee in *In Re: TikTok, Inc., Consumer Privacy Litigation*, MDL No. 2948 (N.D. Ill.), a class action related to allegations of data privacy violations. In that case, I was one of the primary negotiators of a $92 million settlement, one of the largest in Illinois history. I served as one of the Settlement Class Counsel in *In re Proctor & Gamble Aerosol Products Marketing and Sales Practice Litigation*, 2:22-MD-3025 (S.D. OH) (settlement valued over $11 million) and was appointed to serve on the Plaintiffs' Executive Committees in *In Re: Morgan Stanley Data Security Litigation*, 1:20-CV-05914 (S.D. NY), a data breach resulting in a $60 million settlement and *Jones et. al. v. Lemonade Inc. et al.* 2022-LA-000308-366 (Circ. Ct. DuPage County, Illinois) (data privacy settlement of $4 million).

7. I received my B.A. *magna cum laude* from Boston University in 1998 and my J.D. from Washington University School of Law in 2001.

8. My colleague Matthew Ruan is a partner at JJLM and has extensive experience with antitrust class action litigation. Mr. Ruan has co-led JJLM's efforts in the prosecution of this matter and has also played a key role in procuring the settlements achieved to date. Mr. Ruan has been appointed as Co-Lead counsel in antitrust matters, including *Estuary Transit District v. Hartford HealthCare Corp. et al.*, No. 24-cv-01051 (D. Conn.) and *Lambrix et al. v. Tesla, Inc.*, 23-cv-01145-TLT (N.D. Cal.). Notable matters in which Mr. Ruan has helped secure significant recoveries for the clients and classes he has represented include: *Sutter Health Antitrust Litigation* (Sup. Ct. Cal., San Fran. Cty.) (antitrust class action against Sutter Health, one of the largest

healthcare providers in California, for restraining hospital competition through its contracting practices with insurance companies, resulting in $575 million settlement and significant injunctive relief); *In re Automotive Parts Antitrust Litigation* (E.D. Mich.) (antitrust class action brought on behalf of direct purchasers of automotive parts in multiple concurrently active nationwide price-fixing cases, resulting in settlements to date in excess of $500 million); and *In re AOL/Time Warner Securities Litigation* (S.D.N.Y.) (class action alleging securities fraud in connection with merger of AOL and Time Warner, resulting in $2.65 billion recovery for shareholders).

9. Mr. Ruan received his B.A., with Honors, from the University of Chicago and his J.D. from the University of Michigan.

10. My firm and I have worked cooperatively and efficiently with McGuire Law, P.C. since the inception of this litigation. For a detailed and comprehensive history of our joint efforts in securing the settlements achieved to date, I incorporate by reference the Declaration of Paul Geske (filed contemporaneously with this Declaration).

11. JJLM has devoted thousands of hours of attorney time and hundreds of thousands of dollars in expenses and other resources investigating and prosecuting this matter over the last two and a half years and reaching the Settlements in this litigation. Based on my experience in other class action settlements, I anticipate that our firm will expend an equal amount of additional time and resources over the pendency of this action relating to briefing and filing a motion for final approval of the Settlement, attending the final approval hearing, responding to Class Members' inquiries regarding the Settlement and advising them how to proceed, responding to any objectors and potential appeals, and remaining involved with the Settlement through implementation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 18, 2026 in Lincolnshire, Illinois.

/s/ Jonathan M. Jagher
Jonathan M. Jagher

Exhibit 1

FIRM RESUME

JUSTICE JAGHER LONDON & MILLEN

Complex Antitrust and Consumer Protection Class Action Litigation

Our mission is to ***protect consumers*** and ***preserve competition*** in an increasingly complex economy. Backed by ***decades of experience*** and ***billions recovered by clients***, we confront corporate misconduct with the rigor, creativity, and resolve high-stakes cases demand.

Firm Overview.

Justice Jagher London & Millen LLC is a national litigation boutique focused on complex antitrust and consumer protection class actions.

Origins.

Justice Jagher London & Millen LLC (JJLM) traces its roots to the 1990s, when several of the firm's founding attorneys developed a nationally recognized class action practice at a mid-sized Chicago law firm. Over the next decade, that practice achieved significant success representing consumers and businesses in complex antitrust, securities and consumer litigation.

Formation.

In 2007, those attorneys established Freed Kanner London & Millen (FKLM) to continue that work as an independent firm focused on complex class action litigation. FKLM built a strong reputation in antitrust and consumer cases, securing landmark recoveries on behalf of clients and class members nationwide.

Today.

In 2019, accomplished litigators Kimberly Justice and Jonathan Jagher joined the firm, expanding its national reach and strengthening its focus on antitrust and consumer protection litigation. Today, JJLM operates from Philadelphia and Chicago and represents consumers and businesses harmed by unlawful corporate conduct, continuing a decades-long commitment to complex class action litigation.

“

For decades, Freed Kanner London & Millen stood for fearless advocacy, exceptional results, and an unwavering commitment to justice. The reputation we built was earned case by case and client by client. I could not be more confident that Justice Jagher London & Millen will continue that tradition—bringing the same determination, talent, and vision to the next chapter of the firm.

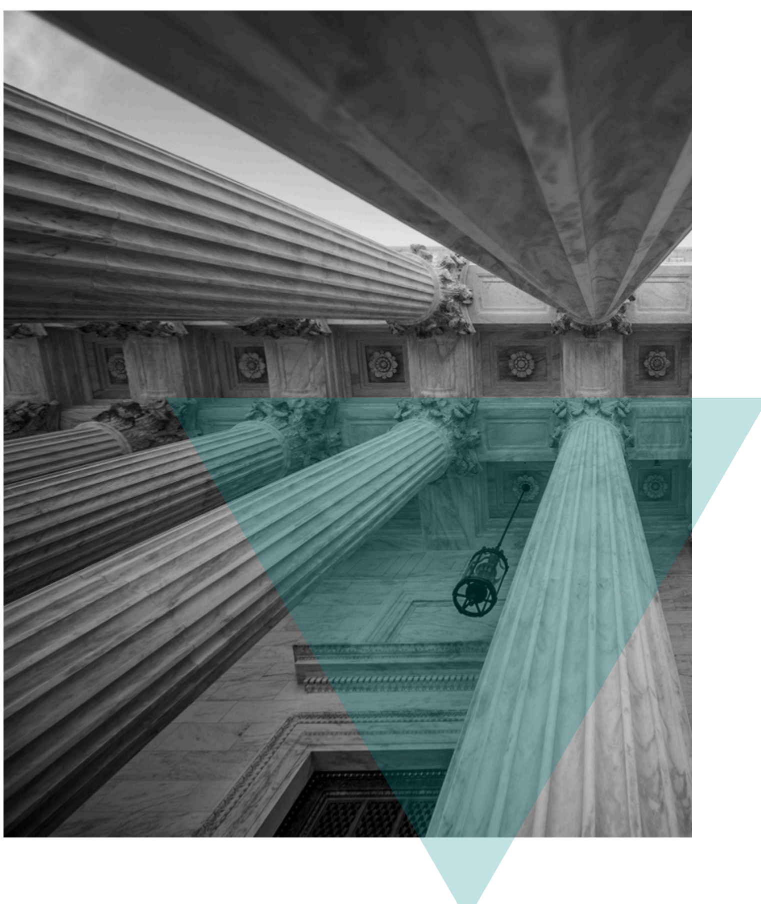
Michael J. Freed
Founding Partner

Trusted by Clients. Respected by Courts.

Complex litigation demands credibility, strategic judgment, and the willingness to take difficult cases to trial. JJLM attorneys have earned that trust through decades of leadership in major antitrust and consumer protection matters nationwide.

Our work is grounded in three core principles:

Integrity. Innovation. Impact.



$5+ Billion

Recovered for Clients and Class Members

100+

Court-Appointed Leadership Roles

Millions

Consumers and Businesses Represented Nationwide

50+ Years

Partner Experience in Complex Class Action Litigation

3 of the 4 Largest

Antitrust Class Action Settlements in Seventh Circuit History

Integrity.

Courts trust our judgment to lead complex litigation.

Courts across the country have appointed JJLM attorneys to lead nationwide complex class actions, including roles as lead or co-lead counsel and executive or steering committee members. These appointments reflect sustained confidence in our judgment, professionalism, and ability to manage demanding matters involving multiple parties, jurisdictions, and competing interests.

We approach that responsibility with discipline and independence — making decisions that advance the interests of the class while maintaining credibility with courts and opposing counsel. Our team includes former trial attorneys from the U.S. Department of Justice Antitrust Division, bringing firsthand enforcement experience and a practical understanding of how multifaceted investigations are built and proven.

Innovation.

Sophisticated misconduct requires sophisticated investigation.

The matters we handle rarely present themselves clearly. They are layered, evolving, and often structured to avoid detection — whether through opaque pricing practices, coordinated conduct, or misconduct embedded within digital systems and data.

We combine sophisticated legal strategy with industry, economic, and data-driven insight to identify patterns and conduct that are not immediately visible. From developing novel legal theories to working through intricate evidentiary records, we build cases that are designed to hold together under sustained challenge. This work requires persistence, precision, and a willingness to pursue theories others may overlook, particularly in areas where the law continues to evolve alongside technology and modern business practices.

Impact.

Results that compensate those harmed and change industries.

Our work is measured by outcomes that deliver meaningful recovery and drive accountability across industries. We pursue matters that address systemic conduct — issues that shape industries and affect large groups of consumers and businesses.

JJLM attorneys have achieved significant results across antitrust and consumer protection matters, including cases involving price-fixing, monopolization, exclusionary conduct, deceptive practices, data privacy violations, and product defects. We prepare every case with trial in mind. That discipline carries through the litigation — shaping strategy, strengthening our position, and grounding outcomes in the strength of the case.

Recognition & Professional Distinction.

JJLM has earned recognition from courts, peers, and legal media for its innovative and efficient approach to litigation and significant impact in the class action field.

Professional Recognition.

American Antitrust Institute – Private Antitrust Enforcement Hall of Fame

In 2021, FKLM founding partner and counsel to JJLM, Michael Freed, was inducted into the Private Antitrust Enforcement Hall of Fame which recognizes practitioners for three major contributions: distinguished service to the private antitrust enforcement community, commitment to the enforcement of the antitrust laws; and success in fighting for competition, consumers, and workers.

AAI AMERICAN ANTITRUST INSTITUTE

American Antitrust Institute – Outstanding Antitrust Litigation Achievement

In 2022, JJLM and its co-counsel received the American Antitrust Institute's award for 'Outstanding Antitrust Litigation Achievement in Private Law Practice' for collective work on behalf of our clients in ***Cameron et al. v. Apple Inc***., 4:19-cv-03074 (N.D. Cal.) ($100 million settlement).

In 2021, JJLM and its co-counsel received the American Antitrust Institute's award for "Outstanding Antitrust Litigation Achievement in Private Law Practice" for collective work on behalf of our clients in ***In re Peanut Farmers Antitrust Litigation***, 2:19-cv-00463 (E.D. Va.) ($102.75 million in settlements).

Chambers and Partners USA

JJLM has been ranked consistently by Chambers amongst the nation's top antitrust firms. In the 2025 Guide, the publication noted about the firm:

> *Freed Kanner London & Millen LLC [n/k/a JJLM] is a highly regarded boutique firm singled out for its strong plaintiff representation. Has extensive experience in nationwide class action cases and is acclaimed for its antitrust expertise in price-fixing and anticompetitive conduct cases.*

> *The lawyers are highly skilled and knowledgeable yet possess the ability to explain in simple terms the legal concepts and risks.*

> *The firm has deep experience. The attorneys are bright and hard-working.*

Chambers AND PARTNERS

Chambers TOP RANKED USA 2025 Michael Freed

Chambers RANKED IN USA 2025 Kimberly Justice

Antitrust Annual Report

Ranking JJLM antitrust leadership appointments and settlements among the top in the nation.

Davis, Josh Paul and Kohles, Rose, 2024 Antitrust Annual Report: Class Actions in Federal Court (Published July 2025)

Antitrust Annual Report TOP LAW FIRM Antitrust Since 2018

Lawdragon

JJLM attorneys Jonathan Jagher and Kimberly Justice were selected to the 2026 Lawdragon 500 Global Plaintiff Lawyers Guide.

JJLM attorneys Michael Freed, Kimberly Justice, William "Billy" London, and Douglas Millen are recognized as distinguished leaders in antitrust litigation.

LAWDRAGON

Super Lawyers

JJLM attorneys Michael Freed, Jonathan Jagher, Kimberly Justice, Nicholas Lange, William "Billy" London, Douglas Millen, and Michael Moskovitz are acknowledged as prominent figures in class action and antitrust litigation.

Super Lawyers

Judicial Commendations.

Murphy v. Toyota Motor Corp., et al., No. 4:21-cv-00178, Dkt. No. 150 (Nov. 19, 2024).

The **Honorable Amos L. Mazzant** applauded the firm and its co-counsel's *"vigorous litigation efforts"* which resulted in settlement relief valued up to $77.3 million and was the *"driving force"* compelling a recall reasonably valued at over $600 million:

> *Plaintiffs' Counsel conducted the litigation and achieved the Settlement with skill, perseverance, and diligent advocacy, and are highly regarded in consumer and complex class action law matters.*

In re Peanut Farmers Antitrust Litigation, 2021 WL 9494033, at *2 & 3 (E.D. Va., Aug. 10, 2021).

After reaching settlements totaling $102.75 million, the **Honorable Raymond Jackson** praised the firm's *"effective and efficient prosecution"* of the matter in discovery, class certification, fully briefed summary judgment practice and full trial preparation that led to *"an excellent result for the Class,"* without the benefit of a government investigation.

In re Linerboard Antitrust Litigation, 2004 WL 1221350, at 5-6 (E.D. Pa. 2004).

In approving the Plaintiffs' motion for final approval of the settlement, the **Honorable Jan DuBois** commended co-lead counsel:

> *[T]he size of the settlements in absolute terms and expressed as a percentage of total damages evidence a high level of skill by petitioners ... The Court has repeatedly stated that the lawyering in the case at every stage was superb, and does so again.*

In re Hydrogen Peroxide Antitrust Litigation, MDL 1682 (E.D. Pa.).

After reaching settlements of over $97 million, the **Honorable Stewart Dalzell** lauded the firm and its co-lead counsel:

> *[T]he skill and efficiency of the attorneys involved is of a very high order indeed, and as we noted at the fairness hearing yesterday, we have been impressed that these attorneys have prosecuted this matter vigorously against seasoned opponents without needlessly distracting the Court.*

In re High Fructose Corn Syrup Antitrust Litigation, MDL 187 (C.D. Ill.), Transcript of Oct. 4, 2004 Oral Argument at 45.

After reaching settlements of $531 million for the direct-purchaser class, the **Honorable Michael M. Mihm** praised the firm and its co-lead counsel:

> *I've said many times during this litigation that you and the attorneys who represented the defendants here are as good as it gets. Very professional. At least in my presence or in my contacts with you, you've always been civil. You've always been cutting to the chase and not wasting my time or each other's time or adding to the cost of the litigation.*

In re Automotive Parts Antitrust Litigation, No. 12-md-02311 (E.D. Mich.).

The **Honorable Marianne O. Battani** commended the firm and its co-lead counsel:

> *I think that class counsel . . . have just done a tremendous job, and are highly, highly experienced and knowledgeable in this area.*

Selected Results.

Landmark Recoveries.

The following is a selection of landmark recoveries, impactful precedents and active cases that reflect Justice Jagher London & Millen's record across decades of complex class action litigation.

Murphy v. Toyota Motor Corporation | E.D. Texas

JJLM served as lead counsel in this car-defect case. The case resulted in a significant reimbursement program and a recall of 1.85 million 2013-2018 model year Toyota RAV4 vehicles to replace an alleged defective battery retention system. Settlement relief was valued up to $77.3 million; the litigation was also the driving force compelling a recall reasonably valued at over $600 million.

For the Court's praise of counsel in this matter, see *Judicial Commendations* section.

RECOVERY: VALUED AT $675M+

In re Broiler Chicken Antitrust Litigation | N.D. Illinois

JJLM attorneys represented a class of direct purchasers and were part of the team that led this antitrust class action that alleged that U.S. broiler chicken producers conspired to fix prices and limit supply, thereby inflating chicken costs. Plaintiffs accused producers of violating the Sherman Antitrust Act by illegally coordinating to reduce production (e.g., destroying breeder hens and closing plants).

RECOVERY: $280M+

Kleen Products v. International Paper (Containerboard) | N.D. Illinois

JJLM attorneys served as co-lead counsel in this antitrust case on behalf of purchasers of containerboard (cardboard) and against major producers for conspiring to illegally inflate prices by, in part, coordinating capacity cuts and production shutdowns. After seven years of heavily contested litigation and two Seventh Circuit appeals, co-lead counsel settled the case for significant monetary damages. This recovery ranks as one of the four largest antitrust settlements in the Seventh Circuit.

RECOVERY: $376M

In re High Fructose Corn Syrup Antitrust Litigation | C.D. Illinois

JJLM attorneys were co-lead counsel in this antitrust case against certain corn refiners for colluding to fix the price of high fructose corn syrup, the main sweetener used in soda pop and many bakery and dairy products. The case settled weeks before trial. This recovery ranks as one of the four largest antitrust settlements in the Seventh Circuit.

For the Court's praise of counsel in this matter, see *Judicial Commendations* section.

RECOVERY: $531M

In re AT&T Inc. Customer Data Security Breach Litigation | N.D. Texas

As part of the Steering Committee for Plaintiffs, JJLM attorneys helped secure a settlement against AT&T for failing to safeguard customers' sensitive information during two separate incidents that exposed the data of tens of millions of people.

RECOVERY: $177M

In re Generic Pharmaceuticals Pricing Antitrust Litigation | E.D. Pennsylvania

JJLM attorneys represent a class of indirect purchasers and are part of the team helping to lead the largest antitrust multidistrict litigation pending in the United States. The plaintiffs allege that leading generic pharmaceutical manufacturers fixed prices for more than 180 generic drugs. Litigation is ongoing.

RECOVERY: $500M+

In re Automotive Parts Antitrust Litigation | E.D. Michigan

JJLM attorneys were co-lead counsel in this multi-district antitrust litigation against numerous Japanese, European, and American parts manufacturers for fixing, maintaining, rigging bids, and allocating the supply of more than 20 automobile parts (including wire harnesses, instrument panel clusters, heater control panels, air conditioning systems, and bearings).

For the Court's praise of counsel in this matter, see Judicial Commendations section.

RECOVERY: VALUED AT $550M+

Dzananovic v. Badoo Trading Limited (Bumble) | Circuit Court, Winnebago County, Illinois

JJLM attorneys were co-lead counsel in this lawsuit that alleged that the Bumble and Badoo dating apps violated Illinois law by using facial-recognition technology to scan and collect user photographs for "photo verification" without consent. Co-lead counsel settled the case, providing class members with a sizable monetary award.

RECOVERY: $40M

In re Peanut Farmers Antitrust Litigation | E.D. Virginia

JJLM attorneys served as co-lead counsel on behalf of peanut farmers. Plaintiffs brought the lawsuit against the largest peanut shellers in the country, accusing them of conspiring to underpay farmers for runner peanuts, the primary type of peanuts grown.

JJLM and its co-counsel received the **American Antitrust Institute's Award for Outstanding Antitrust Litigation Achievement**.

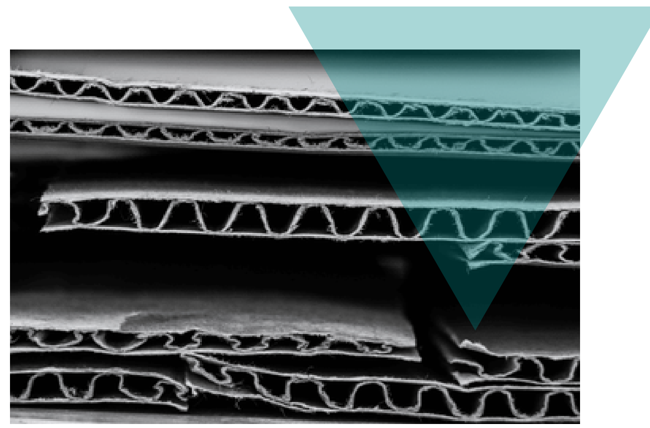
For the Court's praise of counsel in this matter, see *Judicial Commendations* section.

RECOVERY: $102.75M

In Re: Morgan Stanley Data Security Litigation | S.D. New York

As part of the Executive Committee, JJLM attorneys successfully litigated this action related to allegations that Morgan Stanley failed to safeguard its customers' highly sensitive personally identifiable information.

RECOVERY: $60M



In re Linerboard Antitrust Litigation | E.D. Pennsylvania

JJLM attorneys served as co-lead counsel in this nationwide antitrust class action against the producers of linerboard. Plaintiffs alleged that the defendants conspired to reduce production of linerboard in order to increase the price of linerboard and the corrugated boxes and sheets made from linerboard.

For the Court's praise of counsel in this matter, see *Judicial Commendations* section.

RECOVERY: $200M+

Cameron v. Apple, Inc. | N.D. California

As part of the Executive Committee, JJLM attorneys brought suit against Apple for monopolizing (or attempting to monopolize) the iOS app and in-app product distribution services in violation of federal antitrust laws and California unfair competition laws. Plaintiffs secured an outstanding monetary recovery for app developers. JJLM and its co-counsel received the **American Antitrust Institute's Award for Outstanding Antitrust Litigation Achievement** for our work in this case.

RECOVERY: **$100M**

In re Hydrogen Peroxide Antitrust Litigation | E.D. Pennsylvania

JJLM attorneys served as co-lead counsel in this antitrust price-fixing action against domestic and European hydrogen peroxide producers. Plaintiffs alleged that defendants conspired over an eleven-year period to fix, raise, and stabilize prices for hydrogen peroxide and its downstream products, and to allocate markets and customers.

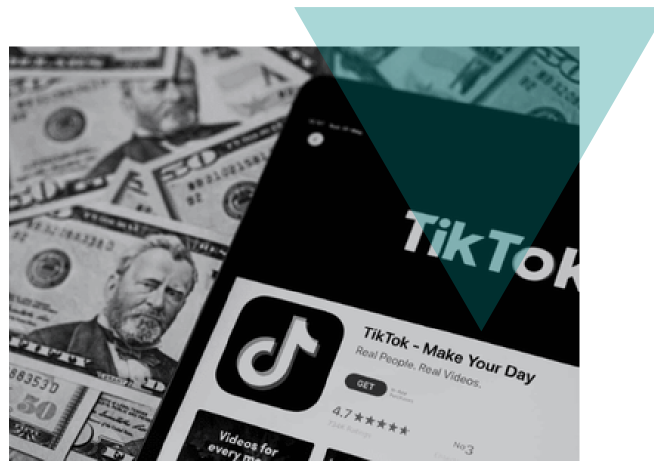
For the Court's praise of counsel in this matter, see *Judicial Commendations* section.

RECOVERY: **$97M+**

In re TikTok Consumer Privacy Litigation | N.D. Illinois

As part of the Plaintiffs' Steering Committee, JJLM attorneys helped lead this consumer case that alleged TikTok unlawfully harvested user data, including biometric data (faces, fingerprints), geolocation, and clipboard content in violation of Illinois' BIPA statute, federal computer fraud laws, and the Children's Online Privacy Protection Act. Plaintiffs obtained significant monetary damages on behalf of the class.

RECOVERY: **$92M**



In re Brand Name Prescription Drugs Antitrust Litigation | N.D. Illinois

JJLM attorneys served as co-lead counsel in this landmark pharmaceutical antitrust case. The settlement is the largest antitrust class action recovery in the Seventh Circuit.

RECOVERY: **$715M**

Current Leadership Appointments.

Tuccori v. At World Properties, LLC | N.D. Illinois

JJLM attorneys serve as co-lead counsel for home purchasers claiming real estate brokerages, brokerage franchisors, and other real estate companies joined a conspiracy with the National Association of REALTORS® and its members to implement and follow anticompetitive practices in the market for real estate broker services that restrained competition and kept real estate agents' commissions artificially elevated at the expense of consumers who were forced to pay those commissions.

In re Payment Card Interchange Fee Litigation | E.D.N.Y.

JJLM attorneys serve as co-lead counsel for over 12 million merchants seeking injunctive relief from allegedly inflated interchange fees and anti-steering restraints imposed by Visa and MasterCard.

RECOVERY: Motion for preliminary approval is pending for a class settlement that provides numerous reforms that will spur competition, provide merchants relief from anti-steering restraints, and lower interchange fees, which should save merchants in excess of $200 billion.

In re Passenger Vehicle Replacement Tires Antitrust Litigation | N.D. Ohio

JJLM serves on the Direct Purchaser Plaintiff Steering Committee in this antitrust class action alleging some of the largest tire manufacturers in the world conspired to fix the prices of new replacement tires for passenger cars, vans, trucks, and buses sold in the United States. Litigation is ongoing.

In re Archery Products Antitrust Litigation | D. Colorado

JJLM attorneys are serving as co-lead counsel on behalf of direct purchasers in this antitrust case that alleges an antitrust price-fixing conspiracy across the U.S. archery industry which artificially raised the prices of bows, arrows and equipment. Litigation is ongoing.

In re Frozen Potato Products Antitrust Litigation | N.D. Illinois

JJLM serves as co-lead counsel for the commercial indirect purchaser class. This class action brings antitrust and consumer protection claims related to alleged anticompetitive conduct in the market for frozen potato products, including french fries, hash browns and tater tots. Litigation is ongoing.

In re: Construction Equipment Rental Antitrust Litigation | N.D. Illinois

JJLM serves on the Plaintiffs' Steering Committee in this antitrust class action that alleges several large rental equipment companies and a data company, Rouse, have engaged in anticompetitive conduct to raise the price to rent various pieces of rental equipment and tools used for construction, manufacturing, entertainment, and other industries. Litigation is ongoing.

In re Granulated Sugar Antitrust Litigation | D. Minnesota

JJLM serves as co-lead counsel on behalf of commercial indirect purchasers in this antitrust case that alleges major U.S. sugar producers conspired from 2019 onwards to fix and artificially inflate granulated sugar prices. Litigation is ongoing.

Estuary Transit District and Teamsters 671 Health Service & Insurance Plan v. Hartford Healthcare Corporation, et al. | D. Connecticut

JJLM serves as co-lead counsel in this antitrust class action against Hartford HealthCare Corporation (HHC), one of Connecticut's largest healthcare systems. Plaintiffs are healthcare benefit plans and insurers who allege that HHC violated federal antitrust law by substantially foreclosing competition across general acute care inpatient hospital services and outpatient medical services in multiple markets in Connecticut. Litigation is ongoing.

In re Apple Inc. Smartphone Antitrust Litigation | D. New Jersey

JJLM serves on the Indirect iPhone Purchasers' Executive Committee in this antitrust class action brought to address Apple's anticompetitive and exclusionary conduct and alleviate harm to competition and consumers. Litigation is ongoing.

In re MoveIt Customer Data Security Breach Litigation | D. Massachusetts

JJLM attorneys are part of the team that is helping to lead this data breach class action against over 100 defendants. The case involves numerous class-action lawsuits that were consolidated and relate to a May 2023 cyberattack by the Russian CLOP ransomware group that exploited vulnerabilities in Progress Software's MOVEit file transfer platform. The breach affected over 2,500 organizations, including banks, universities, government agencies, and healthcare providers, impacting over 93 million individual records and exposing names, social security numbers, birthdates, medical records, financial details, and other personal information. Litigation is ongoing.

Burbage v. U.S. Anesthesia Partners, Inc., et al. | S.D. Texas

JJLM attorneys represent a class of patients who are challenging a multi-year scheme, consisting of acquisitions, monopolization and price fixing, that raised the prices for anesthesia services in Texas. Litigation is ongoing.

In re Fragrances Antitrust Litigation | D. New Jersey

JJLM serves as co-lead counsel on behalf of end-user plaintiffs in this antitrust case against the world's four largest fragrance ingredient manufacturers for allegedly conspiring to fix prices, allocate markets, and restrict the supply of fragrance compounds. Litigation is ongoing.

RECOVERY: Motion for preliminary approval is pending for an $11M class settlement with one of four defendants.

In re Packaged Beef Antitrust Litigation | D. Minnesota

As part of the Plaintiffs' Steering Committee, JJLM attorneys represent a class of direct purchasers and are part of the team helping to lead this antitrust class action against JBS, Cargill, Tyson, and National Beef for allegedly engaging in anticompetitive behavior to artificially inflate margins. Plaintiffs allege that Defendants agreed to coordinate their offers to buy fed cattle at low prices and conspired to raise the prices of the beef they sold after processing the cattle. Litigation is ongoing.

RECOVERY: **$52.5M+ TO DATE**

In re Local TV Advertising Antitrust Litigation | N.D. Illinois

As part of the Executive Committee, JJLM attorneys bring this litigation on behalf of advertisers and businesses that purchased spot ads directly from defendants in specific designated market areas. The case is against major U.S. television station owners for conspiring to artificially inflate the prices of local spot advertisements. Litigation is ongoing.

RECOVERY: **$48M TO DATE**

Little v. Pacific Seafood Procurement, LLC, et al. | N.D. California

JJLM attorneys are part of the team that is helping to lead this class action under federal and state antitrust and unfair competition laws on behalf of commercial crabbers in California, Oregon, and coastal Washington. Plaintiffs allege that Defendants artificially suppressed the price paid to crabbers. Litigation is ongoing.

Additional Representative Matters.

In re Air Cargo Shipping Services Antitrust Litigation | E.D.N.Y.

JJLM attorneys represented a class of direct purchasers and was part of the team that brought suit against numerous global airlines, alleging that they conspired in violation of U.S. antitrust laws to fix fuel and security surcharges. The case resulted in major settlements for purchasers of airfreight services.

RECOVERY: **$1.2B**

Kent et. al. v. Women's Health USA, Inc. | Connecticut Superior Court

JJLM served as co-lead counsel in this class action antitrust lawsuit against Women's Health USA, Inc.; In Vitro Sciences, LLC; Center for Advanced Reproductive Services, P.C.; and Reproductive Medicine Associates of Connecticut alleging that Defendants conspired to artificially raise, fix, maintain, or stabilize prices for Assisted Reproductive Technology ("ART") IVF services and to allocate geographic markets for ART services. JJLM attorneys negotiated a $2.85 million settlement (approximately 50% of total damages).

RECOVERY: **$2.85M**

In re Pork Antitrust Litigation | D. Minnesota

JJLM attorneys represented a class of direct purchasers and were part of the team that led this antitrust class action that alleged that the nation's largest pork producers violated antitrust laws by limiting production and manipulating price indices.

RECOVERY: $200M+

In re Farm-Raised Salmon Antitrust Litigation | S.D. Florida

As a member of the Executive Committee, JJLM attorneys helped bring class action lawsuits against major Norwegian salmon farming firms, alleging they conspired to fix, raise, and maintain prices of farm-raised Atlantic salmon sold in the U.S. in violation of federal antitrust laws. Plaintiffs achieved monetary settlements on behalf of a class of direct purchasers.

RECOVERY: $85M

In re Proctor & Gamble Aerosol Products Marketing and Sales Practice Litigation | S.D. Ohio

JJLM attorneys served as Settlement Class Counsel in this case related to the alleged contamination of certain Proctor & Gamble aerosol products with benzene, a human carcinogen and the economic damages to the purchasers of these products.

RECOVERY: $11M+

In re Chubb Drought Insurance Litigation | S.D. Ohio

JJLM attorneys served as co-lead counsel in this class action filed on behalf of farmers who purchased drought insurance that Chubb refused to honor. The settlement exceeded $110 million and was achieved in less than 9 months. This sum, together with $8 million recovered at trial against Chubb's general agent, resulted in complete recovery for the affected farmers.

RECOVERY: $118M

Mediate v. Life Line Screening of America, Ltd. | District Court Travis County, Texas 261st Judicial District)

JJLM served as co-lead counsel in this class action alleging that, unbeknownst to Plaintiff and Class Members, Defendant's website contained the Facebook Tracking Pixel, which surreptitiously transmitted visitors' communications to Facebook, the exact text and phrases they typed into search box queries, and detailed information about which types of medical screening tests they selected and ordered. JJLM attorneys negotiated a $1.4 million settlement and significant injunctive relief whereby Defendant ceased the practices alleged.

RECOVERY: $1.4M PLUS SIGNIFICANT INJUNCTIVE RELIEF

Clarke et. al. v. Lemonade Inc. et. al. | Circuit Ct. DuPage County, Illinois

As a member of the Plaintiffs' Executive Committee in this data privacy class action, JJLM attorneys negotiated a $4 million settlement valued on behalf of thousands of United States residents that made video claim submissions to Lemonade Insurance Company.

RECOVERY: $4M

In re Vitamins Antitrust Litigation | D.D.C. (MDL 1285)

JJLM attorneys were part of the team that brought a massive case alleging a global conspiracy against major vitamin manufacturers to illegally fix prices and allocate markets for vitamins sold in bulk. The case involved numerous novel, and precedent-setting, legal issues involving jurisdiction and applying U.S. antitrust laws extraterritorially. Plaintiffs obtained significant monetary recoveries for vitamin purchasers.

RECOVERY: $1.3B+

In re Opana ER Antitrust Litigation | N.D. Illinois

JJLM served as co-lead counsel on behalf of indirect purchasers (end-payors) of brand or generic Opana ER, an opioid painkiller, in this antitrust "pay-for-delay" case brought under the laws of 30 states. This case was litigated through trial.

RECOVERY: $15M

Powe v. Dermalogica, LLC | Circuit Ct. DuPage County, Illinois

JJLM attorneys served as co-lead counsel in this data privacy case which alleged that Dermalogica collected, captured, used, and stored individuals' biometric identifiers and/or biometric information without providing sufficient disclosures required by the Illinois Biometric Information Privacy Act, and without obtaining the written release required by the statute.

RECOVERY: $8.9M

Attorney Profiles.

Michael J Freed

Founding Partner,
Of Counsel

After leaving the Department of Justice Antitrust Division, Mr. Freed has engaged in private antitrust class action litigation for 50 years. He has served as co-lead counsel in many prominent antitrust and securities fraud class action cases. Presently, Mr. Freed is serving as co-lead counsel in ***In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*** (E.D.N.Y.). Prior antitrust class actions in which Mr. Freed served as co-lead counsel include ***Kleen Products v. International Paper/Containerboard*** Antitrust case, ***In re Opana ER Antitrust Litigation***, I***n re Aftermarket Filters Antitrust Litigation***, ***In re Brand Name Prescription Drugs Antitrust Litigation, In re High Fructose Corn Syrup Antitrust Litigation***, ***In re Linerboard Antitrust Litigation***, ***In re Carbon Dioxide Antitrust Litigation***, ***In re Infant Formula Antitrust Litigation***, and ***In re Ocean Shipping Antitrust Litigation***. More than $2 billion has been recovered for the plaintiff classes in cases in which Mr. Freed has served as co-lead counsel.

Mr. Freed has been named an Illinois Super Lawyer by Chicago Magazine, an Illinois Leading Lawyer by the Leading Lawyer's Network, and one of the top plaintiffs' antitrust lawyers in Illinois by Chambers and Partners. In March 2007, Mr. Freed was honored by the Chicago Appleseed Fund for Justice for his exceptional pro bono efforts. In November 2021, Mr. Freed was inducted into the American Antitrust Institute's Private Enforcement Hall of Fame and in July 2023, Mr. Freed was named to Business Today's Top 10 Influential Antitrust Plaintiffs Shaping US Law: Nation's Legal Titans.

Mr. Freed was formerly a trial and appellate attorney with the United States Department of Justice, Antitrust Division (Honors Program). He is a graduate of the University of Pennsylvania (B.S., 1959) and University of Chicago Law School (J.D., 1962).

Samantha M. Gupta

Associate

Samantha Gupta is an Associate at Justice Jagher London & Millen, where her practice focuses on antitrust, consumer, and securities fraud litigation. She has extensive litigation experience across a diverse range of practice areas, shaped by a career advocating for individuals and businesses in high-stakes, high-impact cases.

In 2026, Ms. Gupta was appointed to the Plaintiffs' Steering Committee in **In re Construction Equipment Rental Antitrust Litigation**, a class action that alleges several large rental equipment companies and a data company, Rouse, have engaged in anticompetitive conduct to raise the price to rent various pieces of rental equipment and tools used for construction, manufacturing, entertainment, and other industries.

Prior to joining JJLM, Ms. Gupta practiced plaintiff-side antitrust litigation at a national firm, where she represented clients in complex financial matters, including ***In re LIBOR-Based Financial Instruments Antitrust Litigation***., No. 11-md-2262-NRB (S.D.N.Y.). She also previously practiced at a New York City-based firm, representing plaintiffs in a range of civil matters, including civil rights and medical malpractice.

Ms. Gupta began her legal career as a public defender at The Legal Aid Society in Brooklyn, where she gained extensive courtroom and trial experience advocating on behalf of thousands of indigent clients. Across all areas of her practice, she brings a deep commitment to justice and a client-centered approach to litigation.

She received her B.A., with honors, from Macalester College and her J.D. from Harvard Law School. She also holds an M.Sc. from the University of Oxford. Ms. Gupta is admitted to practice law in New York, Massachusetts, and various federal courts.

Jonathan M. Jagher

Partner

Mr. Jagher is the founding partner of JJLM's Philadelphia office. With over 20 years of experience, he has a national practice representing plaintiffs in consumer and antitrust class actions. Mr. Jagher and JJLM have recovered over $1 billion for their clients.

Mr. Jagher was appointed as Co-Chair of the Settlement Committee in ***In re: MoveIt Customer Data Security Breach Litigation***, MDL No. 1:23-md-03083-ADB (D. MA) one of the largest data breaches in history. He recently served as Co-Lead Counsel in ***Dzananovic and Howell v. Badoo Trading Limited and Bumble Trading LLC***, 2021-L-307 (Circ. Ct. Winnebago County, Illinois) ($40 million settlement) and ***Powe v. Dermalogica, LLC***, 2022-LA-000874 (Circ. Ct. DuPage County, Illinois) (settlement valued at $8.9 million). Notably, he was appointed to the Plaintiffs' Steering Committee in ***In Re: TikTok, Inc., Consumer Privacy Litigation***, MDL No. 2948 (N.D. Ill.). In this case, Mr. Jagher was one of the primary negotiators of a $92 million settlement, one of the largest in Illinois history. Mr. Jagher served as one of the Settlement Class Counsel in ***In re Proctor & Gamble Aerosol Products Marketing and Sales Practice Litigation***, 2:22-MD-3025 (S.D. OH) (settlement valued over $11 million) and was appointed to serve on the Plaintiffs' Executive Committees in ***In Re: Morgan Stanley Data Security Litigation***, 1:20-CV-05914 (S.D. NY), a data breach resulting in a $60 million settlement and ***Clarke et. al. v. Lemonade Inc. et. al.***, 2022-LA-000308-366 (Circ. Ct. DuPage County, Illinois) (a data privacy settlement of $4 million). Mr. Jagher also served as counsel in ***Culbertson et al. v. Deloitte Consulting LLP,*** 1:20-cv-03962 (S.D. NY), a data breach that settled for approximately $5 million. In addition, Mr. Jagher was tasked by co-lead counsel with supervising and directing (in part) third-party discovery in ***In re Philips Recalled CPAP, Bi-Level Pap, and Mechanical Ventilator Products Litigation***, MDL No. 3014 (W.D. PA), a large complex litigation involving the recall of 10.8 million CPAP, BiPAP and ventilator machines over the breakdown of sound-insulating foam (resulting in a $479 million settlement of the economic loss claims).

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Mr. Jagher's recent antitrust cases include ***Kent et al. v. Women's Health USA, Inc.*** FST-CV21-6054676-S (Ct. Superior Court) where he was appointed as Co-Lead Counsel on behalf of women who were victims of alleged price fixing by IVF clinics and settled the case for $2.85 million. Mr. Jagher was named to the Executive Committee in ***Cameron et. al. v. Apple, Inc.*** 4:19-cv-03074 (N.D. Cal.) and helped recover $100 million on behalf of app developers (for this role he and his firm were named as one of the recipients of the American Antitrust Institute's Award for Outstanding Antitrust Litigation Achievement in Private Law Practice). Mr. Jagher also played active roles in ***In re Automotive Parts Antitrust Litigation,*** MDL No. 2311 (E.D. Mich.) (co-lead counsel and achieved total settlements over $550 million) ("*Auto Parts*"); ***In re OSB Antitrust Litigation***, Master File No. 06-CV-00826 (E.D. Pa.) (settlements totaled $120 million) ("*OSB*"); ***In re Broiler Chicken Antitrust Litigation***, 1:16-cv-08637 (N.D. Ill.) (settlements totaled $280+ million) ("*Broilers*"); and ***In re Pork Antitrust Litigation*** 0:18-CV-01776 (D. Minn.)(settlements to date total approximately $200 million)("*Pork*"). In ***Auto Parts, OSB, Broilers and Pork***, Mr. Jagher was tasked with taking the lead role in the depositions of top-ranking executives of numerous defendants throughout the world.

Prior to entering private practice, Mr. Jagher served as a supervising Assistant District Attorney for the Middlesex District Attorney in Cambridge, Massachusetts. As a prosecutor, he conducted numerous investigations and tried approximately forty cases before a jury. Mr. Jagher received a B.A. degree magna cum laude from Boston University in 1998 and a J.D. degree from Washington University School of Law in 2001. He is currently admitted to practice law in Pennsylvania, Massachusetts, Illinois, the United States District Courts for the Districts of Massachusetts, the Eastern District of Pennsylvania, the Northern District of Illinois, the Southern District of Illinois, and the United States Courts of Appeals for the Third and Seventh Circuits. Mr. Jagher currently serves on the Advisory Board of Loyola University School of Law's Institute for Consumer Antitrust Studies and frequently serves as a guest speaker on a multitude of class action issues on panels throughout the United States. Mr. Jagher has been named as a Pennsylvania Super Lawyer since 2018 after being named as a Super Lawyer Rising Star (2012 - 2016) and is recognized in Lawdragon's 500 Global Plaintiff Lawyers for his expertise in class action, consumer and antitrust litigation.

Kimberly A. Justice

Partner

Kimberly A. Justice is a trial lawyer who represents consumers and businesses in complex antitrust, consumer protection, and securities class actions. With over twenty-five years of experience in complex litigation, she has been instrumental in obtaining billions of dollars in recoveries for clients and class members.

Courts across the country have appointed Ms. Justice to leadership roles in major nationwide class actions. She has experience across every stage of complex litigation—from developing case theories and managing litigation strategy to conducting discovery and trying cases.

Ms. Justice led the trial team that obtained a jury verdict for investors in ***In re Longtop Financial Technologies Ltd. Securities Litigation*** (S.D.N.Y.), one of the very few securities class actions ever tried to a jury verdict.

She currently serves as Co-Lead Counsel in ***In re Granulated Sugar Antitrust Litigation***, MDL No. 24-3110 (D. Minn.), on behalf of a commercial indirect purchaser class, ***In re Fragrance End-User Plaintiff Antitrust Litigation***, No. 2:23-cv-01627 (D.N.J.), on behalf of a nationwide consumer class, and I***n re Frozen Potato Products Antitrust Litigation***, No. 1:24-cv-11801 (N.D. Ill.), on behalf of a commercial indirect purchaser class.

Earlier in her career, Ms. Justice served as Lead Counsel in ***Murphy v. Toyota Motor Corporation*** (E.D. Tex.) litigation which resulted in settlement relief valued up to $77.3 million and was the "driving force" compelling a recall of 1.85 million vehicles reasonably valued at over $600 million, and in ***In re Peanut Farmers Antitrust Litigation (E.D. Va.),*** which produced a $102.75 million recovery for the class. She also held a Co-Lead Counsel role in ***In re Chicago Board Options Exchange Volatility Index Manipulation Antitrust Litigation*** (N.D. Ill.).

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Her additional leadership experience includes service on the Plaintiffs' Steering Committees in ***In re Local TV Advertising Antitrust Litigation*** (N.D. Ill.), where the court has approved $48 million in settlements to date, ***In re Farm-Raised Salmon and Salmon Products Litigation*** (S.D. Fla.), recovering $85 million for the direct purchaser plaintiff class, and ***In re Liquid Aluminum Sulfate Antitrust Litigation,*** (D.N.J.), which produced a recovery exceeding $90 million for the direct purchaser plaintiff class. She has also been appointed to steering or executive committees in several other major antitrust matters.

Before entering private practice, Ms. Justice spent nearly a decade as a federal antitrust prosecutor in the U.S. Department of Justice's Antitrust Division, where she investigated and prosecuted domestic and international cartel activity in industries including graphite electrodes, carbon products, ocean shipping, and benchmark interest rates (LIBOR). She also tried the Division's case against the first U.K. national extradited by the Antitrust Division, securing a guilty verdict in ***United States v. Norris***, No. 03-cr-0632 (E.D. Pa.).

Ms. Justice earned her B.A., cum laude, from Kalamazoo College. She graduated magna cum laude from Temple University Beasley School of Law, where she served as an Articles Editor of the Temple Law Review. Ms. Justice later clerked for the Honorable William H. Yohn, Jr. of the United States District Court for the Eastern District of Pennsylvania. She frequently lectures on antitrust and securities litigation and serves on the Advisory Board of the American Antitrust Institute. She has earned recognition as a Pennsylvania Super Lawyer, been included in the Lawdragon 500 Leading Lawyers in America and Lawdragon 500 Global Plaintiff Lawyers and is ranked among the top antitrust attorneys nationwide by Chambers and Partners in its Chambers USA Guide.

Nicholas R. Lange

Partner

Nicholas R. Lange is a partner at Justice Jagher London & Millen. Mr. Lange is a Chicago native and received his J.D. from the DePaul University College of Law in 2014. He has experience in litigating civil matters that include fraud, tort, breach of contract, and corporate matters. In 2023, Mr. Lange received the Super Lawyers Rising Star award (Class Action/Mass Torts). He was recently appointed to the Plaintiffs' Steering Committee in ***In re AT&T Inc. Customer Data Security Breach Litigation***, 3:24-cv-00757 (N.D. Tex.) (ECF No. 165).

Mr. Lange was drawn to class action litigation because of the potential to compel a company to change its conduct and compensate those it has wronged. He is admitted to the State Bar of Illinois as well as the Northern and Southern Districts of Illinois.

William H. London

Founding Partner

Mr. London has been litigating class action cases for over 35 years. He served as trial counsel for the plaintiff class in In re High Pressure Laminates Antitrust Litigation, a case that was tried before a jury in the Southern District of New York. He was actively involved in several cases in which JJLM attorneys were serving in a leadership capacity, including ***In re Flat Glass Antitrust Litigation (***No. II), MDL No. 1942 (W.D. Pa.); ***In re Static Random Access Memory (SRAM) Antitrust Litigation***, MDL No. 1819 (N.D. Cal); and ***In re Hydrogen Peroxide Antitrust Litigation***, MDL 1682 (E.D. Pa.). Mr. London presently has significant involvement in ***In re Automotive Parts Antitrust Litigation***, MDL 2311 (E.D. Mich.) and ***In re Optical Disk Drive Products Antitrust Litigation***, No. 3:10-md-2143 (N.D. Cal.).

Mr. London graduated Magna Cum Laude from Syracuse University in 1984 and received his law degree in 1987 from IIT Chicago-Kent College of Law. In 1987, he was admitted to the Illinois Bar and the Federal Bar; and in 1988, he was admitted to practice before the United States Court of Appeals for the Seventh Circuit. Mr. London is a member of the American Bar Association and is a past-Chairman of the Chicago Bar Association Class Litigation Committee. He was formerly an Assistant Attorney General for the State of Illinois, during which time he argued cases in the United States Court of Appeals for the Seventh Circuit and the Illinois Supreme Court. Since 1990, Mr. London has concentrated on complex and commercial litigation, with an emphasis on class action litigation involving antitrust claims. Mr. London practiced with Much Shelist Freed from March 1993 through December 31, 2006.

Douglas A. Millen

Founding Partner

Mr. Millen devotes his practice to prosecuting direct purchaser, price-fixing class actions and has played a key role in many of the most successful price-fixing cases in the United States. For example, Mr. Millen was most recently appointed to serve on the Plaintiffs' Steering Committee for the ***In re DPP Beef Antitrust Litigation*** (D. Minn.) Mr. Millen was appointed to serve on the Direct Purchaser Plaintiffs' Steering Committee in ***In re Lithium Ion Batteries Antitrust Litigation***, MDL No. 2420 (N.D. Cal) which ultimately obtained almost $140 million for the class. Mr. Millen has also played a prominent role in many of the largest antitrust cases in recent history – including: ***In re Cathode Ray Tube (CRT) Antitrust Litigation***, MDL 1971 (N.D. Cal.), where he served as Chair of Discovery and aided in the recovery of more than $210 million of the class; ***In re Dynamic Random Access Memory (DRAM) Antitrust Litigation***, MDL 1486 (N.D. Cal.); ***In re Vitamins Antitrust Litigation***, MDL 1285 (D.D.C.); and ***In re Rubber Chemicals Antitrust Litigation***, MDL 1648 (N.D. Cal.) – and his efforts have assisted in the recovery of billions of dollars for class members. Accordingly, he has been recognized as one of the nation's top competition lawyers by various publications, including Global Competition Review, and as a top Plaintiffs' lawyer by Lawdragon 500 Leading Lawyers in America. Mr. Millen currently represents several Fortune 500 companies in the Rail Freight Fuel Surcharge Antitrust Litigation and provides antitrust compliance consultation services for large, multi-national companies.

Mr. Millen is a graduate of the University of Michigan (B.G.S., 1991) and University of Illinois College of Law (J.D. magna cum laude, 1994). In 1994, he was admitted to the New York and Connecticut State Bars; and in 1995 he was admitted to the Illinois State Bar. He is also admitted to practice in the Northern and Southern Districts of Illinois. Mr. Millen is a member of the American Bar Association, Antitrust Section and the Chicago Bar Association. Prior to founding JJLM, Mr. Millen was a partner at Much Shelist Freed, where he practiced with the class action group from November 1995 through December 31, 2006.

Michael E. Moskovitz

Managing Partner,
Founding Partner

Michael E. Moskovitz is the managing partner at Justice Jagher London & Millen and has been involved in trial and appellate litigation for 30 years. Since 2000, he has concentrated on complex commercial litigation, with primary emphasis on class action litigation involving antitrust, securities fraud, and consumer fraud claims.

Mr. Moskovitz previously played a key role in the class action practice of Much Shelist Freed. He is significantly involved in several pending antitrust class actions, ***In re Automotive Parts Antitrust Litigation***, MDL 2311 (E.D. Mich.), and ***In re Vehicle Carrier Services Antitrust Litigation***, MDL No. 2471.

Mr. Moskovitz is also a member of The Sedona Conference's Working Group 1 (Electronic Document Retention and Production) and has spoken at The Sedona Conference's Midyear meeting and has co-written papers published by The Sedona Conference.

Mr. Moskovitz is a graduate of Indiana University (B.A., 1993) and New York University School of Law (J.D., 1996).

Matthew W. Ruan

Partner

Matthew W. Ruan is a partner at Justice Jagher London & Millen LLC. Mr. Ruan has extensive experience litigating complex commercial matters, with an emphasis on antitrust, securities, and consumer class actions. He has helped recover billions of dollars on behalf of a broad range of individuals, businesses, shareholders, unions, and pension funds.

Mr. Ruan received his B.A., with Honors, from the University of Chicago in 2000 and his J.D. from the University of Michigan Law School in 2003, where he was an associate editor of the Michigan Journal of International Law. He also served as a judicial extern for the Honorable Blanche M. Manning of the U.S. District Court for the Northern District of Illinois, and interned at the U.S. Department of Justice, Criminal Division, in Washington, D.C.

Currently, Mr. Ruan serves as co-lead counsel in ***Estuary Transit District and Teamsters 671 Health Service & Insurance Plan v. Hartford Healthcare Corporation***, ***et al***., Case No. 3:24-cv-01051-SFR (D. Conn.), a class action alleging Sherman Act violations by ***Hartford HealthCare Corporation*** and its subsidiaries, and in ***Tuccori v. At World Properties, LLC***, Case No. 1:24-cv-00150-LCJ (N.D. Ill.), representing a nationwide settlement class of home purchasers in an antitrust action involving Multiple Listing Service properties.

Among the many other complex cases in which Mr. Ruan has been significantly involved are: ***Sutter Health Antitrust Litigation*** (Sup. Ct. Cal., San Fran. Cty.) (antitrust class action against Sutter Health, one of the largest healthcare providers in California, for restraining hospital competition through its contracting practices with insurance companies, resulting in $575 million settlement and significant injunctive relief). ***In re Automotive Parts Antitrust Litigation*** (E.D. Mich.) (antitrust class action brought on behalf of direct purchasers of automotive parts in multiple concurrently active nationwide price-fixing cases, resulting in settlements to date in excess of $550+ million). ***In re AOL/Time Warner Securities Litigation*** (S.D.N.Y.) (class action alleging securities fraud in connection with merger of AOL and Time Warner, resulting in $2.65 billion recovery for shareholders).

Robert J. Wozniak

Partner

Robert J. Wozniak is a partner at Justice Jagher London & Millen LLC. Since 2001, Mr. Wozniak has been involved in complex commercial litigation, with a primary emphasis on antitrust, employment, and consumer fraud class action cases. He has handled all aspects of litigation, including researching and drafting complaints, motion practice, drafting and responding to written discovery, taking and defending depositions, working closely with expert witnesses, managing large scale electronic discovery, presenting oral argument, and trial. Prior to engaging in private law practice, Mr. Wozniak worked as a trial attorney for the United States Department of Justice, Antitrust Division (Honors Program). Mr. Wozniak was then employed by Cohen Milstein Hausfeld & Toll, a Washington, D.C. class action firm, before joining Much Shelist Freed in 2004.

The complex antitrust class actions in which Mr. Wozniak has had significant involvement include: ***In re Broiler Chicken Antitrust Litigation*** (N.D. Ill.); ***In re Pork Antitrust Litigation*** (D. Minn.); ***In re Opana ER Antitrust Litigation*** (N.D. Ill.); ***In re Local TV Advertising Antitrust Litigation*** (N.D. Ill.); ***Mulhern, et al. v. Pepperidge Farm*** (N.D. Ill.) (consolidated and transferred to C.D. Cal for settlement approval); ***In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*** (E.D.N.Y.); ***Kleen Products, et al. v. International Paper, et al.*** (N.D. Ill.); ***In re NCAA Student-Athlete Names & Likeness Licensing Litigation*** (N.D. Cal.); ***In re Fresh and Process Potatoes Antitrust Litigation*** (D. Idaho); ***In re Municipal Derivatives Antitrust Litigation*** (S.D.N.Y.); ***In re Flat Glass Antitrust Litigation*** (II) (W.D. Pa.); ***In re TFT-LCD (Flat Panel) Antitrust Litigation*** (N.D. Cal.); ***In re Static Random Access Memory (SRAM) Antitrust Litigation*** (N.D. Cal.); ***In re Hydrogen Peroxide Antitrust Litigation*** (E.D. Pa.); ***In re Intel Corp. Microprocessor Antitrust Litigation*** (D. Del.); ***In re Dynamic Random Access Memory (DRAM) Litigation*** (N.D. Cal.); ***In re Buspirone Antitrust Litigation*** (S.D.N.Y.); and ***In re Terazosin Hydrochloride Antitrust Litigation*** (S.D. Fla.).

Mr. Wozniak is a graduate of the University of Michigan (B.A., 1988), University of Minnesota (M.A., 1994), and Wayne State University Law School (J.D., 2000, cum laude, Order of the Coif). He is admitted to practice law in Illinois and Michigan as well as numerous federal district and appellate courts.

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