

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**PACIFIC INPATIENT MEDICAL
GROUP, INC., on behalf of itself and all
others similarly situated,**

Plaintiff,

v.

ZELIS HEALTHCARE, LLC, *et al.*,

Defendants.

Case No.: 1:25-CV-10734-BEM

CLASS ACTION

Hon. Brian E. Murphy

**DENNIS C. AYER, DDS, LLC, and
SMILE LINE, LLC, on behalf of
themselves and all others similarly
situated,**

Plaintiffs,

v.

ZELIS HEALTHCARE, LLC, *et al.*,

Defendants.

Case No.: 1:25-cv-11092-BEM

CLASS ACTION

Hon. Brian E. Murphy

**DANNY BACHOUA CHIROPRACTIC,
APC, on behalf of itself and all others
similarly situated,**

Plaintiffs,

v.

ZELIS HEALTHCARE, LLC, *et al.*,

Defendants.

Case No. 1:25-cv-11167- BEM

CLASS ACTION

Hon. Brian E. Murphy

**ALL PLAINTIFFS' NOTICE OF MOTION FOR CONSOLIDATION OF CASES AND
APPOINTMENT OF JASON S. HARTLEY OF HARTLEY LLP AND RICHARD M.
PAUL III OF PAUL LLP AS INTERIM CLASS COUNSEL**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs Pacific Inpatient Medical Group, Inc., Danny Bachoua Chiropractic, APC, Dennis C. Ayaer, DDS, LLC and Smile Line, LLC (“Plaintiffs”) will and hereby do respectfully move the Court for an order:

1. Appointing Jason S. Hartley of Hartley LLP and Richard M. Paul III of PAUL LLP as Interim Co-Lead Counsel for the Plaintiff Class; and
2. Consolidating the actions.

No Defendants have appeared in this action yet, so moving Plaintiffs are unable to determine their position on this motion.

This motion is based on the accompanying Memorandum of Points and Authorities and the Joint Declaration with Exhibits A and B, filed herewith; and all papers and records on file in this matter; and such other matters as the Court may consider.

Dated: May 7, 2025

Respectfully submitted,

Richard M. Paul III (*pro hac vice*)
Ashlea G. Schwarz, *pro hac* forthcoming
Mary Jane Fait, *pro hac* forthcoming
Haley Hawn, *pro hac* forthcoming
PAUL LLP
601 Walnut Street, Suite 300
Kansas City, Missouri 64106
Telephone: (816) 984-8100
Rick@PaulLLP.com
Ashlea@PaulLLP.com
MaryJane@PaulLLP.com
Haley@PaulLLP.com

/s/ Jason S. Hartley
Jason S. Hartley (*pro hac vice*)
Maureen Forsyth (MA Bar No. 642390)
HARTLEY LLP
101 W. Broadway, Suite 820
San Diego, CA 92101
Telephone: (619) 400-5822
Email: hartley@hartleyllp.com

C. Andrew Dirksen (MA Bar No. 568773)
CERA LLP
529 Main St., Suite P200
Boston, MA 02129
Telephone : (857) 453-6555
Email: cdirksen@cerallp.com

Solomon B. Cera
CERA LLP
50 California St., Suite 1500
San Francisco, CA 94111
Telephone: (415) 777-2230
Email: scera@cerallp.com

Daniel J. Mogin
MOGIN LAW LLP
4225 Executive Square, Suite 600
San Diego, CA 92037
Telephone: (619) 687-6611
Email: dmogin@moginlawllp.com

Fatima Brizuela
SCOTT+SCOTT
600 W. Broadway, Suite 3300
San Diego, CA 92101
800.332.2259
Email: fbrizuela@scott-scott.com

Daniel R. Karon
KARON LLC
631 W. St. Clair Ave.
Cleveland, OH 44113
Telephone: (216) 622-1851
Email: dkaron@karonllc.com

Katrina Carroll
Kyle A. Shamberg
CARROLL SHAMBERG LLC
111 W. Washington Street, Suite 1240
Chicago, IL 60602
Telephone: (872) 215-6205
Email: katrina@csclassactions.com
Email: kyle@csclassactions.com

Adam J. Zapala
COTCHETT PITRE & McCARTHY LLP
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Tel: (650) 697-6000
Email: azapala@cpmlegal.com

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(a)(2)

Counsel for Plaintiff is unable to inform counsel for Defendant that this Motion would be filed, because no counsel for any Defendant has appeared in this case.

Dated: May 7, 2025

Respectfully submitted,

By: /s/ Jason S. Hartley
Jason Hartley (*pro hac vice*)
HARTLEY LLP
101 W. Broadway, Ste. 820
San Diego, CA 92101
Telephone: (619) 400-5822
hartley@hartleyllp.com

*Counsel for Plaintiff Pacific Inpatient
Medical Group, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that I have caused the above papers to be filed through the Court's ECF system, which will serve the papers electronically to all counsel of record.

Dated: May 7, 2025

/s/ Jason S. Hartley
Jason S. Hartley

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

**PACIFIC INPATIENT MEDICAL
GROUP, INC., on behalf of itself and all
others similarly situated,**

Plaintiff,

v.

ZELIS HEALTHCARE, LLC, *et al.*,

Defendants.

Case No.: 1:25-CV-10734-BEM

CLASS ACTION

Hon. Brian E. Murphy

**DENNIS C. AYER, DDS, LLC, and
SMILE LINE, LLC, on behalf of
themselves and all others similarly
situated,**

Plaintiffs,

v.

ZELIS HEALTHCARE, LLC, *et al.*,

Defendants.

Case No.: 1:25-cv-11092-BEM

CLASS ACTION

Hon. Brian E. Murphy

**DANNY BACHOUA CHIROPRACTIC,
APC, on behalf of itself and all others
similarly situated,**

Plaintiffs,

v.

ZELIS HEALTHCARE, LLC, *et al.*,

Defendants.

Case No. 1:25-cv-11167- BEM

CLASS ACTION

Hon. Brian E. Murphy

**MEMORANDUM IN SUPPORT OF ALL PLAINTIFFS' MOTION FOR
CONSOLIDATION OF CASES AND APPOINTMENT OF JASON S. HARTLEY OF
HARTLEY LLP AND RICHARD M. PAUL III OF PAUL LLP
AS INTERIM CLASS COUNSEL**

Plaintiffs in all actions currently pending before this Court respectfully request that the Court enter an Order appointing Jason S. Hartley of Hartley LLP (“HLLP”) and Richard M. Paul III of PAUL LLP¹ (“PLLP”) as interim co-lead class counsel. Mr. Hartley and Mr. Paul are supported by all Plaintiffs’ counsel in their application, namely C. Andrew Dirksen and Solomon B. Cera of Cera LLP, Daniel J. Mogin of Mogin Law, LLP, Daniel R. Karon of Karon LLC, Katrina Carroll and Kyle Shamburg of Carroll Shamburg LLC, Adam J. Zapala of Cotchett Pitre & McCarthy, LLP², and Fatima Brizuela of Scott+Scott. As far as counsel can tell, there are no cases filed against Zelis on behalf of this class other than in this Court. This support includes firms that originally filed separate matters in other jurisdictions and includes attorneys with whom either or both Mr. Hartley and Mr. Paul have successfully resolved myriad antitrust class actions.

I. The Court Should Consolidate the Cases

When actions involving a common question of law or fact are pending before a district court, the court may consolidate them to avoid unnecessary cost or delay. See [Fed. R. Civ. P. 42\(a\)](#). In so doing, a “trial court has broad discretion to determine whether consolidation is appropriate.” *Johnson v. Celotex Corp.*, [899 F.2d 1281, 1284–85 \(2d Cir. 1990\)](#). The three complaints in these cases all allege that Zelis engaged in anticompetitive conduct along with a number of insurance companies to reprice payments to healthcare providers for Out-Of-Network (“OON”) care. Because the complaints involve near-identical questions of law and fact, and Plaintiffs intend to consolidate the three actions into a single complaint. Consolidation under a single docket poses no risk of inequity and would serve to “expedite trial and eliminate unnecessary repetition and confusion.” *Devlin v. Transp. Comm’ns Int’l Union*, [175 F.3d 121, 130 \(2d Cir. 1999\)](#) (quoting

¹ Mr. Paul is plaintiff’s counsel in *Dennis C. Ayer, DDS, LLC and Smile Line, LLC v. Zelis Healthcare, LLC, et al.*, Case No. 1:25-cv-11092

² Mr. Zapala is plaintiff’s counsel in *Danny Bachoua Chiropractic, APC v. Zelis Healthcare LLC, et al.*, Case No. 1:25-cv-11167-BEM.

Miller v. USPS, [729 F.2d 1033, 1036](#) (5th Cir. 1984)). Efficiency and effective administration also counsel that additional related actions filed in or transferred to this district should be consolidated. See, e.g., *Jien v. Perdue Farms*, No. 1:19-cv-2521-SAG, [ECF No. 75](#) (D. Md. Oct. 8, 2019) (ordering such consolidation); *In re Visa Debit Card Antitrust Litigation*, No. 1:24-cv-07435-JGK, [ECF 34](#) (S.D.N.Y. 2025) (same).

II. The Court Should Appoint Interim Class Leadership.

There are three related actions pending before this Court. To facilitate the coordination of these actions, to enable the filing of an Amended Consolidated Complaint combining these actions, and to empower Plaintiffs' counsel to negotiate agreements with defense counsel that bind all actions, it is important that the Court appoint interim class counsel with the authority to do these things.

[Federal Rule of Civil Procedure 23\(g\)\(3\)](#) authorizes courts to designate interim class counsel before determining whether to certify the class to facilitate “efficiency and economy without jeopardizing fairness to the parties.” See Manual for Complex Litig. (Fourth) § 10.221 (2004); see also generally, *Id.* §§ 10.224, 21.272. The Rule identifies four factors a court should consider in appointing class counsel: (i) the work counsel has done to identify or investigate the claims; (ii) counsel's experience in handling class actions, other complex litigation, and the types of claims asserted in the action, (iii) counsel's knowledge of the applicable law; and (iv) the resources that counsel will commit to the representation. [Fed. R. Civ. P. 23\(g\)\(1\)\(A\)\(i\)-\(iv\)](#); *Piercy v. AT&T Inc.*, [348 F.R.D. 1, 3](#) (D. Mass. 2024) (appointing interim co-lead class counsel). Additionally, courts also “may consider any other matter pertinent to counsel's ability to fairly and adequately represent the interests of the class.” [Fed. R. Civ. P. 23\(g\)\(1\)\(B\)](#). Plaintiffs request that the Court appoint Mr. Hartley and Mr. Paul as Interim Co-Lead Class Counsel.

Jason S. Hartley of Hartley LLP. HLLP's practice involves primarily antitrust and consumer class actions, often representing the largest plaintiff class members in nationwide cases and serving in senior leadership roles on some of the largest antitrust cases in history. HLLP has recovered billions of dollars for its clients and successfully represented plaintiffs in federal conspiracy and monopoly cases under the Sherman Act and in state law actions. He currently serves as co-lead counsel in *In re: Diisocyanates Antitrust Litig.*, No. 2:18-mc-01001-DWA (W.D. Pa.) (antitrust class action) and *In re: DPP Beef Litigation*, No. 20-cv-1319-JRT-HB (D. Minn.) (antitrust class action). HLLP has served as court-appointed lead plaintiffs' counsel in numerous precedent-setting class actions, including *In re: Urethane Antitrust Litig.*, No. 04-md-01616 (D. Kan.); *Alfred T. Giuliano, et al. v. SanDisk Corporation*, Case No. 4:10-cv-02787 (N.D. Cal.); *Fond du Lac Bumper Exchange, Inc. v. Jui Li Enterprise Co. Ltd., et al.*, No. 09-CV-0852 (E.D. Wis.); and *In re Aftermarket Automotive Lighting Products Antitrust Litigation*, No. 09-ML-2007 (C.D. Cal.). HLLP also acted in a senior role for plaintiffs in the long running *In re Payment Card Interchange Antitrust Litigation*, 05-md-1720 (S.D.N.Y.).

Mr. Hartley has significant litigation and trial experience in antitrust cases. Mr. Hartley is currently litigating a case involving a similar scheme among hotel operators to suppress competition and maintain pricing through information sharing and use of a third party's common algorithm among competitors. *Shattuck v. SAS Institute Inc.*, Case No. 4:24-cv-03424 (N.D. Cal.), subsequently consolidated with *Dai, et al., v. SAS Institute Inc., et al.*, Case No. 4:24-cv-02537 (N.D. Cal.) ("*IDeaS/SAS*"). Mr. Hartley's experience in *IDeaS/SAS* will assist in allowing this case to proceed in an expeditious manner. See Hartley LLP CV, attached as Exhibit A to the Joint Declaration of Jason S. Hartley and Richard M. Paul III ("Joint Decl."), filed concurrently herewith.

Richard M. Paul III of PAUL LLP. PLLP is focused on complex commercial litigation, including antitrust litigation. Mr. Paul has been appointed as class counsel in over 100 cases in his career, including leadership positions in numerous antitrust cases, and has litigated antitrust cases on both the plaintiff and defense side for over two decades. PLLP currently serves as co-lead counsel on behalf of a putative class of cattle ranchers in *In re Cattle and Beef Antitrust Litigation*, MDL No. 3031 (D. Minn.), was appointed settlement class counsel in *Robinson v. Jackson Hewitt, Inc.*, 2:19-cv-09066 (D.N.J.), and appointed interim co-lead counsel for Indirect Purchaser Plaintiffs in *In re Eyewear Antitrust Litigation*, 1:24-cv-04826-MKV (S.D.N.Y.) and *In re Visa Debit Card Antitrust Litigation*, 24-cv-7435 (S.D.N.Y. JGK 2025).

PLLP is widely recognized for its willingness and ability to take large-scale commercial cases, including class actions, to trial. Mr. Paul has been selected by his peers to try bellwether cases in MDLs, both class action and individual cases, and has used his abilities in the courtroom to achieve superior results. He has taken three class actions to trial as class counsel and/or lead trial counsel. He has recovered over \$3 billion through trial and/or settlement of large-scale commercial and antitrust cases. *See* PLLP CV, attached as Exhibit B to the Joint Decl.

Work Done to Investigate Claims. Mr. Hartley and Mr. Paul each conducted a lengthy and substantial investigation into the probative facts and numerous legal issues in this litigation before filing their respective complaints. Their knowledge of the available facts and sources is demonstrated by highly detailed complaints, which were the first two cases filed in the country and the first-filed in this Court. Their investigation included analysis of SEC filings, press accounts of possible anticompetitive conduct occurring in the industry, Zelis' website, the assignment of prices for healthcare procedures by the Centers for Medicare and Medicaid Services ("CMS"), testimony and reports submitted in other actions, including during deposition and at trial involving

Commercial Payers, a rival repricer, and Zelis. Moreover, Mr. Hartley and Mr. Paul combed through Commercial Payer documents indicating the existence of repricing agreements, repricing communications with Providers, and governmental documents supporting Zelis' participation in the Preferred Provider Organization ("PPO") market in addition to the repricing market. Beyond providing meticulous allegations supporting a price-fixing and price-suppression conspiracy, their complaints address several legal issues that are expected to be raised by Zelis and its co-conspirators. Moreover, they have consulted with an expert economist to determine the plausibility of claims supporting classwide damages and other economic and financial considerations. *See* Joint Decl., ¶¶ 8-10.

These investigatory efforts, ultimately resulting in highly detailed complaints, were performed on a proprietary basis, and without any benefit often provided by governmental investigations or a previously filed matter, as often performed in the antitrust context by the Department of Justice or Federal Trade Commission. Moreover, no plaintiffs' counsel were aware of any press reports mentioning Zelis as a potential price-fixer in the repricing market. Joint Decl., ¶¶ 12-13.

III. Conclusion

This nationwide antitrust class action requires steady, experienced leadership with specific subject matter familiarity and expertise (in terms of both managing antitrust class actions and litigating healthcare issues); commitment to the needs of the proposed class; and fair treatment of all class members, as well as all involved counsel. Hartley LLP and PAUL LLP meet these qualifications and are well-suited to lead this antitrust-based class action impacting the healthcare industry, and have the unanimous support of all Plaintiffs' counsel in the cases.

Accordingly, Plaintiffs respectfully request that the Court appoint Mr. Hartley and Mr. Paul as Interim Co-Lead Counsel.

Dated: May 6, 2025

Respectfully submitted,

Richard M. Paul III (*pro hac vice*)
Ashlea G. Schwarz, *pro hac* forthcoming
Mary Jane Fait, *pro hac* forthcoming
Haley Hawn, *pro hac* forthcoming
PAUL LLP
601 Walnut Street, Suite 300
Kansas City, Missouri 64106
Telephone: (816) 984-8100
Rick@PaulLLP.com
Ashlea@PaulLLP.com
MaryJane@PaulLLP.com
Haley@PaulLLP.com

Solomon B. Cera
CERA LLP
50 California St., Suite 1500
San Francisco, CA 94111
Telephone: (415) 777-2230
Email: scera@cerallp.com

Daniel J. Mogin
MOGIN LAW LLP
4225 Executive Square, Suite 600
San Diego, CA 92037
Telephone: (619) 687-6611
Email: dmogin@moginlawllp.com

Fatima Brizuela
SCOTT+SCOTT
600 W. Broadway, Suite 3300
San Diego, CA 92101
800.332.2259
Email: fbrizuela@scott-scott.com

/s/ Jason S. Hartley
Jason S. Hartley (*pro hac vice*)
Maureen Forsyth (MA Bar No. 642390)
HARTLEY LLP
101 W. Broadway, Suite 820
San Diego, CA 92101
Telephone: (619) 400-5822
Email: hartley@hartleyllp.com

C. Andrew Dirksen (MA Bar No. 568773)
CERA LLP
529 Main St., Suite P200
Boston, MA 02129
Telephone : (857) 453-6555
Email: cdirksen@cerallp.com

Daniel R. Karon
KARON LLC
631 W. St. Clair Ave.
Cleveland, OH 44113
Telephone: (216) 622-1851
Email: dkaron@karonllc.com

Katrina Carroll
Kyle A. Shamberg
CARROLL SHAMBERG LLC
111 W. Washington Street, Suite 1240
Chicago, IL 60602
Telephone: (872) 215-6205
Email: katrina@csclassactions.com
Email: kyle@csclassactions.com

Adam J. Zapala
COTCHETT PITRE & McCARTHY LLP
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Tel: (650) 697-6000
Email: azapala@cpmlegal.com

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**PACIFIC INPATIENT MEDICAL
GROUP, INC., on behalf of itself and all
others similarly situated,**

Plaintiff,

v.

ZELIS HEALTHCARE, LLC, *et al.*,

Defendants.

Case No.: 1:25-CV-10734-BEM

CLASS ACTION

Hon. Brian E. Murphy

**DENNIS C. AYER, DDS, LLC, and
SMILE LINE, LLC, on behalf of
themselves and all others similarly
situated,**

Plaintiffs,

v.

ZELIS HEALTHCARE, LLC, *et al.*,

Defendants.

Case No.: 1:25-cv-11092-BEM

CLASS ACTION

Hon. Brian E. Murphy

**DANNY BACHOUA CHIROPRACTIC,
APC, on behalf of itself and all others
similarly situated,**

Plaintiffs,

v.

ZELIS HEALTHCARE, LLC, *et al.*,

Defendants.

Case No. 1:25-cv-11167- BEM

CLASS ACTION

Hon. Brian E. Murphy

**JOINT DECLARATION IN SUPPORT OF ALL PLAINTIFFS' APPLICATION FOR
APPOINTMENT OF INTERIM CO-LEAD CLASS COUNSEL**

We, Jason S. Hartley and Richard M. Paul III, declare as follows:

1. We submit this joint declaration in support of Plaintiffs' Application for Appointment of Jason S. Hartley and Richard M. Paul III as Interim Co-Lead Counsel .

2. We are the founding partners of Hartley LLP and PAUL LLP, respectively.

3. We make this joint declaration based on personal knowledge.

4. Hartley LLP is a nationwide plaintiffs' law firm specializing in antitrust, unfair competition, and other complex matters. Hartley LLP lawyers have served as Lead or Co-Lead Counsel in various coordinated multi-district litigation actions and represented plaintiffs in cases that have recovered billions of dollars for its clients. Since its inception in 2018, Hartley LLP and its attorneys have received numerous honors and recognitions for outstanding representation. A true and correct copy of Hartley LLP's firm resume is attached hereto as Exhibit A.

5. PAUL LLP is a nationwide firm focused on complex commercial litigation, including both class and mass actions. In this course of this practice, Mr. Paul has been appointed as class counsel in over 100 cases in his career as well as appointed to various leadership positions in antitrust cases. PLLP currently serves as co-lead counsel on behalf of a putative class of cattle ranchers in *In re Cattle and Beef Antitrust Litigation*, MDL No. 3031 (D. Minn.), was appointed settlement class counsel in *Robinson v. Jackson Hewitt, Inc.*, 2:19-cv-09066 (D.N.J.), and appointed interim co-lead counsel for Indirect Purchaser Plaintiffs in *In re Eyewear Antitrust Litigation*, 1:24-cv-04826-MKV (S.D.N.Y.) and *In re Visa Debit Card Antitrust Litigation*, 24-cv-7435 (JGK) (S.D.N.Y.).

6. PLLP is widely recognized for its willingness and ability to take large-scale commercial cases, including class actions, to trial. Mr. Paul has been selected by his peers to try bellwether cases in MDLs, both class action and individual cases, and has used his abilities in the courtroom

to achieve superior results. He has taken three class actions to trial as class counsel and/or lead trial counsel. He has recovered over \$3 billion through trial and/or settlement of large-scale commercial and antitrust cases. A true and correct copy of PAUL LLP's firm resume is attached hereto as Exhibit B.

7. We have litigated and led numerous antitrust cases, class actions, and complex litigation on behalf of plaintiffs. We are well versed in the applicable law, having prosecuted dozens of antitrust cases in federal courts throughout the United States.

8. We collectively worked to investigate and identify the claims at issue in this case before filing the first complaints alleging substantially similar claims against Zelis and the Commercial Payer Defendants. In particular, we spent significant time identifying and investigating the claims, including conducting factual investigation of Defendants, the Preferred Provider Organization ("PPO") market and the repricing market, and reviewing materials regarding related enforcement actions.

9. Further, we have consulted with an expert economist to determine the plausibility of claims supporting classwide damages and other economic and financial considerations.

10. As a result of our vigorous prosecution, we share deep knowledge of the facts and legal issues in this case.

11. Throughout this litigation, we have dedicated the financial and attorney resources necessary to represent the proposed class. We will continue to dedicate similar resources as necessary to prosecute these cases.

12. Our investigatory efforts were performed on a proprietary basis, and without any benefit often provided by governmental investigations or a previously filed matter, as often performed in the antitrust context by the Department of Justice or Federal Trade Commission.

13. Moreover, no plaintiffs' counsel were aware of any press reports mentioning Zelis as a potential price-fixer in the repricing market before we filed our cases.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 6, 2025 at San Diego, California.

/s/ Jason S. Hartley
Jason S. Hartley

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 6, 2025 at Kansas City, Missouri.

/s/ Richard M. Paul III
Richard M. Paul III

EXHIBIT A



101 West Broadway, Suite 820
San Diego, California 92101
(619) 400-5822
<http://hartleyllp.com>
Email: info@hartleyllp.com

Firm Profile:

Hartley LLP was formed in 2018 by founding partners who had previously worked together for nearly two decades. Hartley LLP attorneys have extensive experience in all aspects of complex plaintiffs' contingency litigation, including antitrust, consumer protection, unfair competition, wage and hour, breach of contract, and other large class action cases.

Hartley LLP lawyers have served as Court-appointed Lead or Co-Lead Class Counsel in multiple coordinated multi-district litigation actions, as well as numerous Executive Committee and other leadership positions in all forms of complex litigation.

Judges in class action cases have stated "*there is no question as to the skill and efficiency of Class Counsel [including Hartley LLP]*" and that Hartley LLP lawyers "*handled this matter with extreme professionalism, expediency, and competency,*" and "*ably represented their clients and vigorously pursued their case.*" Courts have noted Hartley LLP's experience in antitrust and class action litigation, including the ability to navigate difficult litigation hurdles such as overseas depositions while achieving settlements with multiple defendants for class members.

Clients have stated that they have "never had more competent counsel," that Hartley LLP lawyers were "knowledgeable and helped make our case with minimal impact to the business" while being "fun to work with," and that founding partner Jason Hartley is a "fierce negotiator."

Attorneys

Jason S. Hartley **Founding Partner**



Jason exclusively represents plaintiffs in commercial contingency representation, class action litigation, antitrust, and unfair competition. He is involved in all aspects of civil litigation and has handled cases in both federal and state courts, in litigation and at trial. For the past several years, his practice has involved primarily antitrust and consumer class actions, often representing the largest plaintiff class members in nationwide antitrust actions.

Jason has successfully represented plaintiffs in federal Section 1 (conspiracy) and Section 2 (monopoly) Sherman Act cases and in state law actions alleging unfair business practices, false advertising, pharmaceutical “sham patent” and “pay-for-delay” cases, among other claims. He has developed an expertise litigating against foreign defendants in cases implicating global markets. Jason has represented a number of Fortune 500 companies as plaintiffs and served as lead counsel and in senior litigation roles in numerous class actions, which have collectively recovered billions of dollars for plaintiffs.

Jason has obtained notable results for his clients in numerous groundbreaking decisions and on issues of first impression. For example, he obtained the first ever certification of a class of purchasers in a patent related Walker Process antitrust claim (*Alfred T. Giuliano, et al. v. SanDisk Corporation*, Case No. 4:10-cv-02787, ECF 302 (N.D. Ca. 2015)); he obtained the first and only court-ordered denial of ACPERA protection claimed by Defendants cooperating with the Department of Justice, thus increasing three-fold the potential damages available to the plaintiffs he represented (*In re Aftermarket Automotive Lighting Products Antitrust Litigation*, 2013 WL 4536569 (C.D.Ca. 2013)) and he obtained the denial of a motion to dismiss based upon the Foreign Trade Antitrust Improvements Act (“FTAIA”) in a case that helped set the standard for FTAIA dismissal motions (*Fond du Lac Bumper Exchange, Inc. v. Jui Li Enterprise Co. Ltd., et al.*; 753 F. Supp.2d 792 (E.D.Wis. 2010)).

Jason has been appointed by federal courts around the country as plaintiffs’ class counsel in over a dozen cases, which have recovered hundreds of millions of dollars for his clients. He was chosen by the Judges of the Southern District of California to serve as a lawyer representative since 2017, is part of the planning committee for the ABA’s Institute on Class Actions, and regularly speaks at CLE seminars and publishes articles on class and antitrust issues. He was recognized as “Best of the Bar” by the San Diego Business Journal in 2017, a “Man of Influence” by San Diego Metro magazine in 2019 and a 2020 Top Antitrust Attorney by California’s Daily Journal. Hartley LLP was the only San Diego firm awarded a “Top Boutique Law Firm” by the Daily Journal in 2021. Jason served on the Board of both the American Association for Justice and the Consumer Attorneys of California, has an AV rating and has been selected by his peers as a Super Lawyer for the last ten consecutive years.

Education

- **Tulane Law School, J.D. *cum laude* 1997**
Honors: Winner, Nathan Burkan Memorial Writing Competition by ASCAP Law Journal; Tulane Journal of International and Comparative Law, Assistant Executive Editor
- **University of California, San Diego, B.A. 1993**
- **Honors:** Provost's Honor List

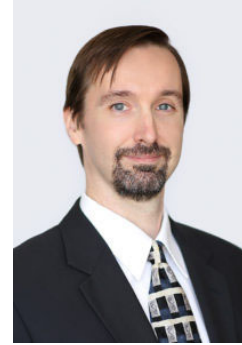
Community Involvement

- San Diego Museum of Man, Balboa Park (Board of Trustees)
- San Diego Regional Economic Development Corporation (Policy Committee)
- ElderHelp of San Diego (Fundraising Committee Member)
- YMCA Adventure Guides (Circle Chief)

Professional Organizations

- American Bar Association (Member)
- American Association for Justice (Board of Governors)
- Consumer Attorneys of California (Board of Directors, Board of Governors)
- Consumer Attorneys of San Diego (Member)
- San Diego County Bar Association (Member)
- American Bar Foundation (Fellow)
- The National Trial Lawyers, Top 100 (Member)
- "Man of Influence" – San Diego Metro Magazine
- Super Lawyers ® San Diego
- Best Lawyers ® - Class Actions
- Top Antitrust Attorneys - Daily Journal
- "Best of the Bar" – San Diego Business Journal
- Top Boutique Law Firm – Daily Journal

Jason M. Lindner
Partner



Jason’s practice includes litigation of antitrust, unfair competition, complex business, California wage and hour, Fair Labor Standards Act, and other general class action litigation. He has been involved in all aspects of civil litigation in both federal and state courts.

Jason has successfully represented plaintiffs in federal Section 1 and Section 2 Sherman Act cases and in state law actions alleging unfair business practices. He has also represented classes of plaintiff employees under both the FLSA and under California State wage and hour statutes. He has served as lead counsel and in senior litigation roles in numerous class actions, which have collectively recovered billions of dollars for plaintiffs.

Education

- **University of Miami**, B.A., *cum laude*, 1997
- **University of Pennsylvania**, J.D., 2000

Community Involvement & Publications

- Super Lawyers – San Diego 2020-2024
- Twice received the Wiley M. Manuel award for excellence in providing Pro Bono Legal Services
- “*Class Action Litigation in the United States and Mexico*” – San Diego Bar Panelist and Author (October 2012)
- “*How Does a Participant Withdraw From a Conspiracy?*” Section of the American Bar Association Section of Antitrust Law’s Proof of Conspiracy Under the Federal Antitrust Law
- “*Background of the Illinois Brick Decision*,” Appendix, American Bar Association Section of Antitrust Law’s Indirect Purchaser Litigation Handbook
- Co-Author, “*Monopolization in Telecommunication Markets*,” Chapter of American Bar Association Section of Antitrust Law’s Telecommunications and Antitrust Practice Guide

Dylan J. McFarland Of Counsel



Dylan brings a wealth of knowledge and experience to the practice of complex commercial civil litigation. Most recently he worked at Heins Mills & Olson, PLC, first as a partner and then as of counsel, where he represented plaintiff classes comprising individuals, governmental entities, and closely and publicly held corporations asserting violations of antitrust, securities fraud, unfair competition, and consumer protection laws. During his career, Dylan has first-chaired more than two dozen trials, and has briefed and argued numerous appeals in both federal and state courts.

Dylan has participated in some of the nation's largest and most challenging cases. In the arena of securities fraud, for example, he was the principal brief writer for the plaintiff shareholder class in *In re AOL Time Warner Securities Litig.* (S.D.N.Y.), which achieved a \$2.65 billion recovery for shareholders who allegedly suffered losses as a result of the merger of AOL and Time Warner. He played a similar role in *In re Broadcom Corp. Securities Litig.* (C.D. Cal.), which recovered \$150 million for shareholders of a semiconductor manufacturer.

Dylan has also been involved in a number of antitrust class actions that have resulted in large recoveries. Examples include *In re Municipal Derivatives Antitrust Litig.* (S.D.N.Y.) (alleging bid-rigging of municipal derivatives by brokers and financial institutions); *In re TFT-LCD (Flat Panel) Antitrust Litig.* (N.D. Cal.) (alleged price-fixing by producers of LCD screens); *In re LIBOR-Based Financial Instruments Antitrust Litig.* (S.D.N.Y.) (alleging conspiracy by British Bankers' Association member banks to manipulate London InterBank Offered Rates); *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.* (E.D.N.Y.) (representing opt-out merchants alleging conspiracy by Visa, Mastercard and their network banks to charge excessive fees for accepting their brand credit and debit cards); *In re Lidoderm Antitrust Litig.* (N.D. Cal.) (alleging anticompetitive conduct by pharmaceutical companies to delay generic competition with Lidoderm transdermal patches); *In re Foreign Exchange Benchmark Rates Antitrust Litig.* (S.D.N.Y.) (alleging conspiracy by international financial institutions to manipulate foreign exchange currency rates).

Dylan also worked on class actions arising in other areas of law, including *In re National Hockey League Players' Concussion Injury Litig.* (D. Minn.) (alleging negligence claims against the NHL on behalf of retired NHL hockey players for concussion-related brain injuries); *In Re Target Corporation Customer Data Security Breach Litigation* (D. Minn.) (seeking damages for Target customers caused by one of the largest payment card security breaches in U.S. history); *Simmons v. Kemp* (D. Minn.) (recovering a \$100 million payment from HUD on behalf of the Minneapolis Public Housing Authority and Minneapolis Community Development Agency as part of a consent decree to remedy unlawful racial segregation in the original siting of public housing in Minneapolis).

In addition to his private practice, Dylan was an adjunct Professor of Law from 1997 to 2002 at the Mitchell Hamline School of Law in St. Paul, Minnesota, which has one of the top-

rated clinical programs in the country. In that program he taught law students trial skills, appellate advocacy and legal writing.

Education

Harvard Law School

J.D. cum laude

- Note and Comment Editor, *Harvard Civil Rights–Civil Liberties Law Review*
- Legal Writing teaching assistant
- Harvard University varsity men’s track & field and cross–country (one year)

University of Minnesota Medical School

No degree

University of Minnesota

B.A. summa cum laude

- Phi Beta Kappa
- Varsity men’s track & field and cross–country

Community Involvement & Publications

- Former “Super Lawyer,” *Minnesota Law & Politics*
- Former “Rising Star,” *Minnesota Law & Politics*
- “Litigation Star,” *Benchmark Plaintiff: The Definitive Guide to America’s Leading Plaintiff Firms & Attorneys*

Maureen Forsyth Of Counsel

Maureen brings a wide array of knowledge to Hartley LLP. Maureen has experience in antitrust, shareholder litigation, government contracts and debt recovery. Since 2016 Maureen has focused on antitrust and class action cases. Maureen has assisted in legal strategy and case development in an array of cases serving both individual and business clients. She has also focused on government subpoena responses as well as internal investigations during merger negotiations. Previously Maureen formed her own private practice focusing primarily on monetary recovery for clients.



Maureen has more recently been involved in securities fraud litigation against a pharmaceutical company, alleging an unlawful kickback scheme which artificially increased the stock value.

Education

- **Suffolk University Law School, Boston, MA; J.D. 1998**
- **University of Massachusetts at Amherst, Amherst, MA; B.A. Legal Studies and English 1994**
Honors: *Cum Laude*

Kenneth A. Frost III

Attorney

Kenneth A. Frost III practices in complex civil litigation on behalf of both individuals and class members. He has obtained relief in cases involving antitrust, securities, consumer protection, and unfair competition issues. Kenneth's antitrust experience includes litigating Sherman Act Sections 1 and 2, Clayton Act, and California's Cartwright Act matters. Kenneth also has both federal (Private Securities Litigation Reform Act) and state-based securities litigation experience. Kenneth began his career in complex litigation by performing factual analysis in a technology matter, which ultimately resolved for the then-largest antitrust settlement in U.S. history. More recently, Kenneth litigated a PSLRA securities fraud matter successfully through trial on behalf of a certified class of shareholders (a rare occurrence).

Kenneth's antitrust, unfair competition, and securities efforts have concerned a variety of industries, including automotive parts, chemicals, consulting, energy, finance, food, health insurance, mechanics, shipping, and technology. Prior to Hartley LLP, Kenneth worked as an associate at Cera LLP (formerly Gold Bennett Cera & Sidener, LLP).

Before law school, Kenneth worked as a research analyst for the Law & Economics Consulting Group (LECG) in Emeryville, California, assisting experts in economics and finance in drafting reports and preparing them to testify in antitrust, securities, and other commercial disputes. At LECG, Kenneth also assisted in drafting non-litigation, state-of-the-industry presentations concerning, for example, economic conditions impacting agriculture and healthcare businesses.

Education

- University of San Francisco, J.D. 2000, where he served as Vice President and Secretary of Intellectual Property Law Association, and Survey Writer and Technical Editor of the University of San Francisco Maritime Law Journal
- Brown University, Providence, Rhode Island, A.B., History 1994, where he competed for the university's water polo team

Teresa Jones **Attorney**



Teresa’s practice includes antitrust, unfair competition, and consumer protection litigation with a focus on complex class action matters.

Most recently she worked at Heins Mills & Olson, PLC, where she represented plaintiff classes asserting violations of antitrust, securities fraud, unfair competition, and consumer protection laws.

During her career, Teresa represented plaintiffs in a number of antitrust class actions alleging anticompetitive conduct by pharmaceutical companies to delay entry of lower priced generic drugs into the market, including *In re Lidoderm Antitrust Litigation*, MDL No. 2521 (N.D. Cal.)(resulting in the September 2018 final approval of a \$104.75 million settlement, a week before jury selection, representing one of the largest recoveries by end-payors in a federal “pay-for-delay” generic suppression case in more than a decade); *In re Aggrenox Antitrust Litigation*, MDL No. 2516 (D. Conn.) (resulting in July 2018 final approval of a \$54 million settlement for the end-payor plaintiffs), and *In re Lipitor Antitrust Litigation* MDL No. 2332 (D.N.J.) (antitrust claims for alleged patent fraud, sham litigation and an anti-competitive reverse payment scheme on behalf of proposed class of indirect purchasers).

She is currently working on *In re Generic Pharmaceuticals Pricing Antitrust Litigation*, MDL 2724 (ED Pa) (a massive nationwide case alleging that dozens of the world’s largest drug makers conspired to raise prices, allocate the market, and prevent competition on commonly used generic drugs); *In re Interior Molded Doors Antitrust Litigation*, 3:18-cv-00718-JAG (E.D. Va.)and 3:18-cv-00850-JAG (E.D. Va.) (alleging that the two largest producers of interior molded doors entered into an illegal price fixing agreement to control the market for interior doors); and, *In re Diisocyanates Antitrust Litigation*, MDL No. 2862 (alleging a conspiracy to fix prices for MDI and TDI products, the precursor ingredients for polyurethane foam).

Teresa’s prior experience includes some of the most notable antitrust cases in the country, such as *In re Target Corporation Customer Data Security Breach Litigation* (D. Minn.) (representing consumers against Target Corporation arising from one of the largest payment card security breaches in U.S. history); *In re Domestic Drywall Antitrust Litigation* (E.D. Pa.) (supply and price-fixing claims against manufacturers of gypsum wallboard); *Fond Du Lac Bumper Exchange, Inc., et. al. v. Jui Li Enterprise Company, Ltd., et. al.* (E.D. Wis.) (supply and price-fixing claims against manufacturers and distributors of aftermarket automotive sheet metal parts); *In re Plasma Derivative Protein Therapies Antitrust Litigation* (N.D. Ill.) (supply and price-fixing claims against manufacturers of plasma-derivative protein therapies); *In re Polyurethane Foam Antitrust litigation*, MDL. No. 2196 (N.D. Ohio) (price-fixing claims on behalf of a class of direct purchasers); *Glaberson v. Comcast Corp.* (E.D. Pa.) (antitrust claims against cable services provider on behalf of subscribers); and *In re AOL Time Warner Securities Litigation* (S.D.N.Y) (securities fraud claims on behalf of AOL and Time Warner shareholders, achieving a \$2.65 billion recovery for the plaintiff shareholder class).

Prior to Heins Mills and Olson, Teresa was part of the trial team in a large antitrust class action lawsuit against a major software company which settled in 2007 after several months of trial for \$180 million.

Teresa graduated magna cum laude from William Mitchell College of Law and is admitted to practice in the state courts of Minnesota, the U.S. District Court for the District of Minnesota, and the United States Court of Appeals for the Eighth Circuit. Teresa has held leadership positions in the Minnesota State Bar Association, Hennepin County Bar Association and American Bar Association.

Education

- **William Mitchell College of Law, St. Paul, MN., J.D. 1996**
Honors: Magna Cum Laude
- **University of Minnesota, Minneapolis, MN., B.A. 1992**
Honors: *Honors Major: Sociology / Criminology*

Case Results

Hartley LLP attorneys have achieved successful results in all forms of complex class action litigation. Below are a select few examples.

In re Cattle and Beef Antitrust Litigation, No. 22-md-03031 (D. Minn.)

Hartley LLP attorneys were appointed Co-Lead Counsel for Direct Purchaser Plaintiffs by the District of Minnesota in this nationwide antitrust MDL case. The complaints asserted a class action on behalf of companies in the United States that purchased the boxed and case ready beef from the four largest beef producers in the country. Hartley LLP secured an ice-breaker settlement of \$52.5 million from JBS and the case is proceeding against the remaining defendants.

In re: Urethane Antitrust Litig., No. 04-md-01616 (D. Kan.)

Hartley LLP attorneys were appointed Co-Lead Counsel for plaintiffs by the court in this nationwide antitrust MDL case. The complaints asserted a class action on behalf of companies in the United States that purchased the input chemicals to manufacture polyurethane products. Polyurethane is made by the combination of a polyol and an isocyanate. The two major polyols used are polyester polyols and polyether polyols. This first Urethanes class action concerned a conspiracy to fix and raise the prices of polyester polyols manufactured by Crompton/Chemtura, Bayer, Rhein Chemie and Uniroyal Chemical. The case settled for over \$33 million.

Aftermarket Automotive Lighting Prods. Antitrust Litig., No. 09-ML-2007 (C.D. Cal.)

Hartley LLP attorneys were the first to file this case behalf of a class of businesses that purchased aftermarket automotive lighting products. Months after the civil antitrust cases were filed, the United States Department of Justice intervened in the case and announced their criminal investigation of Defendants antitrust violations. Hartley LLP attorneys, as court-appointed Lead Counsel, worked in conjunction with the DOJ attorneys to bring the case to a successful resolution. The defendants included Taiwan-based companies and their U.S. subsidiaries that manufactured and sold replacement automotive lighting products such as headlights and taillights to businesses around the country. Hartley LLP attorneys reviewed millions of pages of foreign language documents and took numerous foreign language depositions of defendants. The case settled weeks before trial was scheduled to commence for over \$53 million.

Jones et al v. Bain Capital Private Equity et al., No. 20-cv-02892 (W.D.Tenn.)

Hartley LLP was Court-appointed class counsel in this antitrust class action against the monopolist Varsity Cheer. The case alleged that Varsity artificially manipulated the market for competitive cheer and apparel, costing families of kids who participated tens of millions of dollars in damages. Hartley LLP and its co-counsel secured more than \$82 million for the victim dfamilies that indirectly paid Varsity for competitions and apparel.

Fond du Lac Bumper v. Gordon, et al., No. 09-CV-0852 (E.D. Wis.)

Hartley LLP attorneys spent months investigating this proprietary case before filing it in 2009. Hartley LLP are court-appointed Lead Counsel on behalf of companies in the U.S. that purchased automotive sheet metal parts, such as hoods, fenders, and panels. The case alleges that each of the defendants, all of which are located in Taiwan, conspired to fix the prices of aftermarket sheet metal products sold in the United States. Defendants implemented their conspiracy in several ways, including routine price fixing agreements, client allocation, and joint tooling agreements in which some Defendants mothballed their tools for making certain parts in order to give production control to a single Defendant, eliminating competition for the tool and setting higher prices for customers. Hartley LLP attorneys recovered more than \$30 million in settlements for the Class.

In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation, No. 05-md-01720 (E.D.N.Y)

Hartley LLP attorneys are part of the executive committee in this ground-breaking antitrust case, one of the largest in U.S. history. In it, merchants challenged the very structure of the credit card industry, asserting that the setting of interchange fees by credit card associations and banks constitutes illegal price fixing. The case also challenges the credit card associations' ability to constrain merchant choice by not allowing surcharge fees or minimum purchase amounts for credit card use. The parties reached a settlement that was approved for up to \$6.26 billion in cash for merchants across the country.

In re: Capacitors Antitrust Litigation, No. 14-cv-03264-JD (N.D. Cal.)

Hartley LLP represented U.S. purchasers of aluminum and tantalum electrolytic capacitors and film capacitors. Capacitors are a ubiquitous passive components found in virtually every electronic device. They store an electric charge which allowed devices to remember data even when they are powered down. The complaint alleges that the major manufacturers of capacitors conspired to fix the prices of products sold in the United States. The case settled for over \$600 million at trial.

Spangler, et al., v. National College of Technical Instruction, et al., No. 14-cv-03005-DMS-RBB (S.D. Cal.)

Hartley LLP attorneys were appointed class counsel for a class of students of NCTI, a subsidiary of AMR, one of the country's largest provider of emergency medical responders. Those students alleged that NCTI failed to timely provide the necessary internships as required under the law, misrepresented the duration of instruction before eligibility for licensing as an EMT, and misrepresented the potential for job placement, among many other violations. Even before trial or settlement of the action, Hartley LLP attorneys obtained summary judgment in favor of class members on misrepresentations that NCTI students would receive preferential treatment when seeking jobs with AMR. The case then settled, providing hundreds of thousands of dollars in restitution to students who were delayed in their internships.

In re: Railway Industry Employee No-Poach Antitrust Litig., No. 18-mc-00798 (W.D. Pa.)

Hartley LLP represented one of the named plaintiffs pursuing antitrust claims on behalf of employees against Wabtec and Knorr-Bremse. These companies agreed not to solicit, hire, or poach each other's employees in order to keep wages suppressed. These no-poach agreements restricted competition for their workers, which limited workers' access to better job opportunities, restricted their mobility, and deprived them of significant information that they could have used to negotiate for better terms of employment. The case settled in 2020 for nearly \$50 million.

Steve Johnson and Scott Sollitt v. U.S. Bank National Assn., No. 3:19-cv-0286-JLS-LL (S.D. Cal.)

Hartley LLP represented US Bank loan originators. The complaint alleged that US Bank failed to properly compensate its loan originators, including failing to pay commissions for work done if the employee left US Bank before the loan closed. Judge Sammartino of the Southern District of California granted approval of a settlement of \$6.5 million in this class action on behalf of California workers.

Johnson v. Harvest Management Sub Trs Corp., et al., No. 12-cv-00662 (S.D. Cal.)

Hartley LLP attorneys were co-class counsel on behalf of a class of California managers of retirement communities who alleged that they were not properly paid for overnight shift work. These class members worked in difficult conditions, caring for the sick and elderly, and often had to respond to calls all throughout the night when staying at the facilities, but were not paid for that time. Hartley LLP ultimately obtained a \$5.5 million dollar settlement for the class.

In re: Bank of America Wage and Hour Employment Practices Litig., No. 10-md-02138 (D. Kan.)

Hartley LLP attorneys litigated this case as court-appointed Co-Lead Counsel on behalf of a class of all retail bank tellers, loan officers, and call center employees against one of the largest banks in the nation. Class members alleged that, although the bank required overtime, it enforced standards that caused class members to work off-the-clock. Class members also alleged that the bank failed to properly provide meal and rest breaks, and that call center employees were not properly compensated for pre- and post-shift work activities. Hartley LLP attorneys ultimately obtained a \$73 million dollar settlement for the class members.

Leiszler, et al. v. Align Technologies, No. 10-CV-2010 (N.D. Cal.)

Hartley LLP attorneys were Class Counsel for a class of more than 22,000 dentists against the maker of Invisalign for unfair competition in suspending or decertifying dentists who did not prescribe a minimum number of new Invisalign cases. Align Tech unilaterally imposed new restrictions and quota requirements as prerequisites to maintain dentists' certification to prescribe Invisalign after the dentists had already spent thousands of dollars and underwent training to obtain certification. Hartley LLP attorneys obtained a settlement that amounted to a 100% recovery for the class, with a value of more than \$50 million in cash and non-cash relief.

Alfred T. Giuliano, et al. v. SanDisk Corporation, No. 10-cv-02787 (N.D. Ca.)

Hartley LLP attorneys were co-lead counsel for a class of purchasers of flash memory products from Sandisk in this “Walker Process” antitrust litigation. Plaintiffs alleged that Sandisk fraudulently obtained its “crown jewel” patents regarding flash technology that it then used to exclude competitors and charge monopoly rents on its customer. The Northern District of California certified the class of purchasers in the nation’s first class certification of a Walker Process claim.

Moore v. The Geo Group, Inc., No. 37-2009-0098066 (Cal. Sup. Ct.)

Hartley LLP attorneys were Class Counsel in a case representing a group of officers working at private correctional facilities who were not properly paid overtime due to an automatic rounding of their time entries by the facilities’ computer systems. The class members ultimately received a confidential settlement which was calculated to be well in excess of the actual time they were owed.

Zeisner v. Linens-N-Things, No. 06-cv-1194 (S.D. Cal.)

Hartley LLP attorneys served as Lead Counsel for this nationwide consumer class action alleging false representation of certain bed sheets. Linens N Things claimed that the thread count of its bed sheets was more than twice what it actually was, according to laboratory tests. The settlement resulted in replacement sheets available to every class member around the country.

Childers IV, et al. v. The New York and Presbyterian Hospital, et al., No. 12-cv-05414 (S.D.N.Y)

Hartley LLP attorneys represented thousands of medical students who conducted their residency at New York Presbyterian Hospital (NYP), one of the largest hospitals in the country. The complaints alleged that from 1995 to 2001 NYP took FICA taxes out of the residents’ paychecks, which deductions were improper for students under a retroactive 2010 IRS rule. When NYP residents asked NYP to file refund requests with the IRS, as every other hospital in the country was doing, the residents learned that NYP had negotiated away its right to request a refund or return of the FICA taxes it had taken from residents’ paychecks as part of a settlement NYP made with the IRS in an unrelated dispute. Hartley LLP attorneys negotiated a settlement that got each of the residents a significant portion of their FICA taxes back from NYP.

In Re: Korean Air Lines Co. Ltd. Antitrust Litig., MDL No. 07-01891 (C.D. Cal.)

Hartley LLP attorneys served as plaintiffs’ counsel in this nationwide class action against Korean Airlines and Asiana Airlines. The plaintiffs alleged that the airlines conspired to fix flight surcharges to passengers flying to and from the United States, costing the passengers millions of dollars. Settlements were reached with the defendants, totaling \$50 million in cash and \$36 million in flight vouchers.

In re: Buspirone Antitrust Litig., MDL No. 1410 (S.D.N.Y)

Hartley LLP lawyers represented plaintiffs in this nationwide class action against the manufacturer of the drug Buspar for artificially inflating prices. The case settled for \$535 million.

In re: Relafen Antitrust Litig., No. 01-12239-WGY (D. Mass.)

Hartley LLP attorneys represented the world's largest pork producer and only self-insured plaintiff in a nationwide class action against the company manufacturing the drug Relafen for artificially inflating prices. The case settled for \$75 million.

In re: Methionine Antitrust Litig. No. 00-1311 (N.D. Cal.)

Hartley LLP attorneys represented the largest plaintiff in a nationwide class action for price fixing an animal feed additive. The case settled for \$109 million.

BLS Pharma, Inc. v. Inovio Pharmaceuticals, Inc. and Genetronics, Inc., No. 30-2019-01119045 (Orange County Superior Court)

Hartley LLP represented BLS Pharma in a breach of contract and misrepresentation case against Inovio (NASDAQ-INO) and Genetronics. The lawsuit alleged that Inovio refused to honor its obligation to supply needle-free injection components to BLS, which were needed for BLS's development of a testosterone therapy drug-device combination (DDC). BLS's DDC would have permitted patients to administer testosterone in their own homes without the expense, discomfort and infection risk of a needle puncturing the skin. The case was successfully settled on a confidential basis.

Active Litigation

Hartley LLP is constantly involved in the prosecution of many forms of complex class action litigation. Below are a few examples of our currently active cases:

In re: Diisocyanates Antitrust Litig., No. 2:18-mc-01001-DWA (W.D. Pa.)

Hartley LLP was appointed co-lead counsel in this nationwide antitrust price-fixing action. The complaint alleges that the prices of isocyanates MDI and TDI which, when combined with polyols form a polyurethane, were artificially manipulated by their manufacturers. Bayer, BASF, Covestro, Huntsman, Dow, and Mitsui are alleged to have jointly raised prices and engaged in coordinated efforts to close manufacturing plants that limited production and increased prices. The majority of these defendants were previously subpoenaed by the Department of Justice as part of a government investigation into this industry.

In re: DPP Beef Litigation, No. 20-cv-1319-JRT-HB (D. Minn.)

Hartley LLP was appointed co-lead counsel in this nationwide antitrust price-fixing case. Direct purchasers of beef from defendants Tyson, JBS, National Beef and Cargill claim those suppliers artificially manipulated the price of this \$5 billion market. Defendants are accused of throttling the supply of beef, among other things, in order to raise its prices.

Menezes v. U.C. San Diego Health, No. 21-cv-1641-BEN (S.D. Cal.)

Hartley LLP filed the first data breach action against one of the largest health care providers in San Diego for permitting the breach of highly sensitive medical information. Hundreds of thousands of patients' personal identifying information, including health care history was stolen by hackers due to U.C. San Diego Health's failure to take reasonable precautions to protect their patients' data.

Turlock v. Merck & Co., Inc., No. 18-cv-00352 (E.D. Va.)

Hartley LLP is pursuing claims on behalf of end-payors of the prescription drug ExForge, which is used to treat high blood pressure. The complaint, filed in the Southern District of New York, alleges that Novartis, Par (now part of Endo) conspired to keep a cheaper generic version of ExForge off the market starting in 2012. Novartis' patent for ExForge expired in 2012, and under the federal Hatch-Waxman Act, Par Pharmaceuticals was poised to introduce a generic version of ExForge in the U.S. Instead, Par agreed with Novartis to not bring a generic version to market in exchange for over \$100 million in cash value from Novartis. The branded drug ExForge sells over \$400 million annually in the United States alone, so with generic versions taking 80% or more of a market at an average discount of 50% off the price, buyers of the drug suffered hundreds of millions of dollars in damages, according to the complaint.

In re: Zetia (Ezetimibe) Antitrust Litig., No. 18-md-02836 (E.D. Va.)

Hartley LLP represents the Turlock Irrigation District in this end-payor antitrust action alleging that Merck, Schering-Plough, and Glenmark Pharmaceuticals conspired to keep the generic version of the drug Zetia, used to reduce cholesterol and prevent the buildup of plaque in arteries, off the market and thus keep prices at inflated levels.

In re: Generic Pharmaceuticals Pricing Antitrust Litigation, No. 16-md-2724-CMR (E.D. Pa.)

Hartley LLP represents a class of end-payors of dozens of generic drugs in this nationwide price fixing case. The lawsuit alleges a conspiracy to fix the prices of generic drugs, resulting in price increases since March 2011. The Antitrust Division of the U.S. Department of Justice continues a wide-ranging parallel criminal investigation of the same conduct.

In re: Packaged Seafood Products Antitrust Litig., No. 15-md-02670 (S.D. Cal.)

Hartley LLP represents named plaintiff Trepco Inc. in this nationwide price-fixing case. The complaint alleges that the country's largest packaged seafood and canned tuna producers,

including Starkist, Chicken of the Sea and Bumble Bee, conspired to artificially raise the prices of packaged seafood products sold in the United States. The case implicates over \$10 billion of U.S. commerce, and was the subject of a Department of Justice investigation that has already led to multiple criminal guilty pleas among senior executives of the defendant companies. Hartley LLP continues to prosecute the civil action, seeking damages on behalf of purchasers of packaged seafood that overpaid as a result of the unlawful conspiracy.

Lucy Baker, et al. v. Chaffey Jt. Union High School District, No. CIVSB2128630 (San Bernardino Superior Court)

Hartley LLP represents a putative class of students who were victimized by a teacher at Los Osos High School who placed a hidden camera in the girls locker room bathroom for years. The case alleges negligence on behalf of the Chaffey Joint Union High School District for failure to supervise the teacher, among other claims.

Laura O'Dell, et al. v. Aya Healthcare, Inc., No. 3:22-cv-1151 (S.D. Cal.)

Hartley LLP represents a putative class of travel nurses whose contracts with Aya Healthcare were breached by Aya. The case alleges that Aya unilaterally reduced nurses' compensation, duration and other key provisions in violation of their contracts with the nurses only after these nurses relocated pursuant to the contracts.

Robert Platt v. Sodexo, S.A. et al., No. 8:22-2211 (C.D. Cal.)

Hartley LLP represents former smoker employees of Sodexo who were denied the refund of their health insurance surcharge as smokers after completion of company-sponsored programs to remediate smoking.

In re Realpage Inc, Rental Software Antitrust Litigation, MDL No. 3071

Hartley LLP represents tenants victimized by a price-fixing conspiracy between RealPage and its large landlord subscribers. RealPage's proprietary algorithm produced suggested rent increases to its subscribers many of whom were required to, and did in fact, implement the new higher rents as a condition to their subscription.

EXHIBIT B



601 Walnut, Suite 300
Kansas City, Missouri 64106
Tel (816) 984-8100
Fax (816) 984-8101

www.PaulLLP.com

Rick Paul and Ashlea Schwarz founded Paul LLP after years of litigating high stakes commercial cases together. We have fought against some of the biggest companies in the country, including Syngenta, Dow Chemical, Monsanto, Corteva, JPMorgan Chase, Phillips 66, and General Motors. And we have won big. We founded the firm on two overriding principles: (1) a strong passion for litigating cases on behalf of our clients; and (2) a desire to make meaningful, industry-wide changes that create reshaped markets and improved lives.

We have recovered nearly three billion dollars for our clients through trial, arbitration, and settlement. We have handled some of the largest cases in the country against the largest, most well-funded and well-represented companies. And, we do not just litigate—we prepare cases for trial and take cases to trial.

The Work We Do

Agriculture: The agricultural industry is rapidly consolidating and launching new biotechnology products every year. Located in the Midwest, we have a deep knowledge of how law and agriculture intersect, including the areas of negligence, chemical-drift, trespass, antitrust, food safety, trade, marketing, and resource management. The agricultural and biotechnology industries are highly regulated with a complex web of state and federal regulations, many of which give rise to preemption issues. Our lawyers have handled a wide variety of cases in this area of the law and are well-versed in the statutory and regulatory issues that arise in litigation related to agriculture in individual, mass, and class actions.

Antitrust: Antitrust laws were enacted to ensure that businesses play by the rules to ensure that a free market prevails. Our lawyers have both prosecuted and defended antitrust actions in the agriculture, technology, and health care industries. We handle both antitrust class actions as well as individual cases. We make sure that companies who engage in unfair business practices are kept in check, allowing other businesses the opportunity to compete in a fair marketplace.



Class Actions: We know how difficult it is for a single person to bring a case against a large corporation or entity. The enormity of this task prevents many people from pursuing legitimate claims, which allows companies to continue with unsafe, unlawful, or unfair practices. These are often pervasive, industry-wide violations. Our attorneys have the skill set necessary to bring about meaningful change through class litigation.

Commercial Litigation: Partnerships within or between businesses often lead to disputes. When partnerships are exploited, or contracts are not followed through on, we help pick up the pieces.

Commodities: Being a Midwest law firm, we know commodities litigation. From grains, farm animals, oil and gas, precious metals, we have handled a broad spectrum of commodities-related litigation. We are familiar with the commodities exchanges, the statutory and regulatory environment, and the jargon of these industries.

Products Liability: We have a breadth of experience in ensuring manufacturers take responsibility for products that cause harm or injury to consumers. Injury and financial harm can result from products with faulty design or improper manufacturing, as well as a company's failure to warn consumers of possible injury or unwanted side effects from use of that product.

The Results We Have Achieved

In re Syngenta MIR162 Corn Litigation (U.S. District Court, District of Kansas) and *In re Syngenta Litigation* (Minnesota Fourth Judicial District) (appointed to Plaintiffs' Executive Committee in both federal and state MDLs; trial counsel for individual bellwethers and Minnesota class leading to \$1.51 billion settlement)

In re Dicamba Herbicides Litigation (U.S. District Court, Eastern District of Missouri) (appointed to Plaintiffs' Executive Committee and Settlement Committee leading to \$400 million settlement)

Robinson, et al., v. Jackson Hewitt, Inc., and Tax Services of America, Inc. (U.S. District Court, District of New Jersey) (appointed Interim Co-Lead Class Counsel challenging Jackson Hewitt's "No-Poach Provision," leading to a \$10.8 million class settlement)

Jones and Lorenzen v. Varsity Brands, LLC, et al., (U.S. District Court, Western District of Tennessee) (appointed Interim Class Counsel, Executive Committee Counsel, and Co-Lead Settlement Counsel and served as trial counsel in anti-trust action involving a monopoly, conspiring to raise, fix, and stabilize the prices charge for Varsity competitions, camps, and apparel (i.e., price-fixing) within the cheerleading industry; leading to a \$82.5 million settlement on behalf of indirect purchasers)

Confidential Settlement (California state court) (lead trial counsel on behalf of approximately 1,100 migrant farmworkers who were exposed to pesticides causing brain damage in children; leading to a \$300 million settlement)



Wells Fargo Loan Modification Litigations (U.S. District Court, Northern District of California; U.S. District Court, Southern District of Ohio) (appointed Class Counsel across multiple litigations regarding improper foreclosure of thousands of people's homes, resulting in cumulative settlements of \$53.5 million)

In re P&G Aerosol Products Marketing and Sales Practices Litigation (U.S. District Court, Southern District of Ohio) (Settlement Class Counsel in action over benzene exposure in aerosol products such as deodorant; negotiated an \$8 million settlement)

Fuentes v. Jiffy Lube International, Inc. (U.S. District Court, Eastern District of Pennsylvania) (appointed Class Counsel in action on behalf of hourly franchise employees in Pennsylvania over Jiffy Lube's "No Poach Provision," leading to a \$2 million settlement)

In re General Motors Dex-Cool Cases (Alameda County Superior Court, California; Jackson County Circuit Court, Missouri; Southern District of Illinois, MDL 1562) (appointed Co-Lead Counsel in federal MDL and Co-Lead Class Counsel in two state courts; obtained one of the largest automotive defect settlements of all time)

Holt v. Community America Bank (U.S. District Court, Western District of Missouri) (appointed Class Counsel on behalf customers who were overcharged overdraft fees resulting in a \$2.325 million settlement)

In re Eclipse Aviation Depositor Litigation (Bernalillo County, New Mexico) (negotiated settlement of approximately \$49 million on behalf of purchasers of jet aircraft)

In re: Air Crash of N51RX (Santa Fe County, New Mexico) (negotiated complex 8-figure settlement in a 5-death air ambulance crash with multiple defendants and insurance companies)

Malloy v. Pratt & Whitney (U.S. District Court, Northern District of Oklahoma) (\$2.1 million settlement of product liability claim for defective aircraft engines)

In re Great Plains Air Lines (U.S. Bankruptcy Court, Northern District of Oklahoma) (negotiated confidential settlement with officers and directors of defunct regional airline carrier)

In re Mountain Energy Corp. (U.S. Bankruptcy Court, Western District of Missouri) (officer/director liability, negotiated 14-party settlement with more than \$60 million recovery)

In re Oak Hills Drilling & Operating Co. (U.S. Bankruptcy Court, Eastern District of Oklahoma) (obtained judgment after trial for over \$1.5 million on behalf of bankruptcy estate)

Malloy v. Commerce Bank (District Court of Tulsa County, Oklahoma) (negotiated settlement for claims alleging aiding and abetting breach of fiduciary duty, fraudulent transfers, and civil conspiracy on behalf of bankruptcy estate)



The Lawyers and Reputation We Enjoy



Rick Paul

Partner

Rick specializes in complex antitrust, business, product liability, and consumer litigation—typically involving class or mass actions. Rick graduated from the University of Missouri-Columbia School of Law, where he served as Associate Managing Editor of the Missouri Law Review. After law school, Rick was a judicial law clerk at the Missouri Supreme Court and the Missouri Court of Appeals, Western District. In 1996, he began private practice with the firm formerly known as Shughart Thomson & Kilroy, a large Kansas City law firm with offices in Missouri, Kansas, Colorado, and Arizona. In 2002, the Board of Directors of Shughart

Thomson elected him a Shareholder and Director. In 2008, Rick moved his practice to Stueve Siegel Hanson LLP. In May 2013, Rick started Paul LLP.

Rick has recovered nearly \$3 billion for his clients through trial or settlement. Rick has been appointed by numerous courts across the country to serve as lead counsel in class and mass actions and in MDL proceedings.

Rick enjoys being in the courtroom and has tried and won many types of cases in jury trials, bench trials, and arbitrations. He has repeatedly been brought into a case shortly before trial for just that purpose. Rick served as trial counsel in the *In re Syngenta Litigation* pending in the Minnesota Fourth Judicial District. Rick was co-lead trial counsel for the first individual bellwether trial as well as the Minnesota class action trial. During the third week of the Minnesota class trial, the litigation was settled on behalf of all farmers (individual and classes) across the country. Rick has also argued more than 40 appeals to various state and federal appellate courts and briefed over 100 appeals.

Rick is active in the local bar, including the Kansas City Metropolitan Bar Association. He has served as Vice-Chair on the Business Torts Committee, where he authored the Chapter on Fiduciary Duties for the Business Torts Handbook. Rick is a frequent speaker and moderator at seminars and presentations on trial-related issues. In 2006, Missouri Lawyers Weekly named Rick as one of eight “Up and Coming Lawyers.” He is annually named a “Missouri/Kansas Super Lawyer” and has an AV Preeminent Peer Review Rating with Martindale-Hubbell.



Court Admissions

Missouri, 1995	U.S. Court of Appeals, 9th Circuit
Kansas, 1997	U.S. Court of Appeals, 10th Circuit
U.S. Supreme Court	U.S. Court of Appeals, 11th Circuit
U.S. Court of Appeals, 3rd Circuit	U.S. District Court, District of Colorado
U.S. Court of Appeals, 4th Circuit	U.S. District Court, District of Kansas
U.S. Court of Appeals, 5th Circuit	U.S. District Court, Eastern District of Missouri
U.S. Court of Appeals, 6th Circuit	U.S. District Court, Western District of Missouri
U.S. Court of Appeals, 7th Circuit	U.S. District Court, Eastern District of Wisconsin
U.S. Court of Appeals, 8th Circuit	

Education

University of Missouri-Columbia School of Law, Columbia, Missouri, 1995
J.D., Assistant Managing Editor, Missouri Law Review

University of Missouri, Columbia, Missouri, 1992
B.A., Economics and Political Science, Honors College

Honors: MU Varsity Tennis Team, Letter winner; Academic All Big-8



Ashlea Schwarz

Managing Partner

Ashlea, Managing Partner of Paul LLP, litigates complex business disputes including claims for negligence, breach of contract, breach of fiduciary duty, fraud, and misrepresentation. She also represents clients in a range of litigation matters including complex, consumer class actions.

Ashlea has represented thousands of clients from the inception of a case through a verdict and litigated nearly 100 mass and class actions. Ashlea has taken 6 cases to trial, including three collective/class actions where she recovered over \$5 million collectively for her clients. Her practice is nationwide and traditionally includes multi-party and multi-district litigation.

Ashlea remains involved in the legal community through her work as a former board member for the Kansas City Metropolitan Bar Association and Current Past President of the Kansas City Bar Association’s Federal Court Advocates Section, and subcommittee chair for American Women Lawyers. In 2014, she was named one of Missouri Lawyers’ Weekly’s “Up and Coming Lawyers,” an award recognizing litigators under age 40 who demonstrate excellence in the legal profession and in their commitment to their communities. Ashlea continues to be selected yearly as a Kansas City Business Journal Rising Star and is a Missouri/Kansas Super Lawyer. Additionally, in 2022 she was selected to the Missouri Lawyers’ Weekly’s POWER List of Commercial & Consumer Litigation Attorneys and received their Women’s Justice Litigation Practitioner Award.

Court Admissions

Missouri, 2007

U.S. District Court, District of Colorado

Kansas, 2008

U.S. District Court, District of Kansas

U.S. Court of Appeals, 4th Circuit

U.S. District Court, Western District of Missouri

U.S. Court of Appeals, 10th Circuit



Education

University of Kansas School of Law, Lawrence, Kansas, 2007

J.D., Clerk for Judge Julie Robinson, U.S. District, District of Kansas, 2005-2006

Honors: P. Mize Award for Trial Advocacy, Robert F. Bennett Award for Public Service

Kansas State University, Manhattan, Kansas, 2004

B.A. in Journalism and Mass Communications and minors in English and German

Honors: Phi Beta Kappa, Phi Kappa Phi, Golden Key, Journalism and Mass Communication Ambassador, K-State Student Foundation Board Member, University Ambassador



Laura Fellows

Partner

Laura Fellows focuses her practice on antitrust litigation, class actions, complex business litigation, and mass actions. She represents plaintiffs in federal and state courts throughout the country. During the past decade, Ms. Fellows has prosecuted cases resulting in more than \$375 million in recovery for matters involving agriculture, pesticides, banking, and healthcare, among others. Most recently, Laura served as first chair in a trial for an individual business owner that resulted in a jury verdict in her client's favor. She has been named a Super Lawyers' Missouri/Kansas Rising Star yearly since 2015.

Missouri/Kansas Rising Star yearly since 2015.

During law school, Laura was on the national team for the American Bar Association's Negotiation Competition, reaching the semi-final round of the national competition. Laura also served as president of the Association for Women Law Students. Before law school, Laura attended Missouri State University as a Board of Governor's Scholar and member of the honors college.

Court Admissions

Missouri, 2013
Kansas, 2014
Arkansas, 2015

U.S. Supreme Court
U.S. Court of Appeals, 5th Circuit
U.S. Court of Appeals, 8th Circuit
U.S. Court of Appeals, 9th Circuit
U.S. Court of Appeals, 10th Circuit
U.S. District Court, Western District of Missouri
U.S. District Court, District of Kansas
U.S. District Court, Eastern District of Arkansas
U.S. District Court, Western District of Arkansas

Education

University of Missouri Kansas City School of Law, 2013 J.D.
Missouri State University, 2010
B.A. in Communications and minor in German, *Cum Laude* in the Honors College
Honors: Board of Governors Scholar; Commerce Bank Emerging Leader



Mary Jane Fait

Attorney

Ms. Fait has decades of experience specializing in plaintiffs' complex antitrust, securities fraud and consumer fraud class actions involving a wide range of industries, appearing before federal district and appellate courts throughout the United States. She has served in leadership positions and has generated millions of dollars in damages for aggrieved class members. Before coming to Paul LLP, she served as a partner in two national class action law firms.

Court Admissions

New York	U.S. District Court, Northern District of Illinois
Illinois	U.S. District Court, Southern District of New York
U.S. Supreme Court	U.S. District Court, Eastern District of New York
U.S. Court of Appeals, 2nd Circuit	U.S. District Court, Western District of Texas
U.S. Court of Appeals, 3rd Circuit	U.S. District Court, Eastern District of Michigan
U.S. Court of Appeals, 7th Circuit	
U.S. Court of Appeals, 9th Circuit	

Education

Cornell Law School, Ithaca, NY, J.D.
University of Illinois, Urbana-Champaign, IL
B.A., Economics



David Bodenheimer

Associate

David focuses his practice on complex antitrust litigation, class actions, mass torts, pharmaceutical drug and medical device litigation, and medical malpractice. David joined Paul LLP in 2022 after graduating Valedictorian from the University of Missouri-Kansas School of Law. During law school, David was a Research Assistant; worked as a legal research and writing Teaching Assistant; served as Vice-Magister of Phi Delta Phi, an international legal honors society; founded an organization; served on the UMKC Law Review staff; and competed in the Ellison Moot Court Competition, placing second overall. He

interned at Copilevitz, Lam & Raney, P.C., a firm specializing in First Amendment law, and Paul LLP. Prior to law school, David participated in Boy Scouts of America and earned the rank of Eagle Scout in 2013.

Court Admissions

Missouri, 2022

U.S. Court of Appeals, 5th Circuit
U.S. Court of Appeals, 9th Circuit
U.S. Court of Appeals, 10th Circuit
U.S. District Court, Western District of Missouri

Education

University of Missouri Kansas City School of Law, 2022 J.D.
Valedictorian, *Summa Cum Laude*

Missouri State University, 2019
B.S., Fashion Merchandising & Design, *Cum Laude*



Ryan Heffner

Associate

Ryan focuses his practice on the discovery phase of complex litigation. Ryan joined Paul LLP in 2022 after practicing in the government sector for over five years.

While attending Campbell University, Norman Adrian Wiggins School of Law, Ryan interned with Mayer Brown in Düsseldorf, Germany. Ryan worked on complex international mergers and acquisitions.

Ryan is a native of Cleveland, Ohio. He enjoys spending time with his Golden Retriever, Regan, in his free time.

Court Admissions

Virginia, 2016

District of Columbia, 2018

U.S. Court of Appeals, 4th Circuit, 2019

U.S. Court of Appeals, Federal Circuit, 2019

Education

American University, School of Public Affairs

2020 M.A., Public Administration and Policy

Campbell University, Norman Adrian Wiggins School of Law

2016 J.D.

Eckerd College

2013 B.A., Political Science and History



Sydney Michels

Associate

Sydney focuses her practice on complex antitrust litigation, class actions, and mass torts. Sydney joined Paul LLP in 2023 after beginning her practice as a staff attorney for Kansas Legal Services.

Court Admissions

Washington, 2021

Kansas, 2021

Education

Gonzaga University School of Law
2021 J.D.

Washington State University
2017 B.S. Political Science, *cum laude*



Haley Hawn

Associate

Haley joined Paul LLP in 2024 following a two-year clerkship for the Hon. Sarah E. Warner at the Kansas Court of Appeals. During law school, Haley received the Latshaw Criminal Law Award for excellence in criminal law; served as a teaching assistant for UMKC's legal research and writing program; was a UMKC Law Review staff member; and competed in the Ellison Moot Court Competition, winning an award for best brief and top overall advocate. Haley has been involved with Big Brothers and Big Sisters Kansas City since 2021. She is excited to advocate for safe and responsible industry practices and will focus her practice on complex antitrust litigation, class actions, and mass torts.

Court Admissions

Kansas, 2022
U.S. District Court, District of Kansas

Education

William Jewell College
2019, Political Science & Communication

University of Missouri – Kansas City School of Law
2022 J.D.



Ben Wietharn

Associate

Ben joined Paul LLP Trial Attorneys in 2025 with a desire to work in an intellectually stimulating environment while making a direct impact on the lives of wronged individuals.

Ben graduated *magna cum laude* from the University of Missouri – Kansas City School of Law in 2023. While at UMKC, he was a member of the Mock Trial Team and was given the Order of Barristers Award. Ben began his career at a litigation defense firm prior to joining Paul LLP Trial Attorneys. He is active in the community and is a board member of the Young Lawyers Section of the Lawyers Association of Kansas City.

Ben focuses his practice on complex litigation and antitrust matters.

Court Admissions

Missouri, 2023

Kansas, 2025

Education

University of Missouri, Kansas City School of Law, 2023, J.D., *magna cum laude*, *The Order of Barristers Award*

Kansas State University, 2019



Megan Duffield

Associate

Megan joined Paul LLP with a desire to represent a wide variety of individuals across the nation and to make positive and impactful change within industries and within people's daily lives.

Megan graduated *summa cum laude* from Tulane University School of Law with Pro Bono Honors. While at Tulane, she was senior editor of the Tulane Journal of Technology and Intellectual Property and completed directed research under Professor Brian L. Frye with a focus on the Theory of Property and Corporate Governance within the Music Streaming Industry. She was active in several organizations including the Tulane Business Law Society, the Tulane First-Generation Law Students Panel, and the Tulane Women in Law organization.

Court Admissions

Missouri, 2024

Education

Tulane University School of Law, 2024, J.D.

University of Missouri, 2021, *summa cum laude*



Astrid Reyes Baez

Associate

Astrid Reyes Baez has extensive experience with legal research, with a specialty regarding the statutes of limitations for personal injury and product liability claims under different state laws. Examining evidence, auditing documents, and refining complex legal information into concise and comprehensible summaries for efficient review and analysis are just a few of Astrid’s areas of expertise.

Astrid was born and raised on the beautiful island of Puerto Rico. She completed her undergraduate studies in Psychology at the University of Puerto Rico, Rio Piedras Campus, and then made the decision to pursue a career in law. Astrid obtained her Juris Doctor degree from the University of Puerto Rico School of Law and has been actively practicing law ever since.

During her law school years, she excelled as a law clerk in the San Juan Judicial Center. Additionally, she actively participated in Proyecto ADN Post-Sentencia and put her many talents to use in the Legal Assistance Clinic for Discrimination for Sexual Orientation and Gender Identity of the University of Puerto Rico School of Law.

In 2021, she embarked on her journey as an attorney, dedicating her expertise to mass torts and personal injury law firms. However, driven by a desire for further professional growth, she undertook the notary public exam, successfully obtaining the esteemed title of a Notary Public attorney.

Astrid comes from a background heavily focused on mass torts and multi-district litigations. She brings a wealth of knowledge and experience to Paul LLP Trial Attorneys. She speaks Spanish fluently and is licensed to practice in the United States & Puerto Rico.

Education

University of Puerto Rico, Rio Piedras Campus
Psychology
University of Puerto Rico School of Law, 2020, J.D.



Natalia Barquet Hornback
Associate

Natalia comes to Paul LLP with several years of experience in mass tort litigation. She earned her J.D. in 2015 and has an extensive background in family law, corporate law, gender inequality, domestic violence, and sexism cases. Natalia is a Notary Public Attorney and is fluent in English and Spanish.