

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

BOSTON RETIREMENT SYSTEM,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

ALEXION PHARMACEUTICALS, INC.,
LEONARD BELL, DAVID L. HALLAL,
VIKAS SINHA,

Defendants.

Civ. No. 3:16-cv-2127 (AWT)

Hon. Alvin W. Thompson

**JOINT DECLARATION OF GREGG S. LEVIN AND MICHAEL H. ROGERS
IN SUPPORT OF (I) CLASS REPRESENTATIVES' MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN OF
ALLOCATION AND (II) CO-CLASS COUNSEL'S MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND PAYMENT OF LITIGATION EXPENSES**

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- B. Janeen McIntosh, Svetlana Starykh, & Edward Flores, *Recent Trends in Securities Class Action Litigation: 2022 Full-Year Review* (NERA Jan. 24, 2023)
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- L. Tables of hourly rates for defense firms in bankruptcy proceedings in 2022 compiled by Labaton Sucharow LLP
- M. ISS Securities Class Action Services, *Top 50 of 2022* (Feb. 28, 2023)

We, GREGG S. LEVIN and MICHAEL H. ROGERS, declare as follows under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I, Gregg S. Levin, am a member attorney at the law firm of Motley Rice LLC (“Motley Rice”).

2. I, Michael H. Rogers, am a partner at the law firm of Labaton Sucharow LLP (“Labaton Sucharow”).

3. Motley Rice and Labaton Sucharow (together, the Court-appointed “Co-Lead Counsel” or “Co-Class Counsel”) represent Erste Asset Management GmbH (“Erste AM”) and the Public Employee Retirement System of Idaho (“PERSI,” and together with Erste AM, “Lead Plaintiffs” or “Class Representatives”) in this securities class action (the “Action”).¹

4. We have personal knowledge of the matters set forth herein based on our active supervision of and participation in the prosecution and resolution of the Action.

5. We respectfully submit this Joint Declaration in support of: (i) final approval of the proposed Settlement that Class Representatives reached with Defendants Alexion Pharmaceuticals, Inc. (“Alexion” or the “Company”), Leonard Bell, David L. Hallal, and Vikas Sinha (collectively, “Defendants,” and together with Class Representatives, the “Parties”); (ii) approval of the proposed Plan for the Allocation of the Net Settlement Fund (“Plan of Allocation”); and (iii) approval of Co-Class Counsel’s motion for awards of attorneys’ fees,

¹ Capitalized terms not otherwise defined herein have the meanings given to them in the Stipulation and Agreement of Settlement (“Stipulation”), dated as of September 11, 2023. *See* ECF No. 306.

Citations to “Exhibit” or “Ex. __” herein refer to exhibits to this Declaration. For clarity, citations to exhibits that have internal exhibits will be referenced as “Ex. __-__.” The first reference is to the designation of the entire exhibit attached hereto and the second reference is to the exhibit designation within the exhibit itself.

litigation expenses, and reasonable costs and expenses to Class Representatives pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”).

6. The Settlement will resolve all claims in the Action against all Defendants and the other Released Defendant Parties on behalf of the Class, which consists of all persons or entities who purchased or otherwise acquired Alexion publicly traded common stock during the period from January 30, 2014 to May 26, 2017, inclusive (the “Class Period”), and who were allegedly damaged thereby.²

7. The Court preliminarily approved the Settlement by its Order entered September 19, 2023. *See* ECF No. 309.

I. PRELIMINARY STATEMENT

8. Through rigorous efforts and after extensive arm’s-length settlement negotiations, Class Representatives, through Co-Class Counsel, have obtained a recovery for the Class in the amount of \$125 million in cash, which will be deposited in an interest-bearing escrow account for the benefit of Class Members. As set forth in the Stipulation, in exchange for this payment, the proposed Settlement resolves all claims asserted by Class Representatives and the Class in the Action, or that could have been asserted, as against Defendants and the other Released Defendant Parties (“Released Plaintiffs’ Claims”).

9. The proposed Settlement was negotiated following six years of extensive investigation, litigation, and settlement negotiations, including two arm’s-length, in-person, full-

² Excluded from the Class are: (i) Defendants; (ii) members of the Immediate Families of the Individual Defendants; (iii) Alexion’s subsidiaries and affiliates; (iv) any person who is or was an officer or director of Alexion or any of the Company’s subsidiaries or affiliates during the Class Period; (v) any entity in which any Defendant has a controlling interest; and (vi) the legal representatives, heirs, successors, and assigns of any such excluded person or entity. Also excluded from the Class will be any Person who or which timely and validly seeks exclusion from the Class.

day mediation conferences in September 2022 and July 2023 facilitated by an experienced and highly respected mediator, retired United States District Court Judge Layn R. Phillips (“Judge Phillips”). The result is a substantial \$125 million recovery that avoids the risks and uncertainty associated with further motion practice, trial, and future appeals.

10. Before agreeing to the Settlement, Co-Class Counsel engaged in comprehensive litigation efforts concerning the claims and defenses alleged in the Action. In that regard, Co-Class Counsel analyzed the evidence adduced from, *inter alia*: (i) their extensive factual investigation in connection with the filing of two consolidated complaints, including a rigorous analysis of Alexion’s public filings and statements and analysts’ reactions thereto, the review of news articles and analyst reports about Alexion, and contacting approximately 414 former Alexion employees, and interviewing approximately 68 of them, concerning the relevant subject matter; (ii) researching and briefing Defendants’ two Motions to Dismiss and Lead Plaintiffs’ Class Certification Motion; (iii) the review and analysis of approximately 3,500,000 pages of documents obtained from Defendants and non-parties; (iv) preparing for and taking or defending 24 depositions of fact witnesses, experts, non-parties, and corporate representatives; (v) consultations with an economic expert, Chad Coffman, on issues pertaining to market efficiency, price impact, loss causation and damages; and (vi) consultations with other legal and subject matter experts relevant to the case. Co-Class Counsel also carefully reviewed the documents provided by Alexion in connection with the September 2022 and July 2023 mediation sessions.

11. According to analyses prepared by Mr. Coffman and his team, and based on various assumptions and modeling, class-wide maximum reasonably recoverable damages are estimated to be approximately \$2.4 billion, after deducting gains on pre-Class Period holdings and assuming success in establishing Defendants’ liability and further that the trier of fact would reject

Defendants' primary arguments directed to both loss causation and damages. Accordingly, a \$125 million Settlement represents 5.2% of these reasonably recoverable damages. This percentage is a very favorable result in the face of this Action's significant litigation risks. Indeed, securities class actions with class-wide damages of over \$1 billion often settle for a smaller fraction of the overall damages. During the period from 2013 through 2021 and in 2022, in securities cases where the market capitalization losses exceeded \$1 billion, the average percentage of recovery was 2.4% and 2.2%, respectively.³

12. As explained in the Memorandum of Law in Support of Class Representatives' Motion for Final Approval of Class Action Settlement and Plan of Allocation ("Settlement Memorandum"), filed herewith, the recovery of approximately 5.2% of the estimated damages is a very positive result. In 2022, the median value of securities class actions settlements overall was \$13 million⁴ and the median percentage of recovery (using NERA Economic Consulting's estimates of simple class-wide damages) was 1.8%.⁵ In the first six months of 2023, the median settlement value was \$16 million⁶ and only 3% of securities class actions settled for more than \$100 million.⁷

³ *Securities Class Action Settlements: 2022 Review and Analysis*, at 6 (Cornerstone Research 2023), <https://securities.stanford.edu/research-reports/1996-2022/Securities-Class-Action-Settlements-2022-Review-and-Analysis.pdf> (attached hereto as Ex. A).

⁴ Janeen McIntosh, Svetlana Starykh, & Edward Flores, *Recent Trends in Securities Class Action Litigation: 2022 Full-Year Review*, at 15 (NERA Jan. 24, 2023) ("Jan. 2023 NERA Report") (attached hereto as Ex. B).

⁵ *Id.* at 18.

⁶ See Edward Flores & Svetlana Starykh, *Recent Trends in Securities Class Action Litigation: H1 2023 Update*, at 9 fig.8 (NERA Aug. 2, 2023) ("Aug. 2023 NERA Report") (attached hereto as Ex. C).

⁷ *Id.* at 10 fig.9.

13. As discussed below, Class Representatives and their counsel obtained this favorable recovery for the Class despite the significant risks they faced in prosecuting the Action. The Settlement Amount paid on behalf of Defendants, when viewed in the context of these risks and uncertainties, makes the Settlement a very favorable result for the Class.

14. With respect to the Fee and Expense Application, as discussed in the Memorandum of Law in Support of Co-Class Counsel's Motion for an Award of Attorneys' Fees and Payment of Expenses ("Fee Memorandum"), the requested fee of 25% of the Settlement Fund is fair and reasonable, and warrants the Court's approval. The fee request is within the range of fee percentages frequently awarded in this type of action and would provide a modest multiplier of 1.22 on Plaintiffs' Counsel's lodestar to date. Co-Class Counsel also seek Litigation Expenses totaling \$ 1,364,364.07 and an award to Class Representatives, pursuant to the PSLRA, 15 U.S.C. § 78u-4(a)(4), in the aggregate amount of \$51,960—which, when combined, are less than the cap on expenses of \$1,500,000 provided for in the Notice.

15. The Settlement and Co-Class Counsel's fee and expense request have the full support of the Class Representatives.⁸

II. BRIEF SUMMARY OF CLASS REPRESENTATIVES' CLAIMS

16. Class Representatives' claims in the Action are set forth in the Amended Consolidated Class Action Complaint for Violations of the Federal Securities Laws filed on June 2,

⁸ See Decl. of Romana Peschke of Erste AM in Support of (A) Class Representatives' Motion for Final Approval of Class Action Settlement and Plan of Allocation and (B) Co-Class Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses at ¶ 6 ("Peschke Decl.") (attached hereto as Ex. D); Decl. of Michael Hampton on Behalf of Public Employee Retirement System of Idaho in Support of (a) Class Representatives' Motion for Final Approval of Class Action Settlement and Plan of Allocation and (b) Co-Class Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses at ¶ 6 ("Hampton Decl.") (attached hereto as Ex. E).

2019 (the “Amended Complaint”). *See* ECF No. 121. At its core, the Amended Complaint alleges that Defendants violated Section 10(b) of the Securities Exchange Act of 1934 (the “Exchange Act”), and Rule 10b-5 promulgated thereunder, 17 C.F.R. § 240.10b-5, by making materially false and misleading and/or failing to disclose adverse information regarding the Company’s business and operations.

17. Class Representatives’ claims center on whether Defendants knowingly or recklessly misled investors during the Class Period regarding Alexion’s sales practices in connection with the marketing of the Company’s flagship drug, Soliris, which treats, among others, patients suffering from one of two ultra-rare diseases, paroxysmal nocturnal hemoglobinuria (“PNH”) and atypical hemolytic uremic syndrome (“aHUS”).

18. The Amended Complaint alleges that, as a result of Defendants’ misrepresentations during the Class Period, purchasers of Alexion’s publicly traded common stock paid artificially inflated prices and were damaged thereby when the alleged truth about Alexion’s business was allegedly revealed through a series of partial corrective disclosures.

19. Defendants have denied and continue to deny that they engaged in any wrongdoing or committed any act or omission giving rise to any liability and/or violation of law. Defendants have asserted numerous defenses to liability (which they likely would raise at summary judgment and trial), including, among others, that (i) no material misstatements or omissions were made; and (ii) Class Representatives would not be able to establish that Defendants acted with scienter. Defendants further have contended that Class Representatives faced particularly significant obstacles in proving loss causation and damages.

III. PROCEDURAL HISTORY

A. Commencement of the Action, Appointment of Lead Plaintiffs and Co-Lead Counsel, and Defendants' First Motion to Dismiss

20. On December 29, 2016, a class action complaint, styled as *Boston Retirement System v. Alexion Pharmaceuticals, Inc. et al.*, No. 3:16-cv-02127-AWT, was filed in the United States District Court for the District of Connecticut, against the Defendants and other then-named defendants, alleging violations of the federal securities laws. ECF No. 1. On April 12, 2017, the Court appointed Erste AM (then known as Erste-Sparinvest Kapitalanlagegesellschaft mbH) and PERSI as Lead Plaintiffs and approved Motley Rice LLC and Labaton Sucharow LLP as Co-Lead Counsel. ECF Nos. 43–44.

21. On July 14, 2017, Lead Plaintiffs filed their Consolidated Class Action Complaint for Violation of the Federal Securities Laws (the “Complaint”) asserting claims under Section 10(b) of the Exchange Act and Rule 10b-5 promulgated thereunder, and under Section 20(a) of the Exchange Act. ECF No. 63. Among other things, the Complaint alleged that Defendants made materially false and misleading statements and omissions based principally on Alexion’s sales practices in connection with the marketing of the Company’s flagship drug, Soliris. The Complaint further alleged that the price of Alexion common stock was artificially inflated as a result of the allegedly false and misleading statements and omissions and that the stock price declined when the alleged truth about Alexion’s business was revealed through a series of partial corrective disclosures. On September 12, 2017, Defendants (and former defendants named in the Complaint) moved to dismiss the Complaint, arguing that Lead Plaintiffs had failed to sufficiently allege, *inter alia*, actionable misstatements or omissions, scienter, and loss causation. ECF No. 79. On November 13, 2017, Lead Plaintiffs filed their memorandum of law in opposition to

Defendants' motion to dismiss, ECF No. 86, and on December 28, 2017, Defendants filed their reply brief, ECF No. 99.

22. On October 18, 2017, while the motion to dismiss was pending, Lead Plaintiffs filed a motion to partially lift the PSLRA stay of discovery, seeking to obtain a limited production of documents reflecting the investigation by Alexion's Audit and Finance Committee regarding alleged sales practices that were inconsistent with the Company's policies and procedures. ECF No. 80. After briefing on the motion was completed, the Court denied Lead Plaintiffs' request on March 26, 2019. ECF No. 114.

23. Also on March 26, 2019, the Court informed the Parties that it was preparing a ruling granting Defendants' motion to dismiss and asked Co-Lead Counsel if they would seek leave to amend the Complaint after the Court issued an order granting the motion to dismiss. *Id.* On April 2, 2019, the Court entered an Order permitting Lead Plaintiffs to file an amended complaint. ECF No. 116.

B. The Amended Consolidated Complaint, Defendants' Second Motion to Dismiss and the Court's Ruling Thereon

24. On June 2, 2019, Lead Plaintiffs filed the operative Amended Complaint, ECF No. 121, which alleged claims on behalf of all persons and entities who purchased or otherwise acquired the publicly traded common stock of Alexion from January 30, 2014 through May 26, 2017. Lead Plaintiffs asserted that Defendants violated Section 10(b) (and Rule 10b-5 promulgated thereunder) and Section 20(a) of the Exchange Act by, *inter alia*, making materially false and misleading statements and/or failing to disclose adverse information regarding the Company's business and operations. The allegations in the Amended Complaint included new factual allegations, including information obtained from five confidential witnesses ("CWs").

25. On August 2, 2019, Defendants moved to dismiss all of Lead Plaintiffs' claims. ECF No. 130. In that motion, Defendants argued, among other things, that the Amended Complaint failed to adequately allege any statement that was false or any omission of a fact that rendered the statements materially misleading. Defendants further argued that the Amended Complaint failed to adequately allege Defendants' scienter, contending, *inter alia*, that encouraging sales of products to patients did not evidence fraudulent intent. Finally, Defendants contended that Lead Plaintiffs' failure to assert that the Defendants' alleged fraud caused the Class's losses was yet another basis for dismissal.

26. In preparing opposing arguments to this motion to dismiss, Co-Lead Counsel reviewed and analyzed the briefing, exhibits, and extensive legal authority cited in the motion, and conducted further necessary legal research. On October 2, 2019, Lead Plaintiffs filed a 60-page opposition to Defendants' motion to dismiss, citing numerous authorities to support their contentions, and distinguishing the key authorities cited in support of the motion. ECF No. 142. In their opposition, Lead Plaintiffs vigorously defended their allegations and argued that the Amended Complaint adequately alleged all elements of their claims.

27. Following full briefing on the motion by the Parties, the Court rendered its ruling on August 19, 2021, denying in large part Defendants' motion. In its Order, the Court held that Lead Plaintiffs sufficiently pled that Defendants knowingly or severely recklessly issued false and misleading statements and omissions concerning: (i) Alexion's sales practices *vis-à-vis* Soliris; and (ii) certain of Alexion's certifications made pursuant to the Sarbanes-Oxley Act of 2002. ECF No. 172. The Court also upheld Lead Plaintiffs' claim for scheme liability under Rule 10b-5(a) and (c) and Lead Plaintiffs' control-person claims against Defendants Bell, Hallal, and Sinha. *Id.*

28. With respect to scienter, an element which Defendants had vigorously disputed in their motion to dismiss, the Court held that Lead Plaintiffs had “alleged with particularity facts giving rise to a strong inference that Alexion, Bell and Hallal acted with the required state of mind.” *Id.* at 55. In reaching this conclusion, the Court cited specifically to Lead Plaintiffs’ allegations, including those relating to the CWs, that: (i) Bell and Hallal “knew facts or had access to information suggesting that their public statements about the source of Alexion’s strong revenue growth were misleading”; (ii) “in December 2014, outside counsel submitted a confidential report about the company’s operations in Brazil, which alerted Alexion, Bell and Hallal to the fact that at least some of Alexion’s sales practices were unethical and illegal”; (iii) Alexion had made admissions with respect to “the tone at the top” at the Company; and (iv) Hallal’s departure from his position at the Company. *Id.* at 56. The Court added that “[t]his strong inference of scienter [was] enhanced by factual allegations about the departures of other Alexion executives and with respect to the core operations theory.” *Id.*

29. With respect to loss causation, the Court rejected Defendants’ contentions, concluding that “the factual allegations in the Amended Complaint [did] more than ‘give [d]efendants ‘some indication’ of the actual loss suffered and of a plausible causal link between that loss and the alleged misrepresentations.’” *Id.* at 81-82 (citation omitted).

30. The Court dismissed the claims against David Brennan, David J. Anderson, Carsten Thiel, and Ludwig Hantson, holding that Lead Plaintiffs did not sufficiently plead scienter and, by extension, culpable participation as to those individuals.

31. On October 18, 2021, Defendants filed their answer to the Amended Complaint. ECF No. 182.

C. The Parties' Document Discovery and Fact Depositions

32. Following the Court's August 19, 2021 order on Defendants' motion to dismiss, formal discovery commenced. As set forth in more detail below, Lead Plaintiffs: (i) prepared and served detailed discovery requests on Defendants, including Requests for Production of Documents and Interrogatories; (ii) met and conferred with Defendants on numerous occasions concerning the discovery served by both sides and the search terms and protocols to be used to collect documents and data responsive to those discovery requests; (iii) identified and served 27 subpoenas on non-parties and negotiated with those non-parties and their counsel concerning their production of documents, information, and testimony; (iv) produced or received over 512,500 documents from Defendants, Lead Plaintiffs, and numerous nonparties (approximately 505,000 documents from Defendants, approximately 3,000 documents from Lead Plaintiffs, and approximately 4,000 documents from non-parties); (v) took, defended, or otherwise participated in 18 merits depositions and six depositions in connection with class certification; (vi) reviewed and analyzed approximately eight privilege logs produced on behalf of Defendants and various non-parties, which collectively contained more than 17,300 individual line items each claiming privilege and/or work-product protection, drafted correspondence challenging more than 3,200 such designations, and met and conferred with Defendants regarding these challenged designations; (vii) filed two motions to compel discovery, and negotiated and resolved a myriad of other discovery disputes; and (viii) engaged and consulted with several experts.

33. During discovery, Co-Lead Counsel operated efficiently and flexibly, adjusting the size of the litigation team to fit the needs of the case, and designating sub-teams to handle the many different aspects of discovery, such as Defendants' production, Lead Plaintiffs' production, non-party productions, and deposition preparation. Throughout the discovery process, Co-Lead Counsel: (i) reviewed and analyzed documents; (ii) evaluated discovery issues; (iii) formulated

litigation strategies; (iv) maintained the document-review platform; (v) drafted and reviewed correspondence and documents regarding discovery disputes, and filed two motions to compel with the Court with respect to issues that the Parties were unable to resolve; (vi) prepared for and defended the depositions of Lead Plaintiffs and their experts; (vii) worked with Lead Plaintiffs' experts; (viii) met and conferred with counsel for Defendants and non-parties to discuss and resolve discovery disputes; and (ix) prepared for and took fact depositions.

34. On September 29, 2021, Lead Plaintiffs served their Amended First Set of Requests for the Production of Documents and Lead Plaintiff Erste AM served its Amended First Set of Interrogatories on Defendant Alexion. On February 17, 2023, Erste AM served its Second Set of Interrogatories on Defendant Alexion.

35. On October 11, 2021, Defendants served their First Request for Production of Documents Directed to Lead Plaintiffs and First Set of Interrogatories to Lead Plaintiffs. On December 30, 2021, Defendants served their Second Set of Interrogatories Direct to Lead Plaintiff Erste AM.

36. Lead Plaintiffs took a thoughtful and strategic approach to reviewing and analyzing Defendants' document productions totaling approximately 3,500,000 pages. Document review began immediately following Defendants' initial document production in November 2021 and was ongoing at the time of the Settlement.

37. To facilitate an economical and time-efficient document review process, all production documents were stored in an electronic database, using an eDiscovery platform called Relativity to organize the data.

38. A team of experienced attorneys (hereinafter, the "Review Team") reviewed and analyzed the productions (after having been involved in the selection of potential document

custodians). These attorneys were trained in utilizing the latest technology, including the Relativity eDiscovery platform, with respect to document review and analysis.

39. To efficiently focus on the most relevant documents, the Review Team used the Relativity platform's software tools to analyze and search the data. The document review was conducted with a combination of linear review, targeted search terms, and custodian-specific document review using the Relativity platform. The Review Team conducted targeted searches according to the documents' text, file names, document type (e.g., emails, marketing materials, presentations, reports, and SEC filings), dates, Bates numbers, metadata, and other fields to identify and code documents as "irrelevant," "relevant," "highly relevant," and "hot" for further review, and to create collections of documents sorted by issue and relevance. Documents also were allocated to be reviewed by specific experts retained by Co-Lead Counsel.

40. The Review Team held weekly document review sessions (usually with a core group of attorneys attending in-person and additional attorneys attending via telephone) to discuss the results of their ongoing review, their progress on existing projects, and new projects to be undertaken by the team. Throughout the case, the Review Team prepared meaningful work product, including chronologies, compendiums of key players, master exhibit lists, and analyses of hot documents, which they continually updated and refined as the team's knowledge of the issues in the case expanded.

41. In tandem with their review of the documents that had been produced, the Review Team also undertook the process of identifying additional potential categories of responsive documents, as well as gaps in Defendants' production (which were then discussed with more senior members of the litigation team).

42. The more senior attorneys on the litigation team had frequent interactions with the members of the Review Team. Indeed, there also were numerous conferences (both in-person and telephonic) among the Review Team and the senior litigation attorneys to discuss important and/or potentially “hot” and “highly relevant” documents, discovery preparation efforts, and overall litigation strategy.

43. Through experience and their increasing familiarity with the documents, the Review Team identified additional areas of important documents, which also were run through the analytics and search functions to derive the most significant documents for use in connection with depositions and Lead Plaintiffs’ mediation statements. The Review Team also conducted deposition preparation.

44. While pursuing discovery from Defendants, Lead Plaintiffs also sought discovery from relevant non-parties, including by serving 27 subpoenas on former members of Alexion’s Board of Directors, former Alexion employees, Alexion’s independent auditor, partner laboratories, and patient advocacy organizations:

SUBPOENAED ENTITY	DATE	ROLE IN CASE
Felix Baker	July 14, 2022	Alexion Board Member
David Brennan	July 15, 2022	Alexion Board Member
M. Michele Burns	July 21, 2022	Alexion Board Member
Christopher Coughlin	July 15, 2022	Alexion Board Member
Jack Mollen	July 21, 2022	Alexion Board Member
Alvin Parven	July 21, 2022	Alexion Board Member
Ann Veneman	July 14, 2022	Alexion Board Member
Courtney Cupples	March 8, 2023	Former Employee
Margaret Olinger	March 8, 2023	Former Employee
Elena Ridloff	March 3, 2023	Former Employee
Suzanne Rogers	March 8, 2023	Former Employee
aHUS Foundation, Inc.	October 20, 2021	Patient Advocacy Organization
Aplastic Anemia & MDS International Foundation, Inc.	October 29, 2021	Patient Advocacy Organization
The National Organization for Rare Disorders, Inc.	November 10, 2021	Patient Advocacy Organization
Global Genes	February 9, 2022	Patient Advocacy Organization

SUBPOENAED ENTITY	DATE	ROLE IN CASE
Patient Services, Inc.	January 14, 2022	Patient Advocacy Organization
Associated Regional and University Pathologists, Inc.	February 13, 2023	Partner Laboratory
Caris Life Sciences, Inc.	November 15, 2021	Partner Laboratory
Dahl-Chase Diagnostic Services	November 3, 2021	Partner Laboratory
Laboratory Corporation of America	November 3, 2021	Partner Laboratory
Machaon Diagnostics, Inc.	October 19, 2021	Partner Laboratory
Mayo Clinic Laboratories	November 3, 2021	Partner Laboratory
Med Fusion Services	November 15, 2021	Partner Laboratory
NeoGenomics	November 15, 2021	Partner Laboratory
Quest Diagnostics, Inc.	November 3, 2021	Partner Laboratory
Sanofi Genzyme	November 15, 2021	Partner Laboratory
PricewaterhouseCoopers	October 20, 2022	Independent Auditor

45. During the course of discovery, Co-Class Counsel met and conferred with non-parties and their counsel (often many times) to negotiate issues such as the categories of responsive documents; claims of privilege, relevance, and burden; and search protocols. As a result of these efforts, Lead Plaintiffs obtained approximately 4,000 documents (amounting to approximately 105,000 pages) from non-parties. Furthermore, at the time of the Settlement, Co-Class Counsel were still conferring with several of these non-parties regarding their document productions.

46. As part of their discovery efforts, the Parties also took numerous merits and class certification-related depositions. In this regard, Co-Class Counsel began assembling a deposition strategy early in the litigation, amassing a master list of potential deponents that was organized by priority and topic area. This effort relied on extensive analysis even prior to direct deposition preparation, including significant targeted research of key custodians and subject matter in the Relativity database. Thus, early on in discovery, Lead Plaintiffs developed significant insight into the roles of dozens of key players and their potential knowledge of the Class's claims.

47. Members of the Review Team assisted in the preparation for depositions by creating document binders and witness memoranda.

48. In addition to Alexion's Rule 30(b)(6) deposition, Lead Plaintiffs took merits depositions of twelve former and current Alexion employees and one former Board member:

DATE	DEPONENT	DEPONENT'S ROLE
May 19, 2022	Daniel Bazarko	Alexion's Rule 30(b)(6) Witness
December 14, 2022	Michael Celentano	Director, Distribution and Customer Operations
January 18, 2023	Kelly Burgeson	VP, US Business Unit Lead PNH and aHUS
March 23, 2023	Cathleen Bergin	Senior Director, Case Management
March 30, 2023	Catherine Nester	Senior Director, Global Sales Training and Development
April 4, 2023	Christopher Coughlin	Alexion Board Member
April 6, 2023	Sarah Hansen	Nurse Case Manager
April 24, 2023	Joseph Philipose	Senior Director, Commercial Compliance
April 25, 2023	Susan DeFrancesco	Patient Liaison Specialist
May 2, 2023	Courtney Cupples	Senior Director, Head of Global aHUS Marketing
May 25, 2023	Margaret Olinger	VP, US Business Unit Lead PNH and aHUS
May 25, 2023	Elena Ridloff	Executive Director, Investor Relations
June 14, 2023	Suzanne Rogers	Executive Director, Trade, Distribution, and Customer Operations

49. At the time of Settlement, Lead Plaintiffs were arranging to take the depositions of the following eleven witnesses, all of which were in varying levels of deposition preparation:

DEPONENT	DEPONENT'S ROLE
Vikas Sinha	Individual Defendant; CFO from September 2005 to December 2016
David Hallal	Individual Defendant; CEO from April 2015 to December 2016
Leonard Bell	Individual Defendant; Alexion Board Member 1992 to May 2017; CEO from 1992 to March 2015
Carsten Thiel	EVP and Chief Commercial Officer
David Brennan	Alexion Board Member; CEO from December 2016 to March 2017
David Anderson	CFO from December 2016 to July 2017
Jack Mollen	Alexion Board Member
Sarah Nia	Senior Director, Clinical Services
Scott Phillips	SVP, Corporate Controller and Chief Accounting Officer
Robert "Keith" Woods	SVP, North American Operations
Bradley Mathis	Senior Director, US National Accounts

50. In addition to the Rule 30(b)(6) depositions of Lead Plaintiffs and their two experts at the class certification stage (discussed below), Defendants noticed and took the depositions of

four of the Lead Plaintiffs' five CWs and one deposition of a non-party patient advocacy organization (all of which Lead Plaintiffs attended and participated in):

DATE	DEPONENT	DEPONENT'S ROLE
April 27, 2023	Lynn French	Nurse Case Manager
May 9, 2023	Susanna Johnston	Regional Clinical Specialist
May 24 & June 12, 2023	Lynette Wilson	Nurse Case Manager
June 9, 2023	Sharon Kippenberger	Regional Clinical Specialist
July 19, 2023	Pamela Gavin	NORD's Rule 30(b)(6) Witness

51. The foregoing discovery efforts provided Co-Class Counsel with a solid foundation from which to understand the risks and strengths of the case.

D. The Parties' Discovery Disputes

52. As discussed above, discovery in this Action was both zealous and voluminous. The Parties met and conferred as needed throughout the process. The Parties were able to reach compromises on a number of issues raised during their meet-and-confer sessions. However, as discussed below, the Parties were unable to resolve all discovery disputes without the Court's intervention.

53. On January 14, 2022, Lead Plaintiffs moved to compel Defendants to produce documents and information in response to requests for production of documents and interrogatories related to Alexion's Audit Committee Investigation and the SEC's investigation and settlement regarding Alexion's alleged violations of the Foreign Corrupt Practices Act. *See* ECF No. 205. On February 4, 2022, Defendants filed their opposition to Lead Plaintiffs' motion to compel, ECF No. 211, and on February 14, 2022, Lead Plaintiffs filed their reply, ECF No. 215. On March 31, 2022, the Court granted Lead Plaintiffs' motion to compel the production of documents and interrogatory responses. ECF No. 229.

54. The Parties reached another impasse regarding redactions of the accounting work papers of Alexion's independent auditor, PricewaterhouseCoopers LLP ("PwC"). Following a

series of unsuccessful meet-and-confer calls, on June 5, 2023, Lead Plaintiffs filed a motion to compel Defendants to produce unredacted versions of PwC's work papers. ECF No. 271. On June 26, 2023, Defendants filed their opposition to Lead Plaintiffs' motion to compel, ECF No. 286, and on July 10, 2023, Lead Plaintiffs filed their reply. ECF No. 292. On July 25, 2023, Defendants filed a surreply, ECF No. 296, and Lead Plaintiffs filed their response on July 31, 2023, ECF No. 302. On September 27, 2023, the Court denied the motion as moot, ECF No. 312, due to its order granting preliminary approval of the proposed Settlement, ECF No. 309.

E. Lead Plaintiffs' Class Certification Motion, the Court's Ruling Thereon, and Defendants' Rule 23(f) Appeal

55. On December 15, 2021, Lead Plaintiffs filed their Motion for Class Certification and Appointment of Class Representative and Co-Class Counsel. ECF No. 198. In connection with Lead Plaintiffs' motion, Defendants deposed, and Lead Plaintiffs defended the depositions of (i) a representative of both PERSI and Erste AM; (ii) Chad Coffman, Lead Plaintiffs' economic expert; and (iii) Martin Karollus, who provided an expert opinion that Erste AM has the legal authority to bring suit on behalf of its funds in the United States to recover damages suffered by those funds as a result of the allegedly fraudulent conduct pled in the Amended Complaint. Defendants also deposed, and Lead Plaintiffs cross-examined, a representative from PERSI's investment manager, Peregrine. Additionally, Lead Plaintiffs deposed Defendants' economic expert, Prof. David Smith, PhD. Defendants also served multiple interrogatories on Lead Plaintiffs directed to class certification matters, to which Lead Plaintiffs responded.

56. Lead Plaintiffs' class certification motion was accompanied by a report from Mr. Coffman, who opined on the efficiency of the market for Alexion common stock in order to establish the prerequisite for the class-wide presumption of reliance under *Basic v. Levinson*, 485 U.S. 224 (1988) (the "*Basic* presumption") and the availability of class-wide damages

methodologies. Lead Plaintiffs also submitted a declaration from Professor Karollus to the effect that Austrian asset management companies (including Erste AM) had the exclusive authority to act for the funds they manage, including the authority to bring litigation on their behalf. *See* ECF No. 198-6.

57. On April 15, 2022, Defendants filed their opposition to Lead Plaintiffs' motion for class certification. In their opposition, Defendants argued that Lead Plaintiffs were not entitled to the *Basic* presumption for the majority of the alleged corrective disclosures and further challenged whether damages could be determined on a class-wide basis. ECF No. 236. Defendants asserted that Erste AM and PERSI were not adequate or typical class representatives. *Id.* With respect to Erste AM, for example, Defendants argued that it lacked standing under Austrian law to assert the claims in this Action. *Id.*

58. On June 17, 2022, Lead Plaintiffs filed their reply. ECF No. 248. In their reply, Lead Plaintiffs noted that Defendants did not dispute that Alexion's stock traded in an efficient market, thus acknowledging that Plaintiffs satisfied their burden to invoke the *Basic* presumption. Lead Plaintiffs argued that the burden to rebut the presumption thus had shifted to Defendants, which they failed to do. *Id.* As Lead Plaintiffs further explained, Defendants' attacks against Mr. Coffman's damages methodology ignored legal precedent from both within the Second Circuit and elsewhere. *Id.* With respect to the challenge to typicality, Lead Plaintiffs stated that they relied upon Alexion's market price when purchasing shares, thus rendering them typical, and, further, that their buying and selling of Alexion shares during (or after) the Class Period did not compel a contrary conclusion. *Id.* Lead Plaintiffs noted that Defendants' adequacy challenges—which were premised primarily on Lead Plaintiffs' (appropriate) reliance on counsel's extensive class action experience—should be rejected out of hand. *Id.* Finally, Lead Plaintiffs, with the

assistance of a reply declaration from Professor Karollus (and a declaration from Dr. Leopold Specht, a second expert on Austrian law), established that Defendants' attack on Erste AM's standing failed as a matter of law. *Id.*

59. Briefing on the class certification motion was completed on July 15, 2022, when Defendants filed their sur-reply. ECF No. 251.

60. On April 13, 2023, the Court granted Lead Plaintiffs' motion for class certification, certifying a Class consisting of all persons or entities who purchased or otherwise acquired the common stock of Alexion from January 30, 2014 to May 26, 2017, inclusive. ECF No. 267. The Order also appointed Lead Plaintiffs as Class Representatives and Motley Rice and Labaton Sucharow as Co-Class Counsel. *Id.*

61. Following the Court's Order certifying the class, on April 27, 2023, Defendants filed a petition with the Second Circuit Court of Appeals seeking permission to appeal the Court's class certification order pursuant to Federal Rule of Civil Procedure 23(f). *See Alexion Pharmaceuticals, Inc., et al. v. Boston Retirement System, et al.*, No. 23-709 (2d Cir.), Entry ID No. 3507834. In the petition, Defendants asserted, among other things, that class certification should have been denied with respect to any corrective disclosure that had no impact on Alexion's stock price.

62. On May 8, 2023, Class Representatives filed an answer to the Rule 23(f) petition. *See id.*, Entry ID No. 3512024. In their answer, Class Representatives argued that: (a) courts routinely find that a defendant cannot rebut the *Basic* presumption based on fewer than all of the alleged corrective disclosures; and (b) the reported decisions have uniformly rejected statistical insignificance as proof of the absence of price impact.

63. On August 8, 2023, the Second Circuit granted the Parties' joint motion to hold the Rule 23(f) petition in abeyance pending the final approval of the Settlement. *See id.*, Entry ID No. 3553592.

IV. MEDIATION AND SETTLEMENT

64. While in the midst of formal discovery in mid-2022, Lead Plaintiffs and Defendants agreed that it would serve all Parties' interests to engage in a formal mediation before a highly experienced and reputable mediator possessing a solid track record of mediating complex class action litigation and a deep understanding of the law and issues involved in actions brought under the PSLRA. The Parties agreed to retain Judge Phillips.

65. In preparation for the mediation, the Parties prepared and exchanged detailed mediation statements and supporting exhibits outlining their respective positions and containing relevant evidence, addressing both liability and damages.

66. On September 16, 2022, counsel for the Parties, together with a representative of PERSI, engaged in a full-day, in-person mediation session before Judge Phillips. Although this first mediation session was not successful, Class Representatives and Defendants each developed a better understanding of the other side's positions. Thereafter, the Parties continued discussions with Judge Phillips, further exploring the possibility of a settlement.

67. On July 28, 2023, after submitting supplemental mediation statements and exhibits, the Parties participated in a second full-day, in-person mediation session with Judge Phillips. A representative of PERSI also attended. At the conclusion of the second session, Judge Phillips issued a mediator's proposal, which was accepted by both sides on August 2, 2023 and led to the execution of a Term Sheet on August 3, 2023.

68. On September 13, 2023, the Parties filed the Stipulation with the Court. The Stipulation set forth the final terms and conditions of the proposed Settlement. *See* ECF No. 306.

Also on September 13, 2023, Class Representatives submitted their unopposed Motion for Preliminary Approval of Settlement. *See* ECF No. 307.

69. On September 19, 2023, the Court entered the Preliminary Approval Order, ECF No. 309, which preliminarily approved the Stipulation and the settlement set forth therein as being fair, reasonable, and adequate for purposes of Rule 23 of the Federal Rules of Civil Procedure, subject to further consideration at the Settlement Hearing. The Court directed that a hearing be held on December 20, 2023, at 1:30 p.m., to determine whether: (a) the Settlement of the Action on the terms and conditions provided for in the Stipulation should receive final approval; (b) the Judgment should be entered; (c) the proposed Plan of Allocation is fair, reasonable, and adequate, and should be approved; and (d) Co-Class Counsel's application for a fee and litigation expense award should be granted.

V. RISKS FACED BY CLASS REPRESENTATIVES IN THE ACTION

70. At the time the Parties agreed to settle the Action, document discovery was largely complete, and Class Representatives had reviewed and analyzed a large volume of party and non-party documents, engaged in extensive class certification discovery (including exchanging detailed expert reports with Defendants and the depositions of Class Representatives' representatives and several of the Parties' experts), briefed class certification and Defendants' 23(f) petition, and taken a significant number of depositions. The Parties had also exchanged several rounds of extensive and evidence-heavy mediation statements. Co-Class Counsel's exhaustive factual and legal analysis and discovery efforts provided them with a comprehensive understanding of the risks of continued litigation.

71. Based on publicly available documents, information, and internal documents obtained through Co-Class Counsel's investigation and the extensive fact and expert discovery conducted in the Action, Class Representatives believe that they have gathered substantial

evidence to support their claims and, barring settlement, were prepared to proceed to trial. Class Representatives also realize, however, that trying this case would present many major challenges. Those various challenges are discussed in more detail below.

72. By way of example, there were substantial risks that the claims, as pled in the Amended Complaint, could be narrowed significantly at summary judgment, through factual findings that eliminated claims against certain Defendants or substantially eroded Class Representatives' theories of loss causation and damages. Even if Class Representatives were successful in advancing the claims through summary judgment, there was no way to predict which evidence, testimony, inferences, or interpretations the Court or a jury would accept (and find persuasive) at trial. Further, Defendants have adamantly denied any culpability throughout the litigation, and in particular any intent to deceive the Class, and were prepared to mount aggressive defenses at trial that could have potentially foreclosed any recovery. If the Court at summary judgment or a jury at trial sided with Defendants on even one of their defenses, Class Members could have recovered much less or nothing at all. Moreover, even if Class Representatives prevailed fully at trial, Defendants would likely have pursued every avenue for appeal, injecting additional risk (as well as delay) into the process.

73. Class Representatives also faced further uncertainty in light of Defendants' pending appeal of the Court's Class Certification Order. *See supra* ¶ 61. Indeed, there existed a risk that the Second Circuit could have reversed and remanded (or vacated) the Court's Class Certification Order. If the Second Circuit in ruling on Defendants' Rule 23(f) appeal sided with Defendants on any of their contentions, it could have substantially decreased or potentially foreclosed any recovery at all for the Class.

74. As such, Class Representatives faced considerable challenges and defenses on each and every element of their claims if the Action were to continue through the Rule 23(f) appeal, summary judgment and trial, as well as the inevitable appeals that would follow even if Class Representatives obtained a favorable verdict against Defendants.

75. Indeed, securities class actions like this one are by their nature notoriously complicated, and ongoing litigation may very well have lasted for quite some time in the absence of a settlement. If no settlement had been reached at this stage of the proceedings, Class Representatives would have been required to complete the remaining depositions, retain additional experts, prepare expert reports, complete fact and expert discovery, and brief summary judgment and *Daubert* motions.⁹

A. Risks Concerning Falsity

76. For Class Representatives to prevail, they first would have to establish that Defendants made an actionable false or misleading statement or material omission. Defendants have maintained that Class Representatives cannot demonstrate that any of Defendants' statements meet this standard, arguing that nothing they said was false, deceptive, or misleading when those statements were made.

77. Defendants have argued, among other things, that the evidence would show that descriptions of Alexion's sales growth were accurate and that Alexion's sales growth was driven by legitimate and proper sales practices, and therefore none of the statements Class Representatives allege to have been fraudulent were in fact false or misleading. Defendants have

⁹ While courts have long recognized that securities class actions carry significant risks, post-PSLRA rulings make it clear that the risk of no recovery has increased exponentially. *See, e.g., In re Ikon Office Sols., Inc. Sec. Litig.*, 194 F.R.D. 166, 194 (E.D. Pa. 2000) (“[S]ecurities actions have become more difficult from a plaintiff’s perspective in the wake of the PSLRA.”).

further argued that Alexion had consistently disclosed that its revenue growth was due to its disease awareness and diagnostic initiatives, including that it had extensive relationships with diagnostic laboratories and patient advocacy organizations.

B. Risks Concerning Scienter

78. Even if falsity was established, Class Representatives faced the risk that the Court at summary judgment or a jury at trial would conclude that Defendants did not act with the requisite scienter. In a securities case, a defendant's state of mind often is the most difficult element of proof and one that is rarely supported by direct evidence, such as an admission. The scienter risks were heightened in this case, given that Class Representatives would have to show, among other things, that the Individual Defendants themselves, and not simply lower-level company managers, were aware of, for example, inappropriate sales practices pertaining to Soliris.

79. Throughout the Action, Defendants have vigorously asserted that there was no evidence that the Individual Defendants believed or recklessly disregarded that the Company was using improper sales practices to materially affect revenue. In addition, Defendants have maintained that throughout the Class Period, the Company's senior management team acted in good faith and in accordance with the Company's asserted mission of improving patients' lives.

80. More specifically, in regards to scienter, Defendants would likely argue that Defendants genuinely believed their physician and patient educational and support initiatives were proper and in the best interest of patients. Moreover, at the motion to dismiss stage, Defendants had asserted that the practices in question had been disclosed publicly. *See, e.g.*, ECF No. 130-1 at 46. They likely would have raised that same argument again both at summary judgment and trial in support of a contention that there could not have been any intent to deceive investors about the Company's sales initiatives. Further, in their motion to dismiss briefing, Defendants contended that Class Representatives had not pled facts showing that any of the Individual Defendants

participated in the alleged fraud. *Id.* at 59. In the absence of a settlement, it was expected that Defendants would maintain that even if evidence of improper sales practices were identified by Class Representatives (a point Defendants were not likely to concede), the record would not support an inference that Bell, Hallal, or Sinha had themselves engaged in (or were aware of) any alleged improper practice. In that same vein, Defendants were expected to continue to assert—as they had at the motion to dismiss stage—that neither Hallal nor Sinha’s departure from their positions at the Company were related to the challenged sales practices. While Class Representatives believe that their narrative in support of scienter was both cogent and compelling, it is impossible and, indeed, imprudent to ignore the substantial risk that the Court or a jury could have accepted any or all of the Defendants’ scienter-based contentions and concluded otherwise.

81. Apart from the foregoing, the Parties also disagreed about the significance of Alexion’s statement in an early 2017 Company press release (and subsequently elsewhere) that “there was a material weakness in its internal controls over financial reporting that existed as of December 31, 2015 and subsequent quarters, caused by senior management *not setting an appropriate tone at the top for an effective control environment.*” Class Representatives argued that this “tone at the top” statement (and others like it) showed that (i) senior corporate officials at Alexion failed to fulfill their obligation to monitor the Company’s culture of compliance or (ii) they themselves affirmatively caused or directed the sales-related improprieties alleged in the Amended Complaint. (Either way, the scienter requirement would be satisfied.) On the other hand, however, Defendants steadfastly maintained that any “tone at the top” finding could not be construed as broadly as Class Representatives claimed they ought to be interpreted.

82. Apart from the foregoing, in Alexion’s vigorous opposition to the motion to compel directed to PwC’s work papers, which was referenced above at paragraph 54, the Company

claimed that Class Representatives' scienter-related evidence was wholly unrelated to the claims at issue in the Action. Notwithstanding Class Representatives' belief that they could show that PwC's work for Alexion was designed to ferret out the causes of serious and pervasive failures existing within the Company (issues that bore not only on the claims presented in the Amended Complaint, but upon the question of what Hallal and Sinha knew and when), Defendants maintained that the PwC work papers merely reflected the findings and conclusions of the Company's Audit Committee's investigation of "pull-ins" sales (which Defendants maintained were "marginal" to the case) and other entirely unrelated investigations. Notwithstanding that Class Representatives disagreed with Defendants' contention that pull-ins sales were unrelated to claims at issue, they were cognizant of the fact that at further stages of the case, the Court and/or a jury could have found merit in Defendants' position.

83. In view of these defense contentions, proving scienter would have been very difficult. Moreover, these risks concerning scienter were compounded by the vintage of the events at issue. The Class Period began over nine years ago and ended over six years ago.

84. Finally, questions of scienter are often reduced to the jury's evaluation of the credibility of numerous witnesses, which are impossible to predict. Here, there was a substantial risk that Defendants' testimony and arguments would resonate with a jury.

C. Risks Concerning Loss Causation and Damages

85. In agreeing to settle, Class Representatives also recognized the risks involved in ultimately proving loss causation and damages. Here, Class Representatives and Co-Class Counsel recognized that the Court and the jury would, at the end of the day, be presented with very different opinions involving complex concepts related to the securities markets and financial economics from the Parties and their highly qualified experts. If the Court or a jury found

Defendants' experts' testimony to be more credible, Class Representatives might very well have recovered nothing at all.

86. To establish loss causation, Class Representatives would have to prove "a causal connection between the material misrepresentation and the loss." *Dura Pharms., Inc. v. Broudo*, 544 U.S. 336, 342 (2005). Here, in connection with class certification, Defendants argued that "Alexion's stock did not show a statistically significant reaction to most of the alleged corrective disclosures" identified in the Amended Complaint, ECF No. 136 at 102, an argument they undoubtedly would have repeated again at summary judgment and trial. Further, in the absence of a settlement, Defendants were expected to assert that any remaining alleged corrective disclosures could not support loss causation because they were either unrelated to any alleged fraud or did not disclose any new, fraud-related information. For example, as noted above at paragraph 80, with respect to the disclosures regarding Hallal's and Sinha's exits from the Company (which Class Representatives allege caused stock drops on December 12 and 13, 2016), Defendants have maintained that these executive departures were entirely unrelated to the alleged fraud, relying on cases such as *In re Omnicom Grp., Inc. Sec. Litig.*, 541 F. Supp. 2d 546, 553 (S.D.N.Y. 2008) (ruling that an individual's resignation from the subject company "cannot constitute a corrective disclosure when the resignation is not connected to the alleged fraud.").

87. Additionally, it was anticipated that Defendants would vigorously challenge Class Representatives' reliance on two key events that they allege caused stock drops in November 2016. Class Representatives believe that they can show distinct (and foreseeable) risks that materialized through the Company's (i) sudden delay in the filing of its Form 10-Q in November 2016; and (ii) subsequent announcement that its Board of Directors was investigating allegations made by a former employee about sales practices pertaining to Soliris (and whether those practices violated

Company policy). That said, as they had during class certification briefing, *see* ECF No. 251 at 3, Defendants would have countered that there was no statistically significant price movement on the day following the announcements in question and argued further that Class Representatives could not successfully rely upon “multi-day event windows” (that is, it was Defendants’ view that it is inappropriate to look at stock price changes occurring more than a day after an alleged corrective disclosure). Although Class Representatives disagree with Defendants’ position on this multi-day event window issue, they recognized, in reaching the Settlement, the risk that the Second Circuit in connection with the Rule 23(f) Petition or the Court might agree with Defendants, or, in the event the case went to trial, the jury would accept Defendants’ position.

88. Finally, Class Representatives were relying on a stock drop that followed the publication of a May 24, 2017 *Bloomberg* article that—in their view—disclosed for the first time many of Alexion’s alleged illicit and unethical sales practices. However, Defendants were likely to challenge that position. Indeed, Class Representatives expected Defendants to assert that the article (i) did not reveal any material new information and (ii) merely repeated already public information with a disapproving slant. Although Co-Class Counsel did not believe this to be a meritorious argument, they recognize courts have held that a “negative journalistic characterization of previously disclosed facts does not constitute a corrective disclosure of anything but the journalists’ opinions.” *In re Omnicom Grp., Inc. Sec. Litig.*, 597 F.3d 501, 512 (2d Cir. 2010). That argument could very well have swayed either the Court (on a motion for summary judgment) or a jury (at trial).

89. The issue of alleged damages, i.e., the amount of allegedly artificial inflation, also would have been hotly disputed by the Parties. Defendants were expected to contend that Class Representatives overstated damages. As noted above, they already have argued that Class

Representatives improperly rely on a second-day price impact following certain alleged corrective disclosure dates and further that that disclosures of executive departures are of no consequence when they are not causally related to the alleged fraud.

90. As set forth above, *see* ¶ 11, class-wide maximum reasonably recoverable damages are estimated to be approximately \$2.4 billion, after deducting gains on pre-Class Period holdings and assuming success in establishing Defendants' liability and further that the trier of fact would reject Defendants' primary arguments directed to both loss causation and damages. But, if, for example, the Court and/or jury were to find that the executive departures announced in December 2016 and May 2017 had nothing to do with the alleged fraud (but simultaneously disregard Defendants' other primary loss causation contentions), recoverable damages in the Action would drop considerably—by around sixty-five percent (65%) to approximately \$844 million. (In this regard, it bears noting the alleged share price drops occurring over the two-day period following the December 2016 announcement of Hallal's and Sinha's departures from Alexion—by themselves—allegedly constituted over thirty-nine percent (39%) of Class Representatives' \$2.4 billion damages estimate.)

91. If, by way of further example, the Court and/or jury were to find the executive departures to be unrelated to the alleged fraud *and* that: (i) there was no statistically significant price movement on the day following the November 4 and November 9, 2016 announcements in question, *and* that (ii) Class Representatives cannot rely upon any “multi-day event windows”, then recoverable damages in the Action could have been limited solely to the share price decline following publication of the May 24, 2017 *Bloomberg* article, which would have been approximately \$237 million.

92. Thus, Class Representatives faced a serious risk of having their damage theories rejected by the Court at summary judgment or the jury at trial.

D. Risks at Summary Judgment, at Trial, and on Appeal

93. If not for this Settlement, the Action would have continued to be highly contested by the Parties at each significant stage, from ongoing fact and expert discovery to summary judgment and then trial. Even if Class Representatives prevailed at trial, Defendants could have appealed any such verdict, injecting additional challenges and delay into the process.

94. For example, given the complex nature of the claims, Class Representatives would be required to rely heavily on expert opinions concerning issues such as loss causation and damages and Alexion's purported failure to maintain an ethical "tone at the top" *vis-à-vis* sales practices connected to Soliris. This reliance on expert testimony carried the concomitant risk that: (i) the experts could be subject to a successful *Daubert* motion prior to trial, permitting little or no expert testimony on key issues; or (ii) if allowed to testify, the jury would be faced with a "battle of the experts" and decide to credit Defendants' experts over Class Representatives' experts.

95. The Class also faced additional trial-related risks, including, among other things, presenting a factually complex case to a jury through adverse witnesses controlled by or loyal to Defendants.

96. Even if the claims survived summary judgment challenges and Class Representatives were able to prove both liability and damages at trial, the Class would have faced a host of inevitable post-trial motions and appeals which, even if unsuccessful, would have proved difficult and time consuming. On appeal, Defendants would have renewed their host of arguments as to why Class Representatives had failed to establish liability, loss causation, and damages, thereby exposing the Class to the risk of having any favorable judgment reversed or reduced below the Settlement Amount after years of litigation.

97. Given these challenges, in light of the guaranteed recovery the Settlement provides for the Class, Co-Class Counsel and Class Representatives respectfully submit that the Settlement is fair, reasonable, and adequate and should be approved.

VI. CLASS REPRESENTATIVES' COMPLIANCE WITH THE COURT'S PRELIMINARY APPROVAL ORDER

98. Pursuant to the Preliminary Approval Order, the Court appointed KCC Class Action Services, LLC ("KCC" or "Claims Administrator") as the claims administrator in the Action and instructed KCC to disseminate copies of the Notice of Pendency of Class Action, Proposed Settlement, and Motion for Attorneys' Fees and Expenses (the "Notice") and the Proof of Claim and Release form ("Claim Form," and collectively with the Notice, the "Notice Packet")¹⁰ and to publish the Summary Notice of Pendency of Class Action, Proposed Settlement, and Motion for Attorneys' Fees and Expenses ("Summary Notice").

99. The Notice describes the terms of the Settlement and the Class's recovery; the factors that Class Representatives and Co-Class Counsel considered in determining that the Settlement is fair, adequate, and reasonable; the maximum attorneys' fees and expenses that may be sought; the procedure for requesting exclusion from the Class; the procedure for objecting to the Settlement, the proposed Plan of Allocation, and the Fee and Expense Application; the procedures for submitting a Claim Form to the Claims Administrator; the proposed Plan of Allocation; and the date, time, and place of the Settlement Hearing. The Notice also informs Class Members of Co-Class Counsel's intention to apply for an award of attorneys' fees of no more than

¹⁰ The Notice Packet is attached as Exhibit A to the Declaration of Lance Cavallo Regarding (A) Mailing of Notice and Claim Form; (B) Publication of Summary Notice; (C) Establishment of Telephone Hotline and Settlement Website; and (D) Report on Requests for Exclusion Received to Date (the "Mailing Declaration"). The Mailing Declaration is attached hereto as Exhibit F. The Notice Packet indicates, among other items, that Class Members can contact KCC by sending an e-mail to the case-specific e-mail address *info@AlexionSecuritiesSettlement.com*.

25% of the Settlement Fund and for payment of Litigation Expenses in an amount not to exceed \$1,500,000. The Notice also provides contact information for Co-Class Counsel and counsel for Defendants, as well as information regarding the website created for the Settlement.¹¹

100. In accordance with the Preliminary Approval Order, as of November 13, 2023, KCC has mailed and e-mailed a total of 316,305 Notice Packets to potential Class Members and nominees by first-class mail, postage prepaid. *See* Mailing Decl. at ¶ 8. The Summary Notice was published in *The Wall Street Journal* and transmitted over *PR Newswire* on October 17, 2023.¹²

101. The Notice and Claim Form are available for downloading (along with other Settlement-related documents, such as the Stipulation) at a dedicated website maintained by KCC, the address of which is <https://www.alexionsecuritiessettlement.com>. *See* Mailing Decl. ¶ 12.

102. KCC also maintains and posts information regarding the Settlement on the website to provide Class Members and other interested parties with information concerning the Settlement and important dates and deadlines in connection therewith. *Id.* ¶¶ 11-12. The website also includes a portal for the submission of Claims electronically. Additionally, KCC maintains a toll-free telephone number and interactive voice-response system to respond to inquiries regarding the Settlement and how to complete and submit a Proof of Claim. *Id.* ¶ 10.

103. Pursuant to the terms of the Preliminary Approval Order, the deadline for Class Members to submit objections to the Settlement, the Plan of Allocation, and/or the Fee and Expense Application, or to request exclusion from the Class is November 29, 2023. To date, there

¹¹ The Notice amply describes the terms of the Settlement and the Plan of Allocation, the history of the litigation and the claims presented therein, and the process for submitting objections and requests for exclusion, and therefore is more than sufficient to satisfy all applicable legal requirements.

¹² Defendants have informed Co-Class Counsel that, pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. § 1715, they issued notice of the Settlement on September 20, 2023.

have been no objections to any aspect of the Settlement and no requests for exclusion from the Class.

104. Should any objections or requests for exclusion be received, Class Representatives will address them in their reply papers, which will be filed on December 13, 2023.

VII. PLAN OF ALLOCATION

105. Pursuant to the Preliminary Approval Order, and as set forth in the Notice, all Class Members who wish to participate in the distribution of the Settlement proceeds must submit a valid Proof of Claim, including all required information, postmarked no later than December 15, 2023. As provided in the Notice, after deduction of Court-awarded attorneys' fees and expenses, Notice and Administration Expenses, and all applicable Taxes, the balance of the Settlement Fund (the "Net Settlement Fund") will be distributed to eligible claimants according to the Plan of Allocation approved by the Court. To date, no Class Member has submitted an objection to the Plan of Allocation.

106. The proposed Plan of Allocation, which was set forth and explained in full in the Notice, is designed to achieve an equitable and rational distribution of the Net Settlement Fund, but it is not a formal damages analysis that would be submitted at trial. Co-Class Counsel developed the Plan of Allocation after careful consideration and with the assistance of Mr. Coffman's team and believe that the plan provides a fair and reasonable method to equitably distribute the Net Settlement Fund among Authorized Claimants.

107. The Plan of Allocation provides for distribution of the Net Settlement Fund among Authorized Claimants on a *pro rata* basis based on "Recognized Loss" formulas tied to the liability and damages theories in the case.

108. These formulas incorporate the amount of alleged artificial inflation in Alexion's share prices, as quantified by Mr. Coffman, who analyzed the movement of Alexion common stock

and took into account the portion of the stock drops allegedly attributable to the alleged fraud. The Plan of Allocation ensures that the Net Settlement Fund will be fairly and equitably distributed based on the amount of alleged inflation in the price of Alexion common stock during the Class Period and the alleged wrongdoing. The Plan of Allocation also incorporates the ninety-day “lookback” provision contained in the PSLRA.

109. KCC, under Co-Class Counsel’s direction, will determine each Authorized Claimant’s *pro rata* share of the Net Settlement Fund based upon each Authorized Claimant’s total Recognized Loss compared to the aggregate Recognized Losses of all Authorized Claimants. The calculation of Recognized Loss will depend upon, among other factors, when their shares were purchased and/or sold during the Class Period, whether the shares were held through or sold during the statutory 90-day look-back period, *see* 15 U.S.C. § 78u-4(e) (providing methodology for limiting damages in securities fraud actions), and the value of the shares when they were sold or held.

110. Once the Claims Administrator has processed all submitted claims and provided claimants with an opportunity to cure deficiencies or challenge rejection determinations, payments will be made to eligible Authorized Claimants using checks and, in some instances, wire transfers. After an initial distribution, if there is any balance remaining in the Net Settlement Fund (whether by reason of tax refunds, uncashed checks or otherwise) after at least six (6) months from the date of initial distribution, Co-Counsel will, if feasible and economical, re-distribute the balance among Authorized Claimants who have cashed their checks. Re-distributions will be repeated until the balance in the Net Settlement Fund is no longer economically feasible to distribute. *See* ECF No. 306-2 at ¶ 77. Any balance that still remains in the Net Settlement Fund after re-distribution(s), which is not economical to reallocate, after payment of any outstanding Notice and Administration

Expenses or Taxes, will be contributed to a non-profit, non-sectarian 501(c)(3) organization to be mutually agreed upon by Co-Class Counsel and counsel for Alexion, or as ordered by the Court.

Id.

111. In sum, the proposed Plan of Allocation, developed in consultation with Class Representatives' damages expert, was designed to fairly and rationally allocate the Net Settlement Fund among Authorized Claimants. Accordingly, Co-Class Counsel respectfully submit that the proposed Plan of Allocation is fair, reasonable, and adequate, and should be approved.

VIII. CO-CLASS COUNSEL'S APPLICATION FOR AN AWARD OF ATTORNEYS' FEES AND PAYMENT OF EXPENSES

112. Co-Class Counsel, on behalf of all Plaintiffs' Counsel,¹³ are requesting an attorneys' fee award of 25% of the Settlement Fund, plus accrued interest.¹⁴ Co-Class Counsel submit that, for the reasons discussed below and in the accompanying Fee Memorandum, such an award would be reasonable and appropriate under the circumstances before the Court. Co-Class Counsel's fee request is fully supported by the Class Representatives. *See* Peschke Decl. ¶ 6 (Ex. D); Hampton Decl. ¶ 6 (Ex. E).

113. In requesting a fee award of 25% of the Settlement Fund, Co-Class Counsel respectfully submit that the "percentage-of-the-fund" method is the preferred method for calculating attorney's fees in common fund actions in this Circuit.

¹³ Plaintiffs' Counsel are Labaton Sucharow LLP, Motley Rice LLC, Risch Pisca, PLLC, and Sturman LLC.

¹⁴ Approval of the Settlement is independent from approval of Co-Class Counsel's application for an award of attorneys' fees and litigation expenses; any determination with respect to Co-Class Counsel's application for an award of attorneys' fees and Litigation Expenses will not affect the Settlement, if approved.

114. Attorneys' fee awards of 25% or more in settlements of this magnitude are regularly awarded nationwide:

CASE/FEE ORDER	PERCENTAGE OF THE FUND	SETTLEMENT AMOUNT
<i>In re U.S. Foodservice Inc. Pricing Litigation</i> , 2014 WL 12862264, at *3 (Thompson, J.)	33.33%	\$297 million
<i>Christine Asia Co. v. Yun Ma</i> , 2019 WL 5257534, at *20 (S.D.N.Y. Oct. 16, 2019)	25%	\$250 million
<i>In re Signet Jewelers Ltd. Securities Litigation</i> , 2020 WL 4196468, at *15-16 (S.D.N.Y. July 21, 2020)	25%	\$240 million
<i>In re Comverse Technology, Inc. Securities Litigation</i> , 2010 WL 2653354, at *6 (E.D.N.Y. June 24, 2010)	25%	\$225 million
<i>Standard Iron Works v. ArcelorMittal</i> , 2014 WL 7781572, at *1 (N.D. Ill. Oct. 22, 2014)	33%	\$163.9 million
<i>In re Titanium Dioxide Antitrust Litigation</i> , 2013 WL 6577029, at *1 (D. Md. Dec. 13, 2013)	33.33%	\$163.5 million
<i>City of Pontiac Gen. Emps.' Ret. Sys. v. Wal-Mart Stores, Inc.</i> , 2019 WL 1529517, at *2 (W.D. Ark. Apr. 8, 2019)	30%	\$160 million
<i>In re Snap Inc. Securities Litigation</i> , 2021 WL 667590, at *3 (C.D. Cal. Feb. 18, 2021)	25%	\$154.68 million
<i>In re Flonase Antitrust Litigation</i> , 951 F. Supp. 2d 739, 756 (E.D. Pa. 2013)	33.33%	\$150 million
<i>In re Polyurethane Foam Antitrust Litigation</i> , 2015 WL 1639269, at *7 (N.D. Ohio Feb. 26, 2015)	30%	\$147.8 million
<i>In re Apollo Group Inc. Securities Litigation</i> , 2012 WL 1378677, at *7 (D. Ariz. Apr. 20, 2012)	33.33%	\$145 million
<i>Peace Officers' Annuity & Benefit Fund of Georgia v. Davita, Inc.</i> , 2021 WL 2981970, at *4 (D. Colo. July 15, 2021)	30%	\$135 million
<i>In re Rite Aid Corp. Securities Litigation</i> , 362 F. Supp. 2d 587, 590-91 (E.D. Pa. Mar. 24, 2005)	25%	\$126.6 million
<i>Kurzweil v. Philip Morris Cos.</i> , 1999 WL 1076105, at *1 (S.D.N.Y. Nov. 30, 1999)	30%	\$123.8 million
<i>In re Deutsche Telekom AG Sec. Litigation</i> , 2005 WL 7984326, at *4 (S.D.N.Y. June 14, 2005)	28%	\$120 million
<i>In re Sumitomo Copper Litigation</i> , 74 F. Supp. 2d 393, 400 (S.D.N.Y. 1999)	27.5%	\$116.6 million
<i>Knurr v. Orbital ATK, Inc.</i> , 2019 WL 3317976, at *1 (E.D. Va. June 7, 2019)	28%	\$108 million

115. Co-Class Counsel also request payment of litigation expenses incurred in connection with the prosecution of the Action from the Settlement Fund in the amount of \$1,364,364.07 plus any accrued interest, and awards to Class Representatives for their costs and expenses in the aggregate amount of \$51,960, pursuant to the PSLRA. The total expense payment requested is below the \$1,500,000 maximum expense amount that the Class was advised could be requested.

116. A full analysis of the factors considered by courts in within the Second Circuit when evaluating requests for attorneys' fees from a common fund, as well as the additional supporting legal authority, is set forth in Co-Class Counsel's accompanying Fee Memorandum. Below is a summary of the primary factual bases for Co-Class Counsel's requests.¹⁵

A. Class Representatives Support the Fee and Expense Application

117. Erste AM is a large asset management company based in Vienna, Austria. *See* Peschke Decl. ¶ 1.

118. As described in its Declaration, Erste AM has evaluated and fully supports Co-Class Counsel's Motion for an award of attorneys' fees and expenses in connection with services rendered in the Action. *See id.* ¶ 6.

119. PERSI is a public pension fund based in Boise, Idaho that provides retirement, disability, survivor, and other benefits for public employees in Idaho. *See* Hampton Decl. ¶ 3.

120. As described in its Declaration, PERSI has evaluated and fully supports Co-Class Counsel's Motion for an award of attorneys' fees and expenses in connection with services rendered in the Action. *See id.* ¶ 6.

¹⁵ Both unreported "slip opinions" cited in the Fee Memorandum are attached hereto as Ex. G.

B. The Risks and Unique Complexities of the Litigation

121. The risks faced by Co-Class Counsel in prosecuting this Action are highly pertinent to the Court's consideration of an award of attorneys' fees, as well as its approval of the Settlement. The specific risks that were faced in proving Defendants' liability, loss causation, and damages, as well as the other risks posed here, are detailed in Part V above.

122. The foregoing risks are in addition to the more typical risks accompanying class action and other complex, high-stakes litigation, such as the fact that this Action was undertaken on a fully contingent basis.

123. In that regard, Co-Class Counsel understood from the outset that they were embarking on a complex, expensive, and lengthy litigation with no guarantee of being compensated for the substantial investment of time and money the case would require. In undertaking that responsibility, Co-Class Counsel were obligated to ensure that sufficient resources were dedicated to the prosecution of the Action, and that funds were available to compensate staff and to cover the considerable costs that a case such as this requires. With an average lag time of several years for these cases to conclude, the financial burden on contingent-fee counsel is far greater than on a firm that is paid on an ongoing basis. Indeed, Plaintiffs' Counsel have received no compensation during the course of the Action, but have incurred over 45,671 hours of time, for a total lodestar of \$25,569,948.60, and have incurred over \$1.364 million in expenses in prosecuting the Action for the benefit of the Class. *See* Co-Class Counsel Lodestar & Expense Schedule ("Summary Table"), attached hereto as Ex. H.

124. Co-Class Counsel also bore the risk that no recovery would be achieved (or that a judgment could not be collected, in whole or in part). Even with the most vigorous and competent of efforts, success in contingent-fee litigation, such as this, is never assured. Co-Class Counsel know from experience that the commencement of a class action does not guarantee a settlement.

To the contrary, it takes hard work and diligence by skilled counsel to develop the facts and theories that are needed to sustain a complaint or win at trial, or to convince sophisticated defendants to engage in serious settlement negotiations at meaningful levels.

125. Co-Class Counsel are aware of many hard-fought lawsuits that—because of the discovery of facts unknown when the case was commenced or changes in the law during the pendency of the case, or a decision of the Court or a jury verdict following a trial in the merits—produced no fee for counsel despite the excellent professional efforts of members of the plaintiff’s bar. For example, since the enactment of the PSLRA, there has been a trend towards dismissal of actions at the pleading or summary judgment stage.¹⁶ NERA Economic Consulting also reports that between 2013 and 2022, 61% were dismissed at the motion to dismiss stage, and 83% of securities cases were either dismissed or settled before a class certification motion was even filed.¹⁷ Here, because Co-Class Counsel’s fee was entirely contingent, the only certainty was that there would be no fee without a successful result and that such result would only be realized after significant amounts of time, effort, and expense had been expended. Unlike counsel for Defendants, who were paid substantial hourly rates and reimbursed for their out-of-pocket expenses on a current basis, Co-Class Counsel have received no compensation for their efforts during the course of the Action.

126. Furthermore, federal appellate reports are filled with opinions affirming dismissals with prejudice in securities cases. The many appellate decisions affirming summary judgments and directed verdicts for defendants show that even surviving a motion to dismiss is no guarantee

¹⁶ See generally Jan. 2023 NERA Report, at 9 fig.8.

¹⁷ See *id.* 11 (between 2013 and 2022, “[a] motion for class certification was filed in only 17% of the securities class action suits filed and resolved, as most cases are either dismissed or settled before the class certification stage is reached”).

of ultimate recovery. *See, e.g., Phillips v. Scientific-Atlanta, Inc.*, 489 F. App'x 339 (11th Cir. 2012); *In re Smith & Wesson Holding Corp. Sec. Litig.*, 669 F.3d 68 (1st Cir. 2012); *In re Oracle Corp. Sec. Litig.*, 627 F.3d 376 (9th Cir. 2010); *McCabe v. Ernst & Young, LLP*, 494 F.3d 418 (3rd Cir. 2007); *Geffon v. Micrion Corp.*, 249 F.3d 29 (1st Cir. 2001); *Greebel v. FTP Software, Inc.*, 194 F.3d 185 (1st Cir. 1999); *Longman v. Food Lion, Inc.*, 197 F.3d 675 (4th Cir. 1999); *In re Silicon Graphics Inc. Sec. Litig.*, 183 F.3d 970 (9th Cir. 1999); *Phillips v. LCI Int'l, Inc.*, 190 F.3d 609 (4th Cir. 1999); *In re Comshare, Inc. Sec. Litig.*, 183 F.3d 542 (6th Cir. 1999); *Levitin v. PaineWebber, Inc.*, 159 F.3d 698 (2d Cir. 1998); *Silver v. H&R Block, Inc.*, 105 F.3d 394 (8th Cir. 1997).

127. Successfully opposing a motion for summary judgment is also not a guarantee that plaintiffs will prevail at trial. Indeed, while only a few securities class actions have been tried before a jury, several have been lost in their entirety. *See, e.g., Civil Trial Mins., In re JDS Uniphase Sec. Litig.*, No. C-02-1486 CW (N.D. Cal. Nov. 27, 2007), ECF No. 1885. Additionally, a plaintiff who succeeds at trial still may find its verdict overturned on appeal. *See, e.g., Anixter v. Home-Stake Prod. Co.*, 77 F.3d 1215 (10th Cir. 1996) (overturning plaintiffs' jury verdict obtained following two decades of litigation); *Ward v. Succession of Freeman*, 854 F.2d 780 (5th Cir. 1988) (reversing plaintiffs' jury verdict for securities fraud); *Robbins v. Koger Props., Inc.*, 116 F.3d 1441 (11th Cir. 1997) (same). And, even when a plaintiff wins a jury verdict, it still may face substantial challenges in securing a recovery. *See, e.g., Final Approval Order & J., In re Apollo Grp. Inc. Sec. Litig.*, No. CV-04-2147-PHX-JAT (D. Ariz. Apr. 20, 2012), ECF No. 770 (January 2008 jury verdict for plaintiff vacated by trial court in August 2008, but then reinstated by Ninth Circuit Court of Appeals in 2010 and judgment re-entered for plaintiff in 2011).

128. Changes in the law through legislation or judicial decree, such as *Morrison v. National Australia Bank Ltd.*, 561 U.S. 247 (2010), which limited the ability of investors on non-U.S. stock exchanges to recover under the U.S. securities laws, also can be catastrophic, frequently affecting contingent counsel's entire inventory of pending cases. While the U.S. Supreme Court did not overrule the presumption of reliance in *Halliburton Co. v. Erica P. John Fund, Inc.*, 573 U.S. 258 (2014), that case illustrates the many potential future obstacles to recovery. These are real threats.

129. Losses such as those described above are exceedingly expensive. The fees that are awarded in successful cases are used to cover enormous overhead expenses that are incurred during the course of unsuccessful litigations (after being taxed by federal, state, and local authorities).

130. Additionally, courts have held repeatedly that it is in the public interest to have experienced and able counsel enforce the securities laws and regulations pertaining to the duties of officers and directors of public companies. *See, e.g., Cohn v. Nelson*, 375 F. Supp. 2d 844, 865 (E.D. Mo. 2005) ("The Supreme Court has emphasized that while private actions provide 'a most effective weapon in the enforcement' of the securities laws and are 'a necessary supplement to [SEC] action,' it is imperative that the filing of contingent class action and derivative lawsuits not be chilled by the failure to award attorneys' fees or by the imposition of fee awards that fail to adequately compensate counsel for the risks of pursuing such litigation, and the benefits that would not otherwise be achieved.") (alteration in original). Vigorous private enforcement of the federal securities laws and state corporation laws can occur only if the private plaintiff can obtain some semblance of parity in representation with that available to large corporate interests. If this important policy is to be carried out, courts should award fees that will adequately compensate

private plaintiff's counsel, taking into account the enormous risks undertaken with a clear view of the economics of a securities class action.

131. When Co-Class Counsel undertook to act for the Class in this matter, they were aware that the only way they would be compensated was to achieve a successful result. The benefits conferred on the members of the Class by the Settlement are noteworthy in that a common fund worth \$125 million (plus interest) was obtained for the Class despite the existence of substantial risks and Defendants' zealous and vigorous defense.

132. Here, Co-Class Counsel's diligent efforts in the face of substantial risks and uncertainties have resulted in a significant and immediate recovery for the benefit of the Class. In circumstances such as these, and in consideration of Co-Class Counsel's substantial effort and the very favorable result achieved, the requested fee of 25% of the Settlement Fund is reasonable and should be approved.

133. Apart from the foregoing, courts consider the quality of plaintiff's counsel's performance and the result achieved when granting a fee award. As described above, *see supra* ¶¶ 11-12, the \$125 million Settlement is a significant result when viewed in absolute terms. The Settlement also is significant as it represents approximately 5.2% of the Class's estimated maximum reasonably recoverable damages (i.e., approximately \$2.4 billion) based on the analysis of Mr. Coffman and his team, assuming the primary theories of liability, loss causation, and damages were upheld by a jury.

C. A Lodestar Cross-Check Supports the Requested Award of Attorneys' Fees

134. A lodestar cross-check supports the requested attorneys' fees. A lodestar cross-check can be performed by multiplying the number of hours expended in the litigation by the

hourly rates of the attorneys. While a lodestar cross-check is often a useful tool in determining the reasonability of a fee request, whether or not to perform one is within the Court's discretion.¹⁸

135. Under the lodestar cross-check method, a court engages in a two-step analysis: first, the court multiplies the number of hours each attorney spent working on the case by each attorney's reasonable hourly rate to determine the lodestar; and second, the court adjusts that lodestar figure (by applying a multiplier) to reflect such factors as the risk and contingent nature of the litigation, the result obtained, and the quality of the attorney's work.

136. Here, Plaintiffs' Counsel have expended more than 45,671 hours in the prosecution and investigation of the Action through October 31, 2023. *See* Summary Table, Ex. H.¹⁹

137. The work undertaken by Class Counsel in investigating and prosecuting this case and arriving at the present Settlement in the face of serious hurdles has been time-consuming and challenging. As more fully set forth above, the Action has been prosecuted by Class Representatives and Co-Class Counsel since 2017 and settled only after Co-Class Counsel

¹⁸ The cut-off date for the lodestar figures addressed in this declaration is October 31, 2023. Additional work has been and will be required of Co-Class Counsel on an ongoing basis, including communicating with Class Members; preparation for, and participation in, the fairness hearing on December 20, 2023; responding to any settlement objections; supervising the claims administration process being conducted by the Claims Administrator; and supervising the distribution of the Net Settlement Fund to Class Members who have submitted valid proofs of claim. Co-Class Counsel will not seek payment for this work.

¹⁹ Attached hereto as Exhibits I and J are declarations from Co-Class Counsel to support their request for an award of attorneys' fees and litigation expenses in connection with services rendered in the Action. *See* Decl. of Gregg S. Levin on behalf of Motley Rice LLC in Supp. of Appl. for an Award of Att'ys' Fees & Litig. Expenses, dated Nov. 15, 2023 ("Levin Decl.") (Ex. I); Decl. of Michael H. Rogers on behalf of Labaton Sucharow LLP in Supp. of Appl. for an Award of Atty's' Fees & Litig. Expenses, dated Nov. 15, 2023 ("Rogers Decl.") (Ex. J).

Included with these declarations are schedules that summarize the number of hours worked by each individual who was assigned to this matter and the value of that time at current rates, i.e., the "lodestar" of the respective firms. As set forth in each declaration, these schedules were prepared from contemporaneous daily time records regularly prepared and maintained by our respective firms. Before submitting these time schedules, all entries were carefully reviewed.

overcame a motion to dismiss, obtained class certification, briefed a Rule 23(f) opposition, and devoted substantial resources to the litigation, including through the review of a large volume of party and non-party documents. Among other efforts, Co-Class Counsel conducted an exhaustive investigation into the Class's claims; researched and prepared two detailed complaints; briefed extensive oppositions to Defendants' motions to dismiss; undertook extensive discovery, including taking and/or defending 24 depositions; successfully obtained class certification; and engaged in settlement negotiations, including two formal mediation sessions facilitated by an experienced and well-respected mediator.

138. Throughout the pendency of the Action, Co-Class Counsel's efforts were focused on advancing the litigation to bring about the most successful outcome for the Class, whether through settlement or trial, by the most efficient means possible.

139. The prosecution of this case was undertaken with a focus on efficiency and the avoidance of duplication. Despite the duration of the case and the time-intensive nature of the work, the knowledge and experience of the personnel who worked the most on the matter was utilized to optimize the outcome for the Class. Additionally, a number of attorneys contributed to the successful prosecution of the case in many significant ways. For example, several senior attorneys at Motley Rice and Labaton Sucharow, including the undersigned, were intimately involved in litigating, mediating, and ultimately resolving the case.

140. The hourly rates of Plaintiffs' Counsel in this Action range from \$700 to \$1,325 for members/partners and from \$325 to \$950 for all of the other attorney-timekeepers. *See* Ex. I-A; Ex. J-A. The foregoing attorney rates are consistent with those that have been approved in other complex representative actions within this Circuit. Notably, Plaintiffs' Counsel's rates fall below those of lawyers employed by Alexion's counsel, which range from \$1,650 to \$2,175 for partners

and of counsel and \$825 to \$1,380 for associates. *See* Ninth Monthly Fee Statement of Paul, Weiss, Rifkind, Wharton, & Garrison LLP for Comp. for Servs. Rendered & Reimbursement of Expenses Incurred as Att’ys for Debtors for Period from Mar. 1, 2023 through Apr. 3, 2023, *In re Revlon, Inc.*, No. 22-10760 (DSJ) (Bankr. S.D.N.Y. May 1, 2023), attached hereto as Ex. K. Additionally, Exhibit L, attached hereto, provides tables of hourly rates for defense firms doing comparably complex commercial litigation, which has been compiled by Labaton Sucharow from fee applications submitted by such firms nationwide in bankruptcy proceedings in 2022. The analysis shows that across all types of attorneys, Plaintiffs’ Counsel’s rates are consistent with, or lower than, the firms surveyed.

141. The resulting collective lodestar for Plaintiffs’ Counsel is \$25,569,948.60. Pursuant to a lodestar “cross-check,” the requested fee of 25% of the Settlement Fund (which equates to \$31,250,000 million) results in a modest “multiplier” of 1.22 on the lodestar, which does not include any of the time that will necessarily be spent from October 31, 2023 onwards in administering the Settlement, responding to any inquiries from Class Members, preparing for the final approval hearing, and overseeing the administration of the Settlement.

142. As detailed in Co-Class Counsel’s Fee Memorandum in support of the fee request, this level of multiplier is well within the range of multipliers regularly approved in this Circuit. Indeed, “[i]n contingent litigation, lodestar multipl[iers] of over 4 are routinely awarded by courts.” *Spicer v. Pier Sixty LLC*, 2012 WL 4364503, at *4 (S.D.N.Y. Sept. 14, 2012) (quoting *In re Telik, Inc. Sec. Litig.*, 576 F. Supp. 2d 570, 590 (S.D.N.Y. 2008)).

D. Standing and Expertise of Co-Class Counsel

143. Class Counsel Motley Rice’s expertise and experience in securities litigation is set forth in the firm’s Shareholder and Securities Fraud Resume, which is an attachment to the Levin Declaration. As detailed therein, Motley Rice has served as lead counsel (or co-lead counsel) in

numerous securities class actions throughout the United States. Moreover, the firm has served as lead counsel in several high-profile matters which, during the last several years alone, have recovered hundreds of millions of dollars for investors. In 2022, for example, Motley Rice was recognized by the Institutional Shareholder Services, in its *Securities Class Action Services Top 50* report, as having recovered \$809.5 million for shareholders in 2022, which involved the single largest settlement during the year. See ISS Securities Class Action Services, *Top 50 of 2022*, at 4 (Feb. 28, 2023), attached hereto as Ex. M.

144. Motley Rice's recent securities fraud class action work includes *In re Twitter, Inc. Securities Litigation*, No. 16-cv-05314 (N.D. Cal.) (\$809.5 million recovery); *In re Barrick Gold Securities Litigation*, No. 1:13-cv-03851 (RPP) (S.D.N.Y.) (\$140 million recovery); *Bennett v. Sprint Nextel Corp.*, No. 2:09-cv-02122-EFM-KMH (D. Kan.) (\$131 million recovery); *KBC Asset Management NV v. 3D Systems Corp.*, No. 0:15-cv-02393-MGL (D.S.C.) (\$50 million recovery); *In re Medtronic, Inc. Securities Litigation*, No. 13-cv-01686 (JRT/FLN) (D. Minn.) (\$43 million recovery); and *Hatamian v. Advanced Micro Devices, Inc.*, No. 14-cv-00226-JD (N.D. Cal.) (\$29.5 million recovery). See Ex. I-C.

145. The expertise and experience of Co-Class Counsel Labaton Sucharow's attorneys are described in Exhibit C to the Rogers Declaration. Since the passage of the PSLRA, Labaton Sucharow has been approved by courts to serve as lead counsel in numerous notable securities class actions throughout the United States, and has taken three post-PSLRA securities class actions to trial. For example, Labaton Sucharow has served as lead counsel in *In re American International Group, Inc. Securities Litigation*, No. 04-8141 (S.D.N.Y.) (representing the Ohio Public Employees Retirement System, State Teachers Retirement System of Ohio, and Ohio Police & Fire Pension Fund and reaching settlements of \$1 billion); *In re HealthSouth Corp. Securities*

Litigation, No. 03-1501 (N.D. Ala.) (representing the State of Michigan Retirement System, New Mexico State Investment Council, and the New Mexico Educational Retirement Board and securing settlements of more than \$600 million); *In re Countrywide Securities Litigation*, No. 07-5295 (C.D. Cal.) (representing the New York State and New York City Pension Funds and reaching settlements of more than \$600 million); *In re Schering-Plough Corp. / ENHANCE Securities Litigation*, No. 08-397 (D.N.J.) (representing Massachusetts Pension Reserves Investment Management Board and reaching a settlement of \$473 million).

146. Co-Class Counsel believe their collectively extensive experience in the securities field (and the ability of their attorneys) added valuable leverage during settlement negotiations. Indeed, the substantial result achieved for the Class here reflects the superior quality of Co-Class Counsel's representation.

E. Standing and Caliber of Defense Counsel

147. Defendants' Counsel—Paul, Weiss, Rifkind, Wharton & Garrison LLP, and Wiggin and Dana LLP—are prominent and highly experienced, with well-noted expertise in corporate and securities litigation. The highly skilled attorneys at these firms intensely fought Class Representatives' claims. Despite this formidable opposition, Co-Class Counsel were able to develop and resolve this case on terms favorable to the Class.

F. Request for Litigation Expenses

148. Co-Class Counsel also seek payment from the Settlement Fund of \$1,364,364.07 in litigation expenses reasonably and necessarily incurred by them in connection with commencing and prosecuting the claims against Defendants. *See* Summary Table, Ex. H.

149. From the beginning of the case, Co-Class Counsel were aware that they may not recover any of their expenses, and, at the very least, would not recover anything until the Action was successfully resolved. Thus, Co-Class Counsel were motivated to, and did, take steps to

reduce their expenses when practicable without jeopardizing the vigorous and efficient prosecution of the case.

150. Co-Class Counsel maintained strict control over the litigation expenses incurred in connection with the Action. For instance, they maintained control over the primary expenses in the Action by managing a joint litigation fund (“Joint Litigation Expense Fund” or “Litigation Fund”). Motley Rice and Labaton Sucharow collectively contributed \$ 440,000 to the Joint Litigation Expense Fund. A description of the expenses incurred by the Litigation Fund by category is included as an attachment to the individual firm declaration submitted on behalf of Labaton Sucharow. *See* Ex. J-D. The Litigation Fund has a shortfall of \$151,779.92 and this amount is included in Labaton Sucharow’s expense request so that the remaining litigation expenses can be paid. *See id.*

151. The Levin Declaration and Rogers Declaration summarize by category the expenses incurred by Co-Class Counsel in connection with the prosecution of this Action. *See generally* Exs. I-B; J-B; J-D. The expenses are reflected on the books and records maintained by Co-Class Counsel. These books and records are prepared from expense vouchers, check records, and other source materials, and are an accurate record of the expenses incurred.

152. As detailed in the Levin Declaration and the Rogers Declaration, the expenses for which Co-Class Counsel seek payment are the types of expenses that are necessarily incurred in complex commercial litigation and routinely paid by non-contingent clients in the private legal marketplace. Co-Class Counsel’s expenses include court costs and mediation fees, process servers, online legal and factual research, expert and consultant fees, travel, court reporting and videography for depositions, costs related to the document productions and data hosting and analysis on an eDiscovery platform, printing and reproduction, and postage and delivery expenses.

153. Of the total amount of expenses, \$430,219.42, or approximately 31.5%, was expended for the retention of testifying and consulting experts. As noted above, and by way of example, Co-Class Counsel worked extensively with their expert, Mr. Coffman, on issues related to market efficiency, loss causation, damages, and the Plan of Allocation. This work was instrumental in Co-Class Counsel's appraisal of the claims, obtaining class certification, and ultimately bringing about the favorable result achieved. Additionally, Co-Class Counsel also consulted with, among others, a medical consultant who had extensive experience treating patients with PNH and aHUS. Also, and as explained above, *see supra* at ¶¶ 56, 58, Erste AM retained the services of two experts to assist on issues pertaining to Austrian law in connection with Lead Plaintiffs' motion for class certification.

154. Another significant cost was the expense of litigation support, which included retaining a database provider to host and manage the data from the extensive document productions made in the Action. Those costs totaled \$254,830.39, or approximately 18.67% of the total expenses. Ex. I at ¶ 16(d); Ex. J at ¶¶ 7(b), 10(e). Further, a substantial component of Co-Class Counsel's expenses (i.e., \$152,745.27, or approximately 11.1% of the total expenses) was the cost of court reporters, videographers, and transcripts in connection with the depositions counsel took or defended during the course of the Action. Ex. I at ¶ 16(e); Ex. J at ¶ 10(b).

155. Co-Class Counsel incurred a total of \$ 72,048.75 in connection with the extensive mediation efforts of Judge Phillips. Ex. J at ¶ 10(a); *see also* Ex. J-D.

156. Travel costs in connection with the Action and costs related to working meals, lodging, and transportation, total \$112,105.48. Airfare costs are at economy rates. Ex. I at ¶ 16(f); Ex. J at ¶ 7(d).

157. The combined costs of on-line legal and factual research were \$204,417.90, or approximately 14.98% of the total expenses. Ex. I at ¶ 16(a); Ex. J at ¶ 7(e).

158. All of the litigation expenses incurred by Co-Class Counsel, which total \$1,364,364.07, were necessary to the successful prosecution and resolution of the claims against Defendants. This total expense amount is below the \$1.5 million maximum expense amount contained in the Notice.

G. The Reaction to Date of the Class to the Fee and Expense Application

159. As mentioned above, consistent with the Preliminary Approval Order, as of November 13, 2023, a total of 316,305 Notice Packets have been mailed or e-mailed to potential Class Members and nominees. *See* Mailing Decl. ¶ 8. The Notice stated that Co-Class Counsel would seek an award of attorneys' fees not to exceed 25% of the Settlement Fund, plus accrued interest, and payment of expenses in an amount not greater than \$1.5 million, plus accrued interest. Additionally, the Summary Notice was published in *The Wall Street Journal* and transmitted over the internet using *PR Newswire*. *Id.* ¶ 9. Since October 3, 2023, the Notice and the Stipulation have been available to be downloaded from the settlement website maintained by KCC. *Id.* ¶ 11.

160. The deadline for Class Members to object to the requested fees and expenses is November 29, 2023. Although this deadline has not yet passed, to date, Co-Class Counsel have received no objections to the requested fee and no objections to the requested expenses. Co-Class Counsel will respond to any objections that may be received subsequently in its reply papers that are due to be filed with the Court on December 13, 2023.

H. Class Representatives Should be Reimbursed Pursuant to the PSLRA

161. The PSLRA limits a class representative's recovery to an amount "equal, on a per share basis, to the portion of the final judgment or settlement awarded to all other members of the class," but also provides that "[n]othing in this paragraph shall be construed to limit the award of

reasonable costs and expenses (including lost wages) directly relating to the representation of the class to any representative party serving on behalf of a class.” 15 U.S.C. § 78u-4(a)(4). Here, as explained in their declarations, Class Representatives are seeking the aggregate amount of \$51,960 related to their active participation in the Action. *See* Peschke Decl. at ¶ 9; Hampton Decl. at ¶ 9; Exs. D & E attached hereto. The aggregate amount sought (\$51,960) is broken down as follows: \$27,960 for PERSI; \$24,000 for Erste AM.

162. No objection to this request has been received to date.

163. As discussed in the accompanying Fee Memorandum, numerous courts have approved payments to compensate class representatives for their costs and efforts on behalf of a class.

164. As discussed in the Class Representatives’ supporting declarations, each of the Class Representatives has been fully committed to pursuing the Class’s claims since they became involved in the litigation over six years ago. Specifically, Class Representatives engaged in time-consuming discovery efforts and searches to obtain and produce documents responsive to discovery requests, including, in Erste AM’s case, documents that were not in its possessions, custody, or control, but rather in the possession of its external investment managers. Erste AM voluntarily obtained responsive documents after Defendants opted not pursue those documents under the Hague Convention. *See* ECF No. 248 at 19; *see also* ECF No. 219 at 9. Class Representatives also expended substantial time and effort preparing for and testifying during depositions conducted by defense counsel. Moreover, a representative from PERSI attended and actively participated in both mediation sessions before Judge Phillips, in addition to traveling and preparation in connection therewith. Class Representatives’ efforts required their employees to dedicate considerable time and resources to this Action that would have otherwise been devoted

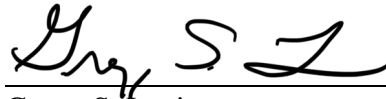
to benefitting Erste AM and/or PERSI and their beneficiaries. The efforts expended by Erste AM and PERSI representatives and employees during the course of this Action, as detailed in Exhibits D and E hereto, fully support the instant request for an award of attorneys' fees and expenses in connection with services rendered in the Action.

IX. CONCLUSION

165. In view of the significant recovery to the Class and the substantial risks of this litigation, as described above and in the accompanying memorandum of law, Class Representatives and Co-Class Counsel respectfully submit that the Settlement should be approved as fair, reasonable, and adequate, and that the proposed Plan of Allocation should likewise be approved as fair, reasonable, and adequate. Moreover, in view of the significant recovery in the face of substantial risks, the quality of work performed, the contingent nature of the fee, and the standing and experience of Co-Class Counsel, as described above and in the accompanying memorandum of law, Co-Class Counsel respectfully request that the Court award attorneys' fees in the amount of 25% of the Settlement Fund and expenses in the amount of \$ 1,364,364.07, plus the interest earned thereon. In addition, Co-Class Counsel respectfully submit that Class Representatives should be awarded the total sum of \$51,960 related to their active participation in the Action.

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

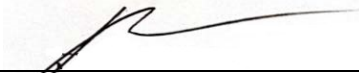
Executed this 15th day of November, 2023, at Mt. Pleasant, South Carolina.

A handwritten signature in black ink, appearing to read "Gregg S. Levin". The signature is written in a cursive style with a horizontal line extending to the right from the end of the signature.

Gregg S. Levin

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

Executed this 15th day of November, 2023, at New York, New York.



Michael H. Rogers

CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2023, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

William H. Narwold
WILLIAM H. NARWOLD

Exhibit A



CORNERSTONE RESEARCH

Economic and Financial Consulting and Expert Testimony

Securities Class Action Settlements

2022 Review and Analysis

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Analyses in this report are based on 2,116 securities class actions filed after passage of the Private Securities Litigation Reform Act of 1995 (Reform Act) and settled from 1996 through year-end 2022. See page 16 for a detailed description of the research sample. For purposes of this report and related research, a settlement refers to a negotiated agreement between the parties to a securities class action that is publicly announced to potential class members by means of a settlement notice.

2022 Highlights

In 2022, the number of settled cases reached its highest level in 15 years, increasing 21% relative to 2021. The median settlement amount, median “simplified tiered damages,” and median total assets of the defendant issuer also rose dramatically.¹

- In 2022, the number of securities class action settlements increased to 105 with a total settlement value of over \$3.8 billion, compared to 87 settlements in 2021 with a total value of \$1.9 billion. (page 3)
- The median settlement amount of \$13.0 million represents an increase of 46% from 2021, while the average settlement amount (\$36.2 million) increased by 63%. (page 4)
- The \$3.8 billion total settlement dollars were 97% higher than the prior year. (page 3)
- There were eight mega settlements (equal to or greater than \$100 million), ranging from \$100 million to \$809.5 million. (page 3)
- The increase in the proportion of “midsize” settlement amounts (\$10 million to \$50 million) was accompanied by a decrease in the proportion of cases that settled for less than \$10 million. (page 4)
- Median “simplified tiered damages” increased more than 125% and reached a record high.² (page 5)
- Median “disclosure dollar losses”³ grew by more than 160%, also reaching an all-time high. (page 5)
- Compared to defendant firms involved in cases that settled in 2021, defendant firms involved in 2022 settlements were 97% larger, as measured by median total assets. (page 5)
- The historically low rate of settled cases involving a corresponding action by the U.S. Securities and Exchange Commission (SEC) observed in 2021 persisted in 2022, remaining below 9%. (page 11)

Figure 1: Settlement Statistics

(Dollars in millions)

	2017–2021	2021	2022
Number of Settlements	395	87	105
Total Amount	\$16,714.3	\$1,932.4	\$3,805.5
Minimum	\$0.3	\$0.7	\$0.7
Median	\$10.2	\$8.9	\$13.0
Average	\$42.3	\$22.2	\$36.2
Maximum	\$3,496.8	\$202.5	\$809.5

Note: Settlement dollars are adjusted for inflation; 2022 dollar equivalent figures are presented.

Author Commentary

Findings

The year 2022 was a record year for settlement activity. The number of securities class action settlements in 2022 increased sharply from 2021 and reached levels not observed since 2007. This sharp increase was accompanied by dramatic growth in case settlement amounts, “simplified tiered damages” (our rough proxy for potential shareholder losses), and the size of issuer defendant firms.

The historically high number of settlements in 2022 can be explained by the elevated number of case filings in 2018–2020, when over 70% of these settled cases were filed.

The median settlement amount is the highest since 2018. This was likely driven by the record-high level of “simplified tiered damages,” an estimate of potential shareholder losses that our research finds is the single most important factor in explaining settlement amounts.

The all-time-high median “simplified tiered damages” reflects a number of factors such as larger issuer defendants (measured by the company’s total assets) and larger disclosure dollar losses (a measure of the change in the issuer defendant’s market capitalization following the class-ending alleged corrective disclosure). Institutional investors are more likely to serve as lead plaintiffs in larger cases, i.e., cases with relatively high “simplified tiered damages.” Consistent with this observation, institutional investor involvement as lead plaintiffs for 2022 settled cases was higher than the prior year and the 2017–2021 average. Larger cases also tend to take longer to settle, and accordingly, we observe an increase in the median time to settlement in 2022 relative to prior years.

2022 was an interesting year as settlement activity reached historically high levels across several dimensions, including the number and size of settlements, and a record-high for our proxy for potential shareholder losses.

*Dr. Laarni T. Bulan
Principal, Cornerstone Research*

In contrast to the historic highs, settlements in relation to our proxy for potential shareholder losses declined sharply. In particular, both the median and average settlement as a percentage of “simplified tiered damages” in 2022 fell to their lowest levels among post–Reform Act years. These low levels are consistent with a low presence in 2022 of factors often associated with higher settlement amounts, such as the presence of an SEC action, criminal charges, or accounting irregularities.⁴

Securities class action settlements in 2022 involved substantially larger cases with larger issuer defendant firms. Overall, these cases took longer to resolve and reached more advanced litigation stages before settlement than in prior years.

*Dr. Laura E. Simmons
Senior Advisor, Cornerstone Research*

Looking Ahead

In light of the reduced level in the number of securities class action case filings in 2021–2022, we may begin to see a slowdown or flattening out in settlement activity in the upcoming years,⁵ absent a decrease in dismissal rates.

Given that SEC enforcement actions have tended to increase subsequent to when a new SEC Chair is sworn in (which last occurred in 2021), we may also begin to see a reversal in the frequency of corresponding SEC actions among settled cases in the near term. For additional details, see Cornerstone Research’s *SEC Enforcement Activity: Public Company and Subsidiaries—FY 2022 Update*.

As discussed in Cornerstone Research’s *Securities Class Action Filings—2022 Year in Review*, certain issues have emerged as focus areas in securities class actions. In particular, 26% of all core federal filings in 2020–2022 were related to special purpose acquisition company (SPAC), COVID-19, or cryptocurrency matters. While very few of these types of cases have settled to date, we expect increased settlement activity for these cases in the future.

—Laarni T. Bulan and Laura E. Simmons

Total Settlement Dollars

As has been observed in prior years, the presence or absence of just a few very large settlements can have a substantial effect on total settlement dollars for a given year.

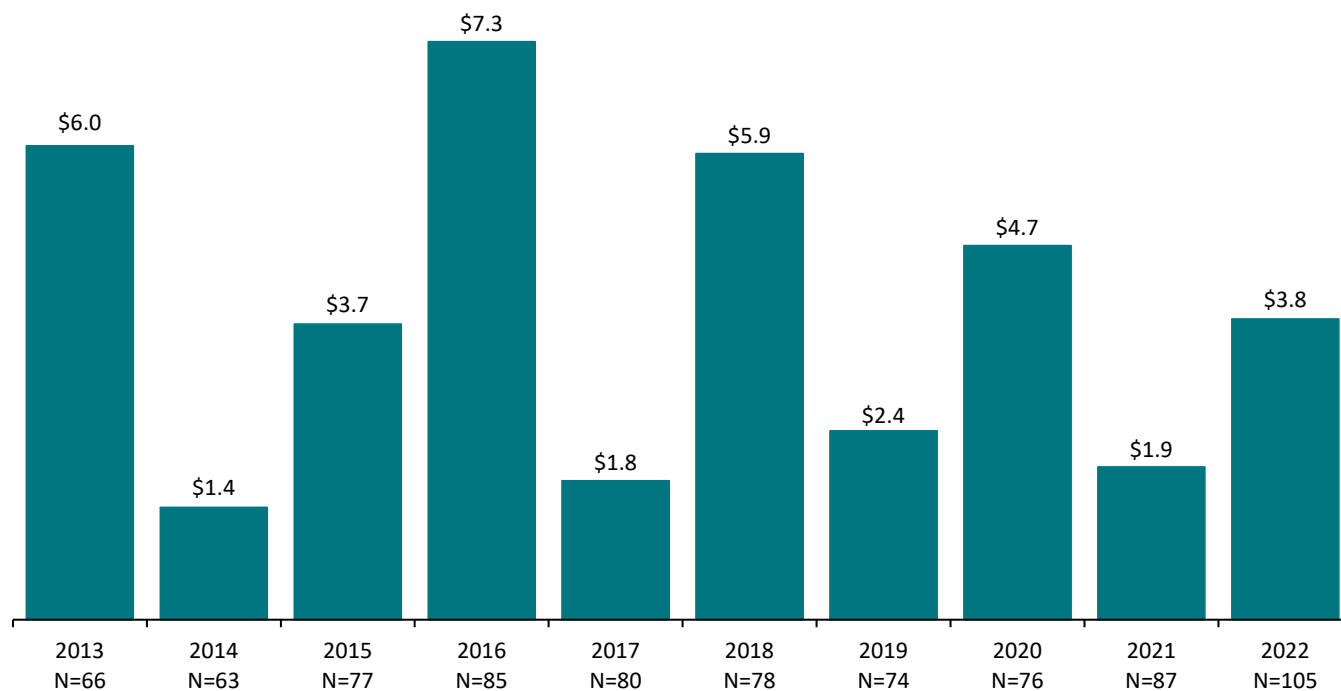
- The number of settlements in 2022 (105 cases) continued the upward trend since 2019 and represented a 38% increase from the prior nine-year average (76 cases).
- An increase in the number of mega settlements (i.e., settlements equal to or greater than \$100 million) contributed to total settlement dollars nearly doubling in 2022 compared to the prior year.

- There were eight mega settlements in 2022, ranging from \$100 million to \$809.5 million. Eight such settlements is the highest number since 2016.
- A decline in the proportion of very small settlements further contributed to the growth in total settlement dollars. Only 23% of settlements in 2022 were for less than \$5 million, compared to 33% of cases settled in the prior nine years.

The number of settlements in 2022 was the highest number since 2007.

Figure 2: Total Settlement Dollars 2013–2022

(Dollars in billions)



Note: Settlement dollars are adjusted for inflation; 2022 dollar equivalent figures are presented. “N” refers to the number of cases.

Settlement Size

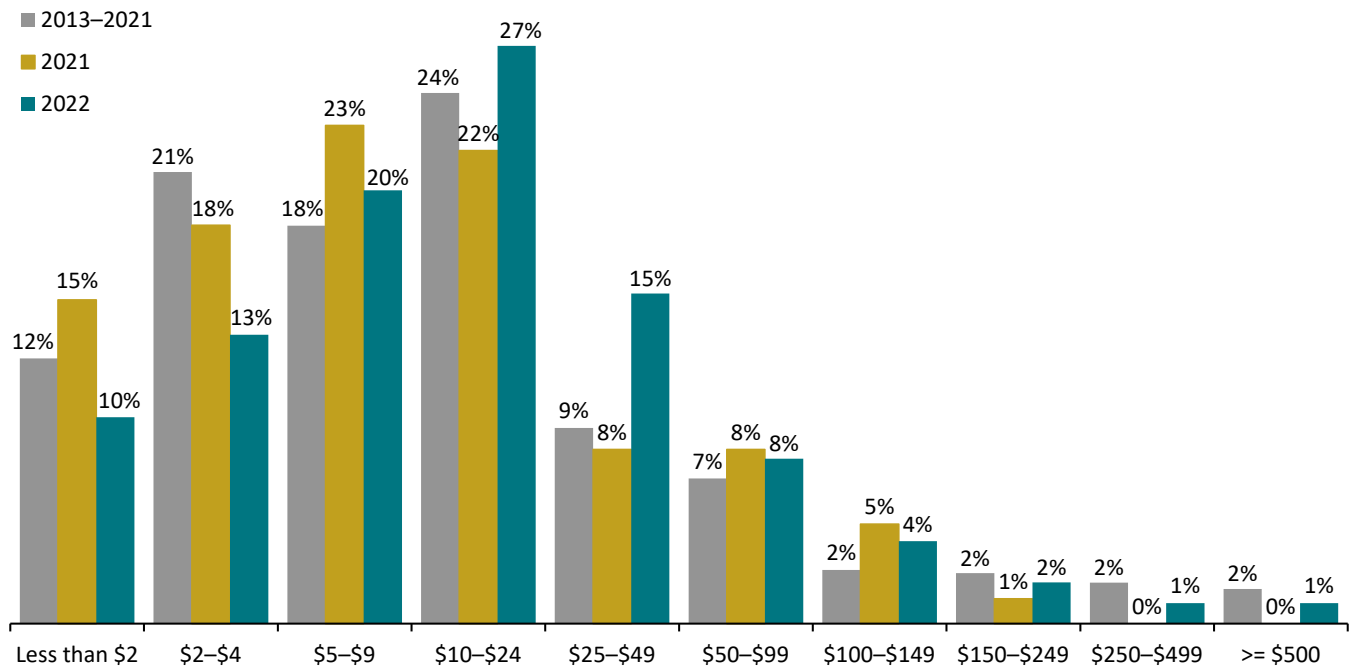
- The median settlement amount in 2022 was \$13.0 million, a 46% increase from 2021 and a 34% increase from the prior nine-year median. Median values provide the midpoint in a series of observations and are less affected than averages by outlier data.
- The average settlement amount in 2022 was \$36.2 million, a 63% increase from 2021. (See [Appendix 1](#) for an analysis of settlements by percentiles.)
- In 2022, 42% of cases settled for between \$10 million and \$50 million, compared to only 30% in 2021 and 34% in 2013–2021.

The median settlement amount in 2022 was the highest since 2018.

- The increase in the proportion of these “midsize” settlement amounts (\$10 million to \$50 million) was accompanied by a decrease in the proportion of cases that settled for less than \$10 million—43% in 2022 compared to 56% in 2021 and 51% in the prior nine years.

Figure 3: Distribution of Settlements 2013–2022

(Dollars in millions)



Note: Settlement dollars are adjusted for inflation; 2022 dollar equivalent figures are presented.

Type of Claim

Rule 10b-5 Claims and “Simplified Tiered Damages”

“Simplified tiered damages” uses simplifying assumptions to estimate per-share damages and trading behavior for cases involving Rule 10b-5 claims. It provides a measure of potential shareholder losses that allows for consistency across a large volume of cases, thus enabling the identification and analysis of potential trends.⁶

Cornerstone Research’s analysis finds this measure to be the most important factor in estimating settlement amounts.⁷ However, this measure is not intended to represent actual economic losses borne by shareholders. Determining any such losses for a given case requires more in-depth economic analysis.

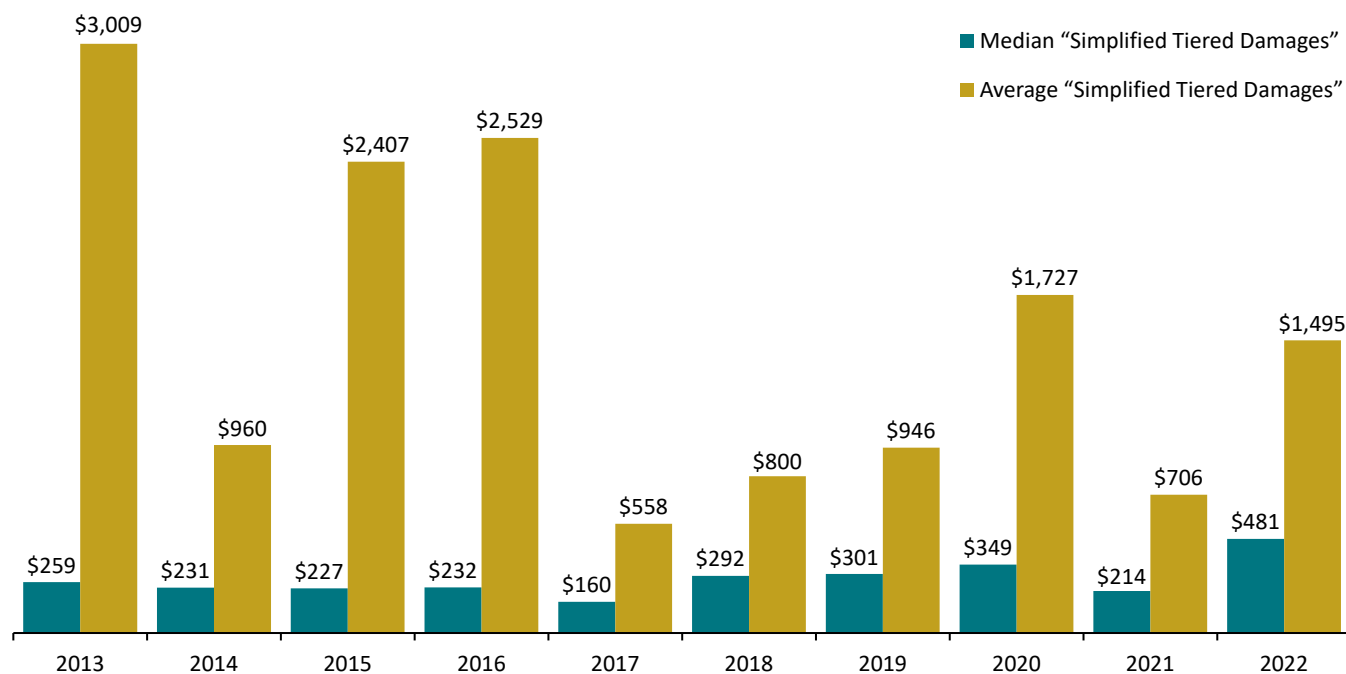
- Similar to settlement amounts, the median “simplified tiered damages” in 2022 increased 125% compared to 2021 and was over 100% higher than the median of settled cases for the prior nine years.

- In 2022, nearly half of settlements with Rule 10b-5 claims involved “simplified tiered damages” over \$500 million, an all-time high.
- Higher “simplified tiered damages” are typically associated with larger issuer defendants. Consistent with this, the median total assets of issuer defendants in 2022 settled cases was 97% higher than the median total assets for 2021 settled cases.
- Higher “simplified tiered damages” are also generally associated with larger disclosure dollar losses. In 2022, the median DDL grew by more than 160% compared to 2021, reaching an all-time high.

Median “simplified tiered damages” reached an all-time high in 2022.

Figure 4: Median and Average “Simplified Tiered Damages” in Rule 10b-5 Cases 2013–2022

(Dollars in millions)

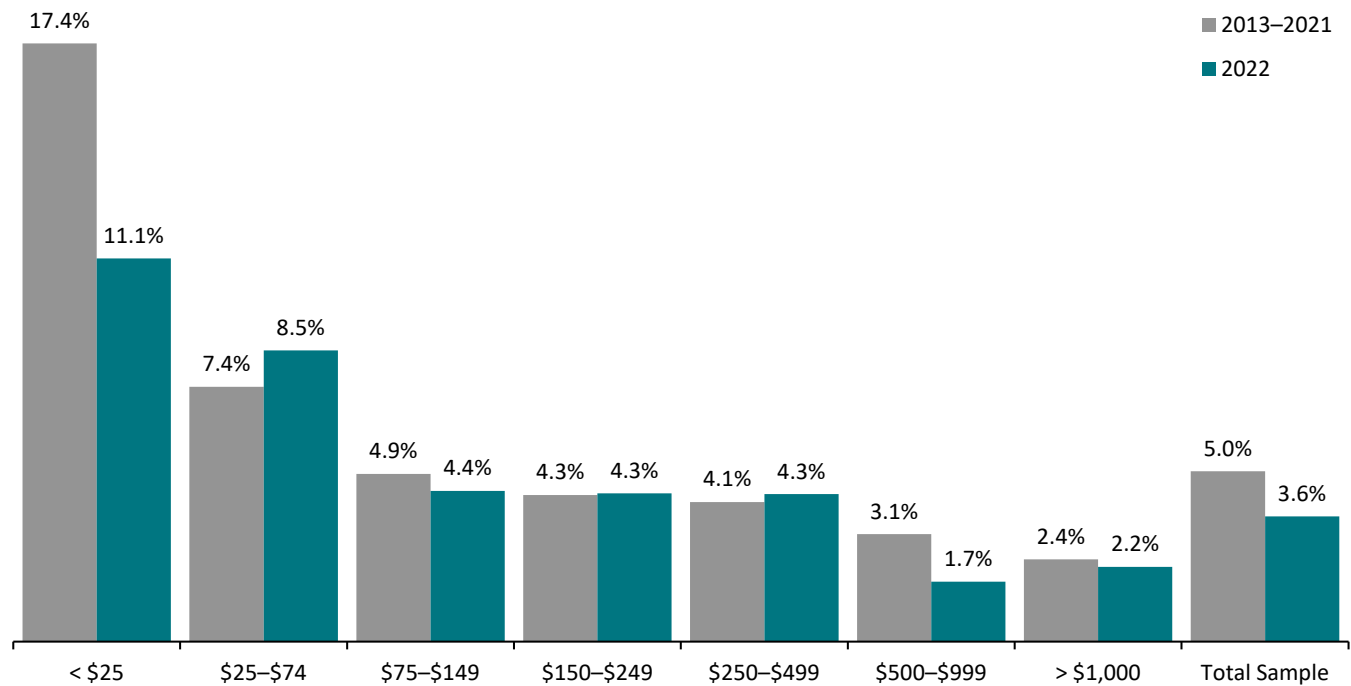


Note: “Simplified tiered damages” are adjusted for inflation based on class period end dates for common stock only; 2022 dollar equivalent figures are presented. Damages are estimated for cases alleging a claim under Rule 10b-5 (whether alone or in addition to other claims).

- Only 4% of settlements in 2022 had “simplified tiered damages” less than \$25 million, the lowest observed to date.
- Cases with smaller “simplified tiered damages” are more likely to be associated with issuers that had been delisted from a major exchange and/or declared bankruptcy prior to settlement. In 2022, the percentage of such issuers for settled cases was at an all-time low (11%).
- The 2022 median and average settlement as a percentage of “simplified tiered damages” of 3.6% and 5.4%, respectively, are all-time lows. (See [Appendix 5](#) for additional information on median and average settlements as a percentage of “simplified tiered damages.”)

Figure 5: Median Settlement as a Percentage of “Simplified Tiered Damages” by Damages Ranges in Rule 10b-5 Cases 2013–2022

(Dollars in millions)



Note: Damages are estimated for cases alleging a claim under Rule 10b-5 (whether alone or in addition to other claims).

'33 Act Claims and “Simplified Statutory Damages”

For Securities Act of 1933 ('33 Act) claim cases—those involving only Section 11 and/or Section 12(a)(2) claims—potential shareholder losses are estimated using a model in which the statutory loss is the difference between the statutory purchase price and the statutory sales price, referred to here as “simplified statutory damages.” Only the offered shares are assumed to be eligible for damages.⁸

- In 2022, there were nine settlements for cases with only '33 Act claims, in line with the average from 2017 to 2020 and well below the historically high number of 16 settlements observed in 2021.

- The median settlement as a percentage of simplified statutory damages in 2022 and 2021 were 4.7% and 4.4%, respectively—the lowest levels since 2002. (See [Appendix 6](#) for additional information on median and average settlements as a percentage of “simplified statutory damages.”)
- The average settlement amount for cases with only '33 Act claims was \$7.3 million in 2022, compared to \$14.9 million during 2013-2021.

In 2022, the median settlement amount for cases with only '33 Act claims was \$7.0 million, the lowest since 2013.

Figure 6: Settlements by Nature of Claims
2013–2022

(Dollars in millions)

	Number of Settlements	Median Settlement	Median “Simplified Statutory Damages”	Median Settlement as a Percentage of “Simplified Statutory Damages”
Section 11 and/or Section 12(a)(2) Only	82	\$9.2	\$145.2	8.7%

	Number of Settlements	Median Settlement	Median “Simplified Tiered Damages”	Median Settlement as a Percentage of “Simplified Tiered Damages”
Both Rule 10b-5 and Section 11 and/or Section 12(a)(2)	123	\$15.4	\$355.7	6.3%
Rule 10b-5 Only	581	\$9.0	\$250.1	4.5%

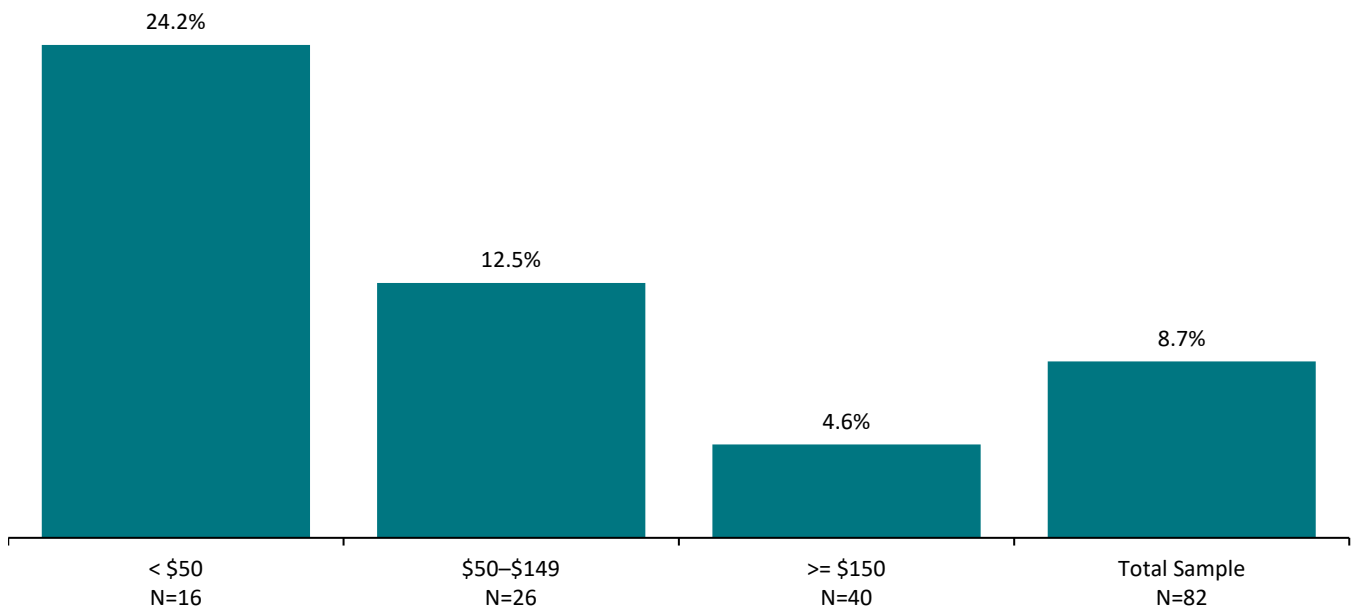
Note: Settlement dollars and damages are adjusted for inflation; 2022 dollar equivalent figures are presented.

- Settlements as a percentage of the simplified proxies for potential shareholder losses used in this report are typically smaller for cases that have larger estimated damages. As with cases with Rule 10b-5 claims, this finding holds for cases with only '33 Act claims.
- In the past decade, over 85% of the settled '33 Act claim cases involved an underwriter (or underwriters) as a named codefendant.
- Over 80% of '33 Act claim cases that settled in 2013–2022 involved an initial public offering (IPO).

Consistent with the lower median settlement amount among '33 Act claim cases, the median “simplified statutory damages” in 2022 declined by 61% from the median in 2021 and was the lowest since 2016.

Figure 7: Median Settlement as a Percentage of “Simplified Statutory Damages” by Damages Ranges in '33 Act Claim Cases 2013–2022

(Dollars in millions)



Jurisdictions of Settlements of '33 Act Claim Cases

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
State Court	1	0	2	4	5	4	4	7	6	6
Federal Court	7	2	2	6	3	4	5	1	10	3

Note: “N” refers to the number of cases. This analysis excludes cases alleging Rule 10b-5 claims..

Analysis of Settlement Characteristics

GAAP Violations

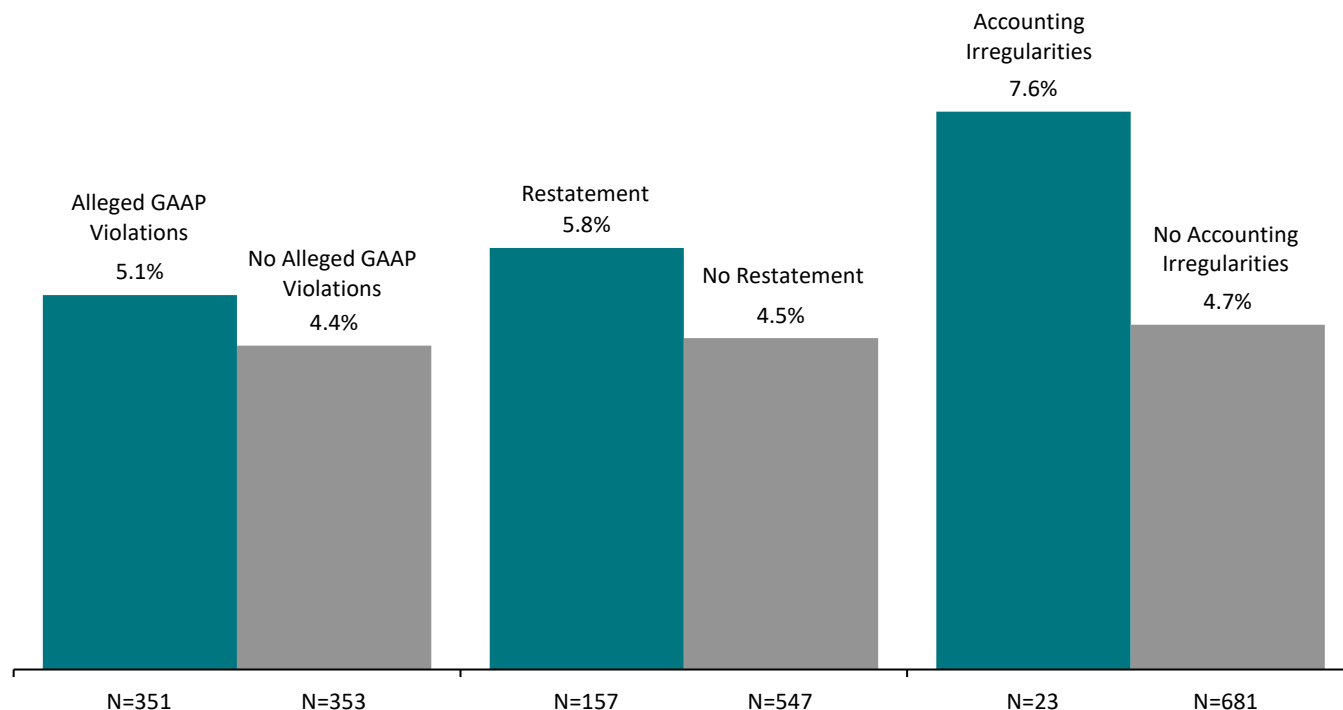
This analysis examines allegations of GAAP violations in settlements of securities class actions involving Rule 10b-5 claims, including two sub-categories of GAAP violations—financial statement restatements and accounting irregularities.⁹ For further details regarding settlements of accounting cases, see Cornerstone Research’s annual report on *Accounting Class Action Filings and Settlements*.¹⁰

- For the first time since 2017, the median settlement amount for cases involving GAAP allegations was larger than that for non-GAAP cases. Notably, in 2022 the median settlement amount for GAAP cases was more than double that of non-GAAP cases.
- As noted in prior years, settlements as a percentage of “simplified tiered damages” for cases involving GAAP allegations are typically higher than for non-GAAP cases. This result has continued despite a relatively low number of cases involving a financial restatement. For example, only 11% of settlements in 2022 involved a restatement of financial statements.

- Auditor codefendants were involved in only 3% of settled cases, consistent with 2021 but substantially lower than the average from 2013 to 2021.
- The infrequency of cases alleging accounting irregularities continued in 2022 at less than 2% of settled cases.

The proportion of settled cases in 2022 with Rule 10b-5 claims alleging GAAP violations remained at a historically low level.

Figure 8: Median Settlement as a Percentage of “Simplified Tiered Damages” and Allegations of GAAP Violations 2013–2022



Note: “N” refers to the number of cases. This analysis is limited to cases alleging Rule 10b-5 claims (whether alone or in addition to other claims).

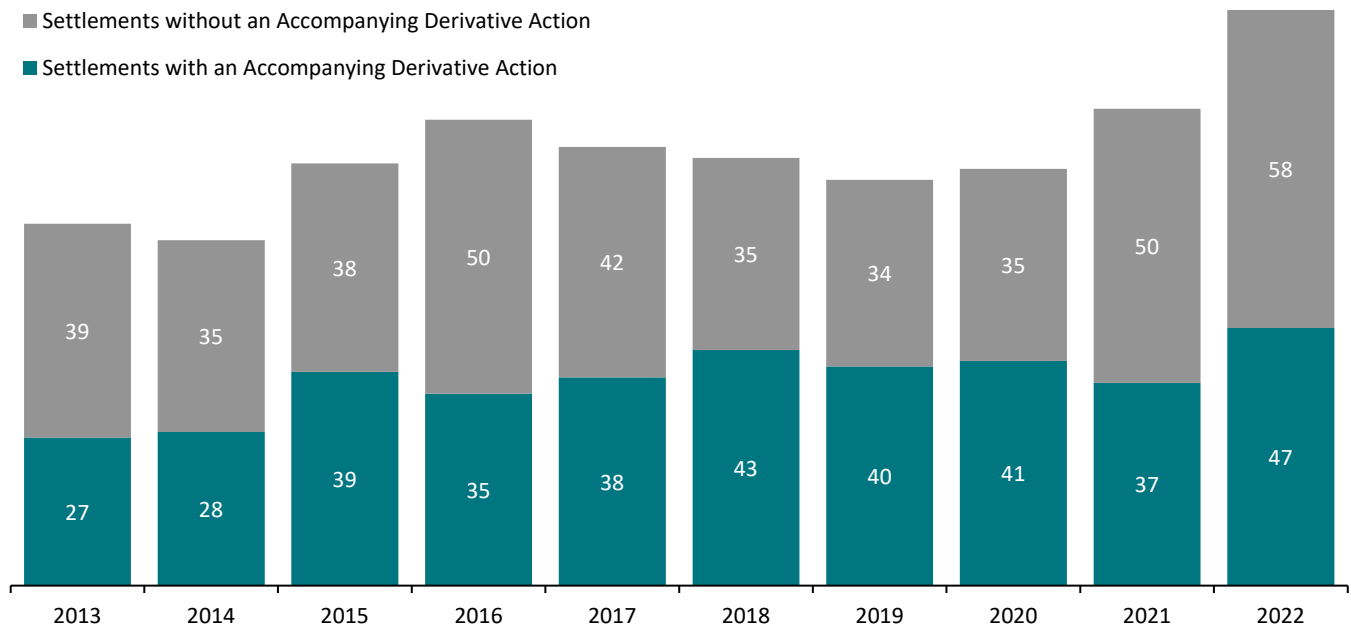
Derivative Actions

- Securities class actions often involve accompanying (or parallel) derivative actions with similar claims, and such cases have historically settled for higher amounts than securities class actions without corresponding derivative matters.¹¹
- In 2022, the median settlement amount for cases with an accompanying derivative action was approximately 28% higher than for cases without (\$14.1 million versus \$11.0 million, respectively).
- For cases settled during 2018–2022, 38% of parallel derivative suits were filed in Delaware. California and New York were the next most common venues for such actions, representing 22% and 15% of such settlements, respectively.

Although the proportion of cases involving accompanying derivative actions in 2022 was higher compared to 2021, it was below the average for 2018–2021.

- It is commonly understood that most parallel derivative suits do not settle for monetary amounts (other than plaintiffs’ attorney fees). However, the likelihood of a monetary settlement among parallel derivative actions is higher when the securities class action settlement is large, as shown in Cornerstone Research’s *Parallel Derivative Action Settlement Outcomes*.¹²

Figure 9: Frequency of Derivative Actions 2013–2022

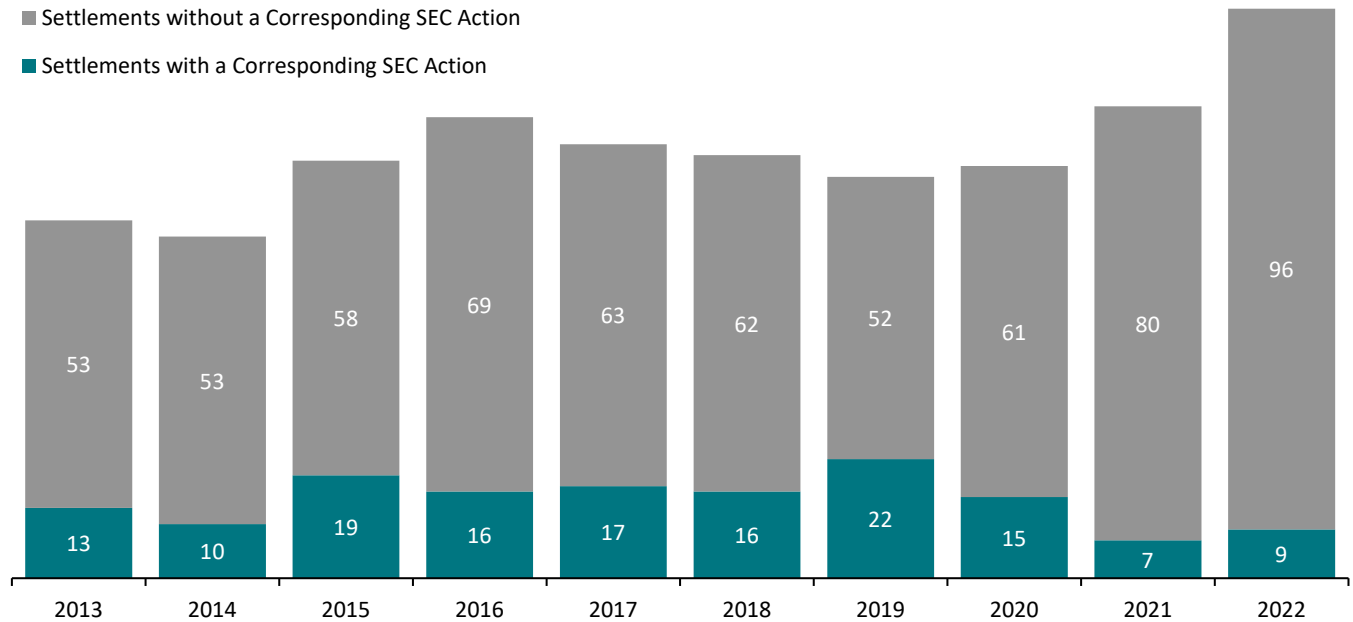


Corresponding SEC Actions

- Historically, cases with an accompanying SEC action have typically been associated with substantially higher settlement amounts.¹³ However, this pattern did not hold in 2022.
- The median settlement amount in 2022 for cases that involved a corresponding SEC action was less than 5% higher than the median for cases without such an action. In contrast, in 2021, the median settlement amount for cases with an accompanying SEC action was more than double that for cases without such an action.
- Both “simplified tiered damages” and DDL were lower in 2022 for cases with a corresponding SEC action when compared to those without, at 72% and 83% lower, respectively.
- Settled cases in 2022 with a corresponding SEC action were nearly 10% quicker to reach settlement, on average, compared to cases without such an action. In contrast, in 2021, cases with corresponding SEC actions took over 20% longer to reach a settlement than cases without corresponding SEC actions.
- The number of settled cases in 2022 involving either a corresponding SEC action or criminal charge remained below 13%, compared to an average of 24% for the years 2013–2021.

Settled cases involving SEC actions in 2022 were considerably smaller than cases without accompanying SEC actions.

Figure 10: Frequency of SEC Actions 2013–2022



Institutional Investors

As discussed in prior reports, increasing institutional participation as lead plaintiffs in securities litigation was a focus of the Reform Act.¹⁴ Indeed, in years following passage of the Reform Act, institutional investor involvement as lead plaintiffs did increase, particularly in larger cases, that is, cases with higher “simplified tiered damages.”

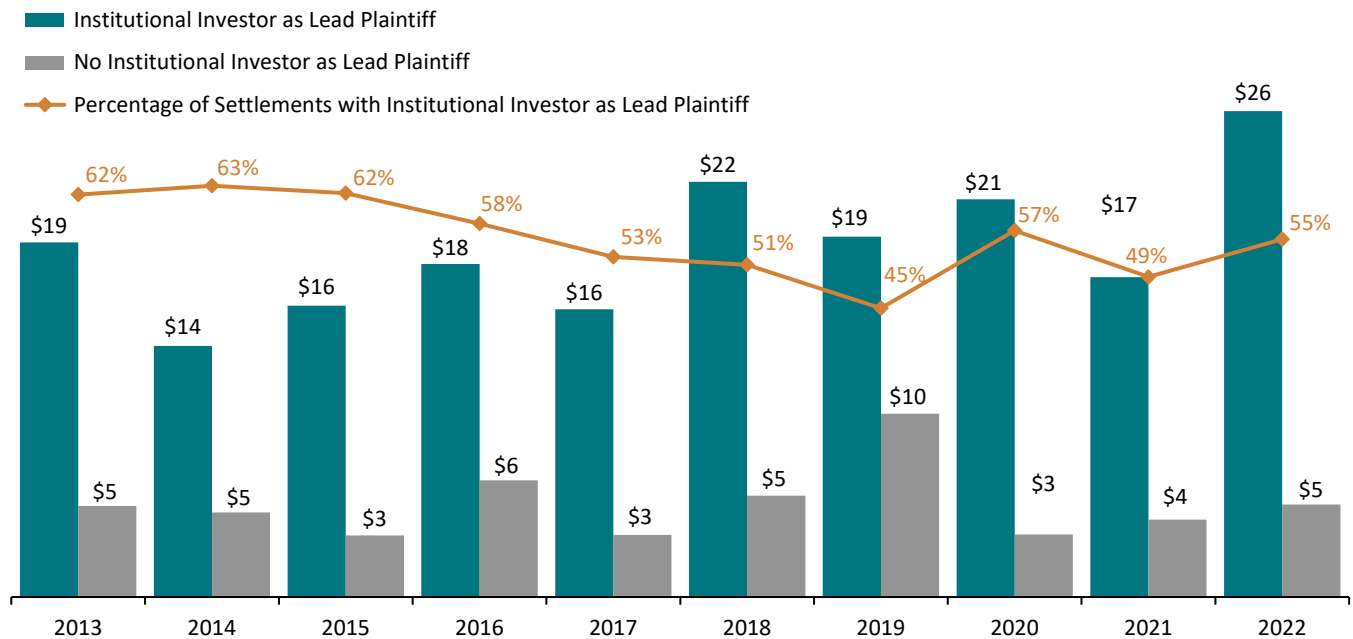
- In 2022, for cases involving an institutional investor as lead plaintiff, median “simplified tiered damages” and median total assets were five times and eight times higher, respectively, than the median values for cases without an institutional investor as a lead plaintiff.
- Since passage of the Reform Act, public pension plans have been the most frequent type of institutional lead plaintiff.

- In 2022, a public pension plan served as lead plaintiff in two-thirds of cases with an institutional lead plaintiff. Moreover, in six of the seven mega settlement cases in 2022 involving an institutional lead plaintiff, the institutional investor was a public pension plan.
- Institutional participation as lead plaintiff continues to be associated with particular plaintiff counsel. For example, an institutional investor served as a lead plaintiff in 2022 in over 85% of settled cases in which Robbins Geller Rudman & Dowd LLP and/or Bernstein Litowitz Berger & Grossmann LLP served as lead plaintiff counsel. In contrast, institutional investors served as lead plaintiffs in 21% of cases in which The Rosen Law Firm, Pomerantz LLP, or Glancy Prongay & Murray LLP served as lead plaintiff counsel.

Of the eight mega settlement cases in 2022, seven included an institutional lead plaintiff.

Figure 11: Median Settlement Amounts and Institutional Investors 2013–2022

(Dollars in millions)



Note: Settlement dollars are adjusted for inflation; 2022 dollar equivalent figures are presented.

Time to Settlement and Case Complexity

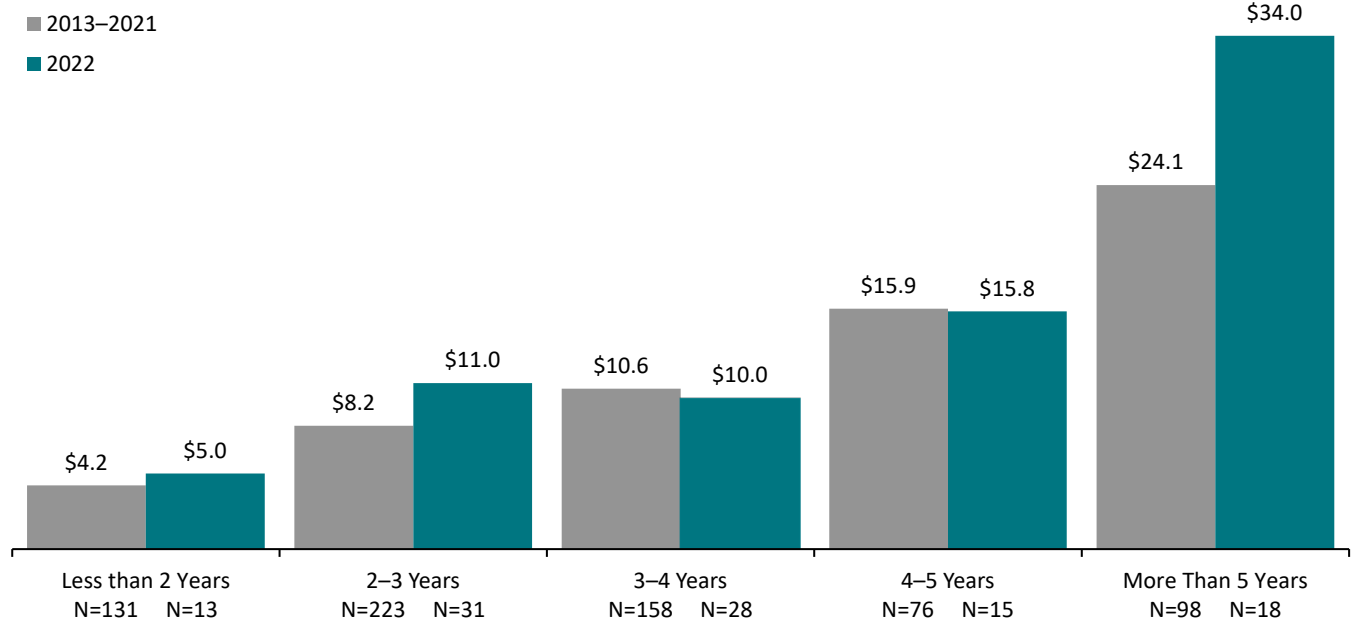
- Overall, the median time from filing to settlement hearing date in 2022 was longer—3.2 years for 2022 settlements, compared to 2.9 years for 2013–2021 settlements.
- Cases involving an institutional lead plaintiff continued to take longer to settle. In particular, settlements in 2022 with institutional lead plaintiffs took 33% longer to settle than cases not involving an institutional lead plaintiff.

Only 42% of cases in 2022 reached a settlement hearing date within three years of filing, the lowest percentage in the prior nine years.

- Larger cases (as measured by higher “simplified tiered damages”) often take longer to resolve. Consistent with this, in 2022, the median time to settlement for cases that settled for at least \$100 million was over 5.5 years—an all-time high for such cases.

Figure 12: Median Settlement by Duration from Filing Date to Settlement Hearing Date 2013–2022

(Dollars in millions)



Note: Settlement dollars are adjusted for inflation; 2022 dollar equivalent figures are presented. “N” refers to the number of cases.

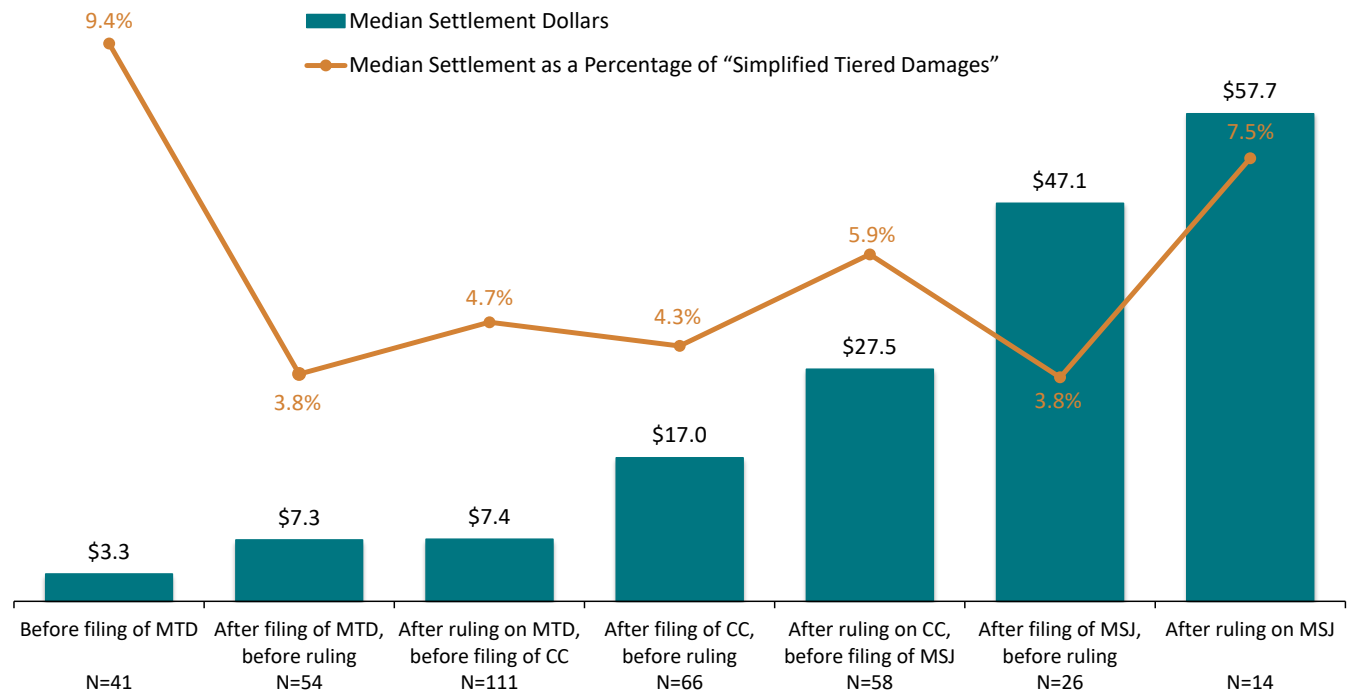
Case Stage at the Time of Settlement

In collaboration with Stanford Securities Litigation Analytics (SSLA),¹⁵ this report analyzes settlements in relation to the stage in the litigation process at the time of settlement.

- Cases settling at later stages continue to be larger in terms of total assets and “simplified tiered damages.”
- In particular, the median issuer defendant total assets for 2022 cases that settled after the ruling on a motion for class certification was over four times the median for cases that settled prior to such a motion being ruled on.
- In 2022, cases where a motion for class certification was filed were nearly three times as likely to have either Robbins Geller Rudman & Dowd LLP and/or Bernstein Litowitz Berger & Grossmann LLP as lead plaintiff counsel than The Rosen Law Firm, Pomerantz LLP, or Glancy Prongay & Murray LLP.
- Cases settling at later stages often included an institutional investor lead plaintiff. For example, in 2022, an institutional investor served as lead plaintiff 69% of the time for cases that settled after the filing of a motion for class certification (slightly higher than the percentage over the prior four years), compared to 44% for cases that settled prior to the filing of a motion for class certification (38% in the prior four years)
- Overall, compared to settlements in 2021, a larger proportion of cases in 2022 did not reach settlement until after a motion for class certification was filed. In addition, 14% of 2022 settled cases were resolved after a summary judgment motion, compared to less than 9% for 2018–2021 settlements.

Figure 13: Median Settlement Dollars and Resolution Stage at Time of Settlement 2018–2022

(Dollars in millions)



Note: Settlement dollars are adjusted for inflation; 2022 dollar equivalent figures are presented. “N” refers to the number of cases. MTD refers to “motion to dismiss,” CC refers to “class certification,” and MSJ refers to “motion for summary judgment.” This analysis is limited to cases alleging Rule 10b-5 claims (whether alone or in addition to other claims).

Cornerstone Research's Settlement Analysis

This research applies regression analysis to examine the relations between settlement outcomes and certain securities case characteristics. Regression analysis is employed to better understand the factors that are important for estimating what cases might settle for, given the characteristics of a particular securities class action.

Determinants of Settlement Outcomes

Based on the research sample of cases that settled from January 2006 through December 2022, important determinants of settlement amounts include the following:

- “Simplified tiered damages”
- Maximum Dollar Loss (MDL)—the dollar-value change in the defendant firm’s market capitalization from its class period peak to the trading day immediately following the end of the class period.
- Most recently reported total assets of the issuer defendant firm
- Number of entries on the lead case docket
- Whether there were accounting allegations
- Whether there was a corresponding SEC action against the issuer, other defendants, or related parties
- Whether there were criminal charges against the issuer, other defendants, or related parties with similar allegations to those included in the underlying class action complaint
- Whether there was an accompanying derivative action

- Whether Section 11 and/or Section 12(a) claims were alleged in addition to Rule 10b-5 claims
- Whether the issuer defendant was distressed
- Whether an institution was a lead plaintiff
- Whether securities other than common stock/ADR/ADS, were included in the alleged class

Cornerstone Research analyses show that settlements were higher when “simplified tiered damages,” MDL, issuer defendant asset size, or the number of docket entries was larger, or when Section 11 and/or Section 12(a) claims were alleged in addition to Rule 10b-5 claims.

Settlements were also higher in cases involving accounting allegations, a corresponding SEC action, criminal charges, an accompanying derivative action, an institution involved as lead plaintiff, or securities in addition to common stock included in the alleged class.

Settlements were lower if the issuer was distressed.

More than 75% of the variation in settlement amounts can be explained by the factors discussed above.

Research Sample

- The database compiled for this report is limited to cases alleging Rule 10b-5, Section 11, and/or Section 12(a)(2) claims brought by purchasers of a corporation's common stock. The sample contains only cases alleging fraudulent inflation in the price of a corporation's common stock.
- Cases with alleged classes of only bondholders, preferred stockholders, etc., cases alleging fraudulent depression in price, and mergers and acquisitions cases are excluded. These criteria are imposed to ensure data availability and to provide a relatively homogeneous set of cases in terms of the nature of the allegations.
- The current sample includes 2,116 securities class actions filed after passage of the Reform Act (1995) and settled from 1996 through 2022. These settlements are identified based on a review of case activity collected by Securities Class Action Services LLC (SCAS).¹⁶
- The designated settlement year, for purposes of this report, corresponds to the year in which the hearing to approve the settlement was held.¹⁷ Cases involving multiple settlements are reflected in the year of the most recent partial settlement, provided certain conditions are met.¹⁸

Data Sources

In addition to SCAS, data sources include Dow Jones Factiva, Bloomberg, the Center for Research in Security Prices (CRSP) at University of Chicago Booth School of Business, Standard & Poor's Compustat, Refinitiv Eikon, court filings and dockets, SEC registrant filings, SEC litigation releases and administrative proceedings, LexisNexis, Stanford Securities Litigation Analytics (SSLA), Securities Class Action Clearinghouse (SCAC), and public press.

Endnotes

- ¹ Reported dollar figures and corresponding comparisons are adjusted for inflation; 2022 dollar equivalent figures are analyzed.
- ² “Simplified tiered damages” are calculated for cases that settled in 2006 or later, following the U.S. Supreme Court’s 2005 landmark decision in *Dura Pharmaceuticals Inc. v. Broudo*, 544 U.S. 336. “Simplified tiered damages” is based on the stock-price drops on alleged corrective disclosure dates as described in the settlement plan of allocation.
- ³ Disclosure Dollar Loss or DDL is the dollar-value change in the defendant firm’s market capitalization between the end of the class period and the trading day immediately following the end of the class period.
- ⁴ Accounting irregularities reflect those cases in which the defendant has reported the occurrence of accounting irregularities (intentional misstatements or omissions) in its financial statements.
- ⁵ *Securities Class Action Filings—2022 Year in Review*, Cornerstone Research (2023).
- ⁶ The “simplified tiered damages” approach used for purposes of this settlement research does not examine the mix of information associated with the specific dates listed in the plan of allocation, but simply applies the stock price movements on those dates to an estimate of the “true value” of the stock during the alleged class period (or “value line”). This proxy for damages utilizes an estimate of the number of shares damaged based on reported trading volume and the number of shares outstanding. Specifically, reported trading volume is adjusted using volume reduction assumptions based on the exchange on which the issuer defendant’s common stock is listed. No adjustments are made to the underlying float for institutional holdings, insider trades, or short-selling activity during the alleged class period. Because of these and other simplifying assumptions, the damages measures used in settlement outcome modeling may differ substantially from damages estimates developed in conjunction with case-specific economic analysis.
- ⁷ Laarni T. Bulan, Ellen M. Ryan, and Laura E. Simmons, *Estimating Damages in Settlement Outcome Modeling*, Cornerstone Research (2017).
- ⁸ The statutory purchase price is the lesser of the security offering price or the security purchase price. Prior to the first complaint filing date, the statutory sales price is the price at which the security was sold. After the first complaint filing date, the statutory sales price is the greater of the security sales price or the security price on the first complaint filing date. Similar to “simplified tiered damages,” the estimation of “simplified statutory damages” makes no adjustments to the underlying float for institutional holdings, insider trades, or short-selling activity.
- ⁹ The two sub-categories of accounting issues analyzed in Figure 8 of this report are (1) restatements—cases involving a restatement (or announcement of a restatement) of financial statements; and (2) accounting irregularities.
- ¹⁰ *Accounting Class Action Filings and Settlements—2022 Review and Analysis*, Cornerstone Research (2023), forthcoming in spring 2023.
- ¹¹ To be considered an accompanying or parallel derivative action, the derivative action must have underlying allegations that are similar or related to the underlying allegations of the securities class action and either be active or settling at the same time as the securities class action.
- ¹² *Parallel Derivative Action Settlement Outcomes*, Cornerstone Research (2022).
- ¹³ As noted previously, it could be that the merits in such cases are stronger, or simply that the presence of a corresponding SEC action provides plaintiffs with increased leverage when negotiating a settlement. For purposes of this research, an SEC action is evidenced by the presence of a litigation release or an administrative proceeding posted on www.sec.gov involving the issuer defendant or other named defendants with allegations similar to those in the underlying class action complaint.
- ¹⁴ See, for example, *Securities Class Action Settlements—2006 Review and Analysis*, Cornerstone Research (2007) and Michael A. Perino, “Have Institutional Fiduciaries Improved Securities Class Actions? A Review of the Empirical Literature on the PSLRA’s Lead Plaintiff Provision,” St. John’s Legal Studies Research Paper No. 12-0021 (2013).
- ¹⁵ Stanford Securities Litigation Analytics (SSLA) tracks and collects data on private shareholder securities litigation and public enforcements brought by the SEC and the U.S. Department of Justice. The SSLA dataset includes all traditional class actions, SEC actions, and DOJ criminal actions filed since 2000. Available on a subscription basis at <https://sla.law.stanford.edu/>.
- ¹⁶ Available on a subscription basis. For further details see <https://www.issgovernance.com/securities-class-action-services/>.
- ¹⁷ Movements of partial settlements between years can cause differences in amounts reported for prior years from those presented in earlier reports.
- ¹⁸ This categorization is based on the timing of the settlement hearing date. If a new partial settlement equals or exceeds 50% of the then-current settlement fund amount, the entirety of the settlement amount is re-categorized to reflect the settlement hearing date of the most recent partial settlement. If a subsequent partial settlement is less than 50% of the then-current total, the partial settlement is added to the total settlement amount and the settlement hearing date is left unchanged.

Appendices

Appendix 1: Settlement Percentiles

(Dollars in millions)

Year	Average	10th	25th	Median	75th	90th
2013	\$90.8	\$2.4	\$3.8	\$8.2	\$27.9	\$103.6
2014	\$22.5	\$2.1	\$3.5	\$7.4	\$16.3	\$61.8
2015	\$48.6	\$1.6	\$2.7	\$8.0	\$20.1	\$116.1
2016	\$86.1	\$2.3	\$5.1	\$10.4	\$40.2	\$178.0
2017	\$22.0	\$1.8	\$3.1	\$6.3	\$18.2	\$42.3
2018	\$75.6	\$1.8	\$4.2	\$13.1	\$28.8	\$57.3
2019	\$32.3	\$1.7	\$6.4	\$12.6	\$22.9	\$57.2
2020	\$62.3	\$1.6	\$3.6	\$11.1	\$22.9	\$60.3
2021	\$22.2	\$1.9	\$3.4	\$8.9	\$19.3	\$63.3
2022	\$36.2	\$2.0	\$5.0	\$13.0	\$33.0	\$71.8

Note: Settlement dollars are adjusted for inflation; 2022 dollar equivalent figures are presented.

Appendix 2: Settlements by Select Industry Sectors 2013–2022

(Dollars in millions)

Industry	Number of Settlements	Median Settlement	Median “Simplified Tiered Damages”	Median Settlement as a Percentage of “Simplified Tiered Damages”
Financial	92	\$14.8	\$293.3	5.0%
Healthcare	20	\$14.2	\$189.4	6.4%
Pharmaceuticals	119	\$7.6	\$237.6	3.8%
Retail	50	\$13.2	\$294.2	4.8%
Technology	103	\$9.3	\$315.9	4.6%
Telecommunication	26	\$10.5	\$311.0	4.4%

Note: Settlement dollars and “simplified tiered damages” are adjusted for inflation; 2022 dollar equivalent figures are presented. “Simplified tiered damages” are calculated only for cases involving Rule 10b-5 claims (whether alone or in addition to other claims).

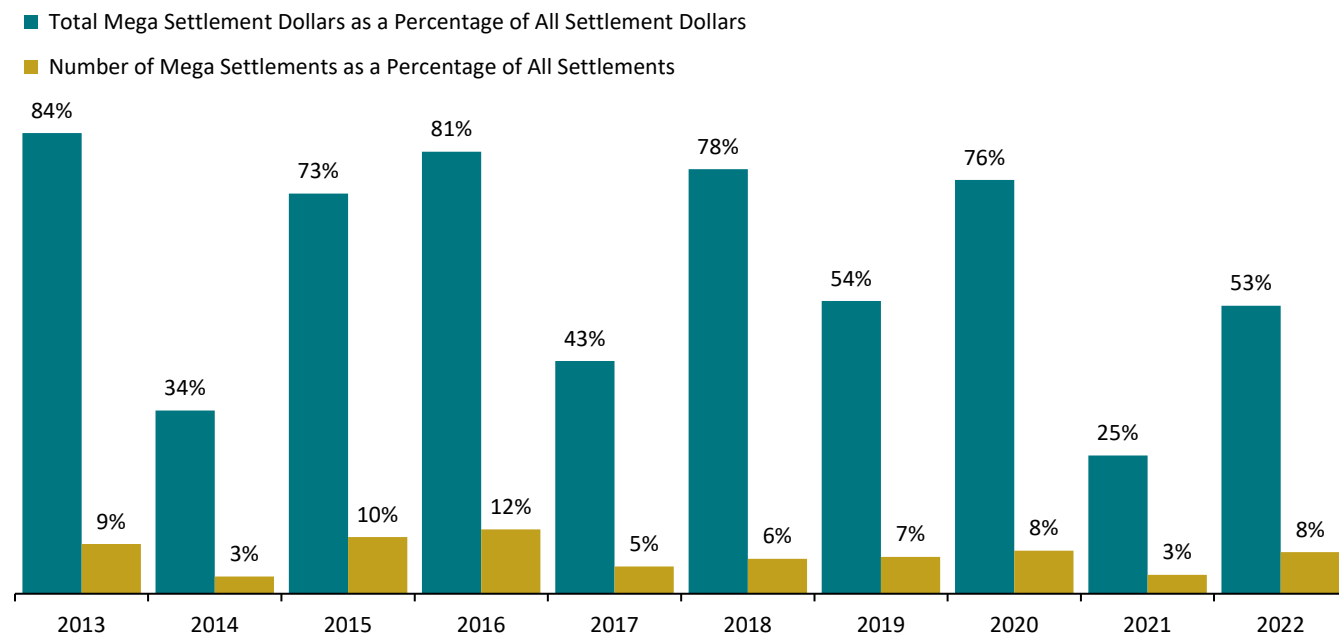
Appendix 3: Settlements by Federal Circuit Court 2013–2022

(Dollars in millions)

Circuit	Number of Settlements	Median Settlement	Median Settlement as a Percentage of “Simplified Tiered Damages”
First	21	\$12.4	3.0%
Second	202	\$9.0	5.0%
Third	81	\$7.5	4.9%
Fourth	26	\$22.9	3.8%
Fifth	38	\$10.7	4.9%
Sixth	32	\$13.5	7.4%
Seventh	37	\$15.5	3.6%
Eighth	14	\$46.4	5.1%
Ninth	191	\$7.6	4.6%
Tenth	17	\$10.2	5.8%
Eleventh	37	\$11.9	4.9%
DC	5	\$33.7	2.4%

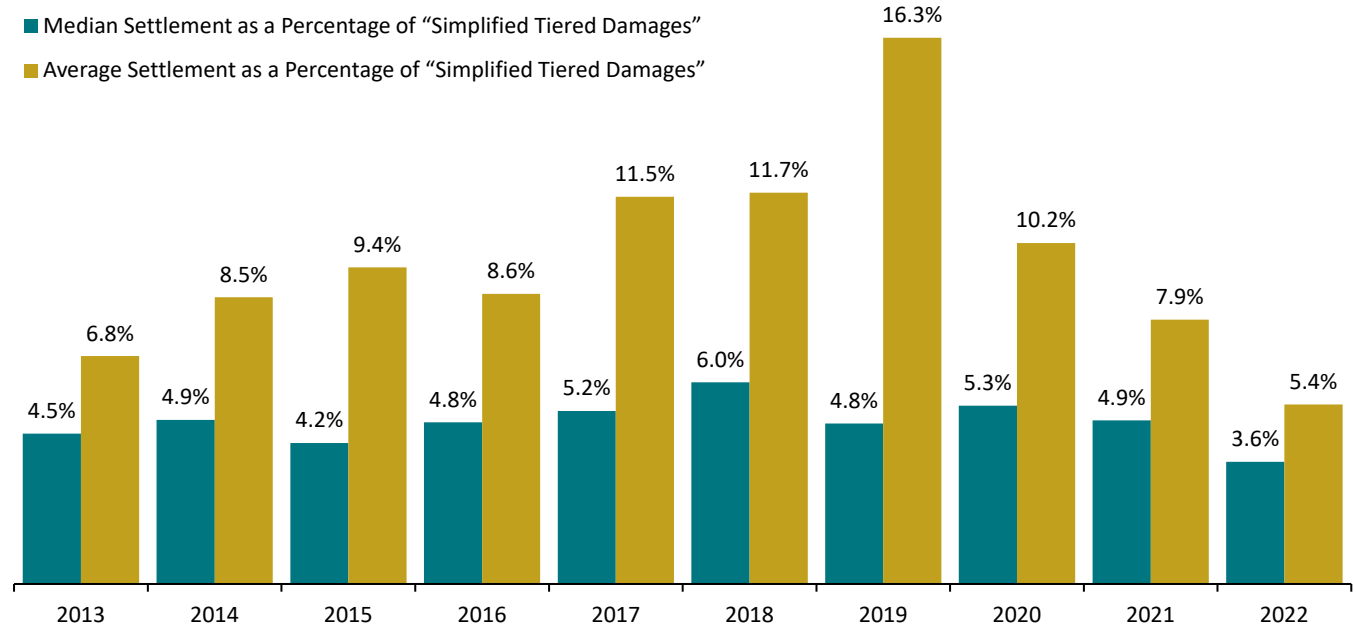
Note: Settlement dollars are adjusted for inflation; 2022 dollar equivalent figures are presented. Settlements as a percentage of “simplified tiered damages” are calculated only for cases alleging Rule 10b-5 claims (whether alone or in addition to other claims).

Appendix 4: Mega Settlements 2013–2022



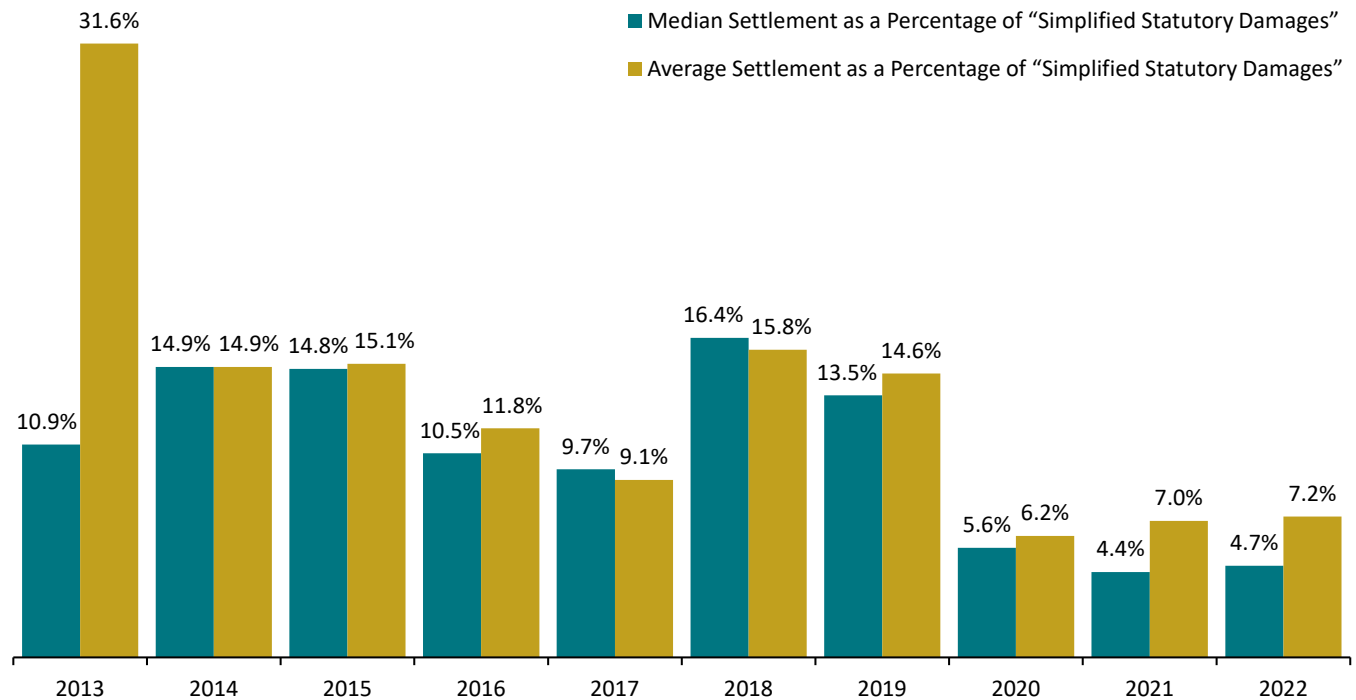
Note: Mega settlements are defined as total settlement funds equal to or greater than \$100 million.

**Appendix 5: Median and Average Settlements as a Percentage of “Simplified Tiered Damages”
2013–2022**



Note: “Simplified tiered damages” are calculated only for cases alleging Rule 10b-5 claims (whether alone or in addition to other claims).

**Appendix 6: Median and Average Settlements as a Percentage of “Simplified Statutory Damages”
2013–2022**

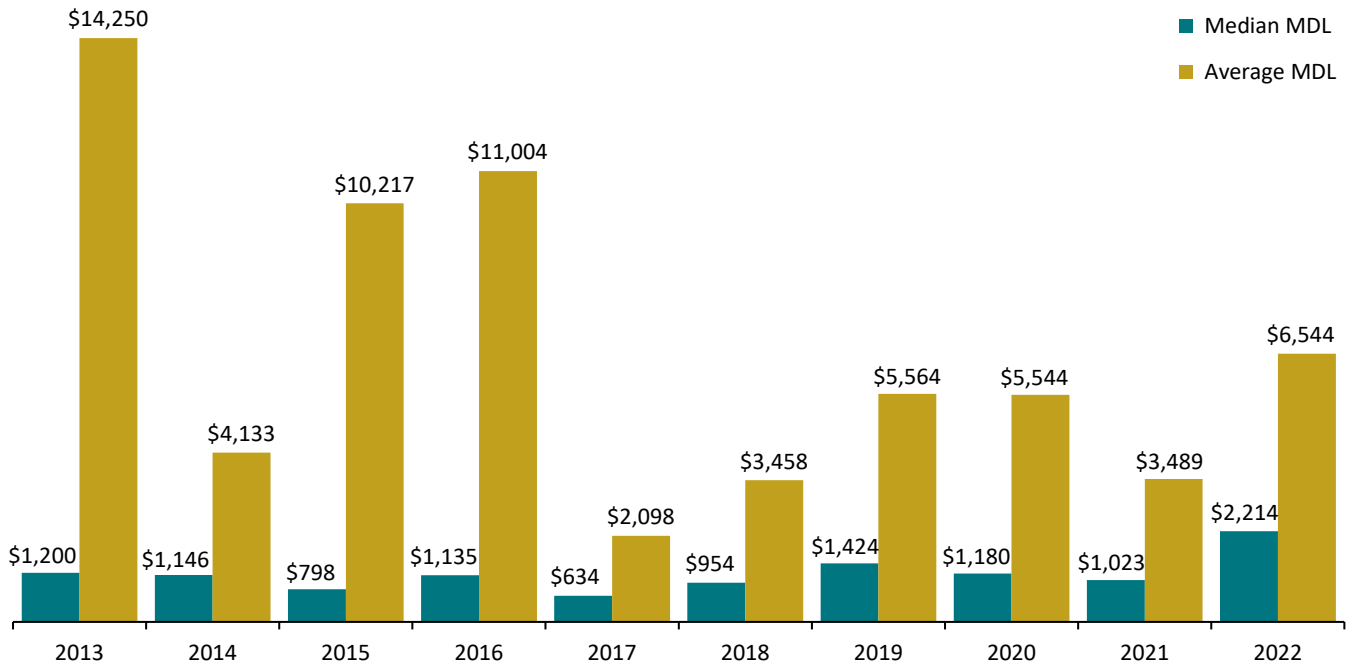


Note: “Simplified statutory damages” are calculated only for cases alleging Section 11 (‘33 Act) claims and no Rule 10b-5 claims.

Appendix 7: Median and Average Maximum Dollar Loss (MDL)

2013–2022

(Dollars in millions)

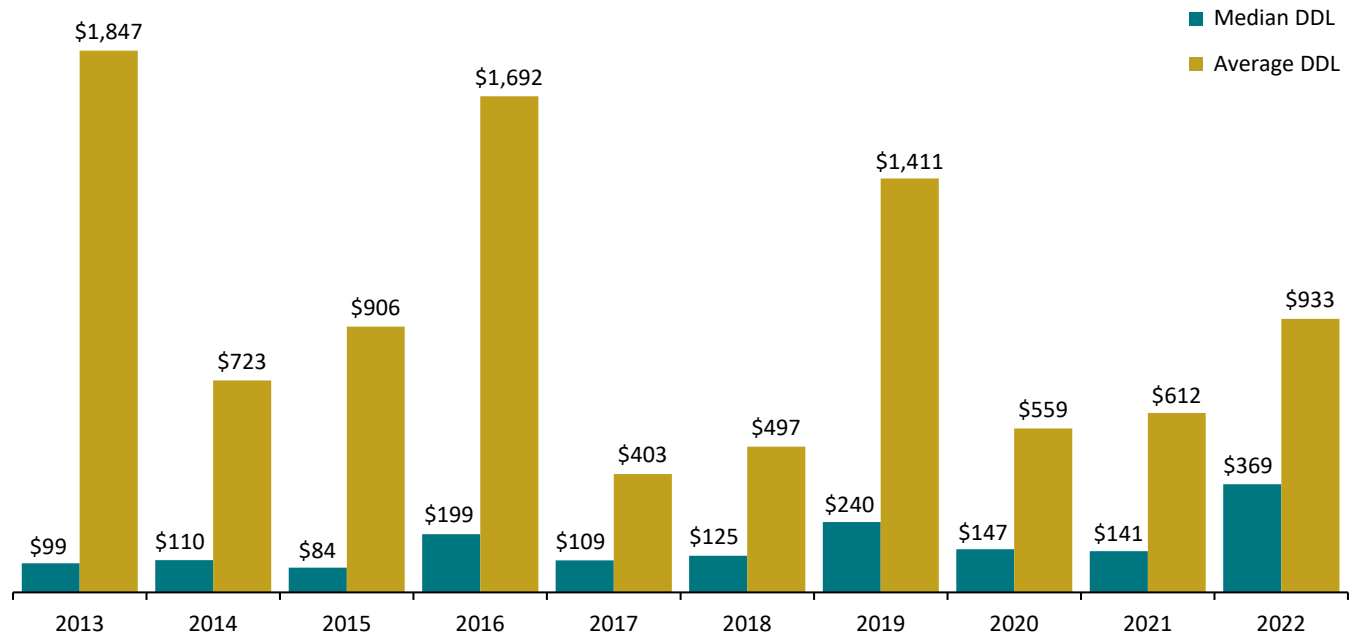


Note: MDL is adjusted for inflation based on class period end dates; 2022 dollar equivalents are presented. MDL is the dollar value change in the defendant firm’s market capitalization from the trading day with the highest market capitalization during the class period to the trading day immediately following the end of the class period. This analysis excludes cases alleging ‘33 Act claims only.

Appendix 8: Median and Average Disclosure Dollar Loss (DDL)

2013–2022

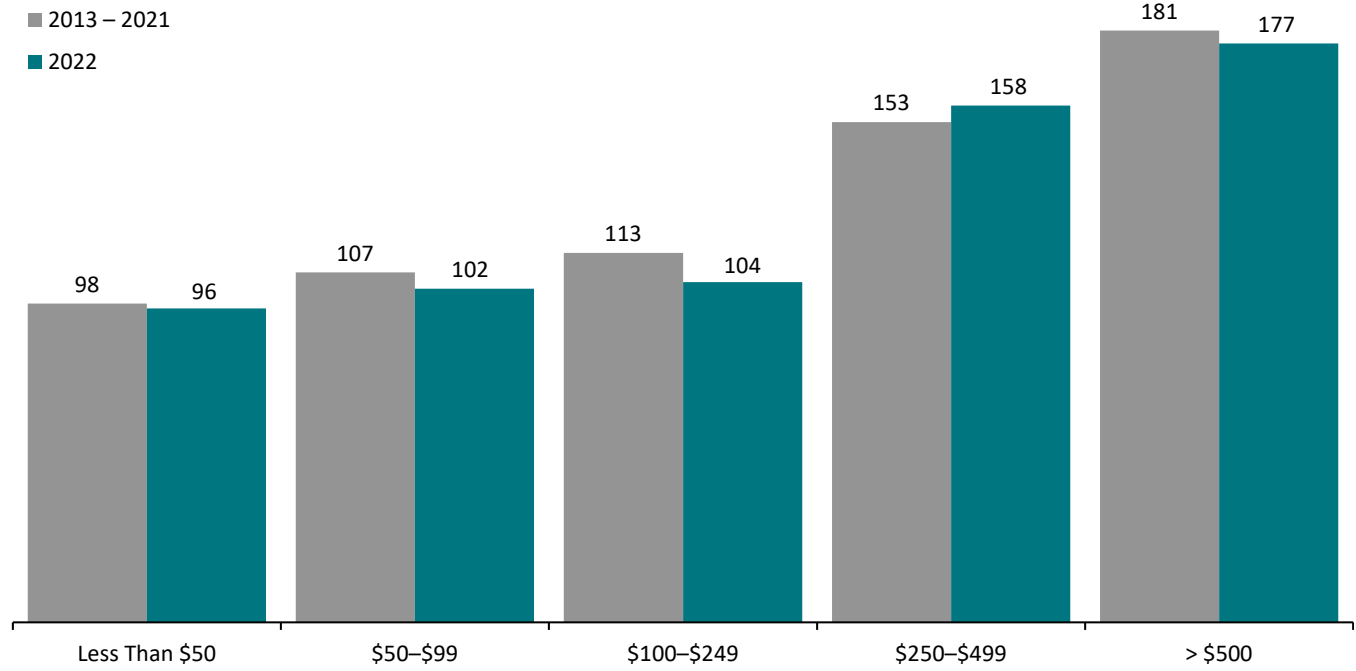
(Dollars in millions)



Note: DDL is adjusted for inflation based on class period end dates; 2022 dollar equivalents are presented. DDL is the dollar-value change in the defendant firm’s market capitalization between the end of the class period and the trading day immediately following the end of the class period. This analysis excludes cases alleging ‘33 Act claims only.

**Appendix 9: Median Docket Entries by “Simplified Tiered Damages” Range
2013–2022**

(Dollars in millions)



Note: “Simplified tiered damages” are calculated only for cases alleging Rule 10b-5 claims (whether alone or in addition to other claims).

About the Authors

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Laarni Bulan is a principal in Cornerstone Research’s Boston office, where she specializes in finance. Her work has focused on securities and other complex litigation addressing class certification, damages, and loss causation issues, firm valuation, and corporate governance, executive compensation, and risk management issues. She has also consulted on cases related to insider trading, market manipulation and trading behavior, financial institutions and the credit crisis, derivatives, foreign exchange, and securities clearing and settlement.

Dr. Bulan has published notable academic articles in peer-reviewed journals. Her research covers topics in dividend policy, capital structure, executive compensation, corporate governance, and real options. Prior to joining Cornerstone Research, Dr. Bulan had a joint appointment at Brandeis University as an assistant professor of finance in its International Business School and in the economics department.

Laura E. Simmons

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Laura Simmons is a senior advisor with Cornerstone Research. She has more than 25 years of experience in economic consulting. Dr. Simmons has focused on damages and liability issues in securities class actions, as well as litigation involving the Employee Retirement Income Security Act (ERISA). She has also managed cases involving financial accounting, valuation, and corporate governance issues. She has served as a testifying expert in litigation involving accounting analyses, securities case damages, ERISA matters, and research on securities lawsuits.

Dr. Simmons’s research on pre- and post-Reform Act securities litigation settlements has been published in a number of reports and is frequently cited in the public press and legal journals. She has spoken at various conferences and appeared as a guest on CNBC addressing the topic of securities case settlements. She has also published in academic journals, including research focusing on the intersection of accounting and litigation. Dr. Simmons was previously an accounting faculty member at the Mason School of Business at the College of William & Mary. From 1986 to 1991, she was an accountant with Price Waterhouse.

The authors gratefully acknowledge the research efforts and significant contributions of their colleagues at Cornerstone Research in the writing and preparation of this annual update. The views expressed herein do not necessarily represent the views of Cornerstone Research.

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Exhibit B

24 January 2023



Recent Trends in Securities Class Action Litigation: 2022 Full-Year Review

Federal Filings Declined for the Fourth Consecutive Year

Average and Median Settlement Values Increased by More than 50%
Compared to 2021

By Janeen McIntosh, Svetlana Starykh, and Edward Flores

Recent Trends in Securities Class Action Litigation: 2022 Full-Year Review

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By Janeen McIntosh, Svetlana Starykh, and Edward Flores¹

24 January 2023

Foreword

I am excited to share NERA's Recent Trends in Securities Class Action Litigation: 2022 Full-Year Review with you. This year's edition builds on work carried out over more than three decades by many members of NERA's Securities and Finance Practice. This year's report continues our analyses of trends in filings and settlements and presents new analyses related to current topics such as event-driven litigation. Although space does not permit us to present all the analyses the authors have undertaken while working on this year's edition or to provide details on the statistical analysis of settlement amounts, we hope you will contact us if you want to learn more about our research or our work related to securities litigations. On behalf of NERA's Securities and Finance Practice, I thank you for taking the time to review our work and hope you find it informative.

Dr. David Tabak, Managing Director

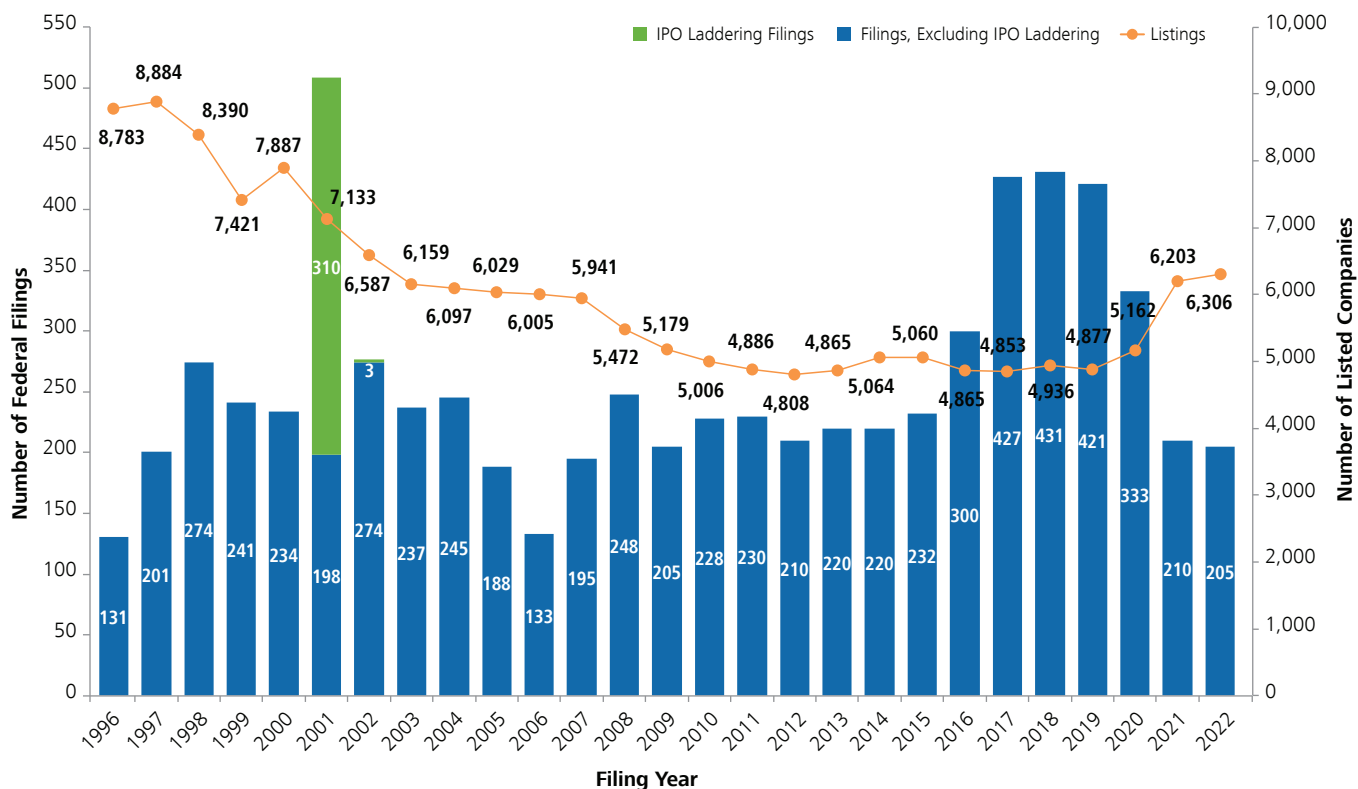
Introduction

Filings of new securities class actions declined each year from 2019 through 2022. In 2022, there were 205 new federal securities class action suits filed. This significant decline from the 431 cases filed in 2018 was largely due to the lower number of merger-objection and Rule 10b-5 cases filed in 2022. Similarly, there were fewer cases resolved in 2022 than in 2021. The decline in resolutions, since 2021, was driven by the decrease in dismissed non-merger-objection and non-crypto unregistered securities cases, a category that declined by more than 30%.² The aggregate settlement amount for cases settled in 2022 was \$4 billion, which is approximately \$2 billion higher than the inflation-adjusted amount for 2021. With more cases settling for higher values in 2022 compared to 2021, the average settlement value increased by over 70% to \$38 million and the median settlement value increased by over 50% to \$13 million.

Trends in Filings

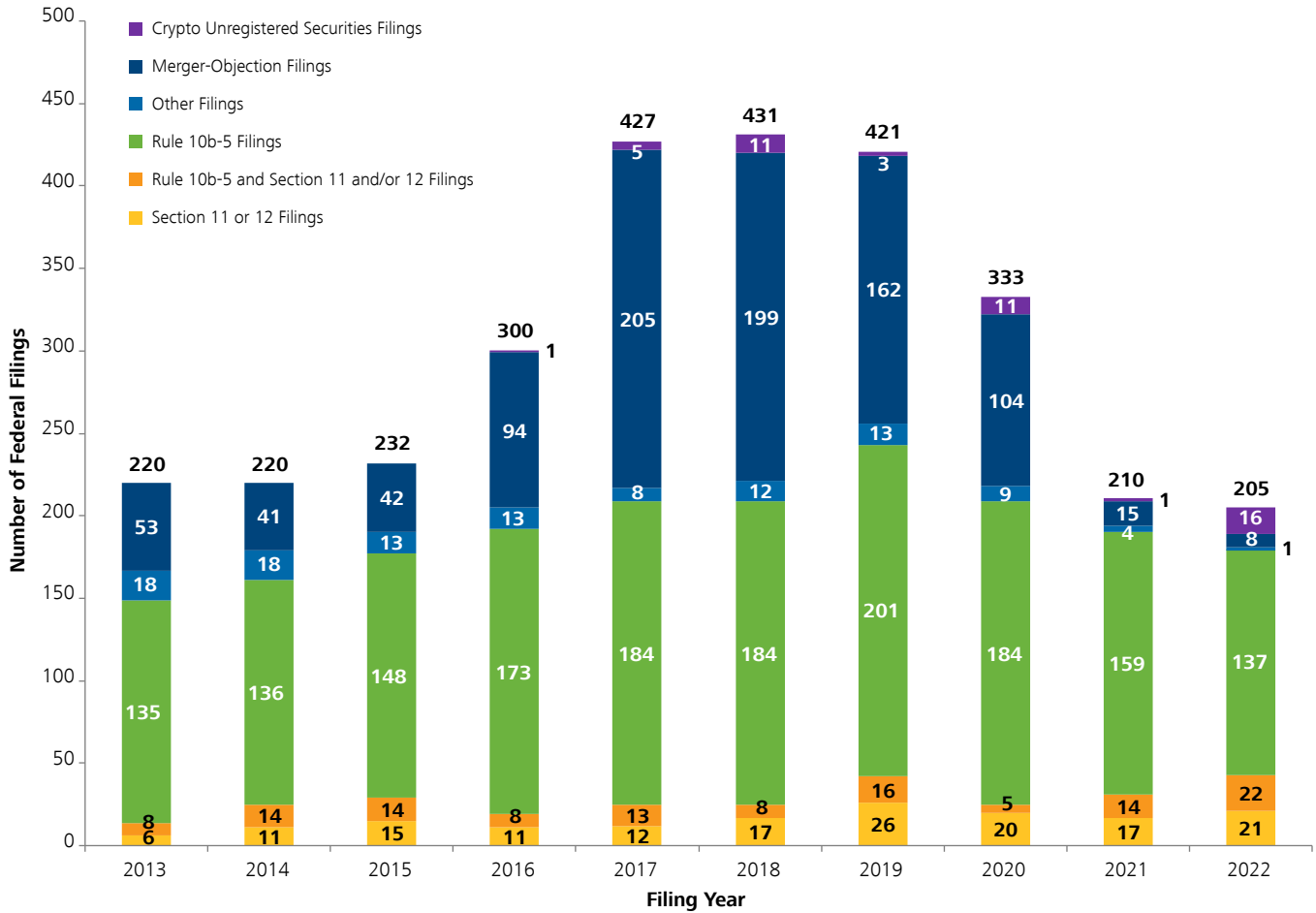
For the fourth consecutive year, there was a decline in the number of new federal securities class action suits filed (see Figure 1).³ In 2022, there were 205 new cases filed, a decline from the 210 new cases filed in 2021. This decline is a continuation of the downward trend observed since 2018, when more than 400 cases were recorded. This decline has been driven by the lower levels of merger-objection cases and cases with only Rule 10b-5 claims filed in each year (see Figure 2). Of the cases filed in 2022, suits against defendants in the health technology and services sector and the electronic technology and services sector were the most common, each accounting for 27% of total cases (see Figure 3). Although there was a decline in the aggregate number of cases filed in the Second, Third, and Ninth Circuits to the lowest level within the 2018–2022 period, the majority of new filings continue to be concentrated in these jurisdictions (see Figure 4). Of the cases filed in 2022, 33% included an allegation related to misled future performance, the most common allegation for the year. The proportion of cases with an allegation related to a regulatory issue increased from 19% in 2021 to 26% in 2022 (see Figure 5).⁴

Figure 1. **Federal Filings and Number of Companies Listed in the United States**
January 1996–December 2022



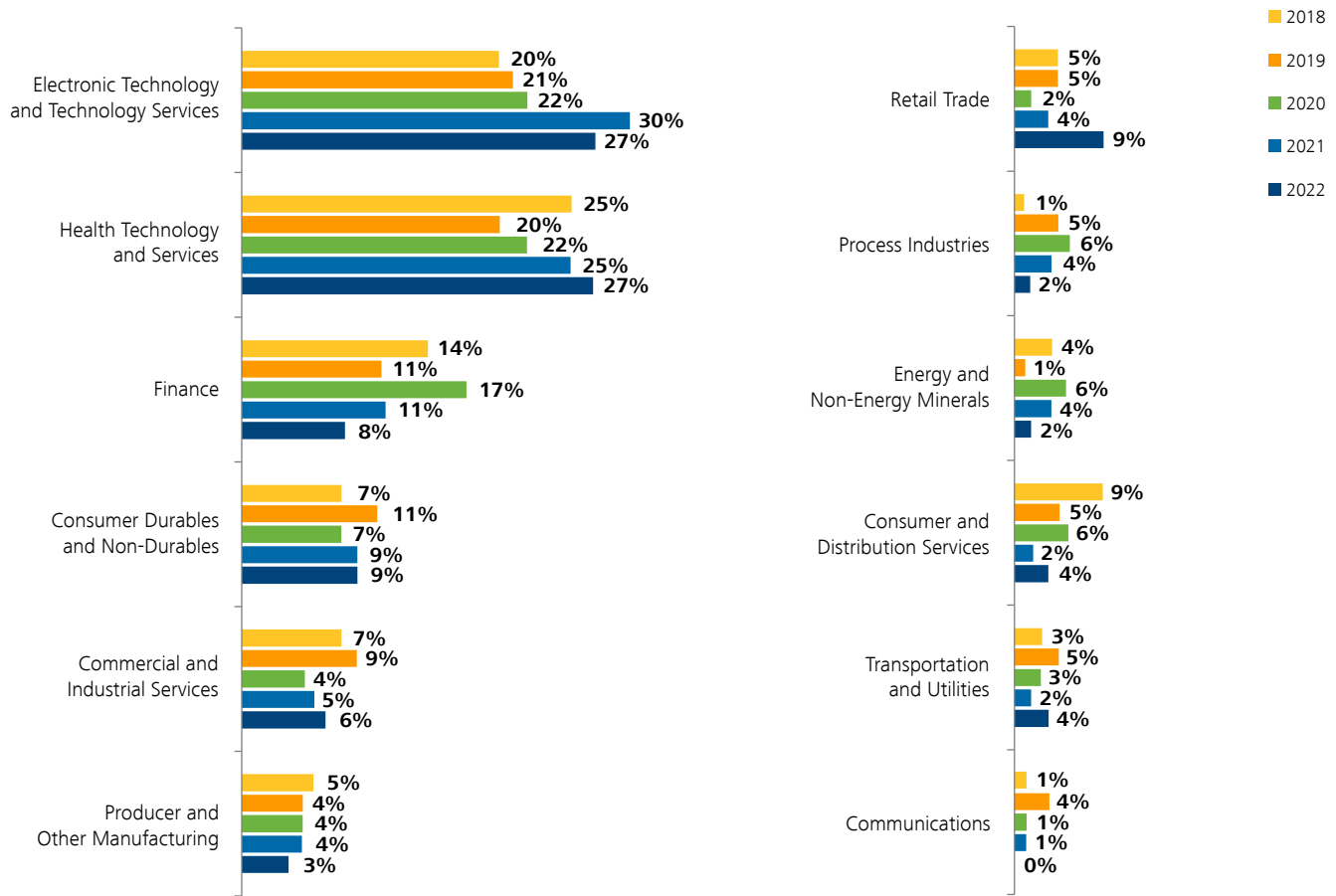
Note: Listed companies include those listed on the NYSE and Nasdaq. Listings data obtained from World Federation of Exchanges (WFE). The 2022 listings data is as of November 2022.

Figure 2. **Federal Filings by Type**
January 2013–December 2022



For the fourth consecutive year, there was a decline in the number of new federal securities class action suits filed.

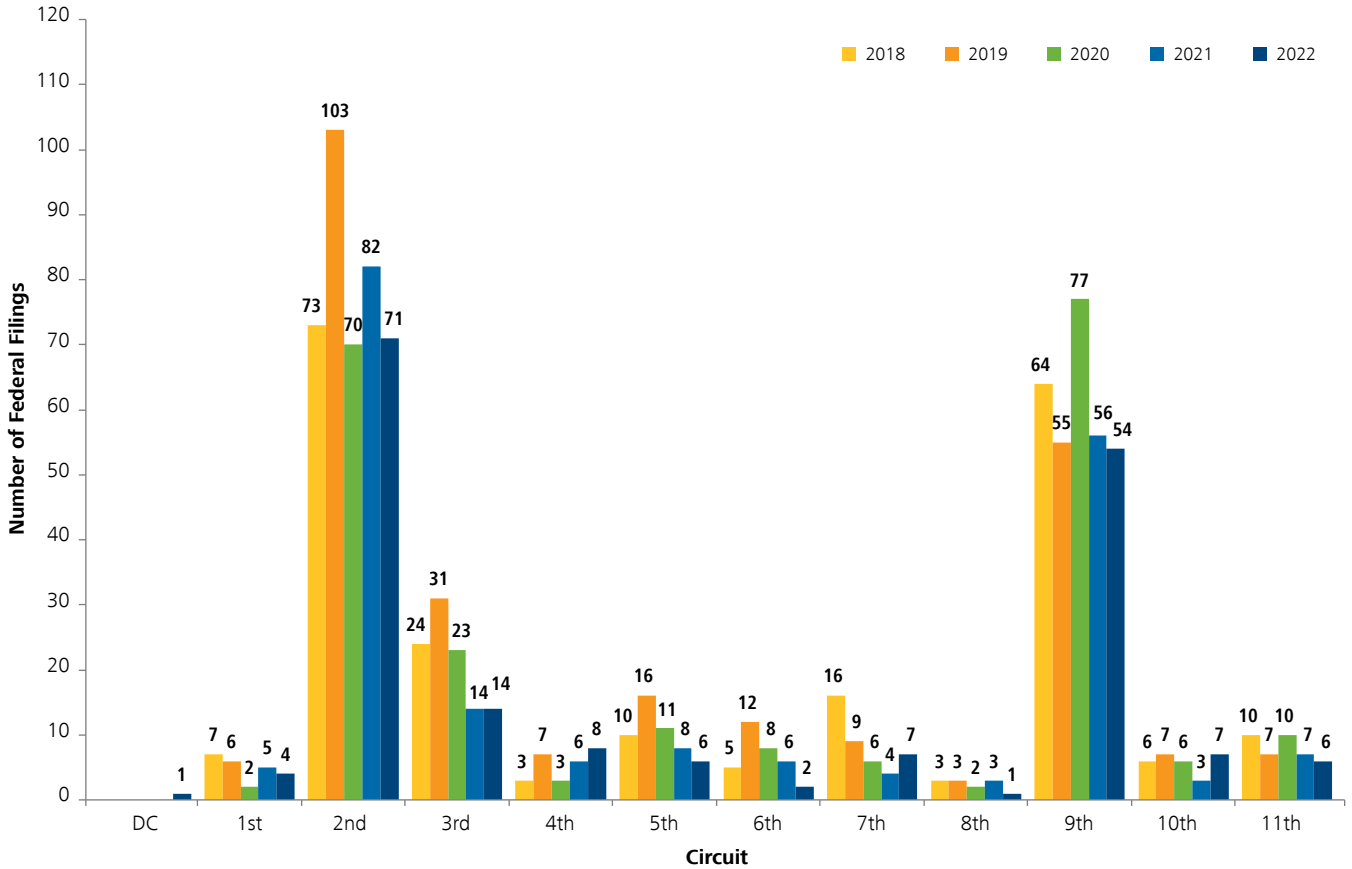
Figure 3. **Percentage of Federal Filings by Sector and Year**
 Excludes Merger Objections and Crypto Unregistered Securities
 January 2018–December 2022



Note: This analysis is based on the FactSet Research Systems, Inc. economic sector classification. Some of the FactSet economic sectors are combined for presentation.

Filings against defendants in the health technology and services sector and the electronic technology and services sector were the most common in 2022, each accounting for 27% of total cases.

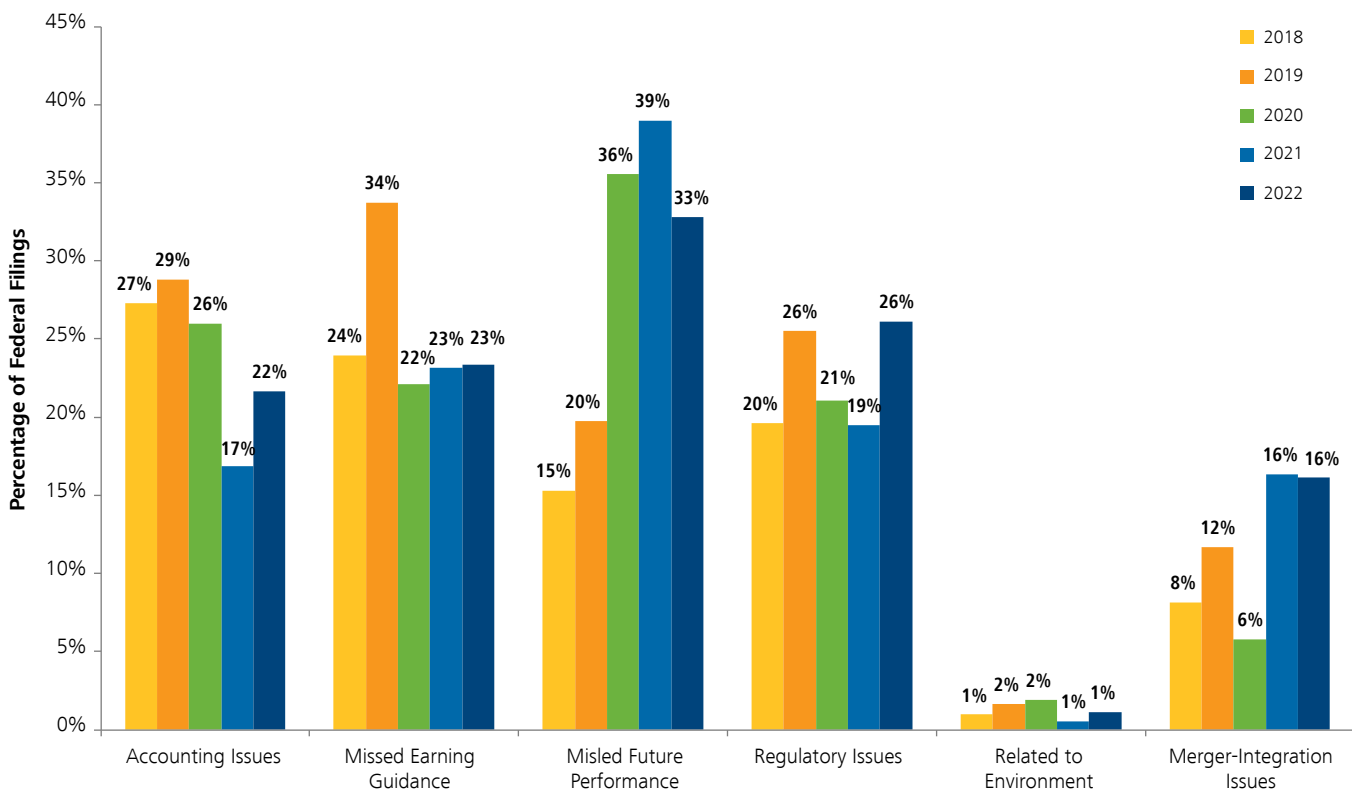
Figure 4. **Federal Filings by Circuit and Year**
 Excludes Merger Objections and Crypto Unregistered Securities
 January 2018–December 2022



Although there was a decline in the aggregate number of cases filed in the Second, Third, and Ninth Circuits to the lowest level within the 2018–2022 period, the majority of new filings continue to be concentrated in these jurisdictions.

Figure 5. **Allegations**

Shareholder Class Actions with Alleged Violations of Rule 10b-5, Section 11, and/or Section 12
January 2018–December 2022



Event-Driven and Special Cases

Here we summarize activity and trends in filings over the 2019–2022 period in potential development areas we have identified for securities class actions (see Figures 6 and 7).⁵

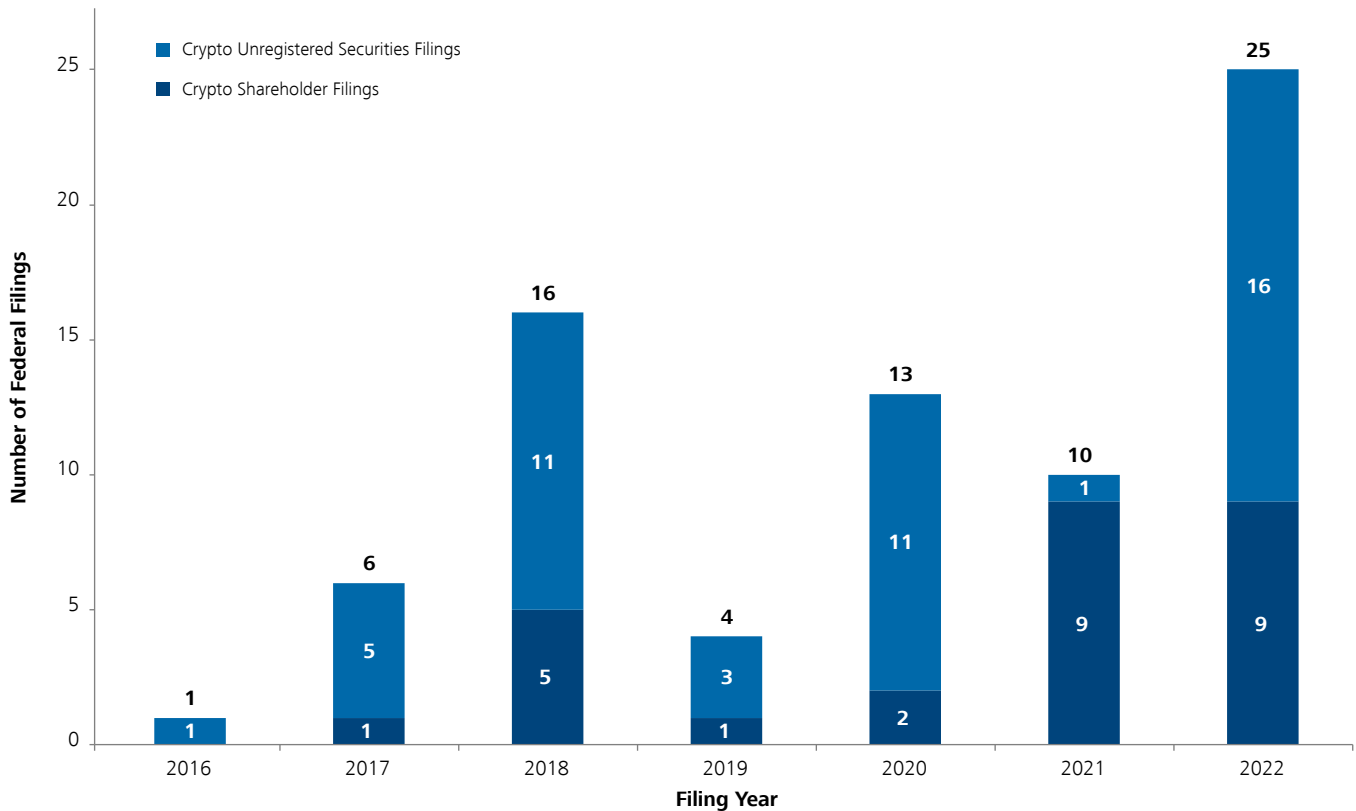
ESG Cases

Environmental, social, and governance (ESG) disclosures and companies' commitments to meet disclosure guidelines have been a developing area of interest to investors and government agencies such as the Securities and Exchange Commission over the recent decade.⁵ Along with that interest have come waves of lawsuits filed by plaintiffs alleging fraud related to ESG disclosures. For example, in a securities class action suit filed against CBS Corporation in 2018, plaintiffs alleged the defendant made false and misleading statements and/or failed to disclose that CBS executives engaged in widespread workplace sexual harassment and that the defendant's purported policies were inadequate to prevent the conduct. This suit was settled in 2022 for \$14,750,000. Similarly, in the ongoing securities suit filed against Activision Blizzard, Inc., in 2021, plaintiffs allege the defendant made false and misleading statements and/or failed to disclose that there was discrimination against women and minority employees and the existence of numerous complaints about unlawful harassment, discrimination, and retaliation made to human resources that were not addressed. As focus and interest in this area continues, this may lead to a higher number of ESG-related cases being filed.

Crypto Cases

The first securities class action related to cryptocurrency was filed against GAW Miners, LLC, in June 2016. Since 2017, there have been year-to-year fluctuations in the number of new crypto federal filings each year. In 2022, there were 25 crypto federal class actions suits filed. This is more than double the number of similar suits filed in 2021. This uptick was driven by the increase in the number of crypto unregistered securities cases.

Figure 6. **Number of Crypto Federal Filings**
January 2016–December 2022



Bribery/Kickbacks

Over the 2019–2020 period, there were 14 cases filed related to allegations of bribery or kickbacks. In 2021, there was a reduction in the number of these cases filed, with only one bribery/kickback-related case filed in that year. In 2022, four such cases were filed.

Cannabis

In 2019 and 2020, there were seven and six securities class action cases filed against defendants in the cannabis industry, respectively. Since then, there has only been one suit filed against these defendants each year.

Cybersecurity Breach

Since 2019, there have been at least three securities class action suits filed each year related to a cybersecurity breach. More specifically, between 2019 and 2020, there were a total of six such cases filed, and an additional five suits brought in 2021. In 2022, the number of new federal suits declined slightly to three filings.

COVID-19

Since the emergence of the COVID-19 pandemic in March 2020, 77 securities class action suits have been filed with claims related to the pandemic. Between March 2020 and December 2020, 33 cases were filed with COVID-19-related claims. In 2021, the number of suits filed declined to 20, but then increased slightly to 24 in 2022.

Environment

Over the 2019–2022 period, 12 environment-related securities class action suits have been filed. Of these, only three were filed in 2021–2022.

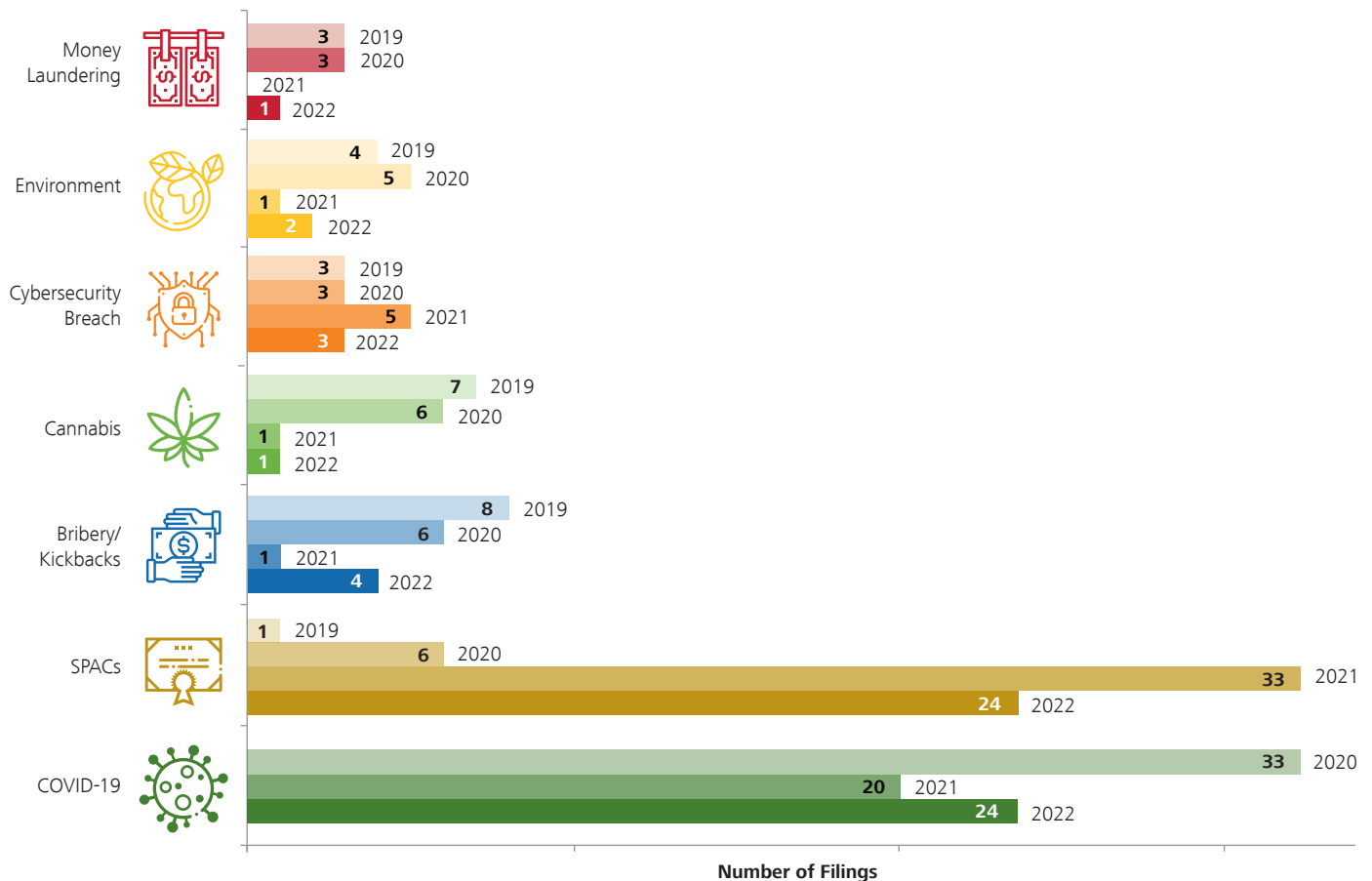
Money Laundering

In 2019 and 2020, there were three cases filed each year with claims related to money laundering. Between 2021 and 2022, only one such suit has been filed.

SPAC

In 2019, only one case related to special purpose acquisition companies (SPACs) was filed. Since then, new federal cases related to these claims have increased substantially, with six filings in 2020 and 33 cases filed in 2021. During 2022, there were 24 securities class action suits filed related to SPACs, a 27% decline from 2021.⁷

Figure 7. **Event-Driven and Other Special Cases by Filing Year**
January 2019–December 2022



Trends in Resolutions

The number of resolved cases—dismissed and settled cases—declined in 2022 to 214 from 248 in 2021 (see Figure 8).⁸ Although 2022 was a record-setting year for the number of settled non-merger-objection, non-crypto unregistered securities cases during the 2013–2022 period, there was a larger decrease in the number of dismissed non-merger-objection, non-crypto unregistered securities cases, which led to a decline in overall resolutions. In addition, in 2022, the number of merger-objection cases resolved declined to 14, a substantial decrease from the 2017–2020 period, when more than 130 such cases were resolved each year. Of the cases filed since 2015, as of 31 December 2022, a larger portion has been dismissed than have settled (see Figure 9). This is consistent with historical trends, which indicate that settlements occur later in the litigation cycle and dismissals tend to occur in the earlier stages. Taking the time between first complaint and resolution to represent the length of time taken to resolve a suit, more than half the cases resolve between one and three years, and 17% of cases resolve more than four years after the first complaint was filed (see Figure 10).

Figure 8. **Number of Resolved Cases: Dismissed or Settled**
January 2013–December 2022

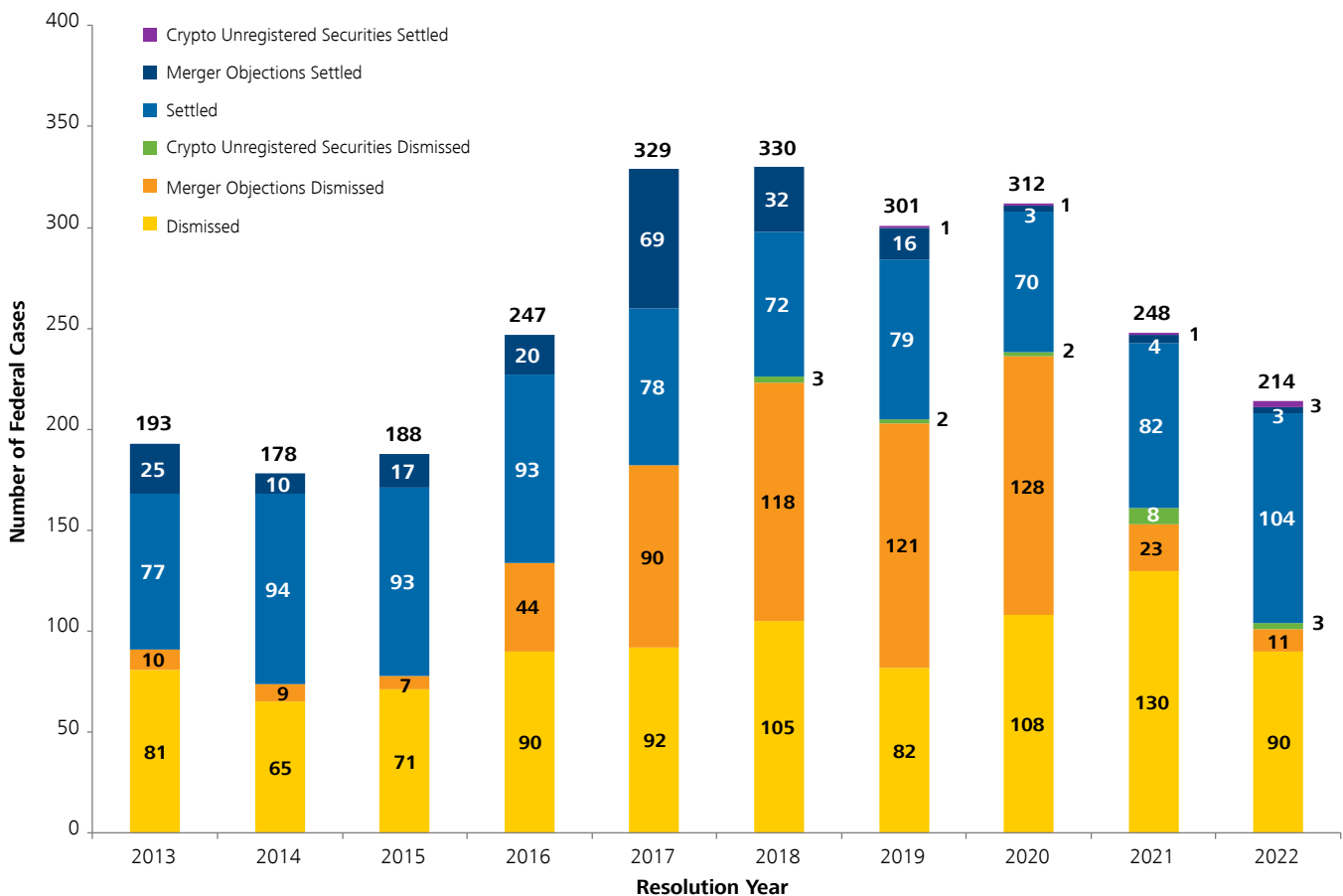
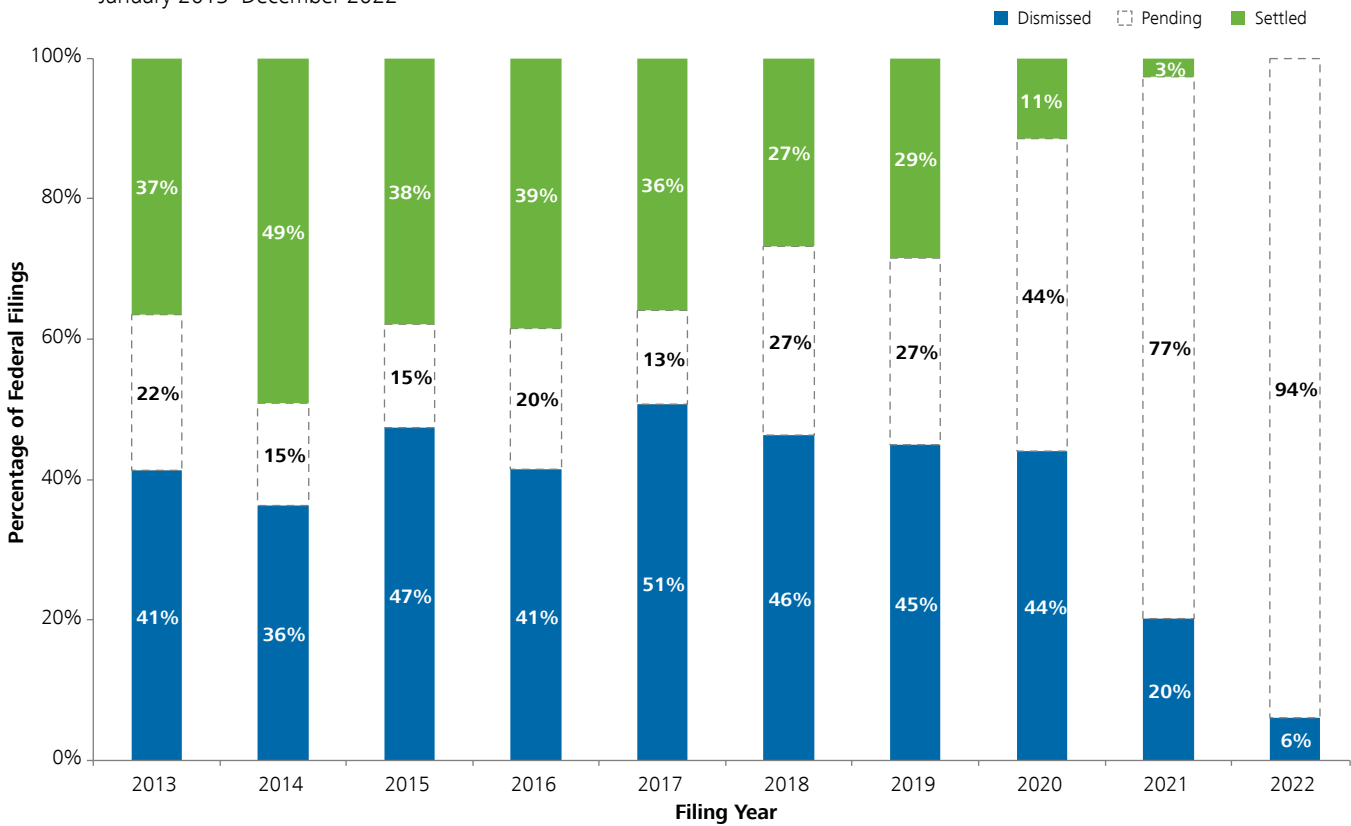
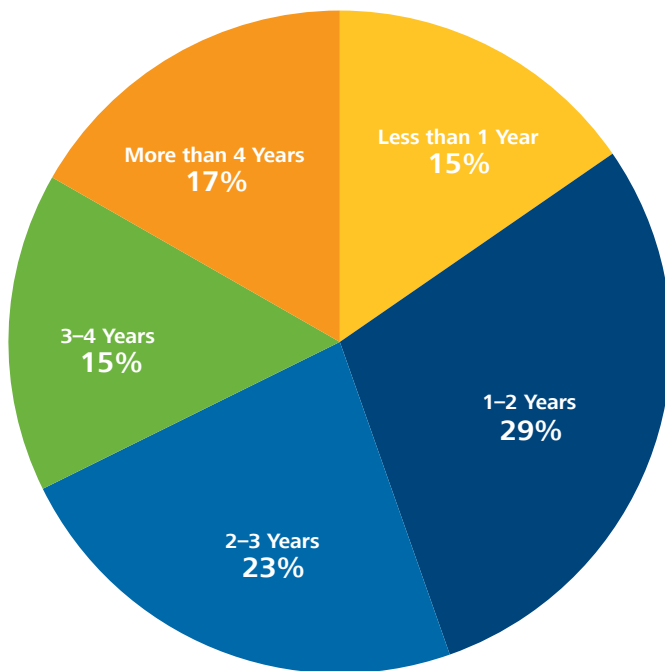


Figure 9. **Status of Cases as Percentage of Federal Filings by Filing Year**
 Excludes Merger Objections, Crypto Unregistered Securities, and Verdicts
 January 2013–December 2022



Note: Dismissals may include dismissals without prejudice and dismissals under appeal. Component values may not add to 100% due to rounding.

Figure 10. **Time from First Complaint Filing to Resolution**
 Excluding Merger Objections and Crypto Unregistered Securities
 Cases Filed January 2003–December 2018 and Resolved January 2003–December 2022



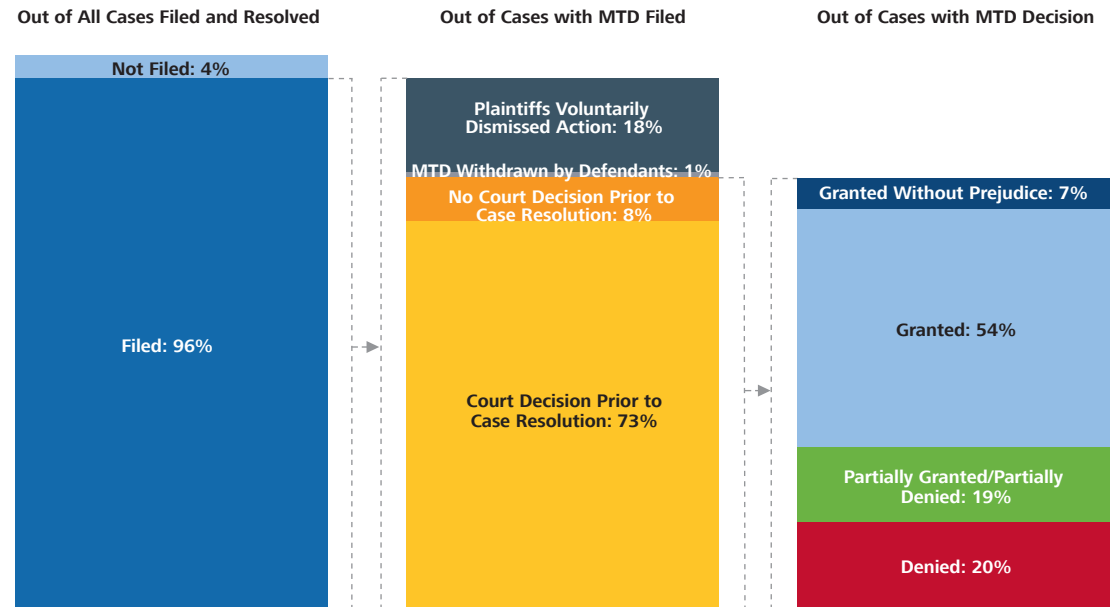
Analysis of Motions

NERA's federal securities class action database tracks filing and resolution activity as well as decisions on motions to dismiss, motions for class certification, and the status of any motion as of the resolution date. For this analysis, we include securities class actions that were filed and resolved over the 2013–2022 period in which purchasers of common stock are part of the class and in which a violation of Rule 10b-5, Section 11, and/or Section 12 is alleged.

Motion to Dismiss

A motion to dismiss was filed in 96% of the securities class action suits filed and resolved. A decision was reached in 73% of these cases, while 18% were voluntarily dismissed by plaintiffs, 8% settled before a court decision was reached, and 1% of the motions were withdrawn by defendants. Among the cases where a decision was reached, 61% were granted (with or without prejudice) and only 20% were denied (see Figure 11).

Figure 11. **Filing and Resolutions of Motions to Dismiss**
Cases Filed and Resolved January 2013–December 2022



Motion for Class Certification

A motion for class certification was filed in only 17% of the securities class action suits filed and resolved, as most cases are either dismissed or settled before the class certification stage is reached. A decision was reached in 60% of the cases where a motion for class certification was filed. Almost all of the other 40% of cases were resolved with a settlement. Among the cases where a decision was reached, the motion for class certification was granted (with or without prejudice) in 86% of cases (see Figure 12). Approximately 65% of decisions on motions for class certification occur within three years of the filing of the first complaint, with nearly all decisions occurring within five years (see Figure 13). The median time was about 2.7 years.

Figure 12. **Filing and Resolutions of Motions for Class Certification**
Cases Filed and Resolved January 2013–December 2022

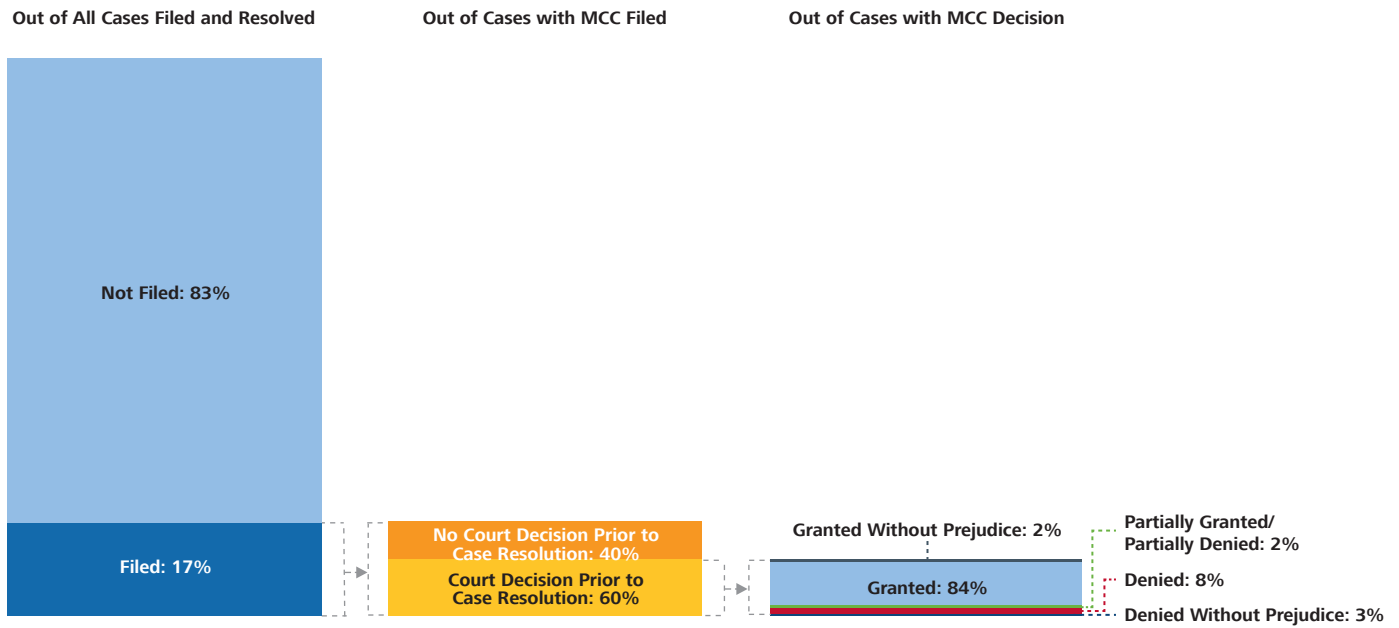
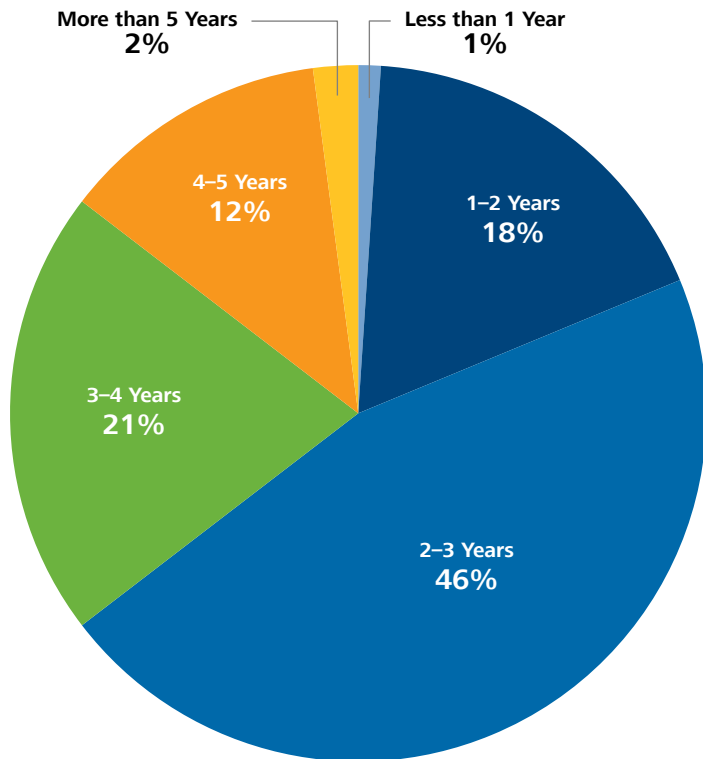


Figure 13. **Time from First Complaint Filing to Class Certification Decision**
Cases Filed and Resolved January 2013–December 2022



Trends in Settlement Values

Aggregate settlements for 2022 totaled \$4 billion, which is more than double the inflation-adjusted total for 2021 of \$1.9 billion.⁹ In 2022, the average settlement value was \$38 million, an increase of more than 70% compared to the 2021 inflation-adjusted average settlement value (see Figures 14 and 15). The distribution of 2022 settlement values differed from the settlements in 2021, with more cases settling for higher values, and more consistent with the distribution of settlement values observed in 2020 (see Figure 16). This shift is also evident in the median settlement values. The median settlement value for 2022 is \$13 million, which is approximately \$5 million higher than the 2021 inflation-adjusted median value of \$8 million (see Figure 17).¹⁰

Figure 14. **Average Settlement Value**

Excludes Merger Objections, Crypto Unregistered Securities, and Settlements for \$0 to the Class
January 2013–December 2022

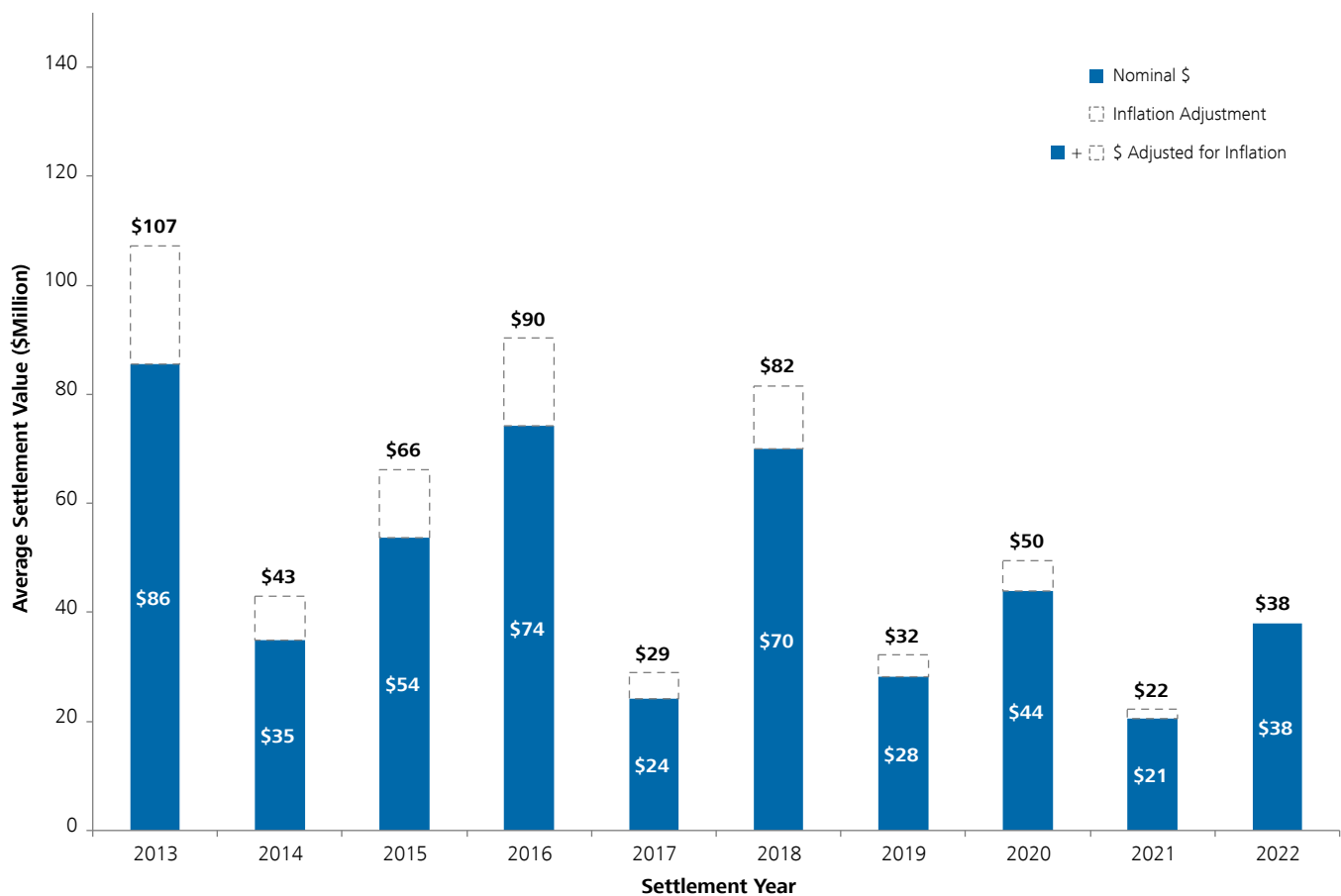


Figure 15. **Average Settlement Value**

Excludes Settlements over \$1 Billion, Merger Objections, Crypto Unregistered Securities, and Settlements for \$0 to the Class January 2013–December 2022

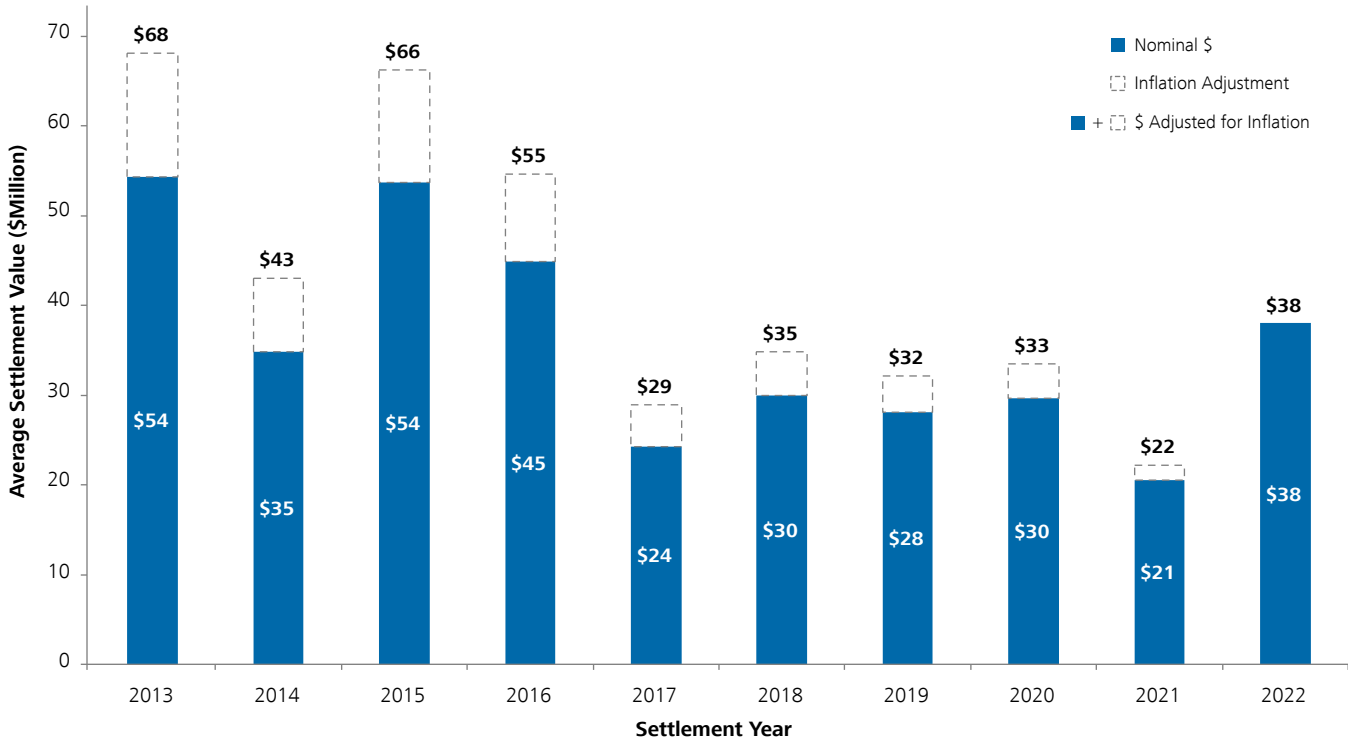


Figure 16. **Distribution of Settlement Values**

Excludes Merger Objections, Crypto Unregistered Securities, and Settlements for \$0 to the Class January 2018–December 2022

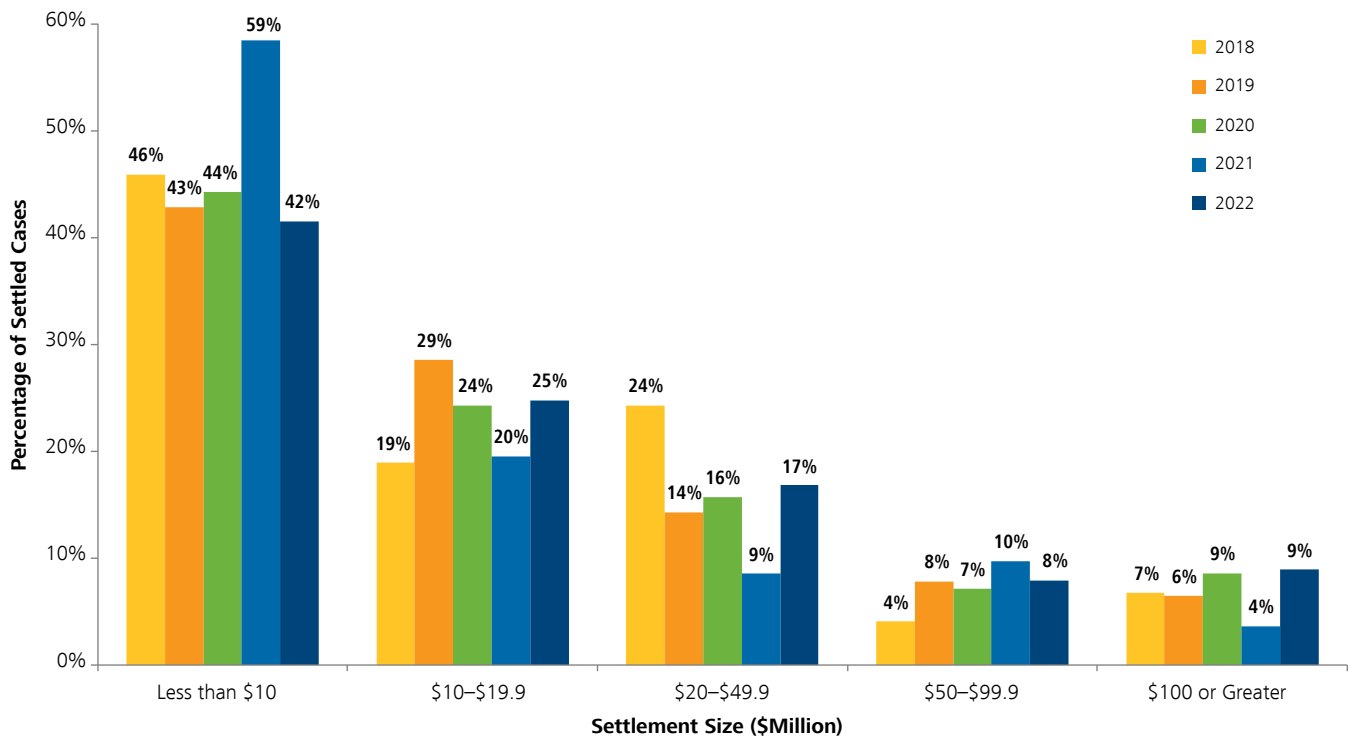
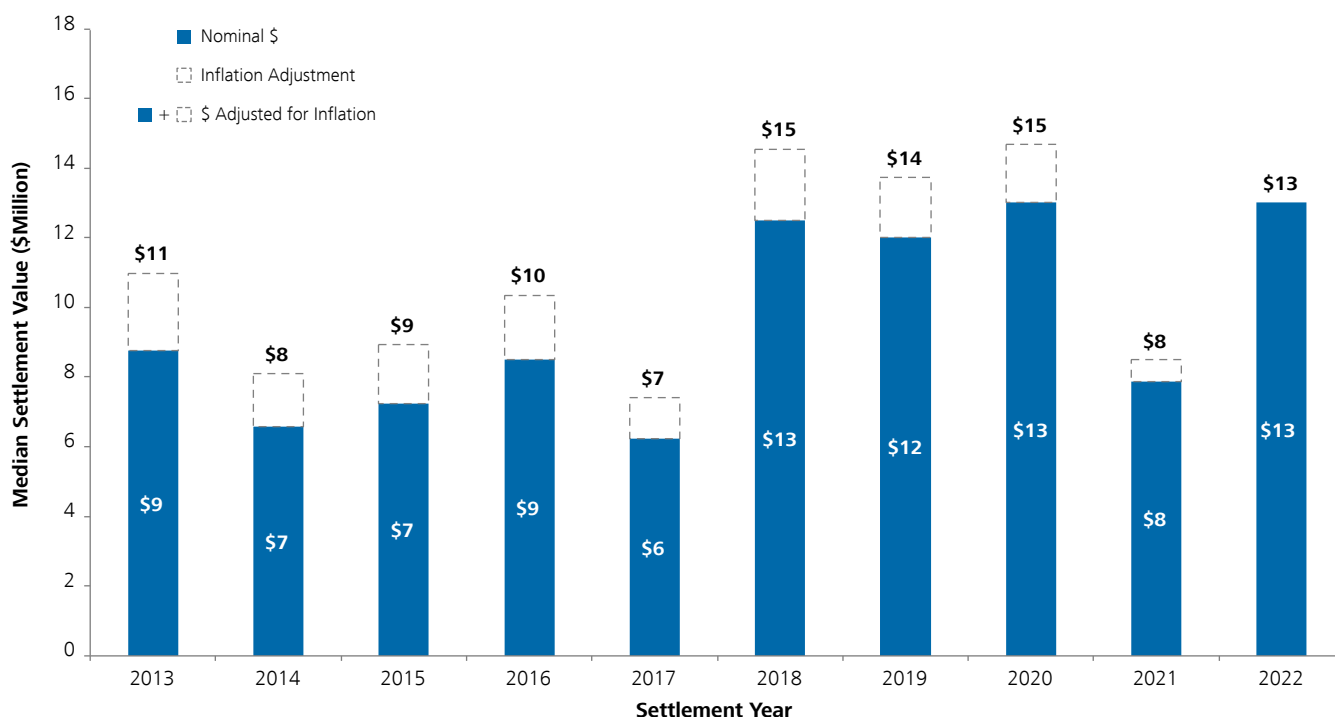


Figure 17. **Median Settlement Value**

Excludes Settlements over \$1 Billion, Merger Objections, Crypto Unregistered Securities, and Settlements for \$0 to the Class January 2013–December 2022



Top Settlements

The top 10 settlements in 2022 ranged from \$98 million to \$809.5 million and totaled \$2.2 billion. The highest settlement reached was against Twitter, Inc., for a case filed in California in 2016 (see Table 1).

Table 1. **Top 10 2022 Securities Class Action Settlements**

Ranking	Defendant	Filing Date	Settlement Date	Total Settlement Value (\$Million)	Plaintiffs' Attorneys' Fees and Expenses Value (\$Million)	Circuit	Economic Sector
1	Twitter, Inc.	16 Sept 16	11 Nov 22	\$809.5	\$185.7	9th	Technology Services
2	Teva Pharmaceutical Industries Ltd.	6 Nov 16	2 Jun 22	\$420.0	\$109.3	2nd	Health Technology
3	Luckin Coffee Inc.	13 Feb 20	22 Jul 22	\$175.0	\$31.3	2nd	Consumer Non-Durables
4	BlackBerry Ltd.	4 Oct 13	29 Sept 22	\$165.0	\$59.5	2nd	Technology Services
5	Granite Construction Inc.	13 Aug 19	24 Feb 22	\$129.0	\$21.7	9th	Industrial Services
6	Endo International plc.	14 Nov 17	23 Feb 22	\$113.4	\$20.9	3rd	Health Technology
7	Walgreen Co.	10 April 15	7 Oct 22	\$105.0	\$31.1	7th	Retail Trade
8	Novo Nordisk A/S	11 Jan 17	27 Jun 22	\$100.0	\$31.7	3rd	Health Technology
9	Stamps.com, Inc.	13 Mar 19	24 Jan 22	\$100.0	\$17.3	9th	Commercial Services
10	Mattel, Inc.	24 Dec 19	2 May 22	\$98.0	\$14.8	9th	Consumer Durables
Total				\$2,214.9	\$523.4		

The top 10 federal securities class action settlements, as of 31 December 2022, consists of settlements ranging from \$1.14 billion to \$7.24 billion. From 2018 to 2021, this list remained unchanged because there were no settlements reached in excess of \$1.1 billion during this time. In 2022, this list was updated to incorporate the \$1.21 billion partial settlement in the ongoing suit against Valeant Pharmaceuticals International, Inc. (see Table 2).

Table 2. **Top 10 Federal Securities Class Action Settlements** (As of 31 December 2022)

Ranking	Defendant	Filing Date	Settlement Year(s)	Total Settlement Value (\$Million)	Codefendant Settlements		Plaintiffs' Attorneys' Fees and Expenses Value (\$Million)	Circuit	Economic Sector
					Financial Institutions Value (\$Million)	Accounting Firms Value (\$Million)			
1	ENRON Corp.	22 Oct 01	2003–2010	\$7,242	\$6,903	\$73	\$798	5th	Industrial Services
2	WorldCom, Inc.	30 Apr 02	2004–2005	\$6,196	\$6,004	\$103	\$530	2nd	Communications
3	Cendant Corp.	16 Apr 98	2000	\$3,692	\$342	\$467	\$324	3rd	Finance
4	Tyco International, Ltd.	23 Aug 02	2007	\$3,200	No codefendant	\$225	\$493	1st	Producer Manufacturing
5	Petroleo Brasileiro S.A.- Petrobras	8 Dec 14	2018	\$3,000	\$0	\$50	\$205	2nd	Energy Minerals
6	AOL Time Warner Inc.	18 Jul 02	2006	\$2,650	No codefendant	\$100	\$151	2nd	Consumer Services
7	Bank of America Corp.	21 Jan 09	2013	\$2,425	No codefendant	No codefendant	\$177	2nd	Finance
8	Household International, Inc.	19 Aug 02	2006–2016	\$1,577	Dismissed	Dismissed	\$427	7th	Finance
9	Valeant Pharmaceuticals International, Inc.*	22 Oct 15	2020	\$1,210	\$0	\$0	\$160	3rd	Health Technology
10	Nortel Networks	2 Mar 01	2006	\$1,143	No codefendant	\$0	\$94	2nd	Electronic Technology
Total				\$32,334	\$13,249	\$1,017	\$3,358		

*Denotes a partial settlement, which is included here due to its sizable amount. Note that this case is not included in any of our resolution or settlement statistics.

NERA-Defined Investor Losses

To estimate the potential aggregate loss to investors as a result of investing in the defendant's stock during the alleged class period, NERA has developed a proprietary variable, NERA-Defined Investor Losses, using publicly available data. The NERA-Defined Investor Loss measure is constructed assuming investors had invested in stocks during the class period whose performance was comparable to that of the S&P 500 Index. Over the years, NERA has reviewed and examined more than 2,000 settlements and found, of the variables analyzed, this proprietary variable to be the most powerful predictor of settlement amount.¹¹

A statistical review reveals that settlement values and NERA-Defined Investor Losses are highly correlated, although the relationship is not linear. The ratio is higher for cases with lower NERA-Defined Investor Losses than for cases with higher Investor Losses (see Figure 18). Since 2013, annual median Investor Losses have ranged from a high of \$972 million to a low of \$358 million. For cases settled in 2022, the median Investor Losses were \$972 million, which is 33% higher than the 2021 value and the highest recorded value during the 2013–2022 period. Between 2020 and 2022, the median ratio of settlement amount to Investor Losses has been stable at 1.8% (see Figure 19).

Figure 18. **Median Settlement Value as a Percentage of NERA-Defined Investor Losses**
By Investor Losses
Cases Filed and Settled December 2011–December 2022

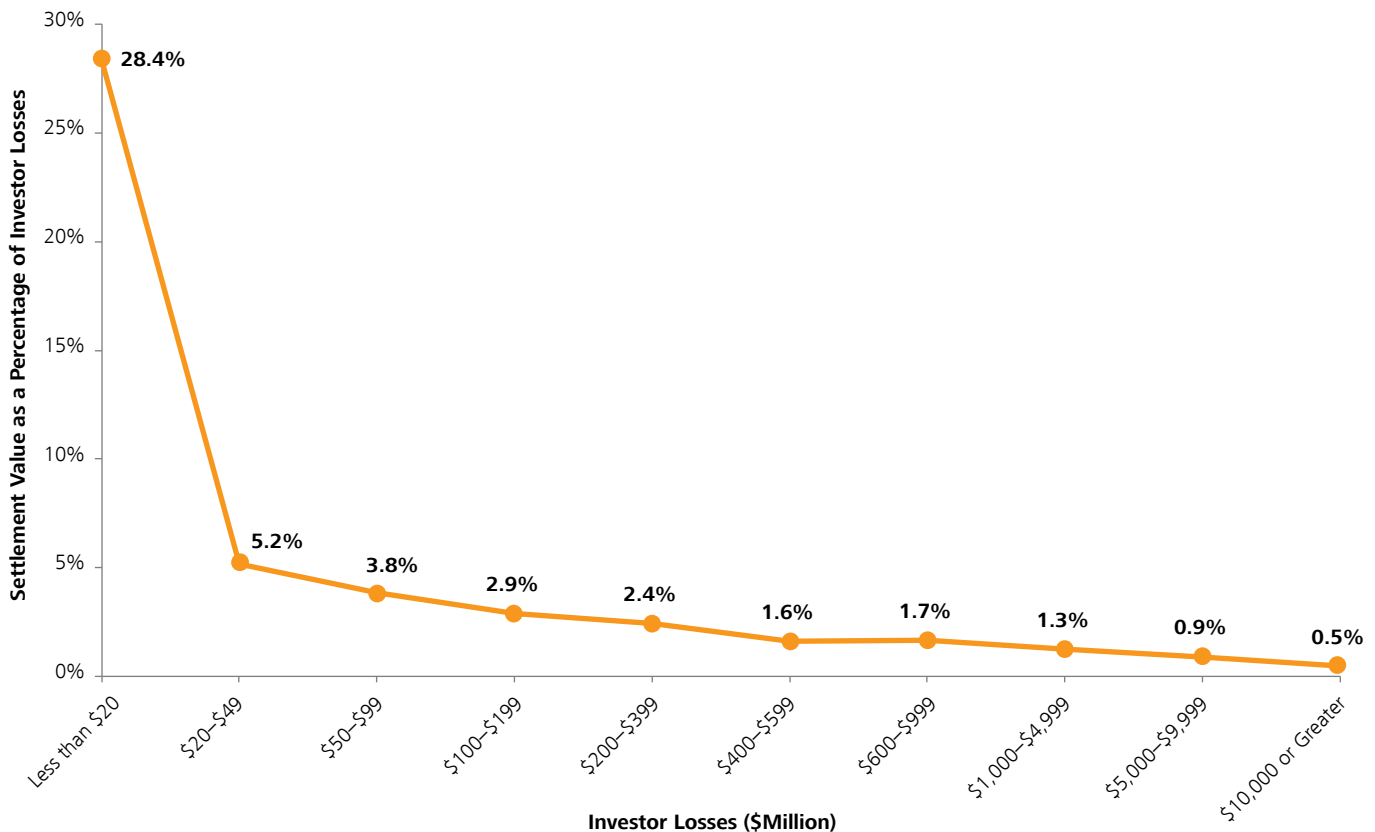
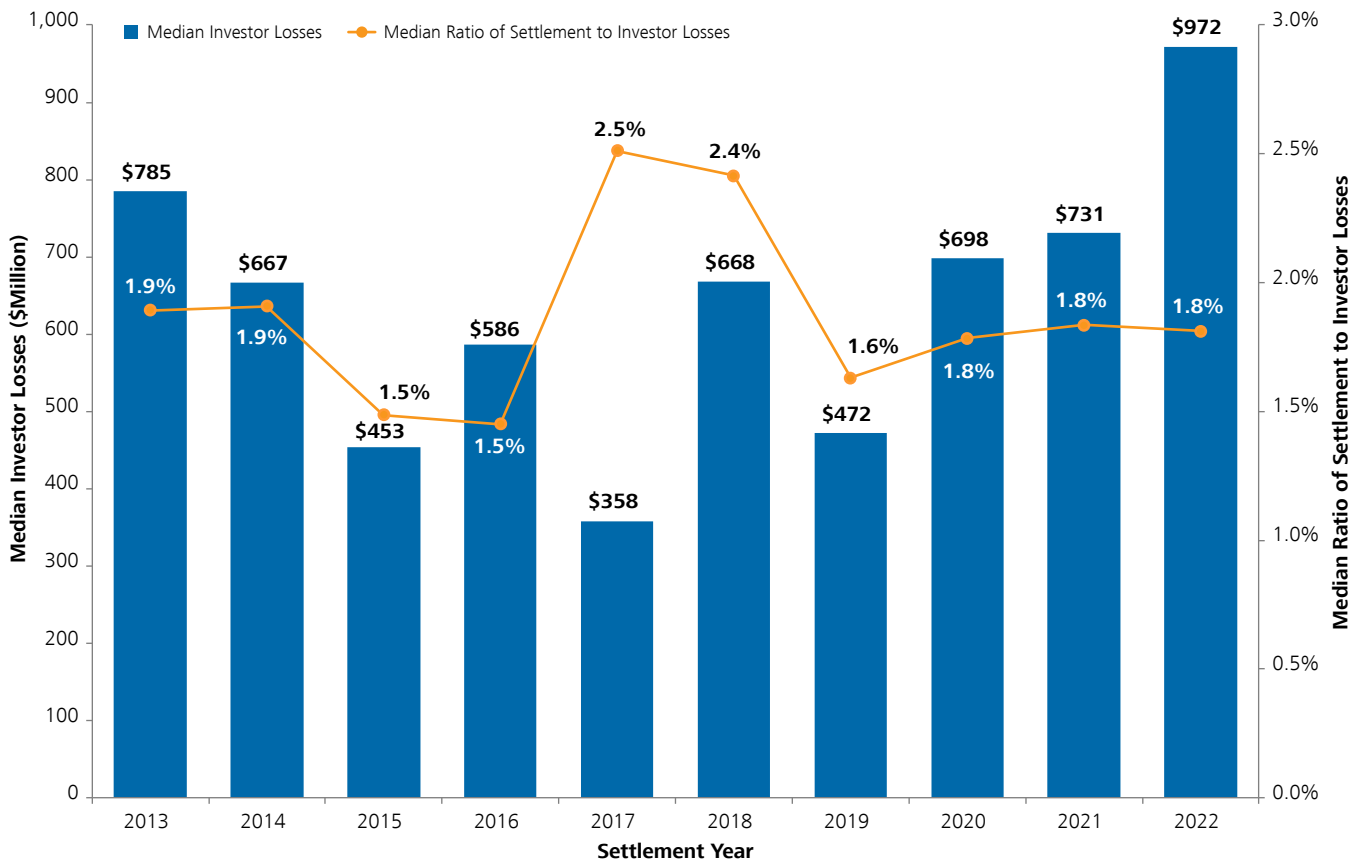


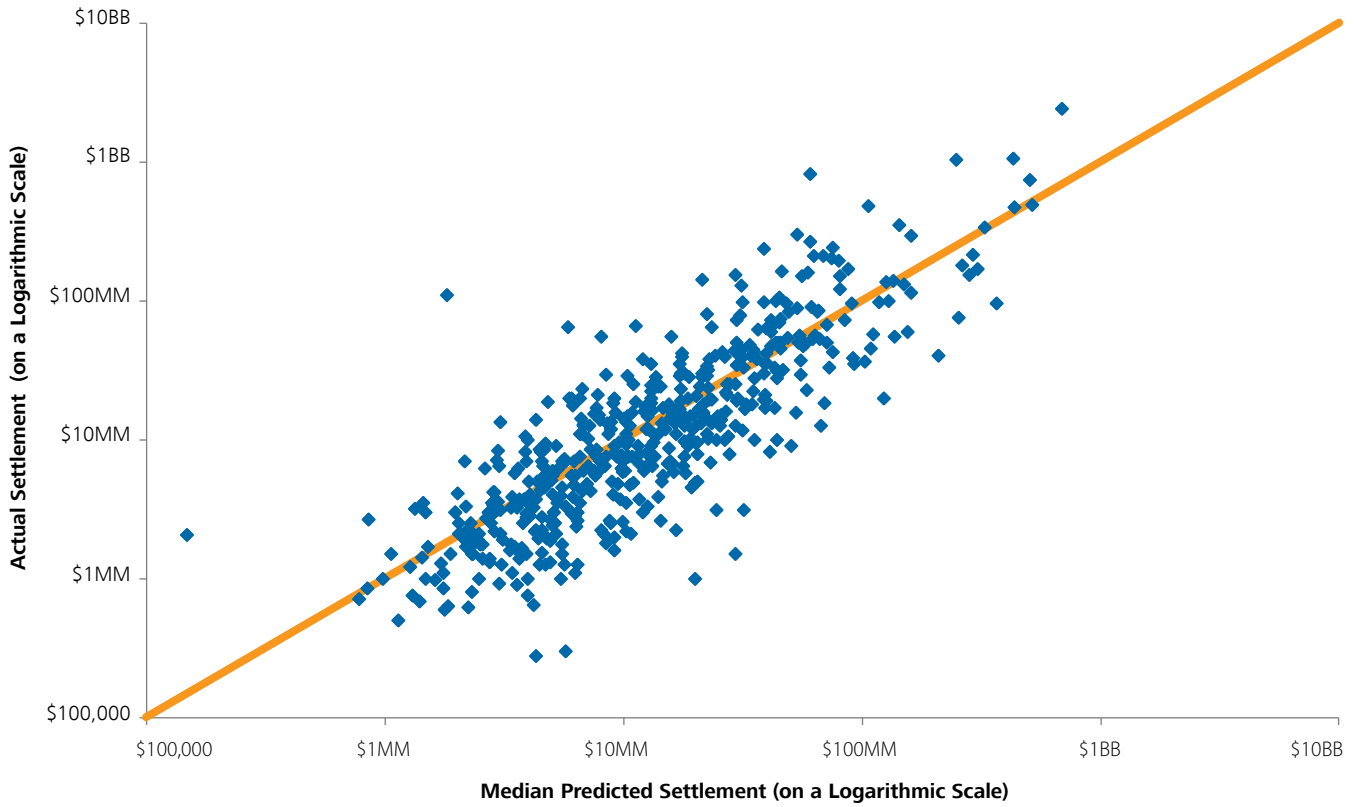
Figure 19. **Median NERA-Defined Investor Losses and Median Ratio of Settlement to Investor Losses by Settlement Year**
January 2013–December 2022



NERA has identified the following key factors as driving settlement amounts:

- NERA-Defined Investor Losses;
- The market capitalization of the issuer immediately after the end of the class period;
- The types of securities (in addition to common stock) alleged to have been affected by the fraud;
- Variables that serve as a proxy for the merit of plaintiffs' allegations (e.g., whether the company has already been sanctioned by a government or regulatory agency or paid a fine in connection with the allegations);
- The stage of litigation at the time of settlement; and
- Whether an institution or public pension fund is named lead plaintiff (see Figure 20).

Figure 20. **Predicted vs. Actual Settlements**
 Investor Losses Using S&P 500 Index
 Cases Settled December 2011–December 2022



Among cases settled between December 2011 and December 2022, factors in NERA’s statistical model account for a substantial fraction of the variation observed in actual settlements.

Trends in Plaintiffs’ Attorneys’ Fees and Expenses

In 2022, aggregate plaintiffs’ attorneys’ fees and expenses amounted to \$1 billion (see Figure 21). This marks the first year since 2018 that aggregate plaintiffs’ attorneys’ fees and expenses exceeded \$1 billion. The 2022 aggregate fees and expenses is double the amount observed in 2021, driven by an increase in the aggregate fees and expenses associated with settlements between \$10 million and \$499.9 million and by the \$186 million in fees and expenses associated with settlements between \$500 million and \$999.9 million. Although there are year-to-year fluctuations in the aggregate fees and expenses, the trend in the median of plaintiffs’ attorneys’ fees and expenses as a percentage of settlement amount has remained stable (see Figure 22). The data reveal that fees and expenses represent an increasing percentage of settlement value as settlement value decreases—a pattern that is consistent in cases settled since 2013 as well as in cases settled between 1996 and 2012. For cases settled in the recent period with a settlement value of \$1 billion or higher, fees and expenses accounted for 8.8% of the settlement value. This percentage increases to more than 30% for cases with a settlement value under \$10 million.

Figure 21. **Aggregate Plaintiffs’ Attorneys’ Fees and Expenses by Settlement Size**
January 2013–December 2022

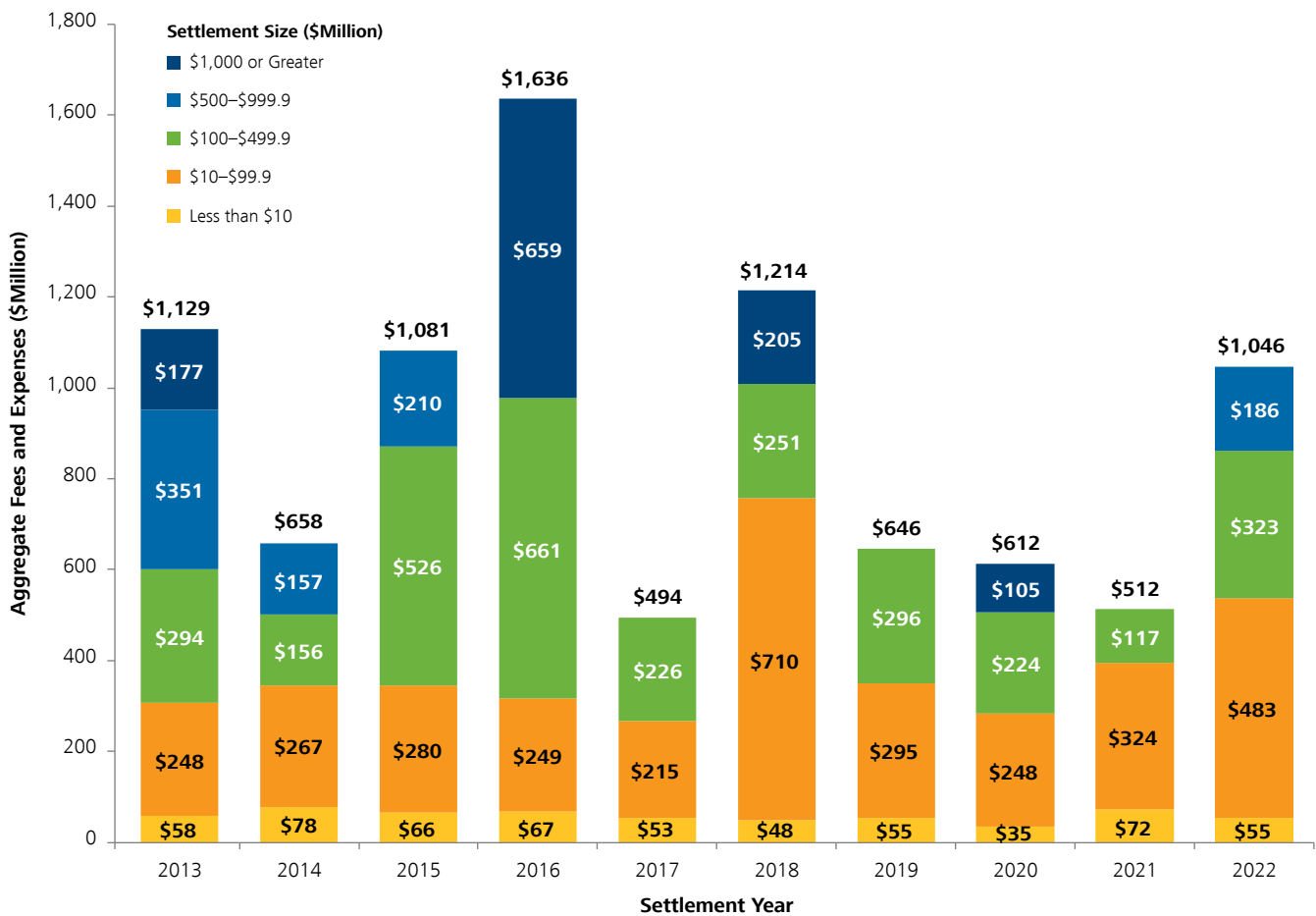
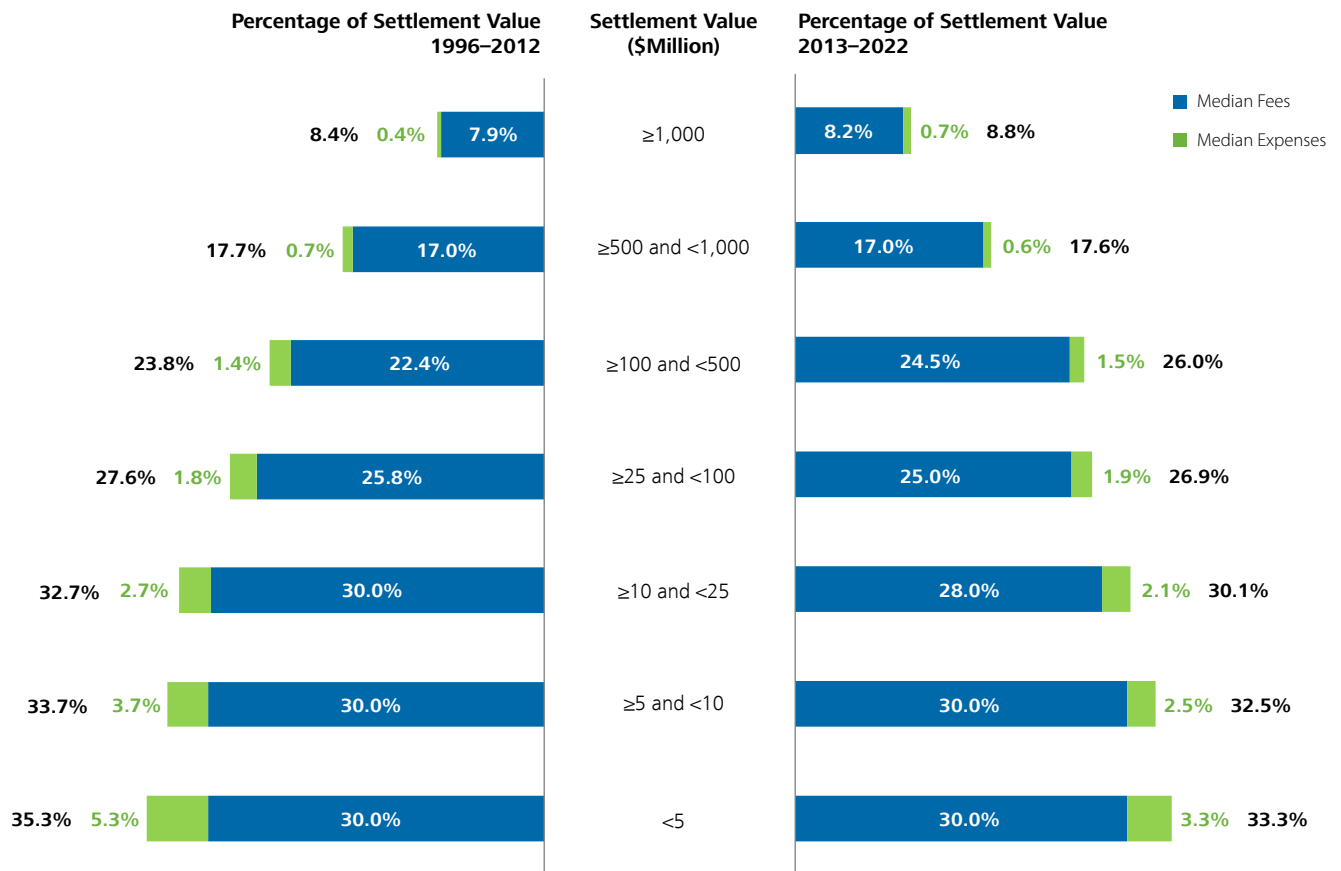


Figure 22. **Median of Plaintiffs’ Attorneys’ Fees and Expenses by Size of Settlement**
 Excludes Merger Objections, Crypto Unregistered Securities, and Settlements for \$0 to the Class



Note: Component values may not add to total value due to rounding.

Conclusion

In 2022, new filings of federal securities class actions declined for the fourth consecutive year as a result of fewer merger-objection and Rule 10b-5 cases filed. Of the 205 cases filed in 2022, more than 20% were SPAC or crypto-related filings. Total resolutions declined by 14% from 248 in 2021 to 214 in 2022 due to the continued reduction in non-merger-objection and non-crypto unregistered cases. The average settlement value and median settlement value for cases settled in 2022 were \$38 million and \$13 million, respectively, an increase over the 2021 values.

Notes

- 1 This edition of NERA's report on "Recent Trends in Securities Class Action Litigation" expands on previous work by our colleagues Lucy P. Allen, Dr. Vinita Juneja, Dr. Denise Neumann Martin, Dr. Jordan Milev, Robert Patton, Dr. Stephanie Plancich, and others. The authors thank Dr. David Tabak and Benjamin Seggerson for helpful comments on this edition. We thank Vlad Lee and other researchers in NERA's Securities and Finance Practice for their valuable assistance. These individuals receive credit for improving this report; any errors and omissions are those of the authors. NERA's proprietary securities class action database and all analyses reflected in this report are limited to federal case filings and resolutions.
- 2 In this study we introduced a new category of "special" cases, crypto cases, which consist of two mutually exclusive subgroups: (1) crypto shareholder class actions, which include a class of investors in common stock, American depository receipts/ American depository shares (ADR/ADS), and/or other registered securities, along with crypto- or digital-currency-related allegations; and (2) crypto unregistered securities class actions, which do not have class investors in any registered securities that are traded on major exchanges (New York Stock Exchange, Nasdaq). We include crypto shareholder class actions in all our analyses that include standard cases. Crypto unregistered securities class actions are excluded from some analyses, which is noted in the titles of our figures.
- 3 NERA tracks securities class actions that have been filed in federal courts. Most of these cases allege violations of federal securities laws; others allege violations of common law, including breach of fiduciary duty, as with some merger-objection cases; still others are filed in federal court under foreign or state law. If multiple actions are filed against the same defendant, are related to the same allegations, and are in the same circuit, we treat them as a single filing. The first two actions filed in different circuits are treated as separate filings. If cases filed in different circuits are consolidated, we revise our count to reflect the consolidation. Therefore, case counts for a particular year may change over time. Different assumptions for consolidating filings would probably lead to counts that are similar but may, in certain circumstances, lead observers to draw a different conclusion about short-term trends in filings. Data for this report were collected from multiple sources, including Institutional Shareholder Services, Dow Jones Factiva, Bloomberg Finance, FactSet Research Systems, Nasdaq, Intercontinental Exchange, US Securities and Exchange Commission (SEC) filings, complaints, case dockets, and public press reports.
- 4 Most securities class action complaints include multiple allegations. For this analysis, all allegations from the complaint are included and thus the total number of allegations exceeds the total number of filings.
- 5 It is important to note that due to the small number of cases in some of these categories, the findings summarized here may be driven by one or two cases.
- 6 ESG securities class action cases filed in federal courts are included in NERA's database and the analyses in this report. For this update, no analyses have been prepared on this development area specifically.
- 7 Report updated on 7 February 2023. Analyses for the "SPACs" group were updated to incorporate "blank check" company-related cases and cases that were not originally classified as SPACs prior to publishing.
- 8 Here "dismissed" is used as shorthand for all class actions resolved without settlement; it includes cases in which a motion to dismiss was granted (and not appealed or appealed unsuccessfully), voluntary dismissals, cases terminated by a successful motion for summary judgment, or an ultimately unsuccessful motion for class certification.
- 9 While annual average settlement values can be a helpful statistic, these values may be affected by one or a few very high settlement amounts. Unlike averages, the median settlement value is unaffected by these very high outlier settlement amounts. To understand what more typical cases look like, we analyze the average and median settlement values for cases with a settlement amount under \$1 billion, thus excluding these outlier settlement amounts. For the analysis of settlement values, we limit our data to non-merger-objection and non-crypto unregistered securities cases with settlements of more than \$0 to the class.
- 10 For our analysis, NERA includes settlements that have had the first settlement-approval hearing. This means we do not include partial settlements or tentative settlements that have been announced by plaintiffs and/or defendants. As a result, although we include the Valeant partial settlement in Table 2 due to its sizable amount, this case is not included in any of our resolution or settlement statistics.
- 11 NERA-Defined Investor Losses is only calculable for cases involving allegations of damages to common stock based on one or more corrective disclosures moving the stock price to its alleged true value. As a result, we have not calculated this metric for cases such as merger objections.

About NERA

NERA Economic Consulting (www.nera.com) is a global firm of experts dedicated to applying economic, finance, and quantitative principles to complex business and legal challenges. For more than six decades, we have been creating strategies, studies, reports, expert testimony, and policy recommendations for government authorities and the world's leading law firms and corporations. We bring academic rigor, objectivity, and real-world industry experience to issues arising from competition, regulation, public policy, strategy, finance, and litigation.

NERA's clients value our ability to apply and communicate state-of-the-art approaches clearly and convincingly, our commitment to deliver unbiased findings, and our reputation for quality and independence. Our clients rely on the integrity and skills of our unparalleled team of economists and other experts backed by the resources and reliability of one of the world's largest economic consultancies. Continuing our legacy as the first international economic consultancy, NERA serves clients from major cities across North America, Europe, and Asia Pacific.

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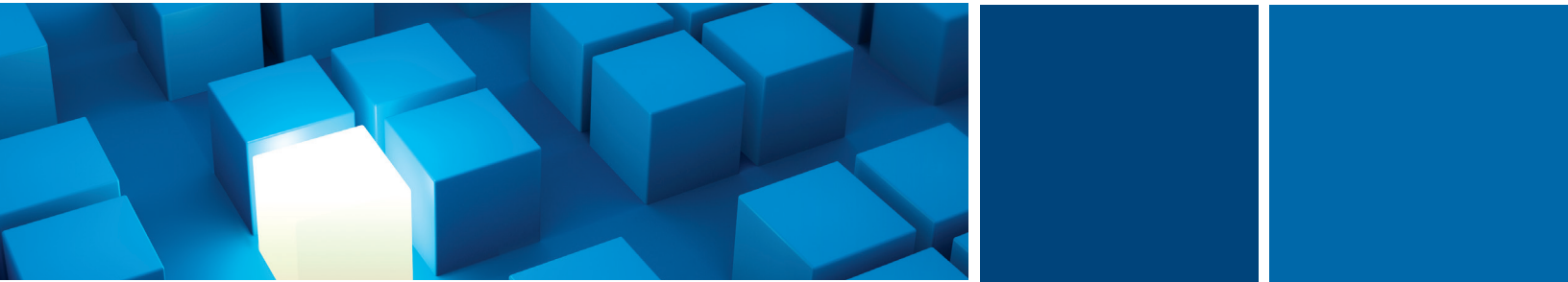
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Exhibit C

2 August 2023



Recent Trends in Securities Class Action Litigation: H1 2023 Update

Filings Are on Track to be Above 2022 Levels

Resolutions Slowed in H1 2023

By Edward Flores and Svetlana Starykh

Summary

During the first half of 2023, 118 new federal securities class action cases were filed. Standard cases, which contain alleged violations of Rule 10b-5, Section 11, and/or Section 12, accounted for most new filings with 105. Merger-objection and crypto unregistered securities cases have remained flat relative to 2022, with four and eight cases filed, respectively. Assuming filings continue at the same pace in the second half of 2023, annual filings for 2023 will be 236, which would represent a 15% increase relative to 2022.

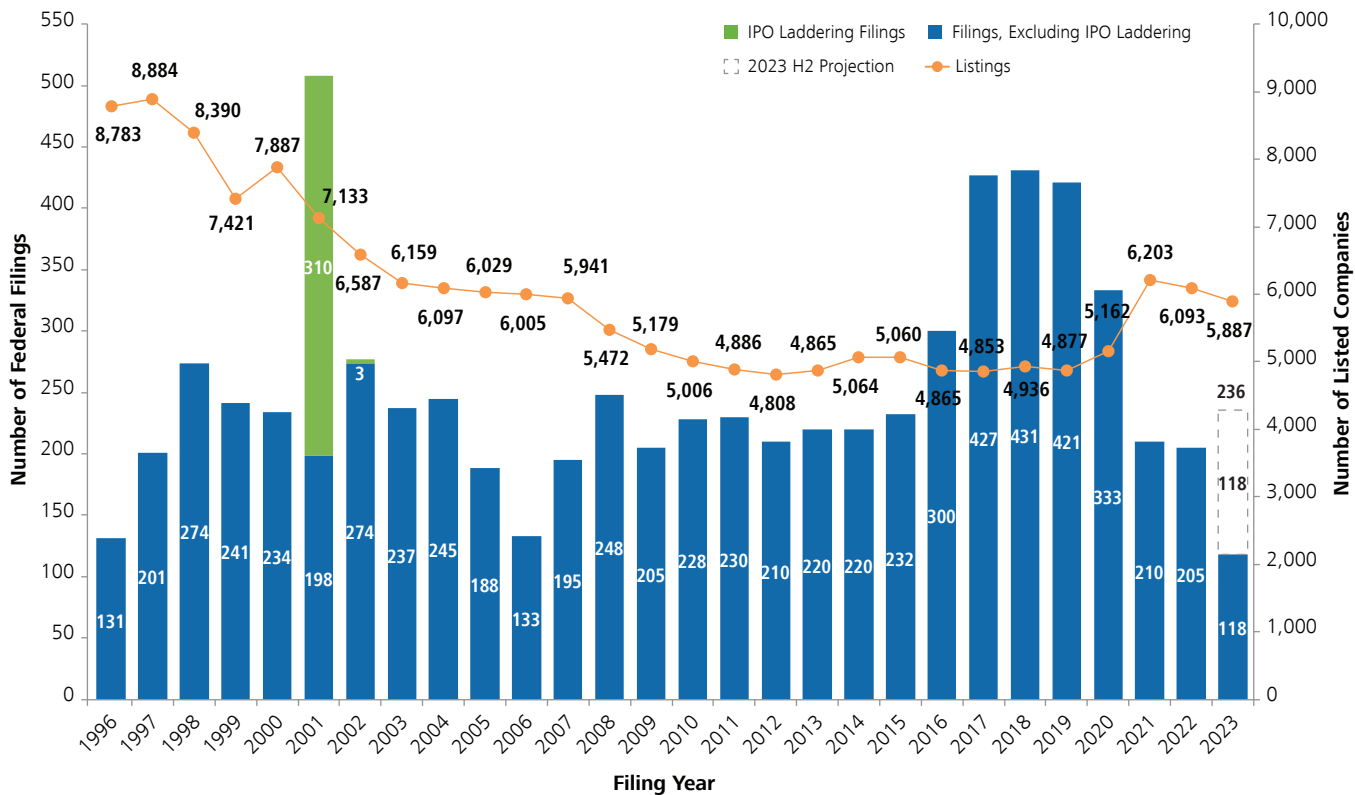
Excluding merger-objection and crypto unregistered securities cases, the electronic technology and technology services sector accounted for 23% of new filings, the largest proportion of any sector. The finance sector accounted for 22% of new filings, nearly triple the percentage relative to 2022. On the other hand, the percentage of suits in the health technology and services sector declined by half to 13%, partially driven by a decline in COVID-19-related suits filed. The Second, Third, and Ninth Circuits continue to be the jurisdictions with the most cases filed, each accounting for 27, 16, and 33 filings, respectively. There were 11 cases filed in the Eleventh Circuit, marking a 5-year high.

Among filings of standard cases, 32% included an allegation related to misled future performance and 29% included an allegation related to regulatory issues. Meanwhile, the percentage of standard cases containing an allegation related to merger-integration issues declined by half to 8%, partially driven by a decline in SPAC-related filings.

There were 76 cases resolved in the first half of 2023, of which 41 were dismissed and 35 were settled. Assuming resolutions continue at this pace for the rest of the year, the number of resolved cases for 2023 will be 152, which would mark the lowest recorded level in the past 10 years and a decline of 29% relative to 2022. The decline in resolutions is seen across all categories of dismissed and settled cases.

For cases settled in the first six months of 2023, the average settlement value was \$21 million, a 47% decrease compared to the 2022 inflation-adjusted average settlement value of \$39 million. The median settlement value was \$16 million, a \$3 million increase from the 2022 inflation-adjusted median settlement value of \$13 million. The shift in 2023 average and median settlement values relative to 2022 is driven in part by a decrease in the percentage of settlements between \$10 and \$19.9 million, a substantial increase in the percentage of settlements between \$20 to \$49.9 million, and a decrease in the percentage of settlements greater than \$50 million.

Figure 1. **Federal Filings and Number of Companies Listed in the United States**
January 1996–June 2023



Note: Listed companies include those listed on the NYSE and Nasdaq. Listings data obtained from World Federation of Exchanges (WFE). The 2023 listings data is as of June 2023.

Figure 2. **Federal Filings by Type**
January 2014–June 2023

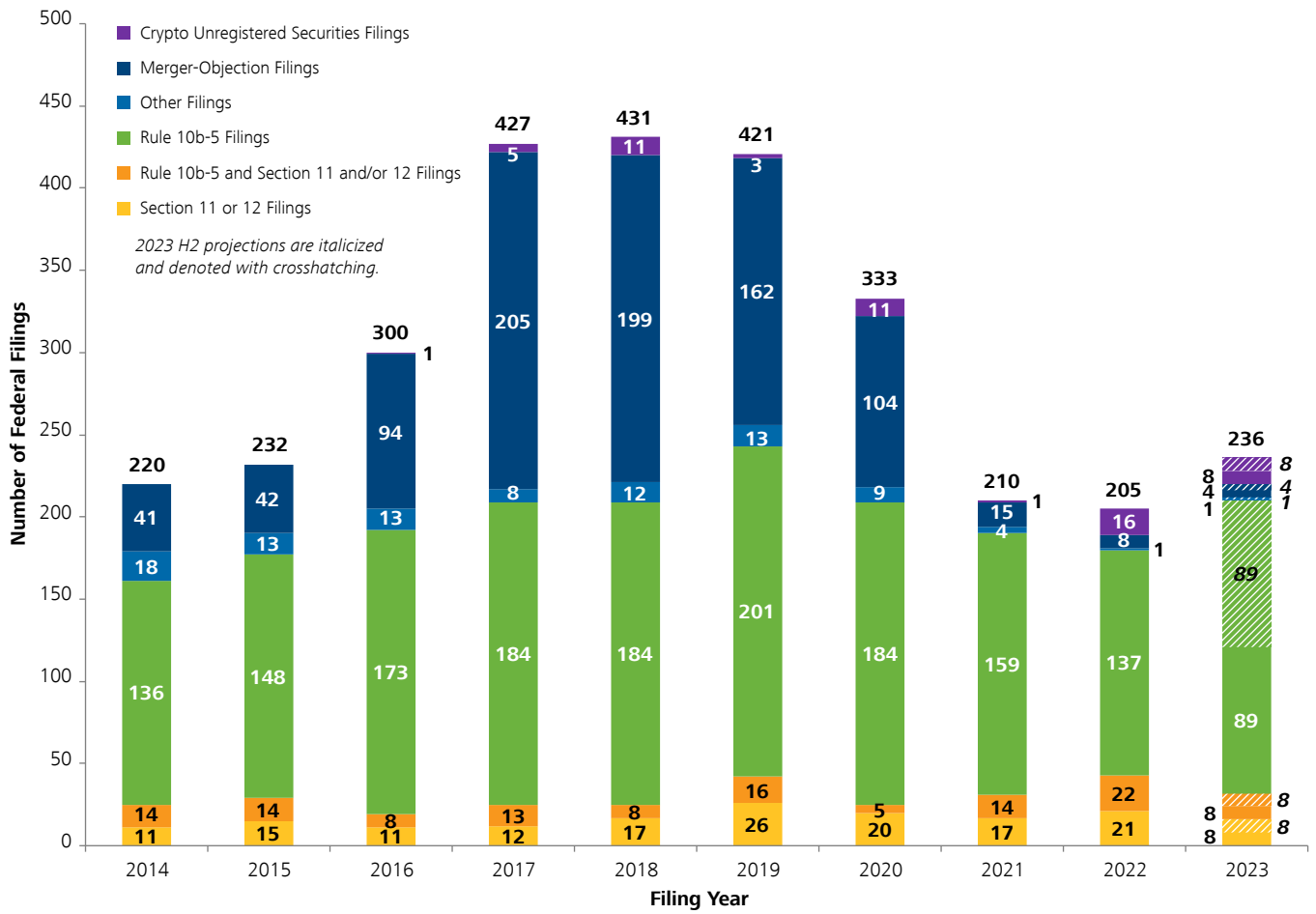
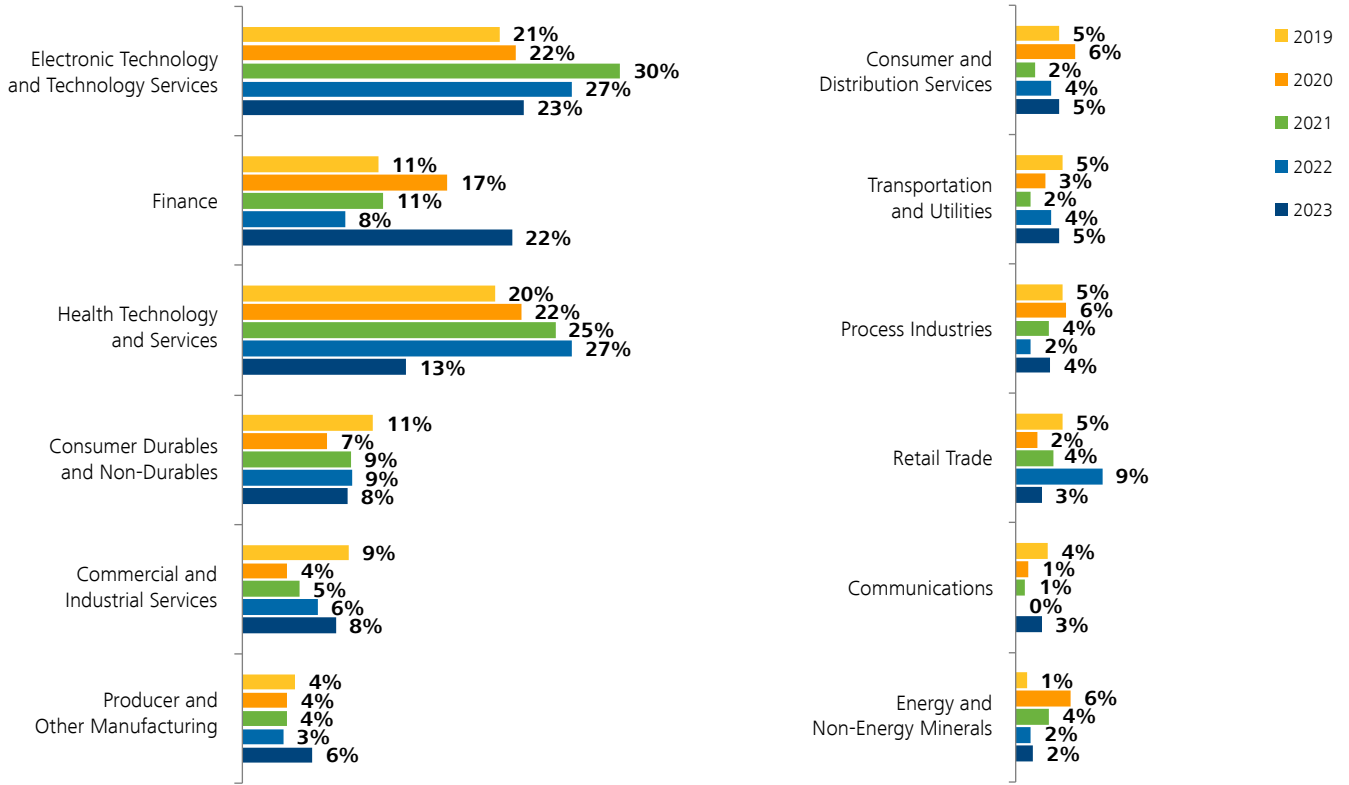


Figure 3. **Percentage of Federal Filings by Sector and Year**
 Excludes Merger Objections and Crypto Unregistered Securities
 January 2019–June 2023



Note: This analysis is based on the FactSet Research Systems, Inc. economic sector classification. Some of the FactSet economic sectors are combined for presentation.

Figure 4. **Federal Filings by Circuit and Year**
 Excludes Merger Objections and Crypto Unregistered Securities
 January 2019–June 2023

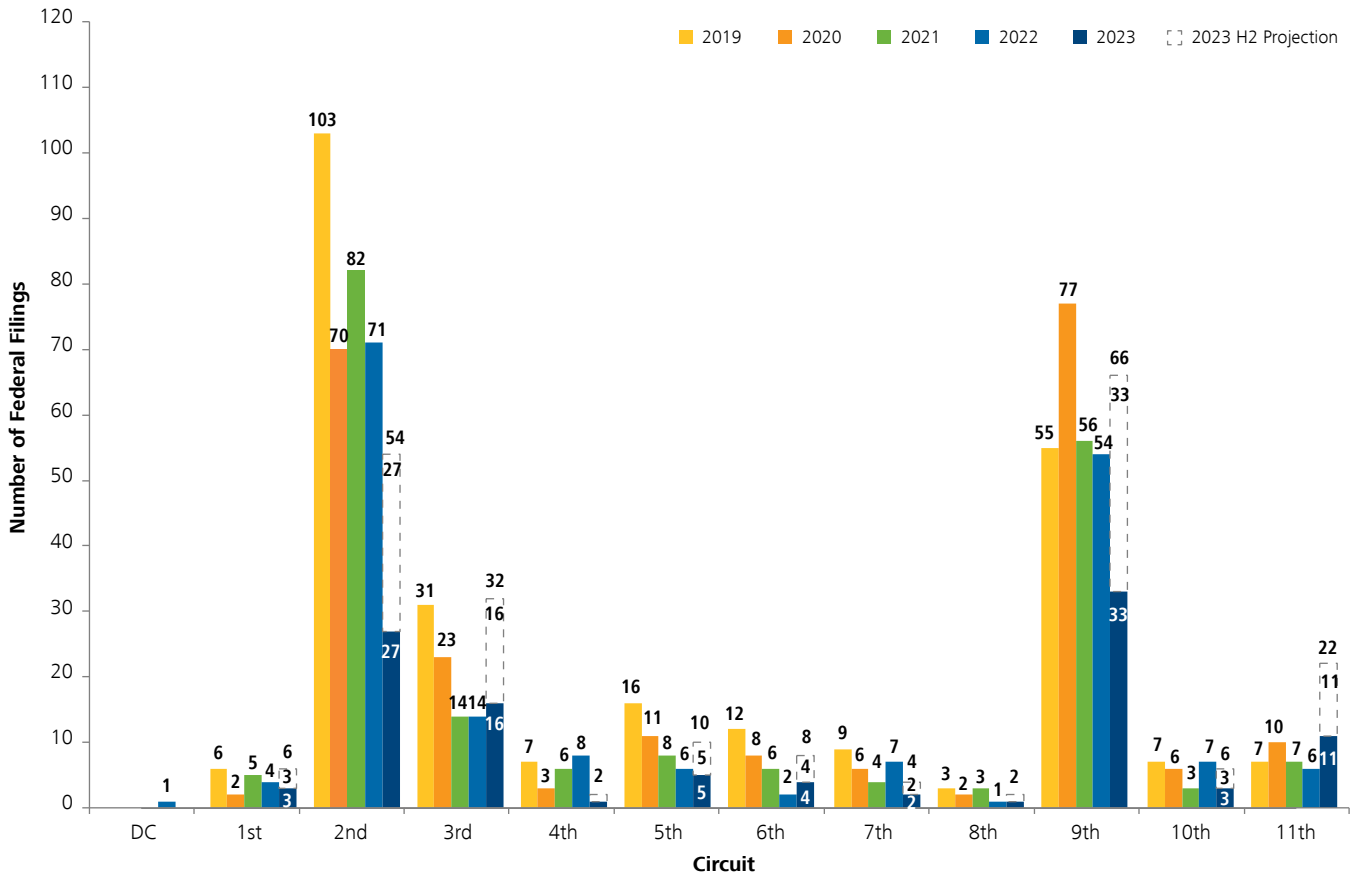


Figure 5. **Allegations**

Shareholder Class Actions with Alleged Violations of Rule 10b-5, Section 11, and/or Section 12
January 2019–June 2023

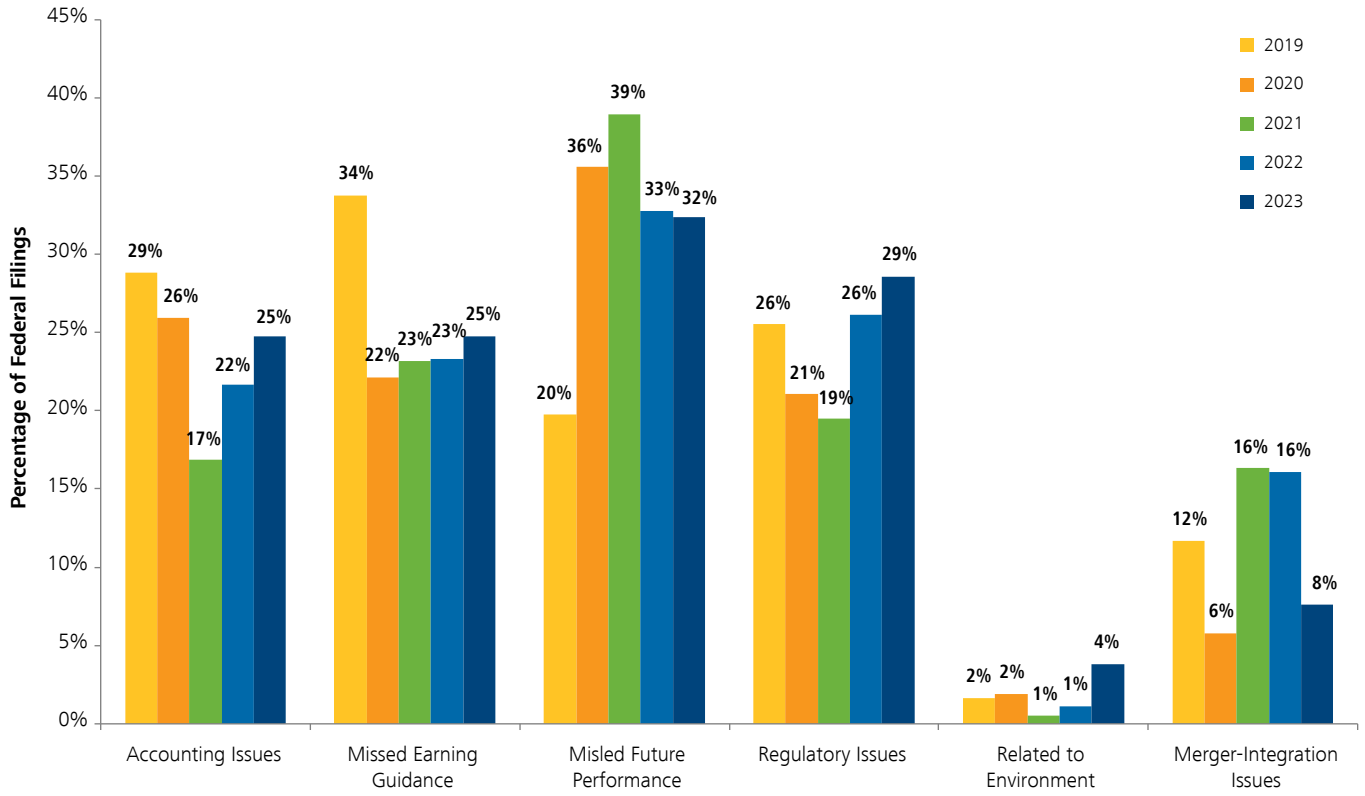


Figure 6. **Number of Resolved Cases: Dismissed or Settled**
January 2014–June 2023

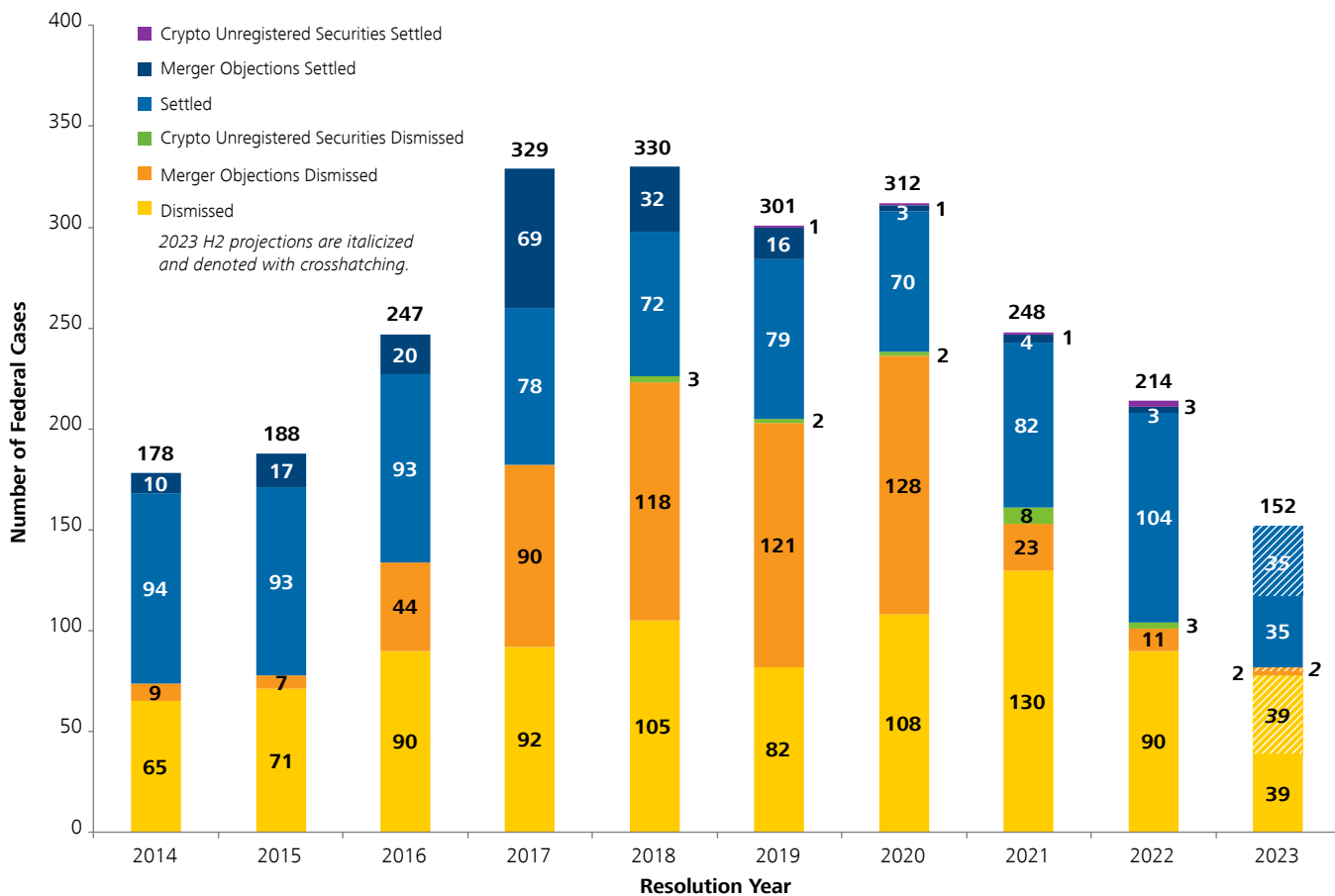


Figure 7. **Average Settlement Value**

Excludes Settlements over \$1 Billion, Merger Objections, Crypto Unregistered Securities, and Settlements for \$0 to the Class
January 2014–June 2023

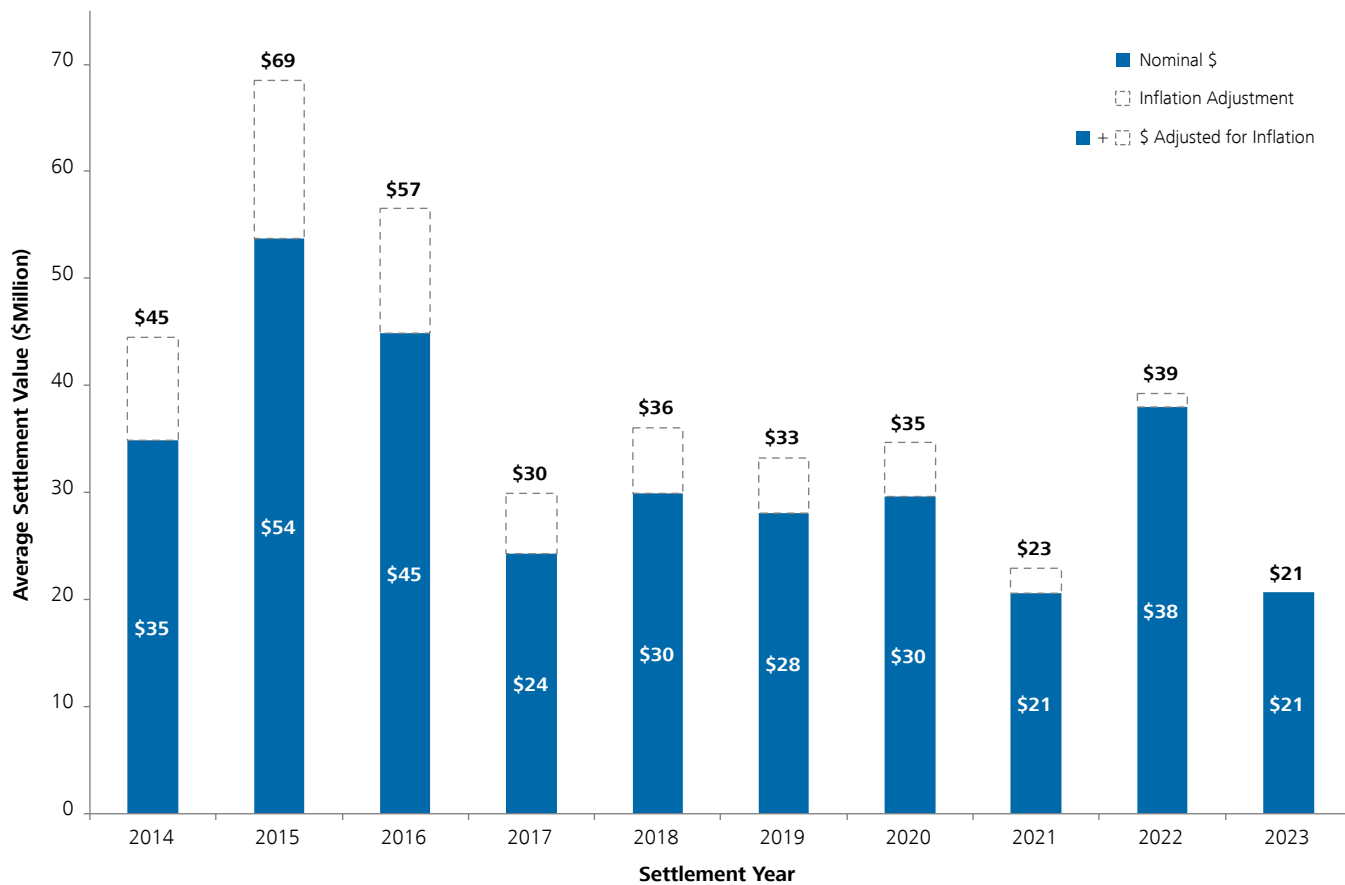


Figure 8. **Median Settlement Value**

Excludes Settlements over \$1 Billion, Merger Objections, Crypto Unregistered Securities, and Settlements for \$0 to the Class January 2014–June 2023

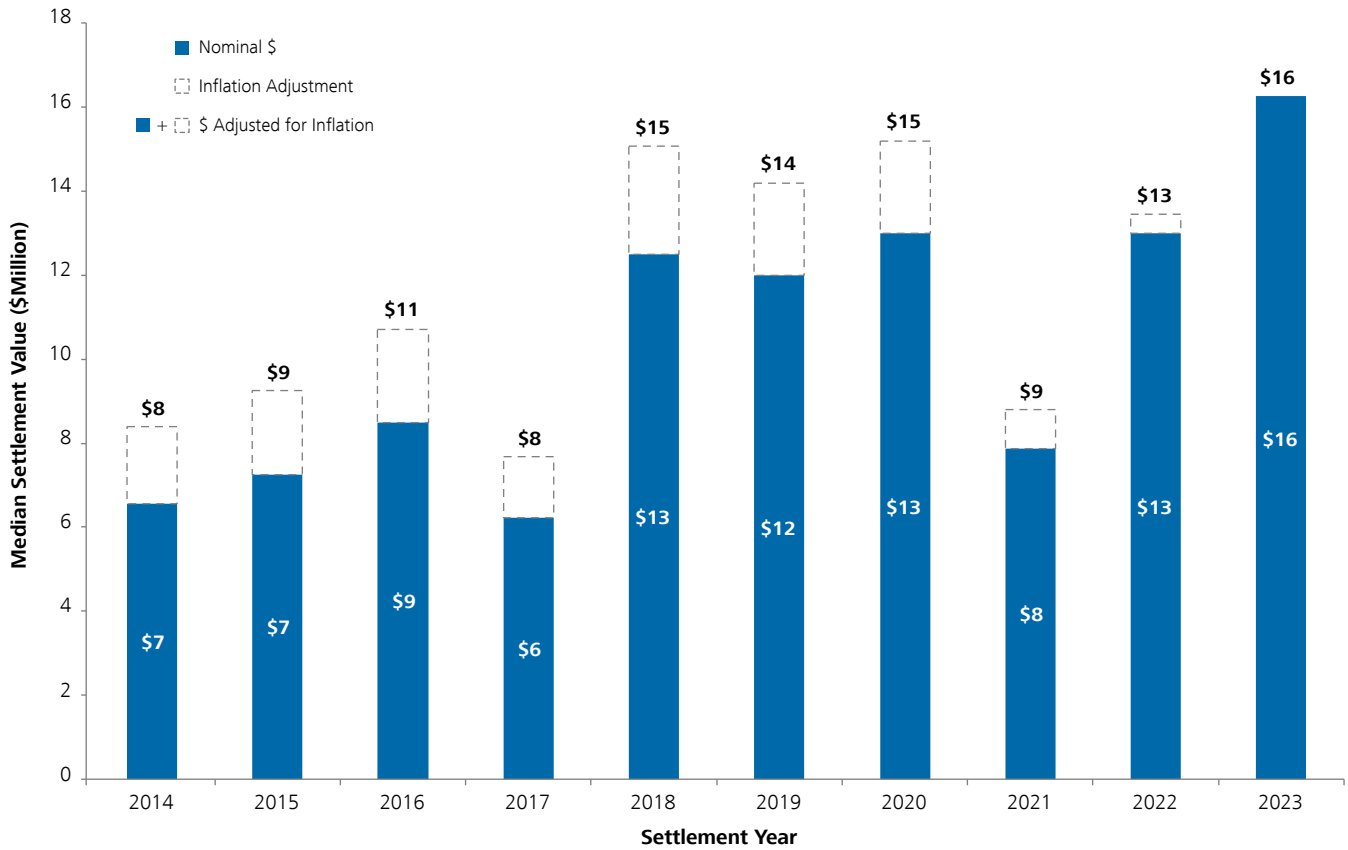
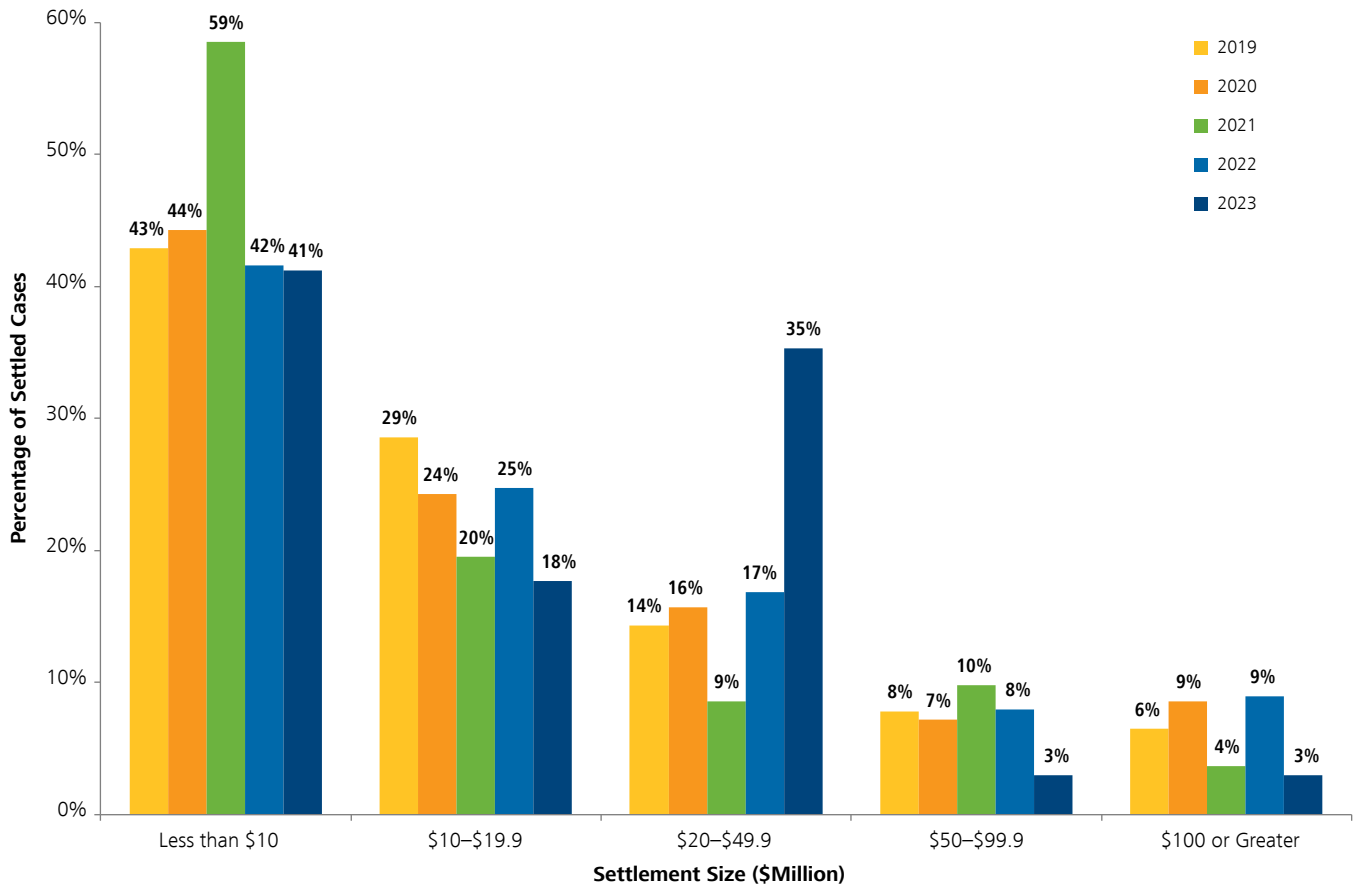


Figure 9. **Distribution of Settlement Values**
 Excludes Merger Objections, Crypto Unregistered Securities, and Settlements for \$0 to the Class
 January 2019–June 2023



About NERA

NERA Economic Consulting (www.nera.com) is a global firm of experts dedicated to applying economic, finance, and quantitative principles to complex business and legal challenges. For more than six decades, we have been creating strategies, studies, reports, expert testimony, and policy recommendations for government authorities and the world's leading law firms and corporations. We bring academic rigor, objectivity, and real-world industry experience to issues arising from competition, regulation, public policy, strategy, finance, and litigation.

NERA's clients value our ability to apply and communicate state-of-the-art approaches clearly and convincingly, our commitment to deliver unbiased findings, and our reputation for quality and independence. Our clients rely on the integrity and skills of our unparalleled team of economists and other experts backed by the resources and reliability of one of the world's largest economic consultancies. Continuing our legacy as the first international economic consultancy, NERA serves clients from major cities across North America, Europe, and Asia Pacific.

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Exhibit D

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

BOSTON RETIREMENT SYSTEM,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

ALEXION PHARMACEUTICALS, INC.,
LEONARD BELL, DAVID L. HALLAL,
VIKAS SINHA,

Defendants.

Civ. No. 3:16-cv-2127 (AWT)

Hon. Alvin W. Thompson

**DECLARATION OF ROMANA PESCHKE IN SUPPORT OF
(A) CLASS REPRESENTATIVES' MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND PLAN OF ALLOCATION AND
(B) CO-CLASS COUNSEL'S MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND PAYMENT OF LITIGATION EXPENSES**

I, Romana Peschke, declare as follows:

1. I have a power of attorney for the Erste Asset Management GmbH (“Erste AM”), an asset management company based in Vienna, Austria, and one of the Court-appointed Class Representatives in the above-captioned securities class action (the “Action”).¹

2. I respectfully submit this Declaration in support of (a) approval of the proposed class action settlement and plan of allocation and (b) Co-Class Counsel’s motion for an award of attorneys’ fees and litigation expenses, which includes Erste AM’s application for reimbursement of costs and expenses pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”). I have knowledge of the matters related to Erste AM’s application and of the other matters set forth in this declaration as I, or others working at Erste AM, have been directly involved in monitoring and overseeing the prosecution of the Action, and I could and would testify competently thereto.

Work Performed by Erste AM on Behalf of the Class

3. Erste AM understands that the PSLRA was intended to encourage institutional investors with large losses to seek to manage and direct securities fraud class actions. Erste AM is a large, sophisticated institutional investor which, as part of its asset management services, is responsible for managing mutual funds, private funds, and institutional funds. As of 2022, Erste AM had approximately €75 billion of assets under management. Erste AM committed itself to prosecuting this Action vigorously through trial, if necessary. In seeking appointment as Lead Plaintiff and as a Class Representative in the case, Erste AM understood its fiduciary duties to serve in the best interests of the Class by participating in the management and prosecution of the case.

4. In its capacity first as Lead Plaintiff for the Class, and later as Class Representative, Erste AM provided value by, among other things: (a) conferring with counsel on the overall strategy for prosecuting the Action and maximizing the value of the recovery for

¹ All capitalized terms used herein, unless otherwise defined, have the same meanings as set forth in the Stipulation and Agreement of Settlement, dated as of September 11, 2023.

the Class; (b) reviewing pleadings and court filings; (c) evaluating regular status reports from counsel regarding developments in the litigation; (d) searching for and compiling relevant documents for production to the Defendants, including documents Erste AM voluntarily obtained from its non-party external managers; (e) preparing and sitting for a two-day deposition under Rule 30(b)(6) of the Federal Rules of Civil Procedure; (f) reviewing and verifying interrogatory and other discovery responses; (g) analyzing and responding to Defendants' settlement proposals; and (h) communicating with counsel regarding settlement negotiations and documents. After the Parties reached an agreement in principle to resolve the Action, as part of Erste AM's fiduciary duties to the Class, and independent of Co-Class Counsel's recommendation, Erste AM considered the reasonableness of the \$125 million Settlement and Co-Class Counsel's proposed fee and expense request.

Erste AM Endorses Approval of the Settlement

5. Based on its involvement throughout the prosecution and resolution of the Action, Erste AM believes that the proposed Settlement is fair, reasonable, and adequate to the Class. Because Erste AM believes that the proposed Settlement represents a substantial recovery for the Class, particularly in light of the substantial risks of continuing the Action, it endorses approval of the Settlement by the Court.

Erste AM Supports Co-Class Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses

6. Furthermore, Erste AM also believes that Co-Class Counsel's request for an award of attorneys' fees in an amount of up to 25% of the Settlement is fair and reasonable. Erste AM has evaluated the fee request in light of the work performed by Plaintiffs' Counsel, the risks and challenges in the Action, and the substantial recovery obtained for the Class. Erste AM understands that Plaintiffs' Counsel will also devote additional time in the future to administering the Settlement and distributing the Net Settlement Fund. Erste AM further believes that Co-Class Counsel's request for payment of litigation expenses is reasonable given that the costs and expenses in question were necessary for the successful prosecution and

resolution of this case. Based on the foregoing, and consistent with its obligation to obtain the best result at the most efficient cost on behalf of the Class, Erste AM fully supports Co-Class Counsel's motion for attorneys' fees and payment of litigation expenses.

7. In addition, Erste AM understands that reimbursement of a representative plaintiff's reasonable costs and expenses, including lost wages, is authorized under § 21D(a)(4) of the PSLRA, 15 U.S.C. § 78u-4(a)(4). Consequently, in connection with Co-Class Counsel's request for litigation expenses, Erste AM seeks reimbursement in the amount of \$24,000, as explained below.

8. I was one of the primary points of contact between Erste AM and counsel during the Action. My colleagues and I consulted with our attorneys regularly throughout the course of the Action, reviewed substantive Court filings, and gathered and analyzed voluminous documents in response to Defendants' discovery requests. Moreover, I reviewed materials in preparation for my 30(b)(6) deposition on March 1 and 2, 2022. My colleagues and I also regularly corresponded with our attorneys through e-mail and telephone conferences and worked with counsel regarding analyzing settlement proposals and settlement documents.

9. In total, Erste AM dedicated approximately 160 hours to the prosecution of this Action over the course of six years. This was time that was not spent attending to Erste AM's usual business. Our effective hourly rate claimed here is \$150 per hour.² The total cost of this time is \$24,000.

Conclusion

10. In conclusion, Erste AM endorses the Settlement as fair, reasonable, and adequate, and believes it represents a very favorable recovery for the Class. Erste AM further supports Co-Class Counsel's attorneys' fee and litigation expense request and believes that it represents fair and reasonable compensation for counsel in light of the extensive work performed, the recovery obtained for the Class, and the attendant litigation risks. Finally, Erste

² In arriving at an appropriate hourly rate, Erste AM considered several factors, including the rates approved by district courts in other PSLRA-governed cases, including in this District.

AM requests reimbursement in the amount of \$24,000, pursuant to the PSLRA. Accordingly, Erste AM respectfully requests that the Court approve the motion for final approval of the proposed Settlement and the motion for an award of attorneys' fees and payment of litigation expenses.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 08 day of November, 2023, at Vienna, Austria.



Romana Peschke
Legal Department
Power of attorney
Erste Asset Management GmbH

Exhibit E

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

BOSTON RETIREMENT SYSTEM,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

ALEXION PHARMACEUTICALS, INC.,
LEONARD BELL, DAVID L. HALLAL,
VIKAS SINHA,

Defendants.

Civ. No. 3:16-cv-2127 (AWT)

Hon. Alvin W. Thompson

**DECLARATION OF MICHAEL HAMPTON ON BEHALF OF
PUBLIC EMPLOYEE RETIREMENT SYSTEM OF IDAHO IN SUPPORT OF
(A) CLASS REPRESENTATIVES' MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND PLAN OF ALLOCATION AND
(B) CO-CLASS COUNSEL'S MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND PAYMENT OF LITIGATION EXPENSES**

I, Michael Hampton, declare as follows:

1. I am the Deputy Director of the Public Employee Retirement System of Idaho (“PERSI”). PERSI is one of the Court-appointed Class Representatives in the above-captioned securities class action, together with Erste Asset Management GmbH (“Erste AM”) (the “Action”).¹

2. I respectfully submit this declaration in support of (a) approval of the proposed Settlement and Plan of Allocation for the distribution of the proceeds of the Settlement and (b) Co-Class Counsel’s motion for an award of attorneys’ fees and litigation expenses, which includes PERSI’s application for reimbursement of costs and expenses pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”). I have knowledge of the matters related to PERSI’s application and of the other matters set forth in this declaration based on information provided by colleagues working with me on behalf of PERSI, including the Office of the Attorney General for the State of Idaho, and I could and would testify competently thereto.

Work Performed by PERSI on Behalf of the Class

3. My understanding is that the PSLRA was intended to encourage institutional investors with large losses to seek to manage and direct securities fraud class actions. PERSI is a public pension fund that provides retirement, disability, survivor, and other benefits to more than 100,000 members in the State of Idaho, and as of September 2023 had approximately \$22 billion of assets under management. PERSI committed itself to prosecuting this Action vigorously through trial, if necessary. In seeking appointment as a Lead Plaintiff and as a Class Representative in the case, PERSI understood its fiduciary duties to serve in the best interests of the Class by participating in the management and prosecution of the case.

4. In its capacity first as a Lead Plaintiff for the Class, and later as a Class Representative, PERSI, among other things: (a) conferred with counsel on the overall strategy

¹ All capitalized terms used herein, unless otherwise defined, have the same meanings as set forth in the Stipulation and Agreement of Settlement, dated as of September 11, 2023.

for prosecuting the Action and maximizing the value of the recovery for the Class; (b) reviewed pleadings and court filings; (c) evaluated regular status reports from counsel regarding developments in the litigation; (d) searched for and compiled documents for production to the Defendants; (e) prepared for and sat for a full-day deposition under Rule 30(b)(6) of the Federal Rules of Civil Procedure; (f) reviewed and verified interrogatory and other discovery responses; (g) attended two full-day mediation sessions, and analyzed and responded to Defendants' settlement proposals; and (h) communicated with counsel regarding settlement negotiations and documents, and authorized the acceptance of the Settlement.

PERSI Endorses Approval of the Settlement

5. Based on its involvement throughout the prosecution and resolution of the Action, PERSI believes that the proposed Settlement is fair, reasonable, and adequate to the Class. Because PERSI believes that the proposed Settlement represents a substantial recovery for the Class, particularly in light of the significant risks of continuing the Action, it endorses approval of the Settlement by the Court.

PERSI Supports Co-Class Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses

6. PERSI also believes that Co-Class Counsel's request for an award to Plaintiffs' Counsel of attorneys' fees in an amount of 25% of the Settlement is fair and reasonable. PERSI has evaluated the fee request in light of the work performed, the risks and challenges in the Action, and the substantial recovery obtained for the Class. PERSI understands that Plaintiffs' Counsel will also devote additional time in the future to administering the Settlement and distributing the Net Settlement Fund. PERSI further believes that Co-Class Counsel's request for payment of litigation expenses of no more than \$1.5 million is reasonable given that the costs and expenses in question were necessary for the successful prosecution and resolution of this long running and extensive case. Based on the foregoing, and consistent with its obligation to obtain the best result at the most efficient cost on behalf of the Class, PERSI fully supports Co-Class Counsel's motion for attorneys' fees and payment of litigation expenses.

7. In addition, PERSI understands that reimbursement of a representative plaintiff's reasonable costs and expenses, including lost wages, is authorized under § 21D(a)(4) of the PSLRA, 15 U.S.C. § 78u-4(a)(4). Consequently, in connection with Co-Class Counsel's request for litigation expenses, PERSI seeks reimbursement in the amount of \$27,960.00, as explained below.

8. PERSI and Cheryl George (Deputy Attorney General in the Office of the Attorney General for the State of Idaho) consulted with our attorneys regularly throughout the course of the Action, reviewed substantive Court filings, gathered and analyzed voluminous documents in response to Defendants' discovery requests, and responded to other discovery requests. Ms. George reviewed materials in preparation for PERSI's 30(b)(6) deposition and was deposed on February 8, 2022. PERSI, through Ms. George, also attended and participated in both mediation sessions before Judge Phillips, in addition to traveling and preparation in connection with the sessions. PERSI and Ms. George also regularly corresponded with our attorneys regarding analyzing settlement proposals and settlement documents.

9. In total, PERSI conservatively estimates that it dedicated approximately 120 hours to the prosecution of this Action over the course of the past six years. This was time that was not spent attending to PERSI's usual business. Using an effective hourly rate of \$233 per hour, the total cost of this time is \$27,960.00.²

Conclusion

10. In conclusion, PERSI endorses the Settlement as fair, reasonable, and adequate, and believes it represents a very favorable recovery for the Class. PERSI further supports Co-Class Counsel's attorneys' fee and litigation expense request and believes that it represents fair and reasonable compensation for counsel in light of the extensive work performed, the recovery obtained for the Class, and the attendant litigation risks. Finally, PERSI requests reimbursement in the amount of \$27,960.00, pursuant to the PSLRA. Accordingly, PERSI respectfully requests

² In arriving at an appropriate hourly rate, PERSI considered several factors, including the rates regularly used by PERSI in connection with litigation.

that the Court approve the motion for final approval of the proposed Settlement and the motion for an award of attorneys' fees and payment of litigation expenses.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 15 day of November, 2023, at Boise, Idaho.



Michael Hampton
Deputy Director

Exhibit F

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

BOSTON RETIREMENT SYSTEM,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

ALEXION PHARMACEUTICALS, INC.,
LEONARD BELL, DAVID L. HALLAL,
VIKAS SINHA,

Defendants.

Civ No. 3:16-cv-02127 (AWT)

Hon. Alvin W. Thompson

**DECLARATION OF LANCE CAVALLO REGARDING
(A) MAILING OF NOTICE AND CLAIM FORM; (B) PUBLICATION OF
SUMMARY NOTICE; (C) ESTABLISHMENT OF TELEPHONE HOTLINE AND
SETTLEMENT WEBSITE; AND (D) REPORT ON REQUESTS FOR EXCLUSION
RECEIVED TO DATE**

I, Lance Cavallo, declare and state as follows:

1. I am a Vice President of Class Actions at KCC Class Action Services, LLC (“KCC”). Pursuant to the Court’s September 19, 2023 Order Granting Preliminary Approval of Class Action Settlement, Approving Form and Manner of Notice, and Setting Date for Hearing on Final Approval of Settlement (“Preliminary Approval Order”), the Court approved the retention of KCC as Claims Administrator in connection with the proposed Settlement of the above-captioned litigation (the “Action”).¹ I have personal knowledge of the matters stated herein and, if called upon, could and would testify thereto.

¹ All terms with initial capitalization not otherwise defined herein shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement, dated as of September 11, 2023 (the “Stipulation”).

MAILING OF THE NOTICE AND CLAIM FORM

2. Pursuant to the Preliminary Approval Order, KCC is responsible for disseminating notice of the Settlement. Specifically, KCC is responsible for mailing the Notice of Pendency of Class Action, Proposed Settlement, and Motion for Attorneys' Fees and Expenses ("Notice") and Proof of Claim and Release Form ("Claim Form", together with the Notice, the "Notice Packet"). A copy of the Notice Packet is attached hereto as Exhibit A.

3. In accordance with the Stipulation and Preliminary Approval Order, KCC received from Co-Class Counsel a list of Alexion Pharmaceuticals, Inc. ("Alexion") shareholders of record provided by Alexion's transfer agent, containing the names and addresses of 99 persons and entities who acquired Alexion publicly traded common stock from January 30, 2014 through May 26, 2017, inclusive (the "Class Period"). On October 3, 2023, KCC disseminated the Notice Packets by first-class mail to the 99 potential Class Members contained on the aforementioned list.

4. As in most class actions of this nature, a large majority of potential class members are beneficial owners whose securities are held in "street name" – *i.e.*, the securities were purchased by brokerage firms, banks, institutions and other third-party nominees in the name of the nominee, on behalf of the beneficial owner. KCC maintains a proprietary database with the names and addresses of the largest and most common U.S. banks, brokerage firms, and nominees, including national and regional offices of certain nominees (the "Nominee Database"). KCC's Nominee Database is updated from time to time as new nominees are identified, and others merge or cease to exist. At the time of the

initial mailing, the Nominee Database contained 280 mailing records. On October 3, 2023, KCC caused Notice Packets to be mailed to the 280 mailing records contained in KCC's Nominee Database.

5. The Notice directed those who acquired Alexion publicly traded common stock from January 30, 2014 through May 26, 2017, inclusive, for the beneficial interest of persons or entities other than themselves to provide KCC with the names and addresses (and, if available, email addresses) of each of the beneficial owners. KCC then caused Notice Packets to be mailed promptly to the beneficial owners. Alternatively, nominees could request copies of the Notice Packet, in bulk, from KCC in order for them to promptly mail directly to the beneficial owners.

6. KCC also provided a copy of the Notice to the Depository Trust Company ("DTC") for posting on its Legal Notice System ("LENS"). The LENS may be accessed by any broker or other nominee that participates in DTC's security settlement system. The Notice was posted on DTC's LENS on October 3, 2023.

7. Following the initial mailing, through November 13, 2023, KCC has received an additional 55,133 unique names and addresses and 378 e-mail addresses of potential Class Members from individuals or nominees requesting that a Notice Packet be mailed and e-mailed to such persons or entities. Additionally, KCC has received bulk requests from nominees for an additional 260,415 Notice Packets for forwarding directly to their customers. All such requests have been responded to in a timely manner, and KCC will continue to disseminate Notice Packets upon receipt of any additional requests and/or upon receipt of updated addresses.

8. As a result of the efforts described above, as of November 13, 2023, KCC has mailed and e-mailed a total of 316,305 Notice Packets to potential Class Members and nominees.

PUBLICATION OF THE SUMMARY NOTICE

9. Pursuant to the Preliminary Approval Order, KCC caused the Summary Notice to be published in *The Wall Street Journal* and transmitted over *PR Newswire* on October 17, 2023. Attached hereto as Exhibit B are confirmations of such publication and transmittal.

TELEPHONE HOTLINE

10. KCC established and continues to maintain a toll-free telephone number (1-866-573-1726) for potential Class Members to call and obtain information about the Settlement, request a Notice Packet, and/or seek assistance from an operator during regular business hours. The toll-free telephone number is set forth in the Notice, Claim Form, Summary Notice, and on the Settlement Website.

SETTLEMENT WEBSITE

11. To further assist potential Class Members, KCC, in coordination with Co-Class Counsel, designed, implemented and currently maintains a website dedicated to the Settlement, www.AlexionSecuritiesSettlement.com (the “Settlement Website”). The address for the Settlement Website is set forth in the Notice, Claim Form, and Summary Notice. The Settlement Website became operational on October 3, 2023, and is accessible 24 hours a day, 7 days a week.

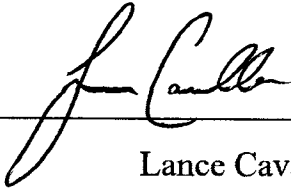
12. The Settlement Website lists the exclusion, objection, and claim submission deadlines, as well as the date, time and location of the Court's final Settlement Hearing. In addition, the Settlement Website contains links to copies of the Stipulation, the Preliminary Approval Order, the Notice, and the Claim Form, all of which can be downloaded by potential Class Members. The Settlement Website also enables potential Class Members to file a claim online and contains detailed instructions for entities that wish to submit claims electronically. KCC will continue operating, maintaining and, as appropriate, updating the Settlement Website until the conclusion of the claims administration process.

REPORT ON REQUESTS FOR EXCLUSION RECEIVED TO DATE

13. The Notice, Summary Notice, and Settlement Website inform potential Class Members that requests for exclusion from the Class must be addressed to *Alexion Securities Settlement*, c/o KCC Class Action Services, Exclusions, P.O. Box 5100, Larkspur, CA 94977-5100, such that they are received no later than November 29, 2023. The Notice also sets forth the information that must be included in each request for exclusion. As of November 13, 2023, KCC has received zero (0) requests for exclusion from the Class. KCC will submit a supplemental declaration after the November 29, 2023 exclusion deadline, which will report on any exclusion requests received.

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

Executed in Wantagh, New York on November 14, 2023.



Lance Cavallo

Exhibit A

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

BOSTON RETIREMENT SYSTEM, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

ALEXION PHARMACEUTICALS, INC., LEONARD BELL,
DAVID L. HALLAL, VIKAS SINHA,

Defendants.

Civ. No. 3:16-cv-02127 (AWT)

Hon. Alvin W. Thompson

**NOTICE OF PENDENCY OF CLASS ACTION, PROPOSED SETTLEMENT,
AND MOTION FOR ATTORNEYS' FEES AND EXPENSES**

If you purchased or otherwise acquired the publicly traded common stock of Alexion Pharmaceuticals, Inc. ("Alexion" or the "Company") from January 30, 2014 to May 26, 2017 inclusive (the "Class Period"), and were allegedly damaged thereby, you may be entitled to a payment from a class action settlement.

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

- This Notice describes important rights you may have and what steps you must take if you wish to participate in the Settlement of this securities class action, wish to object, or wish to be excluded from the Class.¹
- If approved by the Court, the proposed Settlement will create a \$125,000,000 fund, plus earned interest, for the benefit of eligible Class Members after the deduction of Court-approved fees, expenses, and Taxes. This is an average recovery of approximately \$0.76 per allegedly damaged share before deductions for awarded attorneys' fees and Litigation Expenses, and \$0.56 per allegedly damaged share after deductions for awarded attorneys' fees and Litigation Expenses.
- The Settlement resolves claims by Court-appointed Class Representatives Erste Asset Management GmbH, f/k/a Erste-Sparinvest Kapitalanlagegesellschaft mbH ("Erste") and Public Employee Retirement System of Idaho ("PERSI") that have been asserted on behalf of the Class (defined below) against Alexion, Leonard Bell, David L. Hallal, and Vikas Sinha (collectively, "Defendants"). The Settlement avoids the costs and risks of continuing the litigation; pays money to eligible investors; and releases the Released Defendant Parties (defined below) from liability.

If you are a Class Member, your legal rights will be affected by this Settlement whether you act or do not act.

Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

SUBMIT A CLAIM FORM BY DECEMBER 15, 2023	The <u>only</u> way to get a payment. See Question 8 for details.
EXCLUDE YOURSELF FROM THE CLASS BY NOVEMBER 29, 2023	Get no payment. This is the only option that, assuming your claim is timely brought, might allow you to ever bring or be part of any other lawsuit against Defendants and/or the other Released Defendant Parties concerning the Released Plaintiffs' Claims. See Question 10 for details.
OBJECT BY NOVEMBER 29, 2023	Write to the Court about why you do not like the Settlement, the Plan of Allocation for distributing the proceeds of the Settlement, and/or Co-Class Counsel's Fee and Expense Application. If you object, you will still be in the Class. See Question 14 for details.
PARTICIPATE IN A HEARING ON DECEMBER 20, 2023 AND FILE A NOTICE OF INTENTION TO APPEAR BY NOVEMBER 29, 2023	Ask to speak in Court at the Settlement Hearing about the Settlement. See Question 18 for details.
DO NOTHING	Get no payment. Give up rights. Still be bound by the terms of the Settlement.

- These rights and options—and the deadlines to exercise them—are explained below.
- The Court in charge of this case still has to decide whether to approve the proposed Settlement. Payments will be made to all eligible Class Members who timely submit valid Claim Forms, if the Court approves the Settlement and after any appeals are resolved.

¹ The terms of the Settlement are in the Stipulation and Agreement of Settlement, dated as of September 11, 2023 (the "Stipulation"), which can be viewed at www.AlexionSecuritiesSettlement.com. All capitalized terms not defined in this Notice have the same meanings as defined in the Stipulation.

WHAT THIS NOTICE CONTAINS

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2. How do I know if I am part of the Class? Page 3

3. Are there exceptions to being included? Page 3

4. Why is this a class action? Page 4

5. What is this case about and what has happened so far? Page 4

6. What are the reasons for the Settlement? Page 5

7. What does the Settlement provide? Page 5

8. How can I receive a payment? Page 5

9. What am I giving up to receive a payment and by staying in the Class? Page 6

10. How do I exclude myself from the Class? Page 7

11. If I do not exclude myself, can I sue Defendants and the other Released Defendant Parties for the same reasons later? Page 7

12. Do I have a lawyer in this case? Page 7

13. How will the lawyers be paid? Page 7

14. How do I tell the Court that I do not like something about the proposed Settlement? Page 7

15. What is the difference between objecting and seeking exclusion? Page 8

16. When and where will the Court decide whether to approve the Settlement? Page 8

17. Do I have to come to the Settlement Hearing? Page 8

18. May I speak at the Settlement Hearing? Page 8

19. What happens if I do nothing at all? Page 8

20. Are there more details about the Settlement? Page 9

21. How will my claim be calculated? Page 9

SPECIAL NOTICE TO SECURITIES BROKERS AND NOMINEES..... Page 12

PSLRA SUMMARY OF THE NOTICE

Statement of the Class’s Recovery

1. Class Representatives have entered into the proposed Settlement with Defendants which, if approved by the Court, will resolve the Action in its entirety. Subject to Court approval, Class Representatives, on behalf of the Class, have agreed to settle the Action in exchange for a payment of \$125,000,000 in cash (the “Settlement Amount”), which will be deposited into an interest-bearing Escrow Account (the “Settlement Fund”). Based on Class Representatives’ damages expert’s estimate of the number of shares of Alexion publicly traded common stock eligible to participate in the Settlement, and assuming that all investors eligible to participate in the Settlement do so, it is estimated that the average recovery, before deduction of any Court-approved fees and expenses, such as attorneys’ fees, Litigation Expenses, Taxes, and Notice and Administration Expenses, would be approximately \$0.76 per allegedly damaged share.² If the Court approves Co-Class Counsel’s Fee and Expense Application (discussed below), the average recovery would be approximately \$0.56 per allegedly damaged share. **These average recovery amounts are only estimates and Class Members may recover more or less than these estimates.** A Class Member’s actual recovery will depend on, for example: (i) the number and value of claims submitted; (ii) the amount of the Net Settlement Fund; (iii) when and how many shares of Alexion publicly traded common stock the Class Member purchased or acquired during the Class Period; and (iv) whether and when the Class Member sold Alexion publicly traded common stock. See the Plan of Allocation beginning on page 9 for information on the calculation of your Recognized Claim.

Statement of Potential Outcome of Case if the Action Continued to Be Litigated

2. The Parties disagree about both liability and damages and do not agree about the amount of damages that would be recoverable if Class Representatives were to prevail on each claim. The issues that the Parties disagree about include, for example: (i) whether Defendants made any statements or omissions that were materially false or misleading, or were otherwise actionable under the federal securities laws; (ii) whether any such statements or omissions were made with the requisite level of intent; (iii) the amount by which the price of Alexion publicly traded common stock was allegedly artificially inflated, if at all, during the Class Period; and (iv) the extent to which factors unrelated to the alleged fraud, such as general market, economic, and industry conditions, influenced the trading prices of Alexion publicly traded common stock during the Class Period.

3. Defendants have denied and continue to deny any and all allegations of wrongdoing or fault asserted in the Action, deny that they have committed any act or omission giving rise to any liability or violation of law, and deny that Class Representatives and the Class have suffered any loss attributable to Defendants’ actions or omissions.

² An allegedly damaged share might have been traded, and potentially damaged, more than once during the Class Period, and the average recovery indicated above represents the estimated average recovery for each share that allegedly incurred damages.

Statement of Attorneys' Fees and Expenses Sought

4. Co-Class Counsel, on behalf of Plaintiffs' Counsel,³ will apply to the Court for attorneys' fees from the Settlement Fund in an amount not to exceed 25% of the Settlement Fund, which includes any accrued interest, or \$31,250,000, plus accrued interest. Co-Class Counsel will also apply for payment of Litigation Expenses incurred in prosecuting the Action in an amount not to exceed \$1,500,000, plus accrued interest, which may include an application pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA") for the reasonable costs and expenses (including lost wages) of Class Representatives directly related to their representation of the Class. If the Court approves Co-Class Counsel's Fee and Expense Application in full, the average amount of fees and expenses is estimated to be approximately \$0.20 per allegedly damaged share of Alexion publicly traded common stock. A copy of the Fee and Expense Application will be posted on www.AlexionSecuritiesSettlement.com after it has been filed with the Court.

Reasons for the Settlement

5. For Class Representatives, the principal reason for the Settlement is the guaranteed cash benefit to the Class. This benefit must be compared to, among other factors, the uncertainty of being able to prove the allegations in the Amended Complaint; the risk that the Court may grant some or all of the anticipated summary judgment motions to be filed by Defendants; the uncertainty of a greater recovery after a trial and appeals; and the difficulties and delays inherent in such litigation.

6. For Defendants, who deny all allegations of wrongdoing or liability whatsoever and deny that Class Members were damaged, the principal reasons for entering into the Settlement are to end the burden, expense, uncertainty, and risk of further litigation.

Identification of Representatives

7. Class Representatives and the Class are represented by Co-Class Counsel, Michael H. Rogers, Labaton Sucharow LLP, 140 Broadway, New York, NY 10005, (888) 219-6877, www.labaton.com, settlementquestions@labaton.com; and Gregg S. Levin, Motley Rice LLC, 28 Bridgeside Blvd., Mount Pleasant, SC 29464, (855) 481-8480, www.motleyrice.com, alexionsettlementquestions@motleyrice.com.

8. Further information regarding the Action, the Settlement, and this Notice may be obtained by contacting the Claims Administrator: *Alexion Securities Settlement*, c/o KCC Class Action Services, P.O. Box 301170, Los Angeles, CA 90030-1170, (866) 573-1726, www.AlexionSecuritiesSettlement.com, info@AlexionSecuritiesSettlement.com.

Please Do Not Call the Court with Questions About the Settlement.

BASIC INFORMATION**1. Why did I get this Notice?**

9. The Court authorized that this Notice be sent to you because you or someone in your family may have purchased or otherwise acquired Alexion publicly traded common stock during the period from January 30, 2014 through May 26, 2017, inclusive. **Receipt of this Notice does not mean that you are a Member of the Class or that you will be entitled to receive a payment. The Parties to the Action do not have access to your individual investment information. If you wish to be eligible for a payment, you are required to submit the Claim Form that is being distributed with this Notice. See Question 8 below.**

10. The Court directed that this Notice be sent to Class Members because they have a right to know about the proposed Settlement of this class action lawsuit, and about all of their options, before the Court decides whether to approve the Settlement.

11. The Court in charge of the Action is the United States District Court for the District of Connecticut, and the case is known as *Boston Retirement System, et al. v. Alexion Pharmaceuticals, Inc., et al.*, Case No. 3:16-cv-02127 (AWT). The Action is assigned to the Honorable Alvin W. Thompson, United States District Judge.

2. How do I know if I am part of the Class?

12. The Court directed that everyone who fits the following description is a Class Member and subject to the Settlement unless they are an excluded person (see Question 3 below) or take steps to exclude themselves from the Class (see Question 10 below):

All persons or entities who purchased or otherwise acquired the publicly traded common stock of Alexion Pharmaceuticals, Inc. from January 30, 2014 to May 26, 2017, inclusive, and who were allegedly damaged thereby.

13. If one of your mutual funds purchased Alexion publicly traded common stock during the Class Period, that does not make you a Class Member, although your mutual fund may be. You are a Class Member only if you individually purchased or acquired Alexion publicly traded common stock during the Class Period. Check your investment records or contact your broker to see if you have any eligible purchases or acquisitions. The Parties to the Action do not independently have access to your trading information.

3. Are there exceptions to being included?

14. Yes. There are some individuals and entities who are excluded from the Class by definition. Excluded from the Class are: (i) Defendants; (ii) members of the Immediate Families of the Individual Defendants; (iii) Alexion's subsidiaries and affiliates; (iv) any person who is or was an officer or director of Alexion or any of the Company's subsidiaries or affiliates during the Class Period; (v) any entity in which any Defendant has a controlling interest; and (vi) the legal representatives, heirs, successors, and assigns of any such excluded person or entity. Also excluded from the Class is anyone who timely and validly seeks exclusion from the Class in accordance with the procedures described in Question 10 below.

³ "Plaintiffs' Counsel" are Labaton Sucharow LLP, Motley Rice LLC, Sturman LLC, and Risch Pisca, PLLC.

4. Why is this a class action?

15. In a class action, one or more persons or entities (in this case, Class Representatives), sue on behalf of people and entities who have similar claims. Together, these people and entities are a “class,” and each is a “class member.” A class action allows one court to resolve, in a single case, many similar claims that, if brought separately by individual people, might be too small economically to litigate. One court resolves the issues for all class members at the same time, except for those who exclude themselves, or “opt-out,” from the class. In this Action, the Court has appointed Erste and PERSI to serve as Class Representatives and has appointed Labaton Sucharow LLP and Motely Rice LLC to serve as Co-Class Counsel.

5. What is this case about and what has happened so far?

16. Alexion is a pharmaceutical drug company that, during the Class Period, generated nearly all of its revenue from selling the Company’s flagship drug, Soliris, which treats, among others, patients suffering from one of two ultra-rare diseases, paroxysmal nocturnal hemoglobinuria (“PNH”) and atypical hemolytic uremic syndrome (“aHUS”). In the Action, Class Representatives alleged that Defendants made materially false and misleading statements and omissions principally connected to Alexion’s sales practices in connection with the marketing of Soliris. Class Representatives further alleged that the price of Alexion common stock was artificially inflated as a result of the allegedly false and misleading statements and omissions and that the Company’s stock price declined when the alleged truth about Alexion’s business was allegedly revealed through a series of partial corrective disclosures beginning with information released on November 4, 2016, which allegedly affected the price of Alexion common stock on November 7, 2016 and thereafter.

17. On December 29, 2016, a class action complaint (*Boston Retirement System v. Alexion Pharmaceuticals, Inc., et al.*, 3:16-cv-02127-AWT) was filed against the Defendants in the United States District Court for the District of Connecticut alleging violations of the federal securities laws.

18. By Order dated April 12, 2017, the Court: (i) appointed Erste and PERSI as Lead Plaintiffs; and (ii) approved Labaton Sucharow LLP and Motley Rice LLC as Co-Lead Counsel.

19. On July 14, 2017, Lead Plaintiffs filed their Consolidated Class Action Complaint for Violation of the Federal Securities Laws (the “Complaint”) against Defendants and David Brennan (“Brennan”), David J. Anderson (“Anderson”), Ludwig N. Hantson (“Hantson”), and Carsten Thiel (“Thiel”), asserting claims under Section 10(b) of the Securities Exchange Act of 1934 (the “Exchange Act”) and Rule 10b-5 promulgated thereunder, and under Section 20(a) of the Exchange Act.

20. On September 12, 2017, Defendants, and the other then-named defendants, filed a motion to dismiss the Complaint. On November 13, 2017, Lead Plaintiffs filed their memorandum of law in opposition to the motion to dismiss and, on December 28, 2017, defendants filed their reply. On March 26, 2019, during a telephonic status conference with the Court, the Court informed counsel that, among other things, the Court was preparing a ruling granting defendants’ motion to dismiss. At that same time, the Court inquired as to whether Co-Lead Counsel intended to rely on the then-current Complaint or would be seeking leave to amend the Complaint once the Court issued an order granting the motion to dismiss. The Court further indicated that if Lead Plaintiffs wished to file an amended complaint, the Court would allow them to do so.

21. On June 2, 2019, Lead Plaintiffs filed the Amended Consolidated Class Action Complaint for Violation of the Federal Securities Laws (the “Amended Complaint”) asserting claims against Alexion, Bell, Hallal, Sinha, Brennan, Anderson, Hantson, and Thiel under Section 10(b) of the Exchange Act and against the individual defendants under Section 20(a). The allegations in the Amended Complaint included new factual allegations, including information from five confidential witnesses (“CWs”).

22. On August 2, 2019, defendants filed a motion to dismiss the Amended Complaint. On October 2, 2019, Lead Plaintiffs filed their memorandum of law in opposition to defendants’ motion to dismiss the Amended Complaint, and, on November 15, 2019, defendants filed their reply.

23. On August 19, 2021, the Court entered its Ruling on the Motion to Dismiss denying in part and granting in part the motion. On October 18, 2021, the Defendants filed their Answer to the Amended Complaint.

24. Prior to the start of formal discovery in the Action, Lead Plaintiffs, through Co-Lead Counsel, conducted their own investigation relating to the claims, defenses, and underlying events and transactions that are the subject of the Action. This process included reviewing and analyzing: (i) documents filed publicly by the Company with the U.S. Securities and Exchange Commission (“SEC”); (ii) publicly available information, including press releases, news articles, and other public statements issued by or concerning the Company and the Defendants; (iii) research reports issued by financial analysts concerning the Company; (iv) other publicly available information and data concerning the Company; and (v) the applicable law governing the claims and potential defenses. Co-Lead Counsel also identified approximately 458 former Alexion employees and other persons with relevant knowledge, contacted approximately 414 of them, and interviewed approximately 68 of them (five of whom provided information for use in the Amended Complaint as CWs), and consulted with experts on damages issues.

25. Formal discovery in the Action commenced in August 2021. Defendants produced approximately 505,000 documents (numbering approximately 3,500,000 pages), and Lead Plaintiffs produced approximately 3,000 documents (numbering approximately 76,000 pages). Furthermore, third parties produced approximately 4,000 documents (numbering approximately 105,000 pages), and CWs produced approximately 150 documents. In total, approximately 512,500 documents were produced by the Parties and third parties in formal discovery.

26. Additionally, during discovery, Lead Plaintiffs took thirteen merits depositions of Alexion former and current employees. Defendants took four merits depositions of Lead Plaintiffs’ CWs and one merits deposition of a third-party patient advocacy organization.

27. On December 15, 2021, Lead Plaintiffs filed their motion for class certification and appointment of class counsel.

28. In connection with Lead Plaintiffs' December 15, 2021 class certification motion, Defendants deposed, and Lead Plaintiffs defended the depositions of, a representative from PERSI and a representative from Erste, as well as Lead Plaintiffs' experts Chad Coffman and Martin Karollus. Defendants also deposed, and Lead Plaintiffs cross-examined, representatives from one of Lead Plaintiffs' investment managers, Peregrine. In addition, Lead Plaintiffs deposed Defendants' expert, David Smith. Furthermore, Defendants served, and Lead Plaintiffs responded to, multiple interrogatories.

29. On April 15, 2022, Defendants filed their opposition to Lead Plaintiffs' motion for class certification and appointment of class counsel. On June 17, 2022, Lead Plaintiffs filed their reply. On July 5, 2022, Defendants moved for leave to file a sur-reply, which the Court granted on July 8, 2022.

30. On April 13, 2023, the Court granted Lead Plaintiffs' class certification motion, certifying the Class and appointing Lead Plaintiffs as "Class Representatives" and Co-Lead Counsel as "Co-Class Counsel."

31. On May 3, 2023, Defendants filed a Rule 23(f) petition before the U.S. Court of Appeals for the Second Circuit (2d Cir., Case No. 23-709), which was pending at the time the Settlement was reached. On August 3, 2023, the Parties jointly moved the Second Circuit to hold Defendants' 23(f) petition in abeyance in light of this Settlement, which the Second Circuit granted on August 8, 2023.

32. The Parties first began exploring the possibility of a negotiated settlement in mid-2022. Specifically, the Parties agreed to engage in mediation and subsequently retained retired United States District Court Judge Layn R. Phillips to act as mediator in the case (the "Mediator"). On September 16, 2022, Co-Class Counsel and Defendants' Counsel, among others, participated in a full-day mediation session before the Mediator. In advance of that session, the Parties submitted detailed mediation statements to the Mediator, together with numerous supporting exhibits, which addressed both liability and damages. The session ended without any agreement being reached.

33. Thereafter, the Parties continued discussions with the Mediator, exploring the possibility of a settlement. The Parties participated in a second mediation session before the Mediator on July 28, 2023. In advance of that session, the Parties submitted supplemental mediation statements and exhibits. At the conclusion of this mediation session, the Mediator issued a mediator's proposal, setting a deadline for the Parties to provide the Mediator with their respective responses.

34. On August 2, 2023, the Parties agreed to settle the Action, which was memorialized in a term sheet executed and finalized on August 3, 2023 (the "Term Sheet"), subject to the execution of a customary "long form" stipulation and agreement of settlement and related papers. The Stipulation was filed with the Court on September 13, 2023.

6. What are the reasons for the Settlement?

35. The Court did not finally decide in favor of Class Representatives or Defendants. Instead, both sides agreed to a settlement. Class Representatives and Co-Class Counsel believe that the claims asserted in the Action have merit. They recognize, however, the expense and length of continued proceedings needed to pursue the claims through trial and appeals, as well as the difficulties in establishing liability. Assuming the claims proceeded to trial, the Parties would present factual and expert testimony on each of the disputed issues, and there is risk that the Court or jury would resolve these issues unfavorably against Class Representatives and the class. In light of the Settlement and the guaranteed cash recovery to the Class, Class Representatives and Co-Class Counsel believe that the proposed Settlement is fair, reasonable, and adequate, and in the best interests of the Class.

36. Defendants have denied and continue to deny each and every one of the claims alleged by Class Representatives in the Action, including all claims in the Amended Complaint, and specifically deny any wrongdoing and that they have committed any act or omission giving rise to any liability or violation of law. Defendants deny the allegations that they knowingly, or otherwise, made any material misstatements or omissions; that any Member of the Class has suffered damages; that the prices of Alexion's publicly traded common stock were artificially inflated by reason of the alleged misrepresentations, omissions, or otherwise; or that Members of the Class were harmed by the conduct alleged. Nonetheless, Defendants have concluded that continuation of the Action would be protracted and expensive, and have taken into account the uncertainty and risks inherent in any litigation, especially a complex case like this Action.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

37. In exchange for the Settlement and the release of the Released Plaintiffs' Claims against the Released Defendant Parties (see Question 9 below), Defendants have agreed to cause a \$125,000,000 payment to be made, which, along with any interest earned, will be distributed after deduction of Court-awarded attorneys' fees and Litigation Expenses, Notice and Administration Expenses, Taxes, and any other fees or expenses approved by the Court (the "Net Settlement Fund"), to Class Members who submit valid and timely Claim Forms and are found to be eligible to receive a distribution from the Net Settlement Fund.

8. How can I receive a payment?

38. To qualify for a payment from the Net Settlement Fund, you must submit a timely and valid Claim Form. A Claim Form is included with this Notice. You may also obtain one from the website dedicated to the Settlement: www.AlexionSecuritiesSettlement.com, or from Co-Class Counsel's websites: www.labaton.com and www.motleystone.com, or submit a claim online at www.AlexionSecuritiesSettlement.com. You can also request that a Claim Form be mailed to you by calling the Claims Administrator toll-free at (866) 573-1726.

39. Please read the instructions contained in the Claim Form carefully, fill out the Claim Form, include all the documents the form requests, sign it, and mail or submit it to the Claims Administrator so that it is **postmarked or received no later than December 15, 2023**.

9. What am I giving up to receive a payment and by staying in the Class?

40. If you are a Class Member and do not timely and validly exclude yourself from the Class, you will remain in the Class and that means that, upon the “Effective Date” of the Settlement, you will release all “Released Plaintiffs’ Claims” against the “Released Defendant Parties.” All of the Court’s orders about the Settlement, whether favorable or unfavorable, will apply to you and legally bind you.

(a) **“Released Plaintiffs’ Claims”** mean any and all claims, demands, losses, rights, and causes of action of every nature and description, whether known or Unknown (defined below), whether arising under federal, state, common, or foreign law, that Class Representatives or any other member of the Class (i) asserted in the Amended Consolidated Complaint for Violation of the Federal Securities Laws filed in the Action on June 2, 2019 (Amended Complaint) or (ii) could have asserted, or could in the future assert, in any court or forum that arise out of or relate to any of the allegations, transactions, facts, matters or occurrences, representations or omissions involved, set forth, or referred to in the Amended Complaint and that relate in any way, directly or indirectly, to the purchase, acquisition, holding, sale or disposition of Alexion common stock during the Class Period. Released Plaintiffs’ Claims do not cover, include, or release: (i) any claims relating to the enforcement of the Settlement, or (ii) any claims of any person or entity that submits a request for exclusion from the Class that is accepted by the Court.

(b) **“Released Defendant Parties”** mean Defendants, Defendants’ Counsel, and each of their respective past or present parents, affiliates, subsidiaries, principals, successors, predecessors, assigns, assignees, officers, directors, shareholders, trustees, partners, agents, representatives, fiduciaries, contractors, employees, employers, attorneys, insurers, advisors, underwriters; the Spouses, members of the Immediate Families, representatives, and heirs of the Individual Defendants, as well as any trust of which any Individual Defendant is the settlor or which is for the benefit of any of their Immediate Family members; any firm, trust, corporation, or entity in which any Defendant has a controlling interest; and each of the legal representatives, heirs, executors, administrators, successors in interest, or assigns of Defendants, including, but not limited to, AstraZeneca PLC and any of its subsidiaries.

(c) **“Unknown Claims”** mean any and all Released Plaintiffs’ Claims that Class Representatives or any other Class Member does not know or suspect to exist in his, her, or its favor at the time of the release of the Released Defendant Parties, and any and all Released Defendants’ Claims that any Defendant does not know or suspect to exist in his, her, or its favor at the time of the release of the Released Plaintiff Parties, which if known by him, her, or it might have affected his, her, or its decision(s) with respect to the Settlement, including the decision to object to the terms of the Settlement or to exclude himself, herself, or itself from the Class. With respect to any and all Released Plaintiffs’ Claims and Released Defendants’ Claims, the Parties stipulate and agree that, upon the Effective Date, Class Representatives and Defendants shall expressly, and each other Class Member shall be deemed to have, and by operation of the Judgment or Alternative Judgment shall have, to the fullest extent permitted by law, expressly waived and relinquished any and all provisions, rights, and benefits conferred by any law of any state or territory of the United States or foreign law, or principle of common law, which is similar, comparable, or equivalent to Cal. Civ. Code § 1542, which provides:

A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.

Class Representatives, other Class Members, or Defendants may hereafter discover facts, legal theories, or authorities in addition to or different from those which any of them now knows or believes to be true with respect to the subject matter of the Released Plaintiffs’ Claims and the Released Defendants’ Claims, but Class Representatives and Defendants shall expressly, fully, finally, and forever settle and release, and each Class Member shall be deemed to have settled and released, and upon the Effective Date and by operation of the Judgment or Alternative Judgment shall have settled and released, fully, finally, and forever, any and all Released Plaintiffs’ Claims and Released Defendants’ Claims as applicable, without regard to the subsequent discovery or existence of such different or additional facts, legal theories, or authorities. Class Representatives and Defendants acknowledge, and other Class Members by operation of law shall be deemed to have acknowledged, that the inclusion of “Unknown Claims” in the definition of Released Plaintiffs’ Claims and Released Defendants’ Claims was separately bargained for and was a material element of the Settlement.

41. The “Effective Date” will occur when an Order entered by the Court approving the Settlement becomes Final and is not subject to appeal.

42. Upon the “Effective Date,” Defendants will also provide a release of any claims against Class Representatives and the Class arising out of or related to the institution, prosecution, or settlement of the claims in the Action.

EXCLUDING YOURSELF FROM THE SETTLEMENT CLASS

43. If you want to keep any right you may have to sue or continue to sue Defendants and the other Released Defendant Parties on your own concerning the Released Plaintiffs’ Claims, then you must take steps to remove yourself from the Class. This is called excluding yourself or “opting out.” **Please note: If you decide to exclude yourself from the Class, there is a risk that any lawsuit you may file to pursue claims alleged in the Action may be dismissed, including because the suit is not filed within the applicable time periods required for filing suit.** Defendants have the option to terminate the Settlement if a certain amount of Class Members request exclusion.

10. How do I exclude myself from the Class?

44. To exclude yourself from the Class, you must mail a signed letter stating that you request to be “excluded from the Class in *Boston Retirement System, et al. v. Alexion Pharmaceuticals, Inc., et al.*, Case No. 3:16-cv-02127 (AWT) (D. Conn.)” You cannot exclude yourself by telephone or e-mail. Each request for exclusion must also: (i) state the name, address, email, and telephone number of the Person seeking exclusion; (ii) state the date(s), price(s), and number(s) of shares of all purchases, acquisitions, and sales of Alexion publicly traded common stock during the Class Period; and (iii) be signed by the Person requesting exclusion. A request for exclusion must be mailed so that it is **received no later than November 29, 2023** at:

Alexion Securities Settlement
c/o KCC Class Action Services
EXCLUSIONS
P.O. Box 5100
Larkspur, CA 94977-5100

45. This information is needed to determine whether you are a member of the Class. Your exclusion request must comply with these requirements in order to be valid.

46. If you ask to be excluded, do not submit a Claim Form because you cannot receive any payment from the Net Settlement Fund. Also, you cannot object to the Settlement because you will not be a Class Member and the Settlement will not affect you. If you submit a valid exclusion request, you will not be legally bound by anything that happens in the Action, and you may be able to sue (or continue to sue) Defendants and the other Released Defendant Parties in the future.

11. If I do not exclude myself, can I sue Defendants and the other Released Defendant Parties for the same reasons later?

47. No. Unless you properly exclude yourself, you will give up any rights to sue Defendants and the other Released Defendant Parties for any and all Released Plaintiffs’ Claims. If you have a pending lawsuit against any of the Released Defendant Parties, **speak to your lawyer in that case immediately**. You must exclude yourself from this Class to continue your own lawsuit. Remember, the exclusion deadline is **November 29, 2023**.

THE LAWYERS REPRESENTING YOU**12. Do I have a lawyer in this case?**

48. Labaton Sucharow LLP and Motley Rice LLC are Co-Class Counsel in the Action and represent all Class Members. You will not be separately charged for these lawyers. The Court will determine the amount of attorneys’ fees and Litigation Expenses, which will be paid from the Settlement Fund. If you want to be represented by your own lawyer, you may hire one at your own expense.

13. How will the lawyers be paid?

49. Co-Class Counsel, together with the other Plaintiffs’ Counsel, have been prosecuting the Action on a contingent basis and have not been paid for any of their work. Co-Class Counsel, on behalf of themselves and the other Plaintiffs’ Counsel, will seek an attorneys’ fee award of no more than 25% of the Settlement Fund, which will include accrued interest. Co-Class Counsel has agreed to share the awarded attorneys’ fees with other Plaintiffs’ Counsel. Co-Class Counsel will also seek payment of Litigation Expenses incurred by Plaintiffs’ Counsel in the prosecution of the Action of no more than \$1,500,000, plus accrued interest, which may include an application in accordance with the PSLRA for the reasonable costs and expenses (including lost wages) of Class Representatives directly related to their representation of the Class. As explained above, any attorneys’ fees and expenses awarded by the Court will be paid from the Settlement Fund. Class Members are not personally liable for any such fees or expenses.

**OBJECTING TO THE SETTLEMENT, THE PLAN OF ALLOCATION, OR
THE FEE AND EXPENSE APPLICATION****14. How do I tell the Court that I do not like something about the proposed Settlement?**

50. If you are a Class Member, you can object to the Settlement or any of its terms, the proposed Plan of Allocation of the Net Settlement Fund, and/or Co-Class Counsel’s Fee and Expense Application. You may write to the Court about why you think the Court should not approve any or all of the Settlement terms or related relief. If you would like the Court to consider your views, you must file a proper objection within the deadline, and according to the following procedures.

51. To object, you must send a signed letter stating that you object to the proposed Settlement, the Plan of Allocation, and/or the Fee and Expense Application in *Boston Retirement System, et al. v. Alexion Pharmaceuticals, Inc., et al.*, Case No. 3:16-cv-02127 (AWT) (D. Conn.). The objection must also: (i) state the name, address, telephone number, and email address of the objector and must be signed by the objector; (ii) contain a statement of the Class Member’s objection or objections and the specific reasons for the objection, including whether it applies only to the objector, to a specific subset of the Class, or to the entire Class, and any legal and evidentiary support (including witnesses) the Class Member wishes to bring to the Court’s attention; and (iii) include documents sufficient to show the objector’s membership in the Class, including the number of shares of Alexion publicly traded common stock purchased, acquired, and sold during the Class Period, as well as the dates and prices of each such purchase, acquisition, and sale. Unless otherwise ordered by the Court, any Class Member who does not object in the manner described in this Notice will be deemed to have waived any objection and will be foreclosed from making any objection to the proposed Settlement, the Plan of Allocation, and/or Co-Class Counsel’s Fee and Expense Application. Your objection must be filed with the Court **no later than November 29, 2023** and be mailed or delivered to the following counsel so that it is **received no later than November 29, 2023**:

Court	Co-Class Counsel	Defendants' Counsel
Clerk of the Court United States District Court District of Connecticut Abraham Ribicoff Federal Building 450 Main Street Hartford, CT 06103	Labaton Sucharow LLP Michael H. Rogers, Esq. 140 Broadway New York, NY 10005 Motley Rice LLC Gregg S. Levin, Esq. 28 Bridgeside Blvd. Mount Pleasant, SC 29464	Paul, Weiss, Rifkind, Wharton & Garrison LLP Audra Soloway, Esq. 1285 Avenue of the Americas New York, NY 10019 Paul, Weiss, Rifkind, Wharton & Garrison LLP Jane O'Brien, Esq. 2001 K Street, NW Washington, DC 20006

52. You do not need to attend the Settlement Hearing to have your written objection considered by the Court. However, any Class Member who has complied with the procedures described in this Question 14 and below in Question 18 may appear at the Settlement Hearing and be heard, to the extent allowed by the Court. An objector may appear in person or arrange, at his, her, or its own expense, for a lawyer to represent him, her, or it at the Settlement Hearing.

15. What is the difference between objecting and seeking exclusion?

53. Objecting is telling the Court that you do not like something about the proposed Settlement, Plan of Allocation, or Co-Class Counsel's Fee and Expense Application. You can still recover money from the Settlement. You can object *only* if you stay in the Class. Excluding yourself is telling the Court that you do not want to be part of the Class. If you exclude yourself from the Class, you have no basis to object because the Settlement and the Action no longer affect you.

THE SETTLEMENT HEARING

16. When and where will the Court decide whether to approve the Settlement?

54. The Court will hold the Settlement Hearing on **December 20, 2023 at 1:30 p.m.**, either remotely or in person, at the Abraham Ribicoff Federal Building, United States Courthouse, South Courtroom, 450 Main Street, Hartford, CT 06103.

55. At this hearing, the Honorable Alvin W. Thompson will consider whether: (i) the Settlement is fair, reasonable, adequate, and should be approved; (ii) the Plan of Allocation is fair and reasonable, and should be approved; and (iii) the application of Co-Class Counsel for an award of attorneys' fees and payment of Litigation Expenses is reasonable and should be approved. The Court will take into consideration any written objections filed in accordance with the instructions in Question 14 above. We do not know how long it will take the Court to make these decisions.

56. The Court may change the date and time of the Settlement Hearing, or hold the hearing remotely, without another individual notice being sent to Class Members. If you want to attend the hearing, you should check with Co-Class Counsel beforehand to be sure that the date and/or time has not changed, or periodically check the Settlement website at www.AlexionSecuritiesSettlement.com to see if the Settlement Hearing stays as scheduled or is changed.

17. Do I have to come to the Settlement Hearing?

57. No. Co-Class Counsel will answer any questions the Court may have. But, you are welcome to attend at your own expense. If you submit a valid and timely objection, the Court will consider it and you do not have to come to Court to discuss it. You may have your own lawyer attend (at your own expense), but it is not required. If you do hire your own lawyer, he or she must file and serve a Notice of Appearance in the manner described in the answer to Question 18 below **no later than November 29, 2023**.

18. May I speak at the Settlement Hearing?

58. You may ask the Court for permission to speak at the Settlement Hearing. To do so, you must, **no later than November 29, 2023**, submit a statement that you, or your attorney, intend to appear in "*Boston Retirement System, et al. v. Alexion Pharmaceuticals, Inc., et al.*, Case No. 3:16-cv-02127 (AWT) (D. Conn.)." If you intend to present evidence at the Settlement Hearing, you must also include in your objections (prepared and submitted according to the answer to Question 14 above) the identities of any witnesses you may wish to call to testify and any exhibits you intend to introduce into evidence at the Settlement Hearing. You may not speak at the Settlement Hearing if you exclude yourself from the Class or if you have not provided written notice of your intention to speak at the Settlement Hearing in accordance with the procedures described in this Question 18 and Question 14 above.

IF YOU DO NOTHING

19. What happens if I do nothing at all?

59. If you do nothing and you are a member of the Class, you will receive no money from this Settlement and you will be precluded from starting a lawsuit, continuing with a lawsuit, or being part of any other lawsuit against Defendants and the other Released Defendant Parties concerning the Released Plaintiffs' Claims. To share in the Net Settlement Fund, you must submit a Claim Form (see Question 8 above). To start, continue, or be a part of any other lawsuit against Defendants and the other Released Defendant Parties concerning the Released Plaintiffs' Claims, you must exclude yourself from the Class (see Question 10 above).

GETTING MORE INFORMATION

20. Are there more details about the Settlement?

60. This Notice summarizes the proposed Settlement. More details are contained in the Stipulation. You may review the Stipulation filed with the Court or other documents in the case during business hours at the Office of the Clerk of the United States District Court, District of Connecticut, Abraham Ribicoff Federal Building, 450 Main Street, Hartford, CT 06103. (Please check the Court's website, www.ctd.uscourts.gov, for information about Court closures before visiting.) Subscribers to PACER, a fee-based service, can also view the papers filed publicly in the Action through the Court's online Case Management/Electronic Case Files System at <https://www.pacer.gov>.

61. You can also get a copy of the Stipulation, and other documents related to the Settlement, as well as additional information about the Settlement by visiting the website dedicated to the Settlement, www.AlexionSecuritiesSettlement.com, or the websites of Co-Class Counsel, www.labaton.com and www.motleyrice.com. You may also call the Claims Administrator toll-free at (866) 573-1726 or write to the Claims Administrator at *Alexion Securities Settlement*, c/o KCC Class Action Services, P.O. Box 301170, Los Angeles, CA 90030-1170. **Please do not call the Court with questions about the Settlement.**

PLAN OF ALLOCATION OF THE NET SETTLEMENT FUND**21. How will my claim be calculated?**

62. The Plan of Allocation set forth below is the plan for calculating claims and distributing the proceeds of the Settlement that is being proposed by Class Representatives and Co-Class Counsel to the Court for approval. The Court may approve this Plan of Allocation or modify it without additional notice to the Class. Any order modifying the Plan of Allocation will be posted on the Settlement website www.AlexionSecuritiesSettlement.com, www.labaton.com, and motleyrice.com.

63. As noted above, the Settlement Amount and the interest it earns is the Settlement Fund. The Settlement Fund, after deduction of Court-approved attorneys' fees and Litigation Expenses, Notice and Administration Expenses, Taxes, and any other fees or expenses approved by the Court is the Net Settlement Fund. The Net Settlement Fund will be distributed to members of the Class who timely submit valid Claim Forms that show a "Recognized Claim" according to the proposed Plan of Allocation (or any other plan of allocation approved by the Court). Class Members who do not timely submit valid Claim Forms will not share in the Net Settlement Fund, but will still be bound by the Settlement.

64. The objective of this Plan of Allocation is to distribute the Net Settlement Fund among claimants who allegedly suffered economic losses as a result of the alleged wrongdoing. To design this Plan, Co-Class Counsel conferred with Class Representatives' damages expert. This Plan is intended to be generally consistent with an assessment of, among other things, the damages that Class Representatives and Co-Class Counsel believe were recoverable in the Action. The Plan of Allocation, however, is not a formal damages analysis and the calculations made pursuant to the Plan are not intended to be estimates of, nor indicative of, the amounts that Class Members might have been able to recover after a trial. The calculations pursuant to the Plan of Allocation are also not estimates of the amounts that will be paid to Authorized Claimants. An individual Class Member's recovery will depend on, for example: (i) the total number and value of claims submitted; (ii) when the claimant purchased or acquired Alexion publicly traded common stock; and (iii) whether and when the claimant sold his, her, or its shares of Alexion publicly traded common stock. The computations under the Plan of Allocation are only a method to weigh the claims of Authorized Claimants against one another for the purposes of making *pro rata* allocations of the Net Settlement Fund. The Claims Administrator will determine each Authorized Claimant's *pro rata* share of the Net Settlement Fund based upon each Authorized Claimant's "Recognized Claim."

65. For losses to be compensable damages under the federal securities laws, the disclosure of the allegedly misrepresented information must be the cause of the decline in the price of the securities at issue. In this case, Class Representatives allege that Defendants issued materially false statements and omitted material facts during the Class Period, which allegedly artificially inflated the price of Alexion publicly traded common stock. It is alleged that corrective information released to the market on November 4, 2016, November 9, 2016, December 12, 2016, March 6, 2017, May 8, 2017, May 23, 2017, and May 24, 2017, negatively impacted the market price of Alexion common stock on November 7, 2016; November 10 and 11, 2016; December 12 and 13, 2016; March 6 and 7, 2017; May 8, 2017; May 23, 2017; and May 24, 25, and 26, 2017, and removed the alleged artificial inflation from the share price on those days. Accordingly, in order to have a compensable loss in this Settlement, the shares of Alexion common stock must have been purchased or otherwise acquired during the Class Period and held through at least one of the alleged corrective disclosure dates listed above.

CALCULATION OF RECOGNIZED LOSS AMOUNTS

66. For purposes of determining whether a claimant has a "Recognized Claim," if a Class Member has more than one purchase/acquisition or sale of Alexion publicly traded common stock during the Class Period, all purchases/acquisitions and sales will be matched on a "First in First Out" (FIFO) basis. Class Period sales will be matched first against any holdings at the beginning of the Class Period and then against purchases/acquisitions in chronological order, beginning with the earliest purchase/acquisition made during the Class Period.

67. A "Recognized Loss Amount" will be calculated as set forth for each purchase of Alexion common stock during the Class Period from January 30, 2014 through May 26, 2017 that is listed in the Claim Form and for which adequate documentation is provided. To the extent that the calculation of a claimant's Recognized Loss Amount results in a negative number, that number shall be set to zero.

68. For each share of Alexion common stock purchased or otherwise acquired during the Class Period and sold before the close of trading on August 23, 2017, an "Out of Pocket Loss" will be calculated. Out of Pocket Loss is defined as the purchase

price (excluding all fees, taxes, and commissions) minus the sale price (excluding all fees, taxes, and commissions). To the extent that the calculation of the Out of Pocket Loss results in a negative number, that number shall be set to zero.

69. **For each share of Alexion common stock purchased or acquired from January 30, 2014 through and including May 26, 2017, and:**

- A. Sold before November 7, 2016, the Recognized Loss Amount for each such share shall be zero.
- B. Sold from November 7, 2016 through May 26, 2017, the Recognized Loss Amount for each such share shall be **the lesser of**:
 1. the dollar artificial inflation applicable to each such share on the date of purchase/acquisition as set forth in **Table 1** below minus the dollar artificial inflation applicable to each such share on the date of sale as set forth in **Table 1** below; or
 2. the Out of Pocket Loss.
- C. Sold after the close of trading on May 26, 2017 and before the close of trading on August 23, 2017, the Recognized Loss Amount for each such share shall be **the least of**:
 1. the dollar artificial inflation applicable to each such share on the date of purchase/acquisition as set forth in Table 1 below; or
 2. the actual purchase/acquisition price of each such share minus the average closing price from May 26, 2017, up to the date of sale as set forth in Table 2 below; or
 3. the Out of Pocket Loss.
- D. Held as of the close of trading on August 23, 2017, the Recognized Loss Amount for each such share shall be **the lesser of**:
 1. the dollar artificial inflation applicable to each such share on the date of purchase/acquisition as set forth in Table 1 below; or
 2. the actual purchase/acquisition price of each such share minus \$123.64.⁴

TABLE 1

Alexion Common Stock

Alleged Artificial Inflation for Purposes of Calculating Purchase and Sale Inflation

Transaction Date	Artificial Inflation Per Share
January 30, 2014 – November 6, 2016	\$68.08
November 7, 2016 – November 9, 2016	\$54.21
November 10, 2016	\$52.09
November 11, 2016 – December 11, 2016	\$39.79
December 12, 2016	\$23.39
December 13, 2016 – March 5, 2017	\$17.34
March 6, 2017	\$17.33
March 7, 2017 – May 8, 2017 (prior to 10:54 AM ET) ⁵	\$17.32
May 8, 2017 (at or after 10:54 AM ET) – May 22, 2017	\$14.56
May 23, 2017	\$3.76
May 24, 2017	\$0.02
May 25, 2017	\$0.01
May 26, 2017 ⁶	\$0.00

⁴ Pursuant to Section 21D(e)(1) of the Exchange Act, “in any private action arising under this title in which the plaintiff seeks to establish damages by reference to the market price of a security, the award of damages to the plaintiff shall not exceed the difference between the purchase or sale price paid or received, as appropriate, by the plaintiff for the subject security and the mean trading price of that security during the 90-day period beginning on the date on which the information correcting the misstatement or omission that is the basis for the action is disseminated to the market.” Consistent with the requirements of the Exchange Act, Recognized Loss Amounts are reduced to an appropriate extent by taking into account the closing prices of Alexion common stock during the “90-day look-back period,” May 26, 2017 through August 23, 2017. The mean (average) closing price for Alexion common stock during this 90-day look-back period was \$123.64.

⁵ For purposes of this Plan of Allocation, in the absence of contrary documentation, the Claims Administrator will assume that any shares purchased/acquired or sold on May 8, 2017 at any price less than \$128.32 per share occurred after the allegedly corrective information was released to the market at or after 10:54 AM ET, and that any shares purchased/acquired or sold on May 8, 2017 at any price equal to or greater than \$128.32 per share occurred before the release of the allegedly corrective information at 10:54 AM ET.

⁶ For purchases on May 26, 2017, artificial inflation per share is equal to \$0.01. For sales on May 26, 2017, artificial inflation per share is \$0.00.

TABLE 2**Alexion Common Stock Closing Price and Average Closing Price
May 26, 2017 – August 23, 2017**

Date	Closing Price	Average Closing Price Between May 26, 2017 and Date Shown	Date	Closing Price	Average Closing Price Between May 26, 2017 and Date Shown
5/26/2017	\$97.70	\$97.70	7/12/2017	\$124.94	\$114.49
5/30/2017	\$97.78	\$97.74	7/13/2017	\$126.91	\$114.87
5/31/2017	\$98.03	\$97.84	7/14/2017	\$126.71	\$115.22
6/1/2017	\$100.58	\$98.52	7/17/2017	\$125.78	\$115.52
6/2/2017	\$101.83	\$99.18	7/18/2017	\$126.77	\$115.83
6/5/2017	\$101.61	\$99.59	7/19/2017	\$127.30	\$116.14
6/6/2017	\$101.47	\$99.86	7/20/2017	\$129.81	\$116.50
6/7/2017	\$100.14	\$99.89	7/21/2017	\$131.79	\$116.89
6/8/2017	\$102.92	\$100.23	7/24/2017	\$130.74	\$117.24
6/9/2017	\$105.38	\$100.74	7/25/2017	\$129.35	\$117.54
6/12/2017	\$106.88	\$101.30	7/26/2017	\$131.07	\$117.86
6/13/2017	\$108.00	\$101.86	7/27/2017	\$133.92	\$118.23
6/14/2017	\$118.00	\$103.10	7/28/2017	\$137.99	\$118.68
6/15/2017	\$117.98	\$104.16	7/31/2017	\$137.34	\$119.09
6/16/2017	\$113.98	\$104.82	8/1/2017	\$137.79	\$119.50
6/19/2017	\$116.16	\$105.53	8/2/2017	\$137.97	\$119.89
6/20/2017	\$119.05	\$106.32	8/3/2017	\$136.72	\$120.24
6/21/2017	\$123.58	\$107.28	8/4/2017	\$136.64	\$120.58
6/22/2017	\$126.23	\$108.28	8/7/2017	\$138.33	\$120.93
6/23/2017	\$126.07	\$109.17	8/8/2017	\$136.04	\$121.23
6/26/2017	\$125.09	\$109.93	8/9/2017	\$136.85	\$121.53
6/27/2017	\$122.11	\$110.48	8/10/2017	\$132.30	\$121.73
6/28/2017	\$125.81	\$111.15	8/11/2017	\$132.93	\$121.94
6/29/2017	\$122.43	\$111.62	8/14/2017	\$133.96	\$122.16
6/30/2017	\$121.67	\$112.02	8/15/2017	\$135.21	\$122.39
7/3/2017	\$121.08	\$112.37	8/16/2017	\$136.55	\$122.64
7/5/2017	\$125.05	\$112.84	8/17/2017	\$134.63	\$122.85
7/6/2017	\$121.09	\$113.13	8/18/2017	\$133.40	\$123.03
7/7/2017	\$123.06	\$113.47	8/21/2017	\$133.43	\$123.20
7/10/2017	\$123.76	\$113.82	8/22/2017	\$138.20	\$123.45
7/11/2017	\$124.32	\$114.16	8/23/2017	\$135.67	\$123.64

ADDITIONAL PROVISIONS OF THE PLAN OF ALLOCATION

70. The sum of a claimant's Recognized Loss Amounts will be the claimant's "Recognized Claim."

71. If the sum total of Recognized Claims of all Authorized Claimants who are entitled to receive payment out of the Net Settlement Fund is greater than the Net Settlement Fund, each Authorized Claimant will receive his, her, or its *pro rata* share of the Net Settlement Fund. The *pro rata* share will be the Authorized Claimant's Recognized Claim divided by the total of Recognized Claims of all Authorized Claimants, multiplied by the total amount in the Net Settlement Fund. If the Net Settlement Fund exceeds the sum total amount of the Recognized Claims of all Authorized Claimants entitled to receive payment out of the Net Settlement Fund, the excess amount in the Net Settlement Fund will be distributed *pro rata* to all Authorized Claimants entitled to receive payment.

72. Purchases or acquisitions and sales of Alexion publicly traded common stock will be deemed to have occurred on the "contract" or "trade" date as opposed to the "settlement" or "payment" or "sale" date. The receipt or grant of shares of Alexion publicly traded common stock by gift, inheritance, or operation of law during the Class Period will not be deemed an eligible purchase, acquisition, or sale of these shares of Alexion publicly traded common stock for the calculation of a claimant's Recognized Claim, nor will the receipt or grant be deemed an assignment of any claim relating to the purchase/acquisition of such shares of such Alexion publicly traded common stock unless: (i) the donor or decedent purchased or acquired such shares of Alexion publicly traded common stock during the Class Period; (ii) no Claim Form was submitted by or on behalf of the donor, on behalf of the decedent, or by anyone else with respect to such shares of Alexion publicly traded common stock; and (iii) it is specifically so provided in the instrument of gift or assignment.

73. In accordance with the Plan of Allocation, the Recognized Loss Amount on any portion of a purchase or acquisition that matches against (or "covers") a "short sale" is zero. The Recognized Loss Amount on a "short sale" that is not covered by a purchase or acquisition is also zero.

74. If a claimant has an opening short position in Alexion publicly traded common stock at the start of the Class Period, the earliest Class Period purchases or acquisitions will be matched against such opening short position in accordance with the FIFO matching described above and any portion of such purchase or acquisition that covers such short sales will not be entitled to recovery. If a claimant newly establishes a short position during the Class Period, the earliest subsequent Class Period purchase or acquisition will be matched against such short position on a FIFO basis and will not be entitled to a recovery.

75. Alexion publicly traded common stock is the only security eligible for recovery under the Plan of Allocation. With respect to Alexion publicly traded common stock purchased or sold through the exercise of an option, the purchase/sale date of the Alexion publicly traded common stock is the exercise date of the option and the purchase/sale price is the exercise price of the option.

76. The Net Settlement Fund will be allocated among all Authorized Claimants whose prorated payment is \$10.00 or greater. If the prorated payment to any Authorized Claimant calculates to less than \$10.00, it will not be included in the calculation and no distribution will be made to that Authorized Claimant.

77. Distributions will be made to eligible Authorized Claimants after all claims have been processed and after the Court has finally approved the Settlement. If there is any balance remaining in the Net Settlement Fund (whether by reason of tax refunds, uncashed checks, or otherwise) after at least six (6) months from the date of initial distribution of the Net Settlement Fund, the Claims Administrator will, if feasible and economical after payment of Notice and Administration Expenses, Taxes, and attorneys' fees and expenses, if any, redistribute such balance among Authorized Claimants who have cashed their checks in an equitable and economic fashion. Once it is no longer feasible or economical to make further distributions, any balance that still remains in the Net Settlement Fund after re-distribution(s) and after payment of outstanding Notice and Administration Expenses, Taxes, and attorneys' fees and expenses, if any, shall be contributed to a non-profit, non-sectarian 501(c)(3) organization to be mutually agreed upon by Co-Class Counsel and counsel for Alexion, or as ordered by the Court.

78. Payment pursuant to the Plan of Allocation or such other plan of allocation as may be approved by the Court will be conclusive against all claimants. No person will have any claim against Class Representatives, Co-Class Counsel, their damages expert, the Claims Administrator, or other agent designated by Co-Class Counsel, arising from determinations or distributions to claimants made substantially in accordance with the Stipulation, the Plan of Allocation approved by the Court, or further orders of the Court. Class Representatives, Defendants, Defendants' Counsel, and all other Released Parties will have no responsibility for or liability whatsoever for the investment or distribution of the Settlement Fund, the Net Settlement Fund, the Plan of Allocation or the determination, administration, calculation, or payment of any Claim Form or non-performance of the Claims Administrator, the payment or withholding of taxes owed by the Settlement Fund or any losses incurred in connection therewith.

79. Each claimant is deemed to have submitted to the jurisdiction of the United States District Court for the District of Connecticut with respect to his, her, or its claim.

SPECIAL NOTICE TO SECURITIES BROKERS AND NOMINEES

80. If you purchased or acquired Alexion publicly traded common stock (CUSIP: [REDACTED]) during the Class Period for the beneficial interest of a person or entity other than yourself, the Court has directed that **WITHIN TEN (10) CALENDAR DAYS OF YOUR RECEIPT OF THIS NOTICE, YOU MUST EITHER:** (a) provide a list of the names and addresses of all such beneficial owners to the Claims Administrator and the Claims Administrator is ordered to send this Notice Packet promptly to such identified beneficial owners; or (b) request from the Claims Administrator sufficient copies of the Notice Packet to forward to all such beneficial owners and **WITHIN TEN (10) CALENDAR DAYS** of receipt of those Notice Packets from the Claims Administrator forward them to all such beneficial owners. If you choose to follow procedure (b), the Court has also directed that, upon making that mailing, **YOU MUST SEND A STATEMENT** to the Claims Administrator confirming that the mailing was made as directed and keep a record of the names and mailing addresses used. Nominees shall also provide email addresses for all such beneficial owners to the Claims Administrator, to the extent they are available.

81. Upon full and timely compliance with these provisions, Nominees who mail the Notice Packets to beneficial owners, or who provide names and addresses of beneficial owners to the Claims Administrator, may seek up to \$0.10 per name/address provided and up to \$0.10 plus postage at the Claims Administrator's rate for bulk mailings by providing the Claims Administrator with proper documentation supporting the expenses for which reimbursement is sought. Nominees whose research yields no records, or a minimal number of beneficial owners, may ask the Claims Administrator to consider an upward adjustment for the reasonable costs incurred to perform their research. Properly documented expenses incurred by Nominees in compliance with the above shall be paid from the Settlement Fund, with any unresolved disputes as to the reasonableness or documentation subject to review by the Court. All communications concerning the foregoing should be addressed to the Claims Administrator:

Alexion Securities Settlement
c/o KCC Class Action Services
PO Box 301170
Los Angeles, CA 90030-1170

Dated: October 3, 2023

BY ORDER OF THE
UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

BOSTON RETIREMENT SYSTEM, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

ALEXION PHARMACEUTICALS, INC., LEONARD
BELL, DAVID L. HALLAL, VIKAS SINHA,

Defendants.

Civ. No. 3:16-cv-02127 (AWT)
Hon. Alvin W. Thompson

PROOF OF CLAIM AND RELEASE FORM

I. GENERAL INSTRUCTIONS

1. To recover as a member of the Class based on your claims in the action entitled *Boston Retirement System, et al. v. Alexion Pharmaceuticals, Inc., et al.*, Case No. 3:16-cv-02127 (AWT) (D. Conn.) (the "Action"), you must complete and, on page 5 below, sign this Proof of Claim and Release form ("Claim Form"). If you fail to submit a timely and properly addressed (as explained in paragraph 2 below) Claim Form, your claim may be rejected and you may not receive any recovery from the Net Settlement Fund created in connection with the proposed Settlement. Submission of this Claim Form, however, does not assure that you will share in the proceeds of the Settlement of the Action.

2. **THIS CLAIM FORM MUST BE SUBMITTED ONLINE AT WWW.ALEXIONSECURITIESSETTLEMENT.COM NO LATER THAN DECEMBER 15, 2023 OR, IF MAILED, BE POSTMARKED NO LATER THAN DECEMBER 15, 2023, ADDRESSED AS FOLLOWS:**

Alexion Securities Settlement
c/o KCC Class Action Services
P.O. Box 301170
Los Angeles, CA 90030-1170
www.AlexionSecuritiesSettlement.com

3. If you are a member of the Class and you do not timely and properly request exclusion in response to the Notice dated October 3, 2023, you are bound by and subject to the terms of any judgment entered in the Action, including the releases provided therein, **WHETHER OR NOT YOU SUBMIT A CLAIM FORM OR RECEIVE A PAYMENT.**

II. CLAIMANT IDENTIFICATION

4. If you purchased or otherwise acquired shares of Alexion Pharmaceuticals, Inc. ("Alexion") publicly traded common stock during the period from January 30, 2014 to May 26, 2017, inclusive (the "Class Period") and held the stock in your name, you are the beneficial owner as well as the record owner. If, however, you purchased or otherwise acquired Alexion publicly traded common stock during the Class Period through a third party, such as a brokerage firm, you are the beneficial owner and the third party is the record owner.

5. Use **Part I** of this form entitled "Claimant Identification" to identify each beneficial owner of Alexion publicly traded common stock that forms the basis of this claim, as well as the owner of record if different. **THIS CLAIM MUST BE FILED BY THE ACTUAL BENEFICIAL OWNERS OR THE LEGAL REPRESENTATIVE OF SUCH OWNERS.**

6. All joint owners must sign this claim. Executors, administrators, guardians, conservators, and trustees must complete and sign this claim on behalf of persons represented by them and their authority must accompany this claim and their titles or capacities must be stated. The Social Security (or taxpayer identification) number and telephone number of the beneficial owner may be used in verifying the claim. Failure to provide the foregoing information could delay verification of the claim or result in rejection of the claim.

III. IDENTIFICATION OF TRANSACTIONS

7. Use **Part II** of this form entitled "Schedule of Transactions in Alexion Publicly Traded Common Stock" to supply all required details of your transaction(s) in Alexion publicly traded common stock. If you need more space or additional schedules, attach separate sheets providing all the required information in substantially the same form. Sign and print or type your name on each additional sheet.

8. On the schedules, provide all the requested information with respect to your holdings, purchases/acquisitions, and sales of Alexion publicly traded common stock, whether the transactions resulted in a profit or a loss. Failure to report all such transactions may result in the rejection of your claim.

9. The date of covering a "short sale" is deemed to be the date of purchase of Alexion publicly traded common stock. The date of a "short sale" is deemed to be the date of sale.

10. Copies of broker confirmations or other documentation of your transactions must be attached to your claim. Failure to provide this documentation could delay verification of your claim or result in rejection of your claim. **THE PARTIES TO THE ACTION DO NOT HAVE INFORMATION ABOUT YOUR TRANSACTIONS IN ALEXION PUBLICLY TRADED COMMON STOCK.**

NOTICE REGARDING ELECTRONIC FILES: Certain claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in electronic files. (This is different than the online claim portal on the Settlement website.) All such claimants **MUST** submit a manually signed paper Claim Form whether or not they also submit electronic copies. If you wish to submit your claim electronically, you must contact the Claims Administrator at (866) 573-1726 to obtain the required file layout. No electronic files will be considered to have been properly submitted unless the Claims Administrator issues to the claimant a written acknowledgment of receipt and acceptance of electronically submitted data.

Must Be Postmarked (if Mailed)
or Received (if Submitted Online)
No Later Than December 15, 2023

A2X

Please Type or Print in the Boxes Below
Must use Black or Blue Ink or your claim
may be deemed deficient.

Official
Office
Use
Only

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

*Boston Retirement System, et al. v. Alexion
Pharmaceuticals, Inc., et al.,*

Case No. 3:16-cv-02127 (AWT) (D. Conn.)

PROOF OF CLAIM AND RELEASE

The Claims Administrator will use this information for all communications regarding this Claim Form. If this information changes, you MUST notify the Claims Administrator in writing at the address above. Complete names of all persons and entities must be provided.

PART I. CLAIMANT IDENTIFICATION

Last Name M.I. First Name

Last Name (Co-Beneficial Owner) M.I. First Name (Co-Beneficial Owner)

Corporation IRA/401K Pension Plan Individual Estate Other (please specify) _____

Entity Name (Beneficial Owner - If Claimant is not an Individual)

Representative or Custodian Name (if different from Beneficial Owner(s) listed above)

Account#/Fund# (Not Necessary for Individual Filers)

Last Four Digits of Social Security Number Taxpayer Identification Number

Telephone Number (Primary Daytime) Telephone Number (Alternate)

Email Address

MAILING INFORMATION

Address

Address (cont.)

City State ZIP Code

Foreign Province Foreign Postal Code Foreign Country Name/Abbreviation

FOR CLAIMS PROCESSING ONLY	OB	CB	<input type="radio"/> ATP	<input type="radio"/> BE	<input type="radio"/> FL	<input type="radio"/> OP	MM / DD / YYYY	FOR CLAIMS PROCESSING ONLY
			<input type="radio"/> KE	<input type="radio"/> DR	<input type="radio"/> ME	<input type="radio"/> RE		
			<input type="radio"/> ICI	<input type="radio"/> EM	<input type="radio"/> ND	<input type="radio"/> SH		



PART II. TRANSACTIONS IN ALEXION PUBLICLY TRADED COMMON STOCK

1. BEGINNING HOLDINGS – State the total number of shares of Alexion common stock held as of the opening of trading on January 30, 2014. If none, write “0” or “Zero.” (Must submit documentation.) [] [] [] [] [] [] [] [] [] []
Proof Enclosed? Y N

2. PURCHASES/ACQUISITIONS DURING THE CLASS PERIOD – Separately list each and every purchase/acquisition of Alexion common stock from after the opening of trading on January 30, 2014 through and including the close of trading on May 26, 2017. (Must submit documentation.)

PURCHASES												
Date of Purchase/Acquisition (List Chronologically) (Month/Day/Year)			Number of Shares Purchased			Purchase Price Per Share		Total Purchase Price (excluding any fees, commissions, and taxes)		Confirm Proof of Purchase Enclosed		
M	M	D	D	Y	Y	Y	Y					
[]	[]	[]	[]	[]	[]	[]	[]	\$	[]	[]	[]	<input type="radio"/> Y
[]	[]	[]	[]	[]	[]	[]	[]	\$	[]	[]	[]	<input type="radio"/> N
[]	[]	[]	[]	[]	[]	[]	[]	\$	[]	[]	[]	<input type="radio"/> Y
[]	[]	[]	[]	[]	[]	[]	[]	\$	[]	[]	[]	<input type="radio"/> N
[]	[]	[]	[]	[]	[]	[]	[]	\$	[]	[]	[]	<input type="radio"/> Y
[]	[]	[]	[]	[]	[]	[]	[]	\$	[]	[]	[]	<input type="radio"/> N

3. PURCHASES/ACQUISITIONS DURING 90-DAY LOOKBACK PERIOD – State the total number of shares of Alexion common stock purchased/acquired from after the opening of trading on May 27, 2017 through and including the close of trading on August 23, 2017¹. (Must submit documentation.) [] [] [] [] [] [] [] [] [] []
Proof Enclosed? Y N

4. SALES DURING THE CLASS PERIOD AND DURING THE 90-DAY LOOKBACK PERIOD – Separately list each and every sale/disposition of Alexion common stock from after the opening of trading on January 30, 2014 through and including the close of trading on August 23, 2017. (Must submit documentation.)

SALES												
Date of Sale (List Chronologically) (Month/Day/Year)			Number of Shares Sold			Sale Price Per Share		Total Sale Price (not deducting any fees, commissions, and taxes)		Confirm Proof of Sale Enclosed		
M	M	D	D	Y	Y	Y	Y					
[]	[]	[]	[]	[]	[]	[]	[]	\$	[]	[]	[]	<input type="radio"/> Y
[]	[]	[]	[]	[]	[]	[]	[]	\$	[]	[]	[]	<input type="radio"/> N
[]	[]	[]	[]	[]	[]	[]	[]	\$	[]	[]	[]	<input type="radio"/> Y
[]	[]	[]	[]	[]	[]	[]	[]	\$	[]	[]	[]	<input type="radio"/> N
[]	[]	[]	[]	[]	[]	[]	[]	\$	[]	[]	[]	<input type="radio"/> Y
[]	[]	[]	[]	[]	[]	[]	[]	\$	[]	[]	[]	<input type="radio"/> N

5. ENDING HOLDINGS – State the total number of shares of Alexion common stock held as of the close of trading on August 23, 2017. If none, write “0” or “Zero.” (Must submit documentation.) [] [] [] [] [] [] [] [] [] []
Proof Enclosed? Y N

IF YOU NEED ADDITIONAL SPACE TO LIST YOUR TRANSACTIONS YOU MUST PHOTOCOPY THIS PAGE AND FILL IN THIS CIRCLE.

¹ Information requested in this Claim Form with respect to your transactions after the opening of trading on May 27, 2017 through and including the close of trading on August 23, 2017, is needed only for the Claims Administrator to confirm that you have reported all relevant transactions. Purchases during this period, however, are not eligible for a recovery because these purchases/acquisitions are outside of the Class Period.



III. SUBMISSION TO JURISDICTION OF COURT AND ACKNOWLEDGMENTS

11. By signing and submitting this Claim Form, the claimant(s) or the person(s) acting on behalf of the claimant(s) certify(ies) that: I (We) submit this Claim Form under the terms of the Plan of Allocation of Net Settlement Fund described in the accompanying Notice. I (We) also submit to the jurisdiction of the United States District Court for the District of Connecticut (the "Court") with respect to my (our) claim as a Class Member(s) and for purposes of enforcing the releases set forth herein. I (We) further acknowledge that I (we) will be bound by and subject to the terms of any judgment entered in connection with the Settlement in the Action, including the releases set forth therein. I (We) agree to furnish additional information to the Claims Administrator to support this claim, such as additional documentation for transactions in eligible publicly traded Alexion common stock, if required to do so. I (We) have not submitted any other claim covering the same transactions in publicly traded Alexion common stock during the Class Period and know of no other person having done so on my (our) behalf.

IV. RELEASES, WARRANTIES, AND CERTIFICATION

12. I (We) hereby warrant and represent that I am (we are) a Class Member as defined in the Notice, that I am (we are) not excluded from the Class, that I am (we are) not one of the "Released Defendant Parties" as defined in the accompanying Notice.

13. As a Class Member, I (we) hereby acknowledge full and complete satisfaction of, and do hereby fully, finally, and forever compromise, settle, release, resolve, relinquish, waive, and discharge with prejudice the Released Plaintiffs' Claims as to each and all of the Released Defendant Parties (as these terms are defined in the accompanying Notice). This release shall be of no force or effect unless and until the Court approves the Settlement and it becomes effective on the Effective Date.

14. I (We) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to this release or any other part or portion thereof.

15. I (We) hereby warrant and represent that I (we) have included information about all of my (our) purchases, acquisitions, and sales of publicly traded Alexion common stock that occurred during the Class Period and the number of securities held by me (us), to the extent requested.

16. I (We) certify that I am (we are) NOT subject to backup tax withholding. (If you have been notified by the Internal Revenue Service that you are subject to backup withholding, please strike out the prior sentence.

I (We) declare under penalty of perjury under the laws of the United States of America that all of the foregoing information supplied by the undersigned is true and correct.

Executed this _____ day of _____ in _____
(Month/Year) (City/State/Country)

Signature of Claimant

Print Claimant Name Here

Signature of Joint Claimant (if any)

Print Name of Joint Claimant (if any)

Signature of person signing on behalf of Claimant

Print Name of person signing on behalf of Claimant

Capacity of person signing on behalf of claimant, if other than an individual, e.g., executor, president, trustee, custodian, etc. (Must provide evidence of authority to act on behalf of claimant.)



ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME. THANK YOU FOR YOUR PATIENCE.

Reminder Checklist:

1. Please sign this Claim Form.
2. DO NOT HIGHLIGHT THE CLAIM FORM OR YOUR SUPPORTING DOCUMENTATION.
3. Attach only copies of supporting documentation as these documents will not be returned to you.
4. Keep a copy of your Claim Form for your records.
5. The Claims Administrator will acknowledge receipt of your Claim Form by mail within 60 days. **Your claim is not deemed submitted until you receive an acknowledgment postcard.** If you do not receive an acknowledgment postcard within 60 days, please call the Claims Administrator toll-free at (866) 573-1726.
6. If you move after submitting this Claim Form please notify the Claims Administrator of the change in your address, otherwise you may not receive additional notices or payment.

THIS CLAIM FORM MUST BE SUBMITTED ONLINE OR MAILED NO LATER THAN DECEMBER 15, 2023, ADDRESSED AS FOLLOWS:

Alexion Securities Settlement
c/o KCC Class Action Services
P.O. Box 301170
Los Angeles, CA 90030-1170
U.S. & Canada Toll-Free Number: (866) 573-1726
Email: info@AlexionSecuritiesSettlement.com
Website: www.AlexionSecuritiesSettlement.com



Exhibit B

COMMODITIES

wsj.com/market-data/commodities

Futures Contracts

Table with columns: Metal & Petroleum Futures, Open, High, Low, Settle, Chg, Open interest. Includes Copper-High, Gold, Palladium, Platinum, Silver, Crude Oil, NY Harbor ULSD, Gasoline, Natural Gas.

Table with columns: Agriculture Futures, Open, High, Low, Settle, Chg, Open interest. Includes Corn, Oats, Soybeans, Soybean Meal, Soybean Oil, Rough Rice, Wheat, Wheat (KC), Cattle-Feeder, Cattle-Live, Hogs-Lean, Lumber, Milk, Cocoa.

Table with columns: Interest Rate Futures, Open, High, Low, Settle, Chg, Open interest. Includes Ultra Treasury Bonds, Treasury Bonds, Treasury Notes, 5 Yr. Treasury Notes, 2 Yr. Treasury Notes, 30 Day Federal Funds, Three-Month SOFR.

Table with columns: Index Futures, Open, High, Low, Settle, Chg, Open interest. Includes Canadian Dollar, British Pound, Swiss Franc, Australian Dollar, Mexican Peso, Euro, Mini DJ Industrial Average, Mini S&P 500, Mini S&P Midcap, Mini Nasdaq 100, Mini Russell 2000, Mini Russell 1000, U.S. Dollar Index.

Bonds | wsj.com/market-data/bonds/benchmarks

Tracking Bond Benchmarks

Return on investment and spreads over Treasuries and/or yields paid to investors compared with 52-week highs and lows for different types of bonds

Table with columns: Total return close, YTD total return (%), Index, Yield (%), Latest, Low, High. Includes Broad Market, U.S. Corporate, Mortgage-Backed, U.S. Agency, Global Government.

Global Government Bonds: Mapping Yields

Yields and spreads over or under U.S. Treasuries on benchmark two-year and 10-year government bonds in selected other countries; arrows indicate whether the yield rose (▲) or fell (▼) in the latest session

Table with columns: Coupon (%), Maturity, Country, Latest, Yield (%), Spread Under/Over U.S. Treasuries. Includes Australia, France, Germany, Italy, Japan, Spain, U.K.

Corporate Debt

Prices of firms' bonds reflect factors including investors' economic, sectoral and company-specific expectations

Investment-grade spreads that tightened the most...

Table with columns: Issuer, Symbol, Coupon (%), Yield (%), Maturity, Spread, Current, One-day change, Last week. Includes Bank of America, Verizon Communications, Eni, Swedbank, United Airlines, Banco Santander, Goldman Sachs, Toyota Motor Credit.

...And spreads that widened the most

Table with columns: Issuer, Symbol, Coupon (%), Yield (%), Maturity, Spread, Current, One-day change, Last week. Includes Metropolitan Life Global Funding, Toyota Motor Credit, Societe Generale, Verizon Communications, Royal Bank of Canada, Citigroup, PNC Financial Services Group, Shell International Finance.

High-yield issues with the biggest price increases...

Table with columns: Issuer, Symbol, Coupon (%), Yield (%), Maturity, Bond Price as % of face value, Current, One-day change, Last week. Includes Belo, Telecom Italia Capital, Owens-Brockway Glass Container, Ball, Intesa Sanpaolo.

...And with the biggest price decreases

Table with columns: Issuer, Symbol, Coupon (%), Yield (%), Maturity, Bond Price as % of face value, Current, One-day change, Last week. Includes Howmet Aerospace, Occidental Petroleum, Ford Motor, United States Cellular, Hughes Satellite Systems, Crown Cork & Seal, Teva Pharmaceutical Finance.

*Estimated spread over 2-year, 3-year, 5-year, 10-year or 30-year hot-run Treasury; 100 basis points=one percentage pt; change in spread shown is for 2-spread. Note: Data are for the most active issue of bonds with maturities of two years or more. Source: MarketAxess

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CLASS ACTION

UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT. BOSTON RETIREMENT SYSTEM, Individually and On Behalf of All Others Similarly Situated, Plaintiff, vs. ALEXION PHARMACEUTICALS, INC., LEONARD BELL, DAVID L. HALLAL, VIKAS SINHA, Defendants.

SUMMARY NOTICE OF PENDENCY OF CLASS ACTION, PROPOSED SETTLEMENT, AND MOTION FOR ATTORNEYS' FEES AND EXPENSES

To: All persons or entities who purchased or otherwise acquired the publicly traded common stock of Alexion Pharmaceuticals, Inc. ("Alexion") or the "Company" from January 30, 2014 to May 26, 2017, inclusive (the "Class Period"), and who were allegedly damaged thereby (the "Class").

YOU ARE HEREBY NOTIFIED, pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the District of Connecticut, that Court-appointed Class Representatives, on behalf of themselves and all members of the proposed Class, and Alexion, Leonard Bell, David L. Hallal, and Vikas Sinha (collectively, "Defendants"), have reached a proposed settlement of the claims in the above-captioned class action (the "Action") in the amount of \$125,000,000 (the "Settlement").

A hearing will be held before the Honorable Alvin W. Thompson, either in person or remotely in the Court's discretion, on December 20, 2023, at 1:30 p.m. at the Abraham Ribicoff Federal Building, United States Courthouse, South Courtroom, 450 Main Street, Hartford, Connecticut 06103 (the "Settlement Hearing") to determine whether the Court should: (i) approve the proposed Settlement as fair, reasonable, and adequate; (ii) dismiss the Action with prejudice as provided in the Stipulation and Agreement of Settlement, dated as of September 11, 2023; (iii) approve the proposed Plan of Allocation for distribution of the proceeds of the Settlement (the "Net Settlement Fund") to Class Members; and (iv) approve Co-Class Counsel's Fee and Expense Application. The Court may change the date of the Settlement Hearing, or hold it remotely, without providing another notice. You do NOT need to attend the Settlement Hearing in order to receive a distribution from the Net Settlement Fund.

IF YOU ARE A MEMBER OF THE CLASS, YOUR RIGHTS WILL BE AFFECTED BY THE PROPOSED SETTLEMENT AND YOU MAY BE ENTITLED TO A MONETARY PAYMENT. If you have not yet received a full Notice and Claim Form, you may obtain copies of these documents by visiting the website for the Settlement, www.AlexionSecuritiesSettlement.com, or by contacting the Claims Administrator at:

Alexion Securities Litigation c/o KCC Class Action Services P.O. Box 301170 Los Angeles, CA 90030-1170 www.AlexionSecuritiesSettlement.com (866) 573-1726

Inquiries, other than requests for information about the status of a claim, may also be made to Co-Class Counsel:

Table with columns: Firm Name, Address, Phone Number. Includes LABATON SUCHAROW LLP and MOTLEY RICE LLC.

If you are a Class Member, to be eligible to share in the distribution of the Net Settlement Fund, you must submit a Claim Form postmarked or submitted online no later than December 15, 2023. If you are a Class Member and do not timely submit a valid Claim Form, you will not be eligible to share in the distribution of the Net Settlement Fund, but you will nevertheless be bound by all judgments or orders entered by the Court relating to the Settlement, whether favorable or unfavorable.

If you are a Class Member and wish to exclude yourself from the Class, you must submit a written request for exclusion in accordance with the instructions set forth in the Notice so that it is received no later than November 29, 2023. If you properly exclude yourself from the Class, you will not be bound by any judgments or orders entered by the Court relating to the Settlement, whether favorable or unfavorable, and you will not be eligible to share in the distribution of the Net Settlement Fund.

Any objections to the proposed Settlement, Co-Class Counsel's Fee and Expense Application, and/or the proposed Plan of Allocation must be filed with the Court, either by mail or in person, and be mailed to counsel for the Parties in accordance with the instructions in the Notice, such that they are received no later than November 29, 2023.

PLEASE DO NOT CONTACT THE COURT, DEFENDANTS, OR DEFENDANTS' COUNSEL REGARDING THIS NOTICE

DATED: October 17, 2023 BY ORDER OF THE COURT UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT

BUSINESS OPPORTUNITIES

AGELESS BEAUTY MOISTURE. All natural skin treatment. Sales of \$27 million U.S. Available for purchase. 541-660-5231 No Text messages. Willem.biologicaquaresearch@gmail.com

CAREERS

M & A BUSINESS BROKERS. Buying and Selling Businesses. 6 Figure Commissions. As an Independent Contractor. Our 38th Year. Gottesman Company. Work From Home / Outside Sales. Support Services & Training. Send Letter & Resume to: brokers@gottesman-company.com

DEA

LEGAL NOTICE. The U.S. Dept. of Justice, Drug Enforcement Administration (DEA) New York gives notice that the property listed below has been abandoned to the custody of the United States and has remained unclaimed. The property shall be held for 30 days from the date of initial publication of notice. Upon expiration of this 30-day period title to the property will vest in the United States. Any person desiring to claim this property must file with the DEA within 30 days. Claims may be filed at the following address: DEA New York Division, 99 Tenth Ave., NY, NY 10011. Attn: SA Vincent Wong. Last date to file: 11/18/2023. Group: T-43, Case: CT-19-0015, Asset I.D.: 20-DEA-661421. Property: \$76,815.00 U.S.C. Place Seized: New York, New York. Owner: Hesham Obaid, Date of Custody: 03/07/2020.

NOTICE OF SALE

NOTICE OF FORECLOSURE SALE IS HEREBY GIVEN that, pursuant to: (a) Section 9-610 of the Uniform Commercial Code ("UCC") as adopted in the State of New York, (b) the Amended and Restated Indenture Agreement, dated as of September 12, 2022 (the "Indenture"), and among Alpine Summit Funding LLC, a Delaware limited liability company ("ASF"), and UMB Bank, N.A., as indenture trustee, paying agent and securities intermediary (the "Indenture Trustee"), relating to ASF's (1) Series 2022-1 Floating Rate Oil & Gas Asset-Backed Notes and (2) Series 2022-2 Floating Rate Oil & Gas Asset-Backed Notes issued to certain Noteholders (the "Noteholders"), (c) the Guaranty Agreement, dated as of April 29, 2022, by Alpine Summit Funding Holdings LLC, a Delaware limited liability company ("ASFH"), in favor of the Indenture Trustee (the "Guaranty"), and (d) the Pledge Agreement, dated as of April 29, 2022 (the "Pledge Agreement") by and among ASFH, the Indenture Trustee, and ASF, the Indenture Trustee, for the benefit of the Noteholders, and the public (the "Auction" or the "Pledged Collateral" as defined in the Pledge Agreement, which includes all title and interest in, and to (i) 100% of the equity in ASF, which is owned by ASFH (the "Pledged Shares") and (ii) certain assets and rights related to the Pledged Shares (together with the Pledged Shares, the "Assets").

The Assets are being sold on an "AS IS WHERE IS" basis pursuant to the following terms and conditions:

TIMING/LOCATION OF THE AUCTION Date and Time of Sale: November 6, 2023 at 10:00 A.M. (prevailing Eastern Time) Location of Sale: Orrick, Herrington & Sutcliffe LLP 51 West 52nd Street New York, New York 10019

TERMS AND CONDITIONS OF THE AUCTION 1. The Assets will be sold in a single transaction to the bidder that makes the best bid. The Successful Bidder (as described below) must be prepared to purchase all of the Assets.

2. Subject to executing confidentiality agreements, parties interested in bidding at the auction may obtain additional information and details concerning the Assets and the Auction (the "Bid Procedures") by contacting the Auctioneer, Orrick, Herrington & Sutcliffe LLP ("Orrick"), as provided below. The Bid Procedures will provide additional information about the bidding process, including bidder eligibility qualifications, deposit information, Auction participation and determination of the winning bid.

3. The Auction will be held on November 6, 2023 at 10:00 a.m. (ET) at the offices of Orrick, Herrington & Sutcliffe LLP, located at 51 West 52nd Street, New York, New York 10019, with an option to attend the Auction remotely via a designated Zoom link that will be made available to qualified bidders on request.

4. The Assets are being sold on an "AS IS WHERE IS" basis, without recourse, warranty or guaranty, whether express or implied. The Indenture Trustee and the Noteholders do not and will not make any representations or warranties with respect to the Assets, and the sale of the Assets is specifically subject to all taxes, liens (other than those of the Indenture Trustee), claims, assessments, liabilities and encumbrances, if any, that may exist against the Assets or ASF under the UCC or other applicable law. Without limiting the generality of the foregoing, the Indenture Trustee and the Noteholders expressly disclaim all representations or warranties relating to any of the Assets, including the condition of title, to the completeness or accuracy of any description of, or any other rights, liabilities or obligations that may accompany any such Assets.

5. The Indenture Trustee reserves the right to determine which bidders qualify for participation in the Auction, reject any bid or bids at the Auction, to announce such other terms at the Auction as may be commercially reasonable in the Indenture Trustee's discretion or to accept non-conforming bids. Further, the Indenture Trustee reserves the right to cancel, postpone or adjourn the Auction by announcement made at the Auction, either before or after the commencement of bidding, without written notice or further publication. The Indenture Trustee, at the direction of the Noteholders, reserves the right to credit bid any portion of the secured indebtedness then outstanding under the Guaranty and Pledge Agreement at the Auction, either directly or through its designee, assignee, or representative. The Indenture Trustee reserves the right to implement such other terms or conditions at the Auction or regarding the Auction procedures as the Indenture Trustee determines to be commercially reasonable under the circumstances.

6. Prior to the Auction, the Indenture Trustee, or an appointee thereof, will require potential bidders that intend to participate at the Auction to submit a deposit in an amount to be determined by the Indenture Trustee, or an appointee thereof, in its sole and absolute discretion (the "Deposit"), to be held by the Indenture Trustee or its appointed escrow agent. If a bidder submits a Winning Bid (as described below) but does not provide the Balance by the Payment Deadline (each, as described below), the Deposit shall be forfeited. If a bidder that has made a Deposit is not the Successful Bidder, the Deposit will be returned promptly.

7. The Indenture Trustee, or an appointee thereof, will determine the highest and best bid made at the Auction for the Assets (the "Winning Bid"). Unless a Winning Bid is made by the Indenture Trustee or its designee, assignee, or representative via credit bid, a party submitting a Winning Bid (the "Successful Bidder") must deliver the balance of the Winning Bid (the "Balance") in US Dollars by wire transfer or certified funds within one business day of the conclusion of the Auction (the "Payment Deadline"). If the Successful Bidder fails to pay the Balance by the Payment Deadline, its Deposit will be forfeited to the Indenture Trustee as liquidated damages and no Assets will be delivered to such bidder.

8. Upon indefeasible payment in full of an applicable Winning Bid by the Successful Bidder, the Indenture Trustee, or an appointee thereof, will cause to be delivered to such Successful Bidder, or its designees, a bill of sale covering all of the Assets purchased by such Successful Bidder.

9. All of the foregoing actions of the Indenture Trustee, or appointee thereof, are done or will be done at the direction of the Noteholders and pursuant to the terms of the Indenture and/or other applicable Basic Documents (as defined therein).

REQUEST FOR FURTHER INFORMATION All inquiries concerning this Notice of Foreclosure Sale and the terms and conditions of the sale (including requirements to be a qualified bidder) should be made to: Orrick, Herrington & Sutcliffe LLP, attention to: (i) Raniero D'Aversa, Esq. (telephone: (212) 506-3715; email: rdaversa@orrick.com) and (ii) Michael Trentin, Esq. (telephone: (212) 506-3393; email: mtrentin@orrick.com), in any person making any inquiry or request must: (i) disclose the person or entity on whose behalf such information is being sought, (ii) execute a confidentiality agreement, and (iii) maintain confidentiality of the information provided.

Labaton Sucharow LLP and Motley Rice LLC Announce Proposed Class Action Settlement Involving Purchasers of the Publicly Traded Common Stock of Alexion Pharmaceuticals, Inc.

NEWS PROVIDED BY

Labaton Sucharow LLP and Motley Rice LLC →

17 Oct, 2023, 08:00 ET

NEW YORK, Oct. 17, 2023 /PRNewswire/ -- The following statement is being issued by Labaton Sucharow LLP and Motley Rice LLC regarding notice of a proposed class action settlement.

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

BOSTON RETIREMENT SYSTEM,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

ALEXION PHARMACEUTICALS, INC.,
LEONARD BELL, DAVID L. HALLAL,
VIKAS SINHA,

Defendants.

Civ. No. 3:16-cv-02127 (AWT)

Hon. Alvin W. Thompson

SUMMARY NOTICE OF PENDENCY OF CLASS ACTION, PROPOSED SETTLEMENT, AND MOTION FOR ATTORNEYS' FEES AND EXPENSES

To: All persons or entities who purchased or otherwise acquired the publicly traded common stock of Alexion Pharmaceuticals, Inc. ("Alexion" or the "Company") from January 30, 2014 to May 26, 2017, inclusive (the "Class Period"), and who were allegedly damaged thereby (the "Class").

YOU ARE HEREBY NOTIFIED, pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the District of Connecticut, that Court-appointed Class Representatives, on behalf of themselves and all members of the proposed Class, and Alexion, Leonard Bell, David L. Hallal, and Vikas Sinha (collectively, "Defendants"), have reached a proposed settlement of the claims in the above-captioned class action (the "Action") in the amount of \$125,000,000 (the "Settlement").

A hearing will be held before the Honorable Alvin W. Thompson, either in person or remotely in the Court's discretion, on December 20, 2023, at 1:30 p.m. at the Abraham Ribicoff Federal Building, United States Courthouse, South Courtroom, 450 Main Street, Hartford, Connecticut 06103 (the "Settlement Hearing") to determine whether the Court should: (i) approve the proposed Settlement as fair, reasonable, and adequate; (ii) dismiss the Action with prejudice as provided in the Stipulation and Agreement of Settlement, dated as of September 11, 2023; (iii) approve the proposed Plan of Allocation for distribution of the proceeds of the Settlement (the "Net Settlement Fund") to Class Members; and (iv) approve Co-Class Counsel's Fee and Expense Application. The Court may change the date of the Settlement Hearing, or hold it remotely, without providing another notice. You do NOT need to attend the Settlement Hearing in order to receive a distribution from the Net Settlement Fund.

IF YOU ARE A MEMBER OF THE CLASS, YOUR RIGHTS WILL BE AFFECTED BY THE PROPOSED SETTLEMENT AND YOU MAY BE ENTITLED TO A MONETARY PAYMENT. If you have not yet received a full Notice and Claim Form, you may obtain copies of these documents by visiting the website for the Settlement, www.AlexionSecuritiesSettlement.com, or by contacting the Claims Administrator at:

~~Alexion Securities Litigation~~

c/o KCC Class Action Services
P.O. Box 301170
Los Angeles, CA 90030-1170
www.AlexionSecuritiesSettlement.com
(866) 573-1726

Inquiries, other than requests for information about the status of a claim, may also be made to Co-Class Counsel:

LABATON SUCHAROW LLP

Michael H. Rogers, Esq.
140 Broadway
New York, NY 10005
www.labaton.com
settlementquestions@labaton.com
(888) 219-6877

MOTLEY RICE LLC

Gregg S. Levin, Esq.
28 Bridgeside Blvd.
Mount Pleasant, SC 29464
www.motleyrice.com
alexionsettlementquestions@motleyrice.com
(855) 481-8480

If you are a Class Member, to be eligible to share in the distribution of the Net Settlement Fund, you must submit a Claim Form **postmarked or submitted online no later than December 15, 2023**. If you are a Class Member and do not timely submit a valid Claim Form, you will not be eligible to share in the distribution of the Net Settlement Fund, but you will nevertheless be bound by all judgments or orders entered by the Court relating to the Settlement, whether favorable or unfavorable.

If you are a Class Member and wish to exclude yourself from the Class, you must submit a written request for exclusion in accordance with the instructions set forth in the Notice so that it is **received no later than November 29, 2023**. If you properly exclude yourself from the Class, you will not be bound by any judgments or orders entered by the Court relating to the Settlement, whether favorable or unfavorable, and you will not be eligible to share in the distribution of the Net Settlement Fund.

Any objections to the proposed Settlement, Co-Class Counsel's Fee and Expense Application, and/or the proposed Plan of Allocation must be filed with the Court, either by mail or in person, and be mailed to counsel for the Parties in accordance with the instructions in the Notice, such that they are **received no later than November 29, 2023**.

**PLEASE DO NOT CONTACT THE COURT, DEFENDANTS, OR
DEFENDANTS' COUNSEL REGARDING THIS NOTICE**

DATED: October 17, 2023

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

SOURCE Labaton Sucharow LLP and Motley Rice LLC

Exhibit G

Compendium of Unreported Cases

<i>Ark. Tchr. Ret. Sys. v. Bankrate,</i> No. 13-cv-7183, slip op. (S.D.N.Y. Nov. 25, 2014)	1
<i>In re Satyam Comput. Servs. Ltd. Sec. Litig.,</i> No. 09-MD-2027, slip op. (S.D.N.Y. Sept. 13, 2011)	2

TAB 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARKANSAS TEACHER RETIREMENT SYSTEM
and FRESNO COUNTY EMPLOYEES'
RETIREMENT ASSOCIATION, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

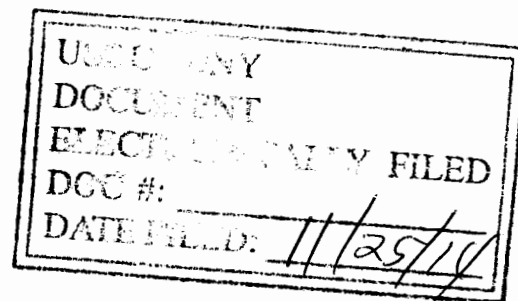
v.

BANKRATE, INC. et al.,

Defendants.

Case No. 13-cv-7183 (JSR)

ECF CASE



ORDER AWARDING ATTORNEYS' FEES AND EXPENSES

This matter came on for hearing on November 21, 2014 (the "Settlement Hearing") on Lead Counsel's motion for an award of attorneys' fees and reimbursement of Litigation Expenses. The Court having considered all matters submitted to it at the Settlement Hearing and otherwise; and it appearing that notice of the Settlement Hearing substantially in the form approved by the Court was mailed to all Settlement Class Members who or which could be identified with reasonable effort, except those persons or entities excluded from the definition of the Settlement Class, and that a summary notice of the hearing substantially in the form approved by the Court was published in *Investor's Business Daily* and was transmitted over the *PR Newswire* pursuant to the specifications of the Court; and the Court having considered and determined the fairness and reasonableness of the award of attorneys' fees and Litigation Expenses requested,

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. This Order incorporates by reference the definitions in the Amended Stipulation and Agreement of Settlement dated September 17, 2014 (ECF No. 73-1) (the "Amended

Stipulation”) and all terms not otherwise defined herein shall have the same meanings as set forth in the Amended Stipulation.

2. The Court has jurisdiction to enter this Order and over the subject matter of the Action and all parties to the Action, including all Settlement Class Members.

3. Notice of Lead Counsel’s motion for attorneys’ fees and reimbursement of Litigation Expenses was given to all Settlement Class Members who could be identified with reasonable effort. The form and method of notifying the Settlement Class of the motion for attorneys’ fees and expenses satisfied the requirements of Rule 23 of the Federal Rules of Civil Procedure, the Private Securities Litigation Reform Act of 1995 (15 U.S.C. § 78u-4(a)(7)), due process, and all other applicable law and rules, constituted the best notice practicable under the circumstances, and constituted due and sufficient notice to all persons and entities entitled thereto.

4. Lead Counsel is hereby awarded attorneys’ fees in the amount of 25 % of the Settlement Fund, net of Court-awarded expenses, and \$ 194,426.83 in reimbursement of litigation expenses (which fees and expenses shall be paid from the Settlement Fund), which sums the Court finds to be fair and reasonable.

5. Lead Counsel shall be paid 50% of the attorneys’ fees awarded and 100% of the approved expenses immediately upon entry of this Order. Payment of the balance of the attorneys’ fees awarded shall be made to Lead Counsel when distribution of the Net Settlement Fund to claimants has been very substantially completed.

6. In making this award of attorneys’ fees and reimbursement of expenses to be paid from the Settlement Fund, the Court has considered and found that:

(a) The Settlement has created a fund of \$18,000,000 in cash that has been funded into escrow pursuant to the terms of the Amended Stipulation, and that numerous

Settlement Class Members who submit acceptable Claim Forms will benefit from the Settlement that occurred because of the efforts of Lead Counsel;

(b) The fee sought by Lead Counsel has been reviewed and approved as fair and reasonable by Lead Plaintiffs, who are institutional investors that oversaw the prosecution and resolution of the Action;

(c) Copies of the Notice were mailed to over 35,000 potential Settlement Class Members and nominees stating that Lead Counsel would apply for attorneys' fees in an amount not to exceed 25% of the Settlement Fund and reimbursement of Litigation Expenses in an amount not to exceed \$300,000, and there were no objections to the requested attorneys' fees and expenses;

(d) Lead Counsel has conducted the litigation and achieved the Settlement with skill, perseverance and diligent advocacy;

(e) The Action raised a number of complex issues;

(f) Had Lead Counsel not achieved the Settlement there would remain a significant risk that Lead Plaintiffs and the other members of the Settlement Class may have recovered less or nothing from Defendants;

(g) Lead Counsel devoted over 5,100 hours, with a lodestar value of approximately \$2,485,000, to achieve the Settlement; and

(h) The amount of attorneys' fees awarded and expenses to be reimbursed from the Settlement Fund are fair and reasonable and consistent with awards in similar cases.

7. Lead Plaintiff Arkansas Teacher Retirement System is hereby awarded \$ 4,270.22 from the Settlement Fund as reimbursement for its reasonable costs and expenses directly related to its representation of the Settlement Class.

8. Lead Plaintiff Fresno County Employees' Retirement Association is hereby awarded \$ 850.67 from the Settlement Fund as reimbursement for its reasonable costs and expenses directly related to its representation of the Settlement Class.

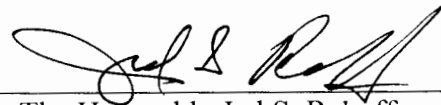
9. Any appeal or any challenge affecting this Court's approval regarding any attorneys' fees and expense application shall in no way disturb or affect the finality of the Judgment.

10. Exclusive jurisdiction is hereby retained over the parties and the Settlement Class Members for all matters relating to this Action, including the administration, interpretation, effectuation or enforcement of the Amended Stipulation and this Order.

11. In the event that the Settlement is terminated or the Effective Date of the Settlement otherwise fails to occur, this Order shall be rendered null and void to the extent provided by the Amended Stipulation.

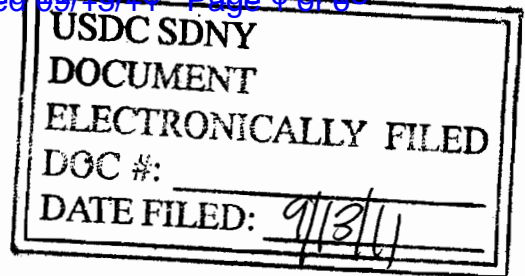
12. There is no just reason for delay in the entry of this Order, and immediate entry by the Clerk of the Court is expressly directed.

SO ORDERED this 21st day of November, 2014.



The Honorable Jed S. Rakoff
United States District Judge

TAB 2



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: SATYAM COMPUTER SERVICES LTD.
SECURITIES LITIGATION

No.: 09-MD-2027-BSJ

ORDER AWARDING ATTORNEYS' FEES AND EXPENSES

This matter came on for hearing on September 8, 2011 (the "Settlement Hearing") on the motion of Lead Counsel to determine, among other things, whether and in what amount to award Lead Counsel in the above-captioned consolidated securities class action (the "Action") fees and reimbursement of expenses.

The Court having considered all matters submitted to it at the Settlement Hearing and otherwise; and it appearing that notices of the Settlement Hearing substantially in the form approved by the Court were mailed to all Class Members who or which could be identified with reasonable effort, except those persons or entities excluded from the definition of the Class, and that summary notices of the hearing substantially in the form approved by the Court were published in *The Wall Street Journal*, *Investor's Business Daily* and *The Financial Times* and transmitted over *Business Wire* pursuant to the specifications of the Court; and the Court having considered and determined the fairness and reasonableness of the award of attorneys' fees and expenses requested.

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. This Order Awarding Attorneys' Fees and Expenses incorporates by reference the definitions in the Stipulations and Agreements of Settlement (the "Settlement Stipulations") and all

terms used herein shall, with respect to the respective Settlement Stipulations, have the same meanings as set forth in the applicable Settlement Stipulations.¹

2. The Court has jurisdiction to enter this Order Awarding Attorneys' Fees and Expenses, and over the subject matter of the Action and all parties to the Action, including all Class Members.

3. Notice of Lead Counsel's application for attorneys' fees and reimbursement of expenses was given to all Class Members who could be identified with reasonable effort. The form and method of notifying the Class of the motion for attorneys' fees and expenses constituted due, adequate, and sufficient notice to all persons or entities entitled to receive notice of the motion and satisfied the requirements of Rule 23 of the Federal Rules of Civil Procedure, the United States Constitution (including the Due Process Clause), the Private Securities Litigation Reform Act of 1995 (15 U.S.C. § 78u-4, et seq.) (the "PSLRA"), and all other applicable law and rules.

4. Lead Counsel are hereby awarded attorneys' fees in the amount of 17% of the total Settlement Funds, as well as 17% of any additional Settlement Funds recovered by Satyam from the PwC Entities, net of any taxes withheld from the Initial Escrow Accounts and ultimately paid pursuant to Indian tax law, and \$1,027,076.94 in reimbursement of litigation expenses advanced or incurred by Lead Counsel collectively while prosecuting this Action (which expenses shall be paid from the Settlement Funds) with interest on such fees and expenses at the same rate as earned by the Settlement Funds from the dates the Settlement Funds were funded to the date of payment, which sums the Court finds to be fair and reasonable. The foregoing award of Attorneys' Fees and

¹ The Settlement Stipulations are: the Stipulation and Agreement of Settlement with Defendant Satyam Computer Services Ltd., dated February 16, 2011 (the "Satyam Stipulation") and the Stipulation and Agreement of Settlement between Lead Plaintiffs and the PwC Entities, dated April 27, 2011 (the "PwC Entities Stipulation") entered into by and among Lead Plaintiffs and the Settling Defendants (together, the "Settlement Stipulations").

Expenses shall be payable immediately in accordance with the terms set forth in ¶¶ 19 and 16, respectively of the Satyam Stipulation and the PwC Entities Stipulation. The award of attorneys' fees shall be allocated among Plaintiffs' Counsel in a manner which, in the opinion of Lead Counsel, fairly compensates Plaintiffs' Counsel for their respective contributions in the prosecution and settlement of the Action.

5. Also in accordance with the terms set forth in ¶¶ 20 and 17, respectively of the Satyam Stipulation and the PwC Entities Stipulation, Lead Counsel who seek to be paid their share of the attorney fee and expense award prior to the Effective Date shall be jointly and severally obligated to make appropriate refunds or repayments of attorneys' fees and expenses and any interest thereon paid to Lead Counsel to the Settlement Funds or to the Settling Defendants who contributed the Settlement Funds in direct proportion to their contributions to the Settlement Funds, as applicable, plus accrued interest at the same net rate as is earned by the Settlement Funds, if the Settlements are terminated pursuant to the terms of the Stipulations or if, as a result of any appeal or further proceedings on remand, or successful collateral attack, the award of attorneys' fees and/or litigation expenses is reduced or reversed by final non-appealable court order.

6. Class Representative the Public Employees' Retirement System of Mississippi is awarded \$14,400 as reimbursement for its costs and expenses directly relating to its services in representing the Class.

7. Class Representative Mineworkers' Pension Scheme is awarded \$98,711 as reimbursement for its costs and expenses directly relating to its services in representing the Class.

8. Class Representative SKAGEN AS is awarded \$59,000 as reimbursement for its costs and expenses directly relating to its services in representing the Class.

9. Class Representative Sampension KP Livsforsikring A/S is awarded \$21,000 as reimbursement for its costs and expenses directly relating to its services in representing the Class.

10. Subclass Representative Brian F. Adams is awarded \$2,000 as reimbursement for his costs and expenses directly relating to his services in representing the Class and Subclass.

11. A litigation fund in the amount of \$1,000,000 from the Satyam Settlement Fund shall be established to fund the continued prosecution of the Action against the Non-Settling Defendants.

12. In making this award of attorneys' fees, and reimbursement of expenses to be paid from the Settlement Funds, the Court has considered and found that:

(a) The Settlements have created a total settlement amount of \$150.5 million in cash that is already on deposit and has been earning interest, and that numerous Class Members who submit acceptable Proofs of Claim will benefit from the Settlements created by the efforts of Lead Counsel;

(b) The fee sought by Lead Counsel has been reviewed and approved as fair and reasonable by the Court-appointed Lead Plaintiffs, sophisticated institutional investors that were substantially involved in all aspects of the prosecution and resolution of the Action;

(c) To date, over 208,000 copies of the Notices were disseminated to putative Class Members stating that Lead Counsel were moving for attorneys' fees not to exceed 17% of proposed Settlements and reimbursement of expenses incurred in connection with the prosecution of this Action. Only one objection to the terms of the Settlement and the fees and expenses requested by Lead Counsel contained in the Notice was received, although it was untimely and not filed with the Court as required by the Preliminary Approval Orders. The objector has not proven that he is a member of the Class, nor does he have standing; even if he did, his objection has been considered and overruled;

(d) Lead Counsel have conducted the litigation and achieved the Settlements with skill, perseverance and diligent advocacy;

(e) The Action involves complex factual and legal issues and, in the absence of settlement, would involve lengthy proceedings with uncertain resolution of the complex factual and legal issues;

(f) Had the Settlements not been achieved, there would remain a significant risk that Lead Plaintiffs and the other members of the Class may have recovered less or nothing from the Settling Defendants; and

(g) The amount of attorneys' fees awarded and expenses reimbursed from the Settlement Funds are fair and reasonable and consistent with awards in similar cases.

13. Any appeal or any challenge affecting this Court's approval regarding any attorneys' fees and expense application shall in no way disturb or affect the finality of the Judgments entered with respect to the Settlements.

14. Continuing jurisdiction is hereby retained over the parties and the Class Members for all matters relating to this Action, including the administration, interpretation, effectuation or enforcement of the Settlement Stipulations and this Order, including any further application for fees and expenses incurred in connection with administering and distributing the settlement proceeds to the members of the Class.

15. In the event that any of the Settlements are terminated or do not become Final or the Effective Date does not occur in accordance with the terms of the applicable Settlement Stipulation(s), this Order, except for ¶ 5 above, shall be rendered null and void to the extent provided by the applicable Settlement Stipulation(s) and shall be vacated in accordance with the terms of the applicable Settlement Stipulation(s).

16. There is no just reason for delay in the entry of this Order, and immediate entry by the Clerk of the Court is expressly directed.

Dated: New York, New York
September 13, 2011



Honorable Barbara S. Jones
UNITED STATES DISTRICT JUDGE

Exhibit H

Alexion Securities Litigation
Civ. No. 3:16-cv-2127 (AWT) (D. Conn.)

SUMMARY OF LODESTARS AND EXPENSES

FIRM	HOURS	LODESTAR	EXPENSES
Motley Rice LLC	25,254.01	\$13,992,296.60	\$822,413.49
Labaton Sucharow LLP	20,417.10	\$11,577,652.00	\$541,950.58
TOTALS	45,671.11	\$25,569,948.60	\$1,364,364.07

Exhibit I

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

BOSTON RETIREMENT SYSTEM,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

ALEXION PHARMACEUTICALS, INC.,
LEONARD BELL, DAVID L. HALLAL,
VIKAS SINHA,

Defendants.

Civ. No. 3:16-cv-2127 (AWT)

Hon. Alvin W. Thompson

**DECLARATION OF GREGG S. LEVIN ON BEHALF OF MOTLEY RICE LLC
IN SUPPORT OF APPLICATION FOR AN AWARD OF
ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, GREGG S. LEVIN, declare as follows, pursuant to 28 U.S.C. § 1746:

1. I am a member attorney in the law firm of Motley Rice LLC (“Motley Rice” or the “Firm”). I submit this declaration in support of the Firm’s application for an award of attorneys’ fees and expenses in connection with services rendered in the above-entitled action (the “Action”) from its inception through October 31, 2023 (the “Time Period”).

2. The Firm, which serves as Co-Class Counsel in the Action, has been involved throughout the course of the Action, which is described in the accompanying Joint Declaration of Gregg S. Levin and Michael H. Rogers in Support of (I) Class Representatives’ Motion for Final Approval of Class Action Settlement and Plan of Allocation and (II) Co-Class Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Litigation Expenses, filed herewith.

3. The information in this declaration and the associated exhibit regarding the time spent on the Action by attorneys and other professional support staff is based on contemporaneous

daily time records regularly prepared and maintained by the Firm. Likewise, the information in this declaration and the associated exhibit regarding expenses is based on the records of the Firm, which are regularly prepared and maintained in the ordinary course of business, and other business records provided to the Firm. These records are prepared from expense vouchers, check records, and other source materials that are an accurate record of the expense incurred.

4. I am the member attorney who oversaw and/or directed the day-to-day activities in the Action and I reviewed these time and expense records (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration.

5. The purpose of this review was to confirm both the accuracy of the time entries and expenses as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. As a result of this review, reductions were made to both time and expenses in the exercise of “billing judgment.” In addition, all time expended in preparing Co-Class Counsel’s application for fees and expenses has been excluded. Further, all time of any Motley Rice timekeeper who spent less than ten hours working on the Action has been excluded.

6. As a result of this review and the adjustments made, I believe that the time reflected in the Firm’s lodestar calculation and the litigation expenses for which payment is sought as set forth in this declaration are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation. In addition, I believe that the expenses are all of a type that would normally be paid by a fee-paying client in the private legal marketplace.

7. In addition to Motley Rice employee timekeepers, the schedule attached hereto as Exhibit A also identifies (a) five (5) contract attorneys and (b) Of Counsel Deborah Sturman, who are not employees of the Firm. These individuals formed part of the Firm’s litigation team in this matter and performed legal work that materially advanced the prosecution of the Action.

8. While the five contract attorneys were not directly employed by the Firm, they were in every instance directly overseen by, and their work product reviewed by, the Firm's members and attorneys. Additionally, Motley Rice provided the necessary facilities and resources for these individuals to perform the legal work assigned to them in connection with this Action. (These facilities and resources included, among other things, access to electronic research and communications systems, and malpractice insurance coverage for their work on the Action.) These contract attorneys are discussed further at paragraphs 11-12 below.

9. The schedule attached hereto as Exhibit A is a summary indicating the amount of time spent by attorneys and professional support staff members of the Firm who were involved in the prosecution of the Action, and the lodestar calculation based on Motley Rice's current hourly rates. The hourly rates for the attorneys and professional support staff listed on Exhibit A are the usual and customary rates set by the Firm in securities litigation. These hourly rates are the same as, or comparable to, the rates accepted by courts in other securities class action litigation or shareholder litigation, including courts within this District and Circuit.

10. The Firm's rates are set based on, among other factors, periodic analysis of rates utilized by firms performing comparable work and that have been approved by courts. Different timekeepers within the same employment category (e.g., members, associates, staff attorneys, paralegals, etc.) may have different rates based on a variety of factors, including years of practice, years at the Firm, year in the current position (e.g., years as a member), relevant experience, and the rates of similarly experienced peers at the Firm or other firms. For personnel who are no longer associated with Motley Rice, the "current rate" used in the lodestar calculation is based upon the rate for that individual in his or her final year of working at Motley Rice.

11. The Firm is treating the five contract attorney timekeepers on the same basis as it is treating the remainder of the legal professionals contained in its lodestar calculations (whether

they be members, associates, staff attorneys, project attorneys, paraprofessionals, or support staff): at their current hourly rates, which are based on market rates. The contract attorneys' market rates were determined based on an analysis of the market rates for contract attorneys approved by federal courts under analogous circumstances—namely, in other litigations where courts were asked to approve fee petitions that included the work of contract attorney timekeepers. *See, e.g., In re MacBook Keyboard Litig.*, 2023 WL 3688452, at *15 (N.D. Cal. May 25, 2023) (approving \$400-\$425 per hour for contract attorneys). Furthermore, at the outset of the litigation, Co-Lead Plaintiff, Erste Asset Management GmbH, approved of Motley Rice's use of hourly rates for contract attorneys that were comparable to those of the Firm's employee-attorneys.¹

12. With respect to the work of the Firm's contract attorneys, they performed extensive review and analysis (involving coding for relevance and identifying "highly relevant" and "hot" documents for escalation to other members of the litigation team) of the millions of pages of documents produced in the Action. The projects completed by them also went far beyond such review, including (among other things): attending regular in-person meetings and telephone calls with the attorneys on the wider team to discuss the results of the document analysis and emerging issues in the litigation; researching and identifying potential document custodians, deponents, and relevant non-parties; researching and drafting witness memoranda and first-pass deposition outlines; reviewing privilege logs to identify issues for dispute resolution; organizing and analyzing the evidence obtained during the discovery process through memoranda, timelines, and Excel spreadsheets; identifying potential materials for review by experts; and numerous other similarly related work going beyond document review.

¹ As noted on Exhibit A, the hourly rates applicable to the five contract attorney timekeepers here range from \$325 to \$410.

13. The total number of reported hours spent on this Action by my Firm during the Time Period is 25,254.01. The total lodestar amount for reported attorney/professional staff time based on the Firm's current rates is \$13,992,296.60.

14. My Firm's lodestar figures are based upon Motley Rice's hourly rates, which do not include expense items. Expense items are recorded separately, and are not duplicated in the Firm's hourly rates.

15. As detailed in Exhibit B hereto, my Firm has incurred a total of \$822,413.49 in unreimbursed expenses in connection with the prosecution of the Action. The expenses are reflected on the books and records of my Firm. These books and records are prepared from expense vouchers, check records, and other source materials and are an accurate record of the expenses incurred.

16. The following is additional information regarding certain categories of expenses incurred in connection with the Action:

(a) **Online Legal and Factual Research:** \$164,374.72. This category includes payments to vendors such as (among others) Westlaw, Lexis/Nexis, PACER, and Bloomberg BNA. These resources were used to obtain access to court filings, to conduct legal research and the cite-checking of briefs, and to obtain factual information regarding the claims asserted through access to various databases. These expenses represent the actual expenses incurred by the Firm for use of these services in connection with this litigation and do not reflect any surcharge by the Firm. The charges of these vendors vary depending upon the type of services requested.

(b) **Litigation Fund Contributions:** \$220,000.00. Motley Rice, along with Co-Class Counsel Labaton Sucharow LLP, maintained a litigation expense fund for certain common expenses in connection with the prosecution of this case. This \$220,000 figure represents

my Firm's total contribution to the litigation fund. Details about the fund are provided in the Declaration of Michael H. Rogers on Behalf of Labaton Sucharow LLP in Support of Application for an Award of Attorneys' Fees and Litigation Expenses, filed herewith.

(c) **Experts, Consultants and Other Professionals:** \$146,245.09. The primary expenses incurred in this category were payments to: Professor Martin Karollus (\$89,905.81) and Leopold Specht (\$25,130.80), each of whom provided expert services in connection with Lead Plaintiffs' Motion for Class Certification. Several other expenses fell within this category including, but not limited to, (a) \$9,146.00 to WW Investigations (a private investigative firm) to conduct research on matters connected to the litigation; and (b) \$7,594.55 for services rendered by Garrison, Levin-Epstein, Fitzgerald & Pirotti, PC, which represented a witness/deponent in the Action.

(d) **Litigation Support:** \$189,836.00. The primary expense incurred in this category were recurring payments to Xact Data Discovery/Consilio, LLC ("Xact") totaling \$188,893.30. Xact provided electronic document hosting services in the Action in connection with the approximately 3.5 million pages produced by Defendants and non-parties.

(e) **Deposition Reporting and Transcripts:** \$9,611.09

(f) **Work-Related Transportation, Hotels & Meals:** \$58,057.01. In connection with the prosecution of this case, the Firm has paid for work-related transportation expenses, meals, and travel expenses related to, among other things, traveling to various depositions and two mediation sessions (both of those mediation sessions were conducted in New York, New York). Any first-class airfare has been reduced to be comparable to economy rates.

17. With respect to the standing of the Firm, attached hereto as Exhibit C is a copy of Motley Rice's Shareholder and Securities Fraud Resume.

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

Executed this 15th day of November, 2023.



A handwritten signature in blue ink, appearing to read "Gregg S. Levin", is written above a horizontal line.

GREGG S. LEVIN

*Alexion Securities Litigation***EXHIBIT A****LODESTAR REPORT**

FIRM: MOTLEY RICE LLC

REPORTING PERIOD: CASE INCEPTION THROUGH OCTOBER 31, 2023

NAME	TITLE	CURRENT RATE	HOURS	LODESTAR
Arnold, Andrew P.	M	\$895.00	48.25	\$43,183.75
Gruetzmacher, Max	M	\$920.00	17.25	\$15,870.00
Hughes, James M.	M	\$925.00	45.70	\$42,272.50
Jasinski, Mathew	M	\$970.00	237.65	\$230,520.50
Levin, Gregg	M	\$1,100.00	1,194.75	\$1,314,225.00
Littlejohn, Joshua C	M	\$970.00	1,910.10	\$1,852,797.00
Moriarty, Christopher F.	M	\$920.00	192.75	\$177,330.00
Narwold, Bill	M	\$1,315.00	197.00	\$259,055.00
Norton, Bill S.	M	\$975.00	2,117.10	\$2,064,172.50
Sturman, Deborah	OC	\$950.00	286.50	\$272,175.00
Burnett, David	SC	\$860.00	73.00	\$62,780.00
Camputaro, Elizabeth A.	A	\$570.00	92.00	\$52,440.00
Rosenbaum, Bruno	A	\$550.00	139.50	\$76,725.00
Tinkler, William	A	\$550.00	22.25	\$12,237.50
Weatherby, Meredith	A	\$650.00	219.70	\$142,805.00
Williams, Erin	A	\$680.00	253.00	\$172,040.00
Davis, Vanessa	SA	\$500.00	1,670.65	\$835,325.00
Jacobs, Rebecca	SA	\$400.00	291.75	\$116,700.00
Quillin, Kelly	SA	\$425.00	440.75	\$187,318.75
Buttel Lopez, Kenya	PA	\$375.00	2,517.10	\$943,912.50
Chenoweth, Steven	PA	\$405.00	354.15	\$143,430.75
Gonzalez, Felicity	PA	\$410.00	1,539.15	\$631,051.50
Harbin, Robert Clay	PA	\$410.00	850.95	\$348,889.50
Kelley, Leacy	PA	\$350.00	130.75	\$45,762.50
McLean, William	PA	\$410.00	2,072.45	\$849,704.50
Miles, Heather	PA	\$350.00	332.40	\$116,340.00

NAME	TITLE	CURRENT RATE	HOURS	LODESTAR
Morris, Sierra	PA	\$405.00	503.85	\$204,059.25
Roy, Kyle	PA	\$410.00	1,331.40	\$545,874.00
Beasley, Daniel	CA	\$325.00	600.70	\$195,227.50
Berarducci, Tom	CA	\$410.00	727.95	\$298,459.50
Ensign, Gregory	CA	\$410.00	1,254.91	\$514,513.10
Gerhard, Michael	CA	\$375.00	1,614.00	\$605,250.00
Wallace, Sarah	CA	\$375.00	316.00	\$118,500.00
Richards, Evelyn	LC	\$400.00	215.25	\$86,100.00
Simon, Florence	LC	\$325.00	15.25	\$4,956.25
Wills, Grant	LC	\$275.00	54.75	\$15,056.25
Hickey, Megan	PL	\$275.00	680.25	\$187,068.75
LePine, Viola T.	PL	\$380.00	22.75	\$8,645.00
Luellen, Julianna	PL	\$275.00	108.00	\$29,700.00
McLaughlin, Lora L.	PL	\$425.00	91.50	\$38,887.50
Romeo, Leanna	PL	\$200.00	12.00	\$2,400.00
Sharda, Lynn	PL	\$350.00	95.70	\$33,495.00
Weil, Katherine M	PL	\$375.00	139.00	\$52,125.00
Wilson, Arden Ruth	PL	\$275.00	10.50	\$2,887.50
Rex, Ernalene	LA	\$125.00	116.75	\$14,593.75
Janelle, Alice H.	LS	\$380.00	10.15	\$3,857.00
Ashby, Lisa	LT	\$270.00	59.75	\$16,132.50
Lollie, Toya	LT	\$190.00	11.25	\$2,137.50
Harris, Lenique	BA	\$210.00	15.75	\$3,307.50
TOTALS			25,254.01	\$13,992,296.60

Associate	(A)	Litigation Technology Specialist	(LT)
Business Analyst	(BA)	Member	(M)
Contract Attorney	(CA)	Of Counsel	(OC)
Law Clerk	(LC)	Paralegal	(PL)
Legal Assistant	(LA)	Project Attorney	(PA)
Legal Secretary	(LA)	Staff Attorney	(SA)

*Alexion Securities Litigation***EXHIBIT B****EXPENSE REPORT**

FIRM: MOTLEY RICE LLC

REPORTING PERIOD: CASE INCEPTION THROUGH OCTOBER 31, 2023

CATEGORY		TOTAL AMOUNT
Court / Witness / Service Fees		\$7,085.67
Long Distance Telephone / Fax/ Conference Calls		\$371.00
Postage / Overnight Delivery Services		\$1,287.70
Online Legal & Factual Research		\$164,374.72
Experts/Consultants/Other Professionals		\$146,245.09
Professor Martin Karollus	\$89,905.81	
Leopold Specht	\$25,130.80	
WW Investigations	\$9,146.00	
Garrison, Levin-Epstein, Fitzgerald & Pirotti, PC	\$7,594.55	
Medical Consultant	\$5,000.00	
Expert Institute	\$2,000.00	
GTS Translation	\$125.00	
Pehl, LLC	\$4,455.00	
Rapid Translate	\$247.93	
Transperfect Translations	\$2,640.00	
Litigation Support		\$189,836.00
Deposition Reporting and Transcripts		\$9,611.09
Work-Related Transportation / Hotels / Meals		\$58,057.01
Duplicating		\$25,545.21
Outside:	\$183.53	
In-House Color: (182 copies at \$0.25 per page)	\$45.50	
In-House Color: (32,144 copies at \$0.40 per page)	\$12,857.60	

CATEGORY		TOTAL AMOUNT
In-House BW: (3,132 copies at \$0.10 per page)	\$313.20	
In-House BW: (52,806 copies at \$0.23 per page)	\$12,145.38	
Litigation Fund Contributions		\$220,000.00
TOTAL		\$822,413.49

Alexion Securities Litigation

EXHIBIT C

MOTLEY RICE SECURITIES RESUME

**SHAREHOLDER AND
SECURITIES FRAUD
RESUME**



INTRODUCTION

Founded as a trial lawyers' firm with a complex litigation focus by Ron Motley, Joe Rice and nearly 50 other lawyers, Motley Rice LLC has become one of the nation's largest plaintiffs' law firms.

Motley Rice LLC ("Motley Rice") is led by lawyers who received their training and trial experience in complex litigation involving in-depth investigations, discovery battles and multi-week trials.

From asbestos and tobacco to counter-terrorism and human rights cases, Motley Rice attorneys have shaped developments in U.S. jurisprudence over several decades. Shareholder litigation has earned an increasing portion of our firm's focus in recent years as threats to global retirement security have increased. Motley Rice seeks to create a better, more secure future for pensioners, unions, government entities and institutional investors through improved corporate governance and accountability.

APPROACH TO SECURITIES LITIGATION

As concerns about our global financial system have intensified, so has our focus on securities litigation as a practice area. As one presenter at the 2009 International Foundation of Employee Benefit Plans annual conference noted, "2008 likely will go down in history as one of the worst years for retirement security in the United States."

Our securities litigation philosophy is straightforward – obtain the best possible results for our clients and any class of investors we represent. Unlike some other firms, we are extremely selective about the cases that we recommend our clients pursue, recognizing that many securities fraud class action cases filed each year are unworthy of an institutional investor's involvement for a variety of reasons.

Our attorneys have substantial experience analyzing securities cases and advising institutional investor clients, whether to seek lead-plaintiff appointment (alone or with a similarly-minded group), remain an absent class member, or consider an opt-out case based on the particular factual and legal circumstances of the case.

When analyzing new filings, our attorneys draw upon their securities, business, and litigation experience, which is supplemented by our in-house team of paralegals and business analysts. In addition, the firm has developed close working relationships with widely-respected forensic accountants and expert witnesses, whose involvement at the earliest stages of complex cases can be critical to determining the best course of action. If Motley Rice believes that a case deserves an institutional investor's involvement, we provide our clients with a detailed written analysis of potential claims and loss-recoupment strategies.

Motley Rice attorneys have secured important corporate governance reforms and returned money to shareholders in shareholder derivative cases, served as lead or co-lead counsel in several significant, multi-million dollar securities fraud class actions, and taken leadership roles in cases involving fiduciaries who failed to maximize shareholder value and fulfill disclosure obligations in a variety of merger and acquisition cases.



OUR BACKGROUND IN COMPLEX LITIGATION

Motley Rice attorneys have been at the forefront of some of the most significant and monumental civil actions over the last 30 years. Our experience in complex trial litigation includes class actions and individual cases involving securities and consumer fraud, occupational disease and toxic tort, medical drugs and devices, environmental damage, terrorist attacks and human rights abuses.

Tobacco Master Settlement Agreement

In the 1990s, Motley Rice attorneys and more than half of the states' attorneys general took on the tobacco industry. Armed with evidence acquired from whistleblowers, individual smokers' cases and tobacco liability class actions, the attorneys led the campaign in the courtroom and at the negotiation table to recoup state healthcare funds and exact marketing restrictions from cigarette manufacturers. The effort resulted in significant restrictions on cigarette marketing to children and culminated in the \$246 billion Master Settlement Agreement, the largest civil settlement in U.S. history.

Asbestos Litigation

From the beginning, our lawyers were integral to the story of how "a few trial lawyers and their asbestos-afflicted clients came out . . . to challenge giant asbestos corporations and uncover the greatest and longest business cover-up of an epidemic disease, caused by a product, in American history."¹ In addition to representing thousands of workers and family members impacted by asbestos, Motley Rice has represented numerous public entities, and litigated claims alleging various insurers of asbestos defendants engaged in unfair settlement practices in connection with the resolution of underlying asbestos personal injury claims. This litigation resulted in, among other things, an eleven-state settlement with Travelers Insurance Company.

Anti-Terrorism and Human Rights

In *In re Terrorist Attacks on September 11, 2001*, Motley Rice attorneys brought a landmark lawsuit against the alleged private and state sponsors of al Qaeda and Osama bin Laden in an action filed on behalf of more than 6,500 family members, survivors, and those killed on 9/11—including the representation of more than 900 firefighters and their families. In prosecuting this action, Motley Rice has undertaken a global investigation into terrorism financing.

Our attorneys also initiated the *In re September 11 Litigation* and negotiated settlements for 56 families that opted out of the Victim Compensation Fund that far exceeded existing precedents at the time for wrongful death cases against the airline industry.

¹ Ralph Nader, commenting on the story told by the book *Outrageous Misconduct*.

BP PLC Oil Spill Litigation

In April 2010, the Deepwater Horizon disaster spilled approximately 4.9 million gallons of oil into the water, killed 11 oil rig workers, devastated the Gulf's natural resources and profoundly harmed the economic and emotional well-being of hundreds of thousands of people. The Deepwater Horizon Economic and Property Damages Settlement is the largest civil class action settlement in U.S. history. Motley Rice co-founder Joseph Rice is a Plaintiffs' Steering Committee member and served as one of the primary negotiators of that Settlement and the Medical Benefits Settlement. In addition, Rice led negotiations in the \$1.028 billion settlement between the PSC and Halliburton Energy Services for its alleged role in the oil spill. Motley Rice attorneys continue to hold leadership roles in the litigation and are currently working to ensure that all qualifying oil spill victims are fairly compensated.

Volkswagen 'Clean Diesel' Litigation

In 2015, Volkswagen Group's admission that it had programmed more than 11 million vehicles to cheat emissions tests and bypass standards sparked worldwide outrage. Motley Rice co-founder Joe Rice served as one of the lead negotiators in the nearly \$15 billion settlement deal reached in 2016 for U.S. owners and lessees of 2.0-liter TDI vehicles, the largest auto-related consumer class action settlement in U.S. history. Rice and other Motley Rice attorneys also helped recover up to \$4.4 billion with regards to affected 3.0-liter vehicles.

Transvaginal Mesh Litigation

Motley Rice attorneys represent thousands of women and have played a leading role in litigation alleging debilitating and life-altering complications caused by defective transvaginal mesh devices. In 2014, Joe Rice, with co-counsel, negotiated the original settlement deal reached in *In re American Medical Systems, Inc., Pelvic Repair Systems Products Liability Litigation* that numerous subsequent settlements with the manufacturer were modeled after.

Opioid Litigation

At the forefront of litigation targeting the alleged overprescribing and deceptive marketing of addictive opioid painkillers, Motley Rice, led by attorney Linda Singer, the former Attorney General for the District of Columbia, serves as lead counsel for the first jurisdictions to file complaints in the most recent wave of litigation against pharmaceutical companies regarding the opioid crisis—the City of Chicago and Santa Clara County. In addition, the firm's co-founder Joe Rice serves as co-lead counsel in the *National Prescription Opiate Litigation* coordinated in the Northern District of Ohio. The firm represents 40 jurisdictions.

Securities Fraud Class Actions

***In re Twitter Inc. Securities Litigation*, No. 3:16-cv-05314 (N.D.Cal.)** Motley Rice, as lead counsel, negotiated a preliminary \$809.5 million settlement in September 2021 for Twitter Inc. shareholders who allege they were misled about the social media network's daily user growth during 2015. Twitter executives announced toward the end of 2014 that they expected the company's number of active users would grow to more than half a billion in the intermediate term, and would reach heights of more than a billion long term. When the public, however, later learned that actual user growth was slower than anticipated, the company's price per share drastically declined.

***In re Citigroup Inc. Securities Litigation*, No. 07 Civ. 9901 (SHS) (DCF) (S.D.N.Y.)**. Motley Rice served as co-counsel in this securities fraud action alleging that Citigroup responded to the widely-known financial crisis by concealing both the extent of its ownership of toxic assets—most prominently, collateralized debt obligations (CDO) backed by nonprime mortgages—and the risks associated with them. By alleged misrepresentations and omissions of what amounted to more than two years of income and an entire significant line of business, Citigroup allegedly artificially manipulated and inflated its stock prices throughout the class period. Citigroup's alleged actions caused its stock price to trade in a range of \$42.56 to \$56.41 per share for most of the class period. These disclosures helped place Citigroup in serious danger of insolvency, a danger that was averted only through a \$300 billion dollar emergency government bailout. On August 1, 2013, the Court approved the settlement resolving all claims in the Citigroup action in exchange for payment of \$590 million for the benefit of the class.

***Alaska Electrical Pension Fund v. Pharmacia Corp.*, No. 03-1519 (D.N.J.)**. Motley Rice served as co-class counsel in federal securities fraud litigation alleging that the defendants misrepresented clinical trial results of Celebrex® to make its safety profile appear better than rival drugs. In January 2013, the lawsuit settled in mediation for \$164 million.

***Bennett v. Sprint Nextel Corporation*, No. 2:09-cv-02122-EFM-KMH (D. Kan.)**. As co-lead counsel, Motley Rice represented the PACE Industry Union-Management Pension Fund (PIUMPF) and two other institutional investors who purchased Sprint Nextel common stock between October 26, 2006 and February 27, 2008. The class action complaint alleged that the defendants made materially false and misleading statements regarding Sprint's business and financial results. As a result, the complaint alleged that Sprint stock traded at artificially inflated prices during the class period and that, when the market learned the truth, the value of Sprint's shares plummeted. In August 2015, the court granted final approval to a \$131 million settlement.

***In re Barrick Gold Securities Litigation*, No. 1:13-cv-03851-RMB (S.D.N.Y.)**. As sole lead counsel, Motley Rice represented Co-Lead Plaintiffs Union Asset Management Holding AG and LRI Invest S.A. in a class action on behalf of investors who purchased shares of Barrick Gold Corporation, the world's largest gold mining company. The suit alleged that Barrick Gold had fraudulently underreported the cost and the time to develop its Pascua-Lama gold mine on the border between Argentina and Chile, and misrepresented its compliance with applicable environmental regulations and the sufficiency of its internal controls. Barrick Gold eventually abandoned its development of the Pascua-Lama mine after an injunction was issued by a Chilean court following the company's failure to comply with environmental regulations, and causing Barrick Gold to take an impairment charge of over \$5 billion. A \$140 million settlement was reached, and received final approval in December 2016.

***Minneapolis Firefighters' Relief Association v. Medtronic, Inc.*, No. 08-6324 (PAM/AJB) (D. Minn.)**. Motley Rice is co-lead counsel for a class of investors who purchased Medtronic common stock in this case that survived the defendants' motion to dismiss. The suit alleges that Medtronic engaged in a pervasive campaign of illegal off-label marketing in which the company advised doctors to use Medtronic's Infuse Bone Graft in ways not FDA-approved, leading to severe complications in patients. Medtronic's stock price dropped significantly after investors learned that the FDA and Department of Justice were investigating Medtronic's off-label marketing. The \$85 million settlement was approved on Nov. 8, 2012.

***Cornwell v. Credit Suisse Group*, No. 08 Civ. 3758 (VM) (S.D.N.Y.)**. Motley Rice served as co-counsel in an action against Credit Suisse Group alleging the defendants issued materially false and misleading statements regarding the company's business and financial results and failed to write down impaired securities containing mortgage-related debt. Subsequently, Credit Suisse's stock price relative to other market events declined 2.83 percent when impaired securities came to light. A \$70 million settlement was approved in July 2011.

***In re Forest Laboratories, Inc. Securities Litigation*, No. 05 Civ. 2827 (RMB) (S.D.N.Y.)**. Motley Rice represented PIUMPF in a securities fraud class action alleging that the company and its officers misrepresented the safety, efficacy, and side effects of several drugs. Motley Rice, in cooperation with other class counsel, helped the parties reach a \$65 million settlement that was approved on May 15, 2009.

CASES

City of Brockton Retirement System v. Avon Products, Inc., No. 11 Civ. 4665 (PGG) (S.D.N.Y.). Motley Rice serves as sole lead counsel representing lead plaintiffs in a class action on behalf of all persons who acquired Avon common stock between July 31, 2006 and Oct. 26, 2011. The action alleges that the defendants falsely assured investors they had effective internal controls and accounting systems, as required under the Foreign Corrupt Practices Act (FCPA). In October 2008, Avon disclosed that it had begun an investigation into possible FCPA violations in China in June 2008. The action alleges that, unbeknownst to investors, Avon had an illegal practice of paying bribes in violation of the FCPA extending as far back as 2004 and which continued even after its October 2008 disclosure. Despite its certifications of the effectiveness of its internal controls, Avon's internal controls were allegedly severely deficient, allowing the company to engage in millions of dollars of improper payments in more than a dozen countries. On August 24, 2016, the court approved a final settlement of \$62 million.

City of Sterling Heights General Employees' Retirement System v. Hospira, Inc., No. 11 C 8332 (N.D. Ill.). Motley Rice serves as co-lead counsel representing investors in this lawsuit against Hospira, the world's largest manufacturer of generic injectable pharmaceuticals, including generic acute-care and oncology injectables and integrated infusion therapy and medication management systems. The lawsuit alleges that Hospira and certain executive officers engaged in a fraudulent scheme to artificially inflate the company's stock price by concealing significant deteriorating conditions, manufacturing and quality control deficiencies at its largest manufacturing facility located in Rocky Mount, N.C., and the costly effects of these deficiencies on production capacity. These deteriorating conditions culminated in a series of regulatory actions by the FDA which the defendants allegedly misrepresented to their investors. The case settled for \$60 million in 2014.

Hill v. State Street Corporation, No. 09-cv-12146-NG (D. Mass.). Motley Rice represented institutional investors as co-lead counsel against State Street. The action alleged that State Street defrauded institutional investors – including the state of California's two largest pension funds, California Public Employees' Retirement System (CalPERS) and California State Teachers' Retirement System (CalSTRS) – by misrepresenting its exposure to toxic assets and overcharging them for foreign exchange trades. On January 8, 2015, the court approved a \$60 million settlement.

In re Hewlett-Packard Co. Securities Litigation, No. SACV 11-1404 AG (RNBx) (C.D. Cal.). Motley Rice served as co-lead counsel representing investors who purchased Hewlett-Packard common stock between November 22, 2010 and August 18, 2011. The lawsuit alleged that Hewlett-Packard misled investors about its ability to release over a hundred million webOS-enabled devices by the end of 2011. After Hewlett-Packard abandoned webOS development in August 2011, the company's stock price declined significantly. The court granted final approval to a \$57 million settlement on September 15, 2014.

KBC Asset Management NV v. 3D Systems Corp., No. 0:15-cv-02393-MGL (D.S.C.). Motley Rice served as co-lead counsel on behalf of Co-Lead Plaintiff KBC Asset Management NV in a securities fraud class action on behalf of investors who purchased the common stock of 3D Systems Corporation between October 29, 2013 and May 5, 2015. The suit alleged that 3D and its senior executives concealed material operating, manufacturing, and product quality problems resulting from the company's aggressive acquisition and product growth strategies while touting the company's ability to meet high demand for its direct metal 3D printers. The court denied defendants' motion to dismiss on July 25, 2016, and denied defendants' motion for reconsideration on February 24, 2017. Following discovery, the parties reached an agreement to settle the action for \$50 million, which received final approval on June 25, 2018.

South Ferry LP #2 v. Killinger, No. C04-1599C-(W.D. Wash.) (regarding Washington Mutual). Motley Rice served as co-lead counsel on behalf of a class of investors who purchased WaMu common stock between April 15, 2003, and June 28, 2004. The suit alleged that WaMu misrepresented its ability to hedge risk and withstand changes in interest rates, as well as its integration of differing technologies resulting from various acquisitions. The Court granted class certification in January 2011 and approved the \$41.5 million settlement on June 5, 2012.

In re Dell, Inc. Securities Litigation, No. A-06-CA-726-SS (W.D. Tex.). Motley Rice was appointed lead counsel for the lead plaintiff, Union Asset Management Holding AG, which sued on behalf of a class of purchasers of Dell common stock. The suit alleged that Dell and certain senior executives lied to investors and manipulated financial announcements to meet performance objectives that were tied to executive compensation. The defendants' alleged fraud ultimately caused the price of Dell's stock to decline by over 40 percent. After the case was dismissed by the district court, Motley Rice attorneys launched an appeal to the Fifth Circuit Court of Appeals. After fully briefing the case and oral arguments, the parties settled the case for \$40 million.

Freedman v. St. Jude Medical, Inc., No. 12-3070 (RHK/JJG) (D. Minn.). Motley Rice served as co-lead counsel representing co-lead plaintiff Första AP-fonden, a Swedish pension fund, in this securities fraud class action against St. Jude Medical, Inc., a manufacturer of medical devices for cardiac rhythm management and the treatment of atrial fibrillation. This action alleged that defendants made false and misleading statements and concealed material information relating to the safety, durability, and manufacturing processes of the company's new generation of cardiac rhythm management devices marketed under the name "Durata." A \$39.5 million settlement was approved in November 2016.

Hatamian v. Advanced Micro Devices, Inc., No. 4:14-cv-00226-YGR (N.D. Cal.). Motley Rice served as co-lead counsel representing Lead Plaintiffs KBC Asset Management NV and Arkansas Teacher Retirement System in this securities fraud class action on behalf of investors that purchased AMD common stock between April 4, 2011, and October 18, 2012. AMD, a multinational semiconductor manufacturer, allegedly misrepresented and concealed problems affecting the production, launch, demand, and sales of its new “Llano” microprocessor. These problems allegedly led AMD to miss the critical sales period for Llano-based computers and ultimately take a \$100 million write-down of by-then obsolete Llano inventory, causing AMD’s stock price to fall, and damaging the company’s investors. The court granted class certification on March 16, 2016. For the next two years, Class Counsel obtained and reviewed approximately 2.5 million pages of documents; participated in 34 depositions of fact, expert, and confidential witnesses; retained industry and financial experts; briefed competing motions for summary judgment; and engaged in multiple mediations with defendants. On March 6, 2018, the court approved a \$29.5 million settlement.

Ross v. Career Education Corp. No. 1:12-cv-00276 (N.D. Ill.). On April 16, 2014, the U.S. District Court for the Northern District of Illinois issued an order granting final judgment and dismissing with prejudice *Ross v. Career Education Corp.* Motley Rice served as co-lead counsel in the lawsuit, which alleged that Career Education and certain of its executive officers violated the federal securities laws by misleading the company’s investors about its placement practices and reporting. The court approved a final settlement of \$27.5 million.

In re MBNA Corporation Securities Litigation, No. 05-CV-00272-GMS (D. Del.). Motley Rice served as co-lead counsel on behalf of investors who purchased MBNA common stock. The suit alleged that MBNA manipulated its financial statements in violation of GAAP, and MBNA executives sold over one million shares of stock based on inside information for net proceeds of more than \$50 million, knowing these shares would drop in value once MBNA’s true condition was revealed to the market. The case was settled with many motions pending. The \$25 million settlement was approved on October 6, 2009.

Bodner v. Aegerion Pharmaceuticals, Inc., et al., 14-cv-10105 (D.Mass.) Motley Rice served as co-lead counsel on behalf of investors who purchased Aegerion common stock. The suit alleged that Aegerion issued false and misleading statements and failed to disclose, among other things, that (i) the Company illegally marketed the drug JUXTAPID beyond its FDA-approved label, and (ii) the Company was experiencing a higher than expected drop-out rate of patients taking JUXTAPID. A \$22.25 million settlement was approved on November 30, 2017.

Welmon v. Chicago Bridge & Iron Co., N.V., No. 06-CV-01283 (JES) (S.D.N.Y.). Motley Rice represented the co-lead plaintiff in this case that alleged that the defendants issued numerous materially false and misleading statements which caused CB&I’s securities to trade at artificially inflated prices. The litigation resulted in a \$10.5 million settlement that was approved on June 3, 2008.

In re NPS Pharmaceuticals, Inc. Securities Litigation, No. 2:06-cv-00570-PGC-PMW (D. Utah). Motley Rice represented the lead plaintiff as sole lead counsel in a class action brought on behalf of stockholders of NPS Pharmaceuticals, Inc., concerning the drug PREOS. NPS claimed that PREOS would be a “billion dollar drug” that could effectively treat “millions of women around the world who have osteoporosis.” The complaint alleged fraudulent misrepresentations regarding PREOS’s efficacy, market potential, prospects for FDA approval and dangers of hypercalcemic toxicity. The case settled after the lead plaintiff moved for class certification and the parties engaged in document production and protracted settlement negotiations. The \$15 million settlement was approved on June 18, 2009.

In re Synovus Financial Corp., No. 1:09-cv-01811 (N.D. Ga.). Motley Rice and our client, Sheet Metal Workers’ National Pension Fund, serve as court-appointed co-lead counsel and co-lead plaintiff for investors in Synovus Financial Corp. The lawsuit alleges that the bank artificially inflated its stock price by concealing its troubled lending relationship with the Sea Island Company, a resort real estate and hospitality company to whom Synovus allegedly made hundreds of millions of dollars of “insider loans” with “little more than a handshake” facilitated by personal relationships among certain senior executives and board members. In 2014, the court approved a final settlement of \$11.75 million.

In re Molson Coors Brewing Co. Securities Litigation, No. 1:05-cv-00294 (D. Del.). Motley Rice served as co-lead counsel for co-lead plaintiffs Drywall Acoustic Lathing and Insulation Local 675 Pension Fund and Metzler Investment GmbH in litigation against Molson Coors Brewing Co. and several of its officers and directors. The lawsuit alleged that, following the February 9, 2005, merger of Molson, Inc. and the Adolph Coors Company, the defendants fraudulently misrepresented the financial and operational performance of the combined company prior to reporting a net loss for the first quarter of 2005. Following protracted negotiations, the parties reached a \$6 million settlement in May 2009.

CASES

Marsden v. Select Medical Corporation, No. 04-cv-4020 (E.D. Pa.). Motley Rice served as co-lead counsel on behalf of stockholders of Select Medical, a healthcare provider specializing in long-term care hospital facilities. The suit alleged that Select Medical exploited its business structure to improperly maximize Medicare reimbursements, misled investors and that the company's executives engaged in massive insider trading for proceeds of over \$100 million. A \$5 million settlement was reached and approved on April 15, 2009.

Shareholder Derivative Litigation

Walgreens / Controlled Substances Violations: In re Walgreen Co. Derivative Litigation. On October 4, 2013, Motley Rice filed a consolidated complaint for a group of institutional investors against the board of directors of Walgreen Co. The complaint alleges that Walgreen's board engaged in a scheme to maximize revenues by encouraging the company's pharmacists to fill improper or suspicious prescriptions for Schedule-II drugs, particularly oxycodone, in Florida. The complaint followed the June 2013 announcement of an \$80 million settlement between Walgreens and the Drug Enforcement Administration relating to the misconduct. A settlement was approved in December 2014, in which Walgreens agreed to, among other things, extended compliance-related commitments, including maintaining a Department of Pharmaceutical Integrity.

Manville Personal Injury Settlement Trust v. Gemunder, No. 10-CI-01212 (Ky. Cir. Ct.) (regarding Omnicare, Inc.). On April 14, 2010, Motley Rice, sole lead counsel in this action, filed a shareholder derivative complaint on behalf of plaintiff Manville Personal Injury Settlement Trust. Plaintiff's claims stem from a November 3, 2009, announcement by the U.S. Department of Justice that Omnicare, Inc. had agreed to pay \$98 million to settle state and federal investigations into three kickback schemes through which the company paid or solicited payments in violation of state and federal anti-kickback laws. The court denied the defendants' motions to dismiss in their entirety on April 27, 2011. The defendants sought an interlocutory appeal, which was denied on October 6, 2011. Following significant discovery, which included plaintiff's counsel's review and analysis of approximately 1.4 million pages of documents, the parties reached agreement on a settlement, which received final approval from the court on October 28, 2013. Under the settlement, a \$16.7 million fund (less court awarded fees and costs) will be created to be used over a four year period by Omnicare to fund certain corporate governance measures and provide funding for the company's compliance committee in connection with the performance of its duties. Additionally, the settlement calls for Omnicare to adopt and/or maintain corporate governance measures relating to, among other things, employee training and ensuring the appropriate flow of information to the compliance committee.

Service Employees International Union v. Hills, No. A0711383 (Ohio Ct. Com. Pl.) (regarding Chiquita Brands International, Inc.). In this shareholder derivative litigation, SEIU retained Motley Rice to bring an action on behalf of Chiquita Brands International. The plaintiff alleged that the defendants breached their fiduciary duties by paying bribes to terrorist organizations in violation of U.S. and Columbian law. In October 2010, the plaintiffs resolved their state court action as part of a separate federal derivative claim.

Mercier v. Whittle, No. 2008-CP-23-8395 (S.C. Ct. Com. Pl.) (regarding the South Financial Group). This shareholder derivative action was brought on behalf of South Financial Group, Inc., following the company's decision to apply for federal bailout money from the Troubled Asset Relief Program (TARP) while allegedly accelerating the retirement of its former chairman and CEO to protect his multi-million dollar golden parachute, which would be prohibited under TARP. The litigation was settled prior to trial and achieved, among other benefits, payment back to the company from chairman Whittle, increased board independence and enhanced shareholder rights.

Manville Personal Injury Settlement Trust v. Farmer, No. A 0806822 (Ohio Ct. Com. Pl.) (regarding Cintas Corporation). In this shareholder derivative action brought on behalf of Cintas Corporation, the plaintiff alleged that the defendants breached their fiduciary duties by, among other things, failing to cause the company to comply with applicable worker safety laws and regulations. In November 2009, the court approved a settlement agreement that provided for the implementation of corporate governance measures designed to increase the flow of employee safety information to the company's board; ensure the company's compliance with a prior agreement between itself and OSHA relating to workplace safety violations; and secure the attendance of the company's chief health and safety officer at shareholder meetings.

Corporate Takeover Litigation

In re The Shaw Group, Inc., Shareholders Litigation, No. 614399 (19th Jud. Dist. La.). Motley Rice attorneys served as co-lead counsel in the class action brought by our client, a European asset management company, on behalf of the public shareholders of The Shaw Group, Inc. The lawsuit challenged Shaw's proposed sale to Chicago Bridge & Iron Company N.V. in a transaction valued at approximately \$3.04 billion. The plaintiffs alleged that the defendants breached their fiduciary duties to Shaw's shareholders by agreeing to a transaction that was financially unfair and the result of an improper sales process, which the defendants pursued at a time when Shaw's stock was poised for significant growth. The plaintiffs also alleged that the transaction offered substantial benefits to Shaw insiders not shared with the company's public shareholders. In December 2012, the parties reached a settlement with two components. Shaw agreed to make certain additional disclosures to shareholders of financial analyses indicating a potential share

price impact of certain alternative transactions of as much as \$19.00 per share versus the status quo. To provide a remedy for Shaw shareholders who believed the company was worth more than CB&I was paying for it, the settlement contained a second component – universal appraisal rights for all Shaw shareholders who properly dissented from the proposed merger, and the opportunity for Shaw dissenters to pursue that remedy on a class-wide basis. The court granted final approval of the settlement on June 28, 2013.

***In re Coventry Health Care, Inc. Securities Litigation*, No. 7905-CS (Del. Ch.).** Motley Rice represented three public pension funds as court-appointed sole lead counsel in a shareholder class action challenging the \$7.2 billion acquisition of Coventry Health Care, Inc., by Aetna, Inc. The plaintiffs alleged that the defendants breached their fiduciary duties to Coventry's shareholders through a flawed sales process involving a severely conflicted financial advisor and at a time when the company was poised for remarkable growth as a result of recent government healthcare reforms. The case settled for improvements to the deal's terms and enhanced disclosures.

***In re Allion Healthcare, Inc. Shareholders Litigation*, No. 5022-cc (Del. Ch.).** Motley Rice attorneys served as co-lead counsel representing a group of institutional shareholders in their challenge to the going-private buy-out of Allion Healthcare, Inc., by private equity firm H.I.G. Capital, LLC, and a group of insider stockholders led by the company's CEO, who controlled about 41 percent the company's shares. The shareholders alleged that the CEO used his stock holdings and influence over board members to accomplish the buyout at the expense of Allion's public shareholders. After a lengthy mediation, the shareholders succeeded in negotiating a settlement resulting in a \$4 million increase in the merger consideration available to shareholders. In January 2011, the Delaware Court of Chancery approved the settlement.

***In re RehabCare Group, Inc. Shareholders Litigation*, No. 6197-VCL (Del. Ch.).** Motley Rice represented institutional shareholders in their challenge to the acquisition of healthcare provider RehabCare Group, Inc., by Kindred Healthcare, Inc. As co-lead counsel, Motley Rice uncovered important additional facts about the relationship between RehabCare, Kindred, and the exclusive financial advisor for the transaction, as well as how those relationships affected the process RehabCare's board of directors undertook to sell the company. After extensive discovery, the parties reached a settlement in which RehabCare agreed to make a \$2.5 million payment for the benefit of RehabCare shareholders. In addition, RehabCare and Kindred agreed to waive certain standstill agreements with potential higher bidders for the company; lower the merger agreement's termination fee from \$26 million to \$13 million to encourage any

potential higher bidders; eliminate the requirement that Kindred have a three-business day period during which it has the right to match any superior proposal; and make certain additional public disclosures about the proposed merger. The Delaware Court of Chancery granted final approval of the settlement on Sept. 8, 2011.

***In re Atheros Communications Inc. Shareholder Litigation*, No. 6124-VCN (Del. Ch.).** In this action involving Qualcomm Incorporated's proposed acquisition of Atheros Communications, Inc., for approximately \$3.1 billion, Motley Rice served as co-lead counsel representing investors alleging that, among other things, Atheros' preliminary proxy statement was materially misleading to the company's shareholders, who were responsible for voting on the proposed acquisition. In March 2011, the Court issued a preliminary injunction delaying the shareholder vote, ruling that Atheros' proxy statement was materially misleading because, even though the proxy stated that the company's CEO "had not had any discussions with Qualcomm regarding the terms of his potential employment," it failed to disclose that he in fact "had overwhelming reason to believe he would be employed by Qualcomm after the transaction closed." The proxy also failed to inform shareholders of an almost entirely contingent \$24 million fee to the company's financial adviser, Qatalyst Partners, LLP.

***In re Winn-Dixie Stores, Inc. Shareholder Litigation*, No. 16-2011-CA-010616 (Fla. 4th Cir. Ct.).** Motley Rice served as co-lead counsel in litigation challenging the \$560 million buyout of Winn-Dixie Stores, Inc. by BI-LO, LLC, achieving a settlement that allows for shareholders to participate in a \$9 million common fund or \$2.5 million opt-in appraisal proceeding.

***Maric Capital Master Fund, Ltd. v. PLATO Learning, Inc.*, No. 5402-VCS (Del. Ch.).** The firm's institutional investor client won a partial preliminary injunction against the proposed acquisition of PLATO Learning, Inc., by a private equity company. In its ruling, the Delaware Court of Chancery found that the target company's proxy statement was misleading to its shareholders and omitted material information. The court's opinion has since been published and has been cited by courts and the legal media.

***In re Lear Corporation Shareholder Litigation*, No. 2728-N (Del. Ch.).** In this deal case, Motley Rice helped thwart a merger out of line with shareholder interests. Motley Rice represented an institutional investor in this case and, along with Delaware co-counsel, was appointed co-chair of the Plaintiffs' Executive Committee. Motley Rice and its co-counsel conducted expedited discovery and the briefing. The court ultimately granted in part and denied in part the plaintiffs' motion for a preliminary injunction. In granting the injunction, the court found a reasonable probability of success in the plaintiffs' disclosure claim concerning the Lear CEO's conflict of interest in securing his retirement through the proposed takeover. Lear shareholders overwhelmingly rejected the merger.

CASES

Helaba Invest Kapitalanlagegesellschaft mbH v. Fialkow, No. 2683-VCL (Del. Ch.) (regarding National Home Health Care Corp.). This action was brought on behalf of the shareholders of National Home Health Care Corporation in response to the company's November 2006 announcement that it had entered into a merger agreement with affiliates of Angelo Gordon. The matter settled prior to trial and was approved on April 18, 2008. The defendants agreed to additional consideration and proxy disclosures for the class.

Schultze Asset Management, LLC v. Washington Group International, Inc., No. 3261-VCN (Del. Ch.). This action followed Washington Group's announcement that it had agreed to be acquired by URS Corporation. The action alleged that Washington Group and its board of directors breached their fiduciary duties by failing to maximize shareholder value, choosing financial projections that unfairly undervalued the company and pursuing a flawed decision-making process. Motley Rice represented the parties, which ultimately settled the lawsuit with Washington Group. Washington Group agreed to make further disclosures to its shareholders regarding the proposed alternative transactions it had rejected prior to its accepting URS's proposal and agreed to make disclosures regarding how the company was valued in the proposed transaction with URS. These additional disclosures prompted shareholders to further question the fairness of the URS proposal. Ultimately, URS increased its offer for Washington Group to the benefit of minority stockholders.

In re The DirecTV Group, Inc. Shareholder Litigation, No. 4581-VCP (Del. Ch.). As court-appointed co-lead counsel, Motley Rice attorneys represented a group of institutional investors on behalf of the minority shareholders of DirecTV Group. A settlement was reached and approved by the court on Nov. 30, 2009. It provided for material changes to the merger agreement and the governing documents of the post-merger DirectTV.

State Law Securities Cases

Kellerman v. Marion Bass Securities Corp., No. 01-L 000457 (Ill. 3d Jud. Cir. Madison Cty.) Motley Rice represented a class of municipal bondholders in a state law class action concerning tax-free revenue bonds that were sold during 1996-1998 to build nursing homes in Indiana, Wisconsin and Michigan. The plaintiffs alleged that the funds raised from bondholders were funneled to a Ponzi scheme, causing the bonds to default. Motley Rice reached settlements with the trustee banks, accountants, and lawyers involved in the bond offerings, resulting in a \$7.8 million recovery for bondholders.

Brown v. Charles Schwab & Co., No. 2:07-cv-03852-DCN (D.S.C.). Motley Rice attorneys served as class counsel in this case, one of the first to interpret the civil liabilities provision of the Uniform Securities Act of 2002. The U.S. District Court for the District of South Carolina certified a class of investors with claims against broker-dealer Charles Schwab & Co., Inc., for its role in allegedly aiding the illegal sale of securities as part of a \$66 million Ponzi scheme. A subclass of 38 plaintiffs in this case reached a settlement agreement with Schwab under which they receive approximately \$5.7 million, an amount representing their total unrecovered investment losses plus attorneys' fees.

Opt-Out/Individual Actions

In re Vivendi Universal, S.A. Securities Litigation, No. 02 Civ. 5571 (S.D.N.Y.). In this action, Motley Rice represents more than 20 foreign institutional investors who were excluded from the class. The firm's clients include the Swedish public pension fund Första AP-fonden (AP1), one of five buffer funds in the Swedish pay-as-you-go pension system. In light of a recent Supreme Court ruling preventing foreign clients from gaining relief, Motley Rice has worked with institutional investor plaintiffs to file suit in France. ***The French action is pending. In re Merck & Co., Inc., Securities Derivative & "ERISA" Litigation***, MDL No. 1658 (SRC) (D.N.J.). Motley Rice and co-counsel represented several foreign institutional investors who opted out of the federal securities fraud class action against Merck & Co., Inc., related to misrepresentations and omissions about the company's blockbuster drug, Vioxx. Private settlements were reached in these cases in 2016.

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OUR LEGACY:

Ronald L. Motley (1944–2013)

EDUCATION:

J.D., University of South Carolina School of Law, 1971

B.A., University of South Carolina, 1966

Ron Motley fought for greater justice, accountability and recourse, and has been widely recognized as one of the most accomplished and skilled trial lawyers in the U.S. During a career that spanned more than four decades, his persuasiveness before a jury and ability to break new legal and evidentiary ground brought to justice two once-invincible giant industries whose malfeasance took the lives of millions of Americans— asbestos and tobacco. Armed with a combination of legal and trial skills, personal charisma, nose-to-the-grindstone hard work and record of success, Ron built Motley Rice into one of the nation's largest plaintiffs' law firms.

Noted for his role in spearheading the historic litigation against the tobacco industry, Ron served as lead trial counsel for 26 State Attorneys General in the lawsuits. His efforts to uncover corporate and scientific wrongdoing resulted in the Master Settlement Agreement, the largest civil settlement in U.S. history and in which the tobacco industry agreed to reimburse states for smoking-related health care costs.

Through his pioneering discovery and collaboration, Ron revealed asbestos manufacturers and the harmful and disabling effects of occupational, environmental and household asbestos exposure. He represented thousands of asbestos victims and achieved numerous trial breakthroughs, including the class actions and mass consolidations of *Cimino, et al. v. Raymark, et al.* (U.S.D.C. TX); *Abate, et al. v. ACandS, et al.* (Baltimore); and *In re Asbestos Personal Injury Cases* (Mississippi).

In 2002, Ron once again advanced cutting-edge litigation as lead counsel for *In re Terrorist Attacks on September 11, 2001*, MDL #1570, a lawsuit filed by more than 6,500 family members, survivors and those who lost their lives. The suit seeks justice and ultimately bankruptcy for al Qaeda's financiers, including many individuals, banks, corporations and charities that provided resources and monetary aid. He also served as lead counsel in numerous individual aviation security liability and damages cases under the *In re September 11 Litigation* filed against the aviation and aviation security industries by victims' families.

Ron brought the landmark case of *Oran Almog v. Arab Bank* against the alleged financial sponsors of Hamas and other terrorist organizations in Israel and was a firm leader in the BP Deepwater Horizon litigation and claims efforts involving people and businesses in Gulf Coast communities suffering as a result of the oil spill. Two settlements were reached with BP, one of which is the largest civil class action settlement in U.S. history.

Recognized as an AV[®]-rated attorney by Martindale-Hubbell[®], Ron served on the AAJ Board of Governors from 1977 to 2012 and was chair of its Asbestos Litigation Group from 1978 to 2012. In 2002, Ron founded the Mark Elliott Motley Foundation, Inc., in loving memory of his son to help meet the health, education and welfare needs of children and young adults in the Charleston, S.C. community.

PUBLICATIONS:

- Ron authored or co-authored more than two dozen publications, including:
- "Decades of Deception: Secrets of Lead, Asbestos and Tobacco" (*Trial Magazine*, October 1999)
- "Asbestos Disease Among Railroad Workers: 'Legacy of the Laggin' Wagon'" (*Trial Magazine*, December 1981)
- "Asbestos and Lung Cancer" (*New York State Journal of Medicine*, June 1980; Volume 80: No.7, New York State Medical Association, New York)
- "Occupational Disease and Products Liability Claims" (*South Carolina Trial Lawyers Bulletin*, September and October 1976)

FEATURED IN:

- Shackelford, Susan. "Major Leaguer" (*South Carolina Super Lawyers*, April 2008)
- Senior, Jennifer. "A Nation Unto Himself" (*The New York Times*, March 2004)
- Freedman, Michael. "Turning Lead into Gold," (*Forbes*, May 2001)
- Zegart, Dan. *Civil Warriors: The Legal Siege on the Tobacco Industry* (Delacorte Press, 2000)
- Ansen, David. "Smoke Gets in Your Eyes" (*Newsweek*, 1999)
- Mann, Michael & Roth, Eric. "The Insider" (Blue Lion Entertainment, November 5, 1999)
- Brenner, Marie. "The Man Who Knew Too Much" (*Vanity Fair*, May 1996)
- Reising, Robin. "The Man Who Took on Manville" (*The American Lawyer*, January 1983)

AWARDS AND ACCOLADES:

Ron won widespread honors for his ability to win justice for his clients and for his seminal impact on the course of civil litigation. For his trial achievements, *BusinessWeek* characterized Ron's courtroom skills as "dazzling" and *The National Law Journal* ranked him, "One of the most influential lawyers in America."

South Carolina Association for Justice

2013 Founders' Award

American Association for Justice

2010 Lifetime Achievement Award

2007 David S. Shrager President's Award

1998 Harry M. Philo Trial Lawyer of the Year

The Trial Lawyer Magazine

2012 inducted into Trial Lawyer Hall of Fame

2011 *The Roundtable: America's 100 Most Influential Trial Lawyers*

The Best Lawyers in America[®]

1993–2013 mass tort litigation/class actions – plaintiffs, personal injury litigation – plaintiffs product liability litigation – plaintiffs

Best Lawyers[®]

2012 Charleston, SC "Lawyer of the Year" mass tort litigation/class actions – plaintiffs

2010 Charleston, SC "Lawyer of the Year" personal injury

Benchmark Plaintiff

2012–2013 National “Litigation Star”: civil rights/human rights, mass tort/product liability, securities

2012–2013 South Carolina “Litigation Star”: human rights, product liability, securities, toxic tort

SC Lawyers Weekly

2011 Leadership in Law Honoree

The Legal 500 United States

2011–2013 Mass tort and class action: plaintiff representation – toxic tort

Chambers USA

2007, 2010–2012 Product liability and mass torts: plaintiffs. “...An accomplished trial lawyer and a formidable opponent.”

2008–2013 *South Carolina Super Lawyers*® list

2008 *Top 10 South Carolina Super Lawyers* list

2008, 2009, 2011, 2012 *Top 25 South Carolina Super Lawyers* list

The Lawdragon™ 500

2005–2012 *Leading Lawyers in America* list – plaintiffs’

National Association of Attorneys General

1998 President’s Award—for his “courage, legal skills and dedication to our children and the public health of our nation.”

The Campaign for Tobacco-Free Kids

1999 Youth Advocates of the Year Award

ASSOCIATIONS:

American Association for Justice

South Carolina Association for Justice

American Bar Association

South Carolina Bar Association

Civil Justice Foundation

Inner Circle of Advocates

International Academy of Trial Lawyers

THE FIRM’S MEMBERS**Joseph F. Rice**

LICENSED IN: DC, SC

ADMITTED TO PRACTICE BEFORE:

U.S. Supreme Court

U.S. Court of Appeals for the Third, Fourth and Fifth Circuits

U.S. District Court for the District of Nebraska and the District of South Carolina

EDUCATION:

J.D., University of South Carolina School of Law, 1979 (The Joseph F. Rice School of Law as of 2023)

B.S., University of South Carolina, 1976

Motley Rice co-founder Joe Rice is recognized as a skillful and innovative negotiator of complex litigation settlements, having served as the lead negotiator in some of the largest civil actions our courts have seen in the last 30 years. *Corporate Legal Times* reported that national defense counsel and legal scholars described Joe as one of the nation’s “five most feared and respected plaintiffs’ lawyers in corporate America.” As the article notes, “For all his talents as a shrewd negotiator ... Rice has earned most of his respect from playing fair and remaining humble.” His alma mater, the University of South Carolina School of Law, rebranded in his honor in November 2023, and is now known as the Joseph F. Rice School of Law.

Joe was recognized by some of the nation’s best-regarded defense lawyers as being “the smartest dealmaker they ever sat across the table from,” *Thomson Reuters* has reported. Professor Samuel Issacharoff of the New York University School of Law, a well-known professor and expert in class actions and complex litigation, has commented that he is “the best strategic thinker on the end stages of litigation that I’ve ever seen.”

Since beginning to practice law in 1979, Joe has continued to reinforce his reputation as a skillful negotiator, including through his involvement structuring some of the most significant resolutions of asbestos liabilities on behalf of those injured by asbestos-related products. He negotiates for the firm’s clients at all levels, including in securities and consumer fraud, anti-terrorism, human rights, environmental, and medical drug and device cases, as well as catastrophic injury and wrongful death cases. He is recognized as an AV Preeminent® rated attorney in Martindale-Hubbell®.

National Prescription Opiate MDL:

Joe is co-lead counsel in the National Prescription Opiate MDL aimed at combatting the alleged over-distribution and deceptive marketing of prescription opioids. Joe, as Chair of the opioid Negotiating Committee, worked with the committee and the Attorney General Committee to reach over \$51 billion in settlements for communities nationwide with defendants in the opioid supply chain. Motley Rice continues to represent dozens of governmental entities, including the first jurisdictions to file cases in the current wave of litigation.

AFFF MDL:

Joe was added in August 2023 as a co-lead counsel in *In re Aqueous Film-Forming Foams Products Liability Litigation*, MDL No. 2873 in U.S. District Court for the District of South Carolina, where he litigates for public water systems and other

TEAM BIOS:

plaintiffs who allege toxic AFFF contamination of drinking water in hundreds of water providers' water supply, as well as groundwater near military bases, airports, and other sites where firefighting foams were used. Communities near these sites have allegedly suffered a heightened need for medical monitoring, personal injuries, property damage, and economic losses due to the discharge of toxic AFFF chemicals into the environment.

Marine Corps Base Camp Lejeune:

Joe serves on a court-appointed Resolution Committee that will help keep victim concerns and interests front and center in a multipronged effort to resolve claims filed through the VA and the Department of the Navy, as well as cases pending in the court system. Victims include service members, their families and civilians who lived and worked at Camp Lejeune between Aug. 1, 1953 and Dec. 31, 1987 and were exposed to toxic water sources that are believed to cause birth defects, cancer and other life-altering diseases.

Vehicle Recalls:

Joe served as a lead negotiator in the \$15 billion Volkswagen Diesel Emissions Fraud class action settlement for 2.0-liter vehicles, the largest auto-related consumer class action settlement in U.S. history, as well as for the 3.0-liter settlement. Under his leadership, Motley Rice also helped negotiate a pair of Takata bankruptcy resolutions that secured funds for victims harmed by the company's deadly, explosive airbags. Joe also serves as a member of the Plaintiffs' Executive Committee for *In re General Motors LLC Ignition Switch Litigation*, and was appointed to the Plaintiffs' Steering Committee for *In re Chrysler-Dodge-Jeep Ecodiesel Marketing, Sales Practices, and Products Liability Litigation*.

Medical Drugs and Devices:

Joe led negotiations on behalf of thousands of women alleging complications and severe health effects caused by transvaginal mesh and sling products, including litigation in five MDLs in West Virginia. He also served as a member of the Plaintiffs' Steering Committee for the Lipitor® MDL, filed for patients who alleged the cholesterol drug caused their Type 2 diabetes.

BP Oil Spill:

Joe served as a co-lead negotiator for the Plaintiffs' Steering Committee in the two settlements with BP, one of which is the largest civil class action settlement in U.S. history. The Economic and Property Damages Rule 23 Class Action Settlement is estimated to make payments totaling between \$7.8 billion and \$18 billion to class members. Joe was also one of the lead negotiators of the \$1.028 billion settlement reached between the Plaintiffs' Steering Committee and Halliburton Energy Services, Inc., for Halliburton's role in the disaster.

9/11:

Joe held a crucial role in executing strategic mediations and/or resolutions on behalf of 56 families of 9/11 victims who opted out of the government-created September 11 Victim Compensation Fund. In addition to providing answers, accountability and recourse to victims' families, the resulting settlements with

multiple defendants shattered a settlement matrix developed and utilized for decades. The litigation also helped provide public access to evidence uncovered for the trial.

Tobacco:

As lead private counsel for 26 jurisdictions, including numerous State Attorneys General, Joe was integral to crafting and negotiating the landmark Master Settlement Agreement, in which the tobacco industry agreed to reimburse states for smoking-related health costs. This remains the largest civil settlement in U.S. history.

Asbestos:

Joe held leadership and negotiating roles involving the bankruptcies of several large organizations, including AWI, Federal Mogul, Johns Manville, Celotex, Garlock, W.R. Grace, Babcock & Wilcox, U.S. Gypsum, Owens Corning and Pittsburgh Corning. He has also worked on numerous Trust Advisory Committees. Today, he maintains a critical role in settlements involving asbestos manufacturers emerging from bankruptcy and has been recognized for his work in structuring significant resolutions in complex personal injury litigation for victims injured by asbestos-related products. Joe has served as co-chair of Perrin Conferences' Asbestos Litigation Conference, the largest national asbestos-focused conference.

Securities and Consumer Fraud:

Investment funds often seek Joe's guidance on litigation strategies to increase shareholder value, enhance corporate governance reforms and recover assets. He was an integral part of the shareholder derivative action against Omnicare, Inc., *Manville Personal Injury Settlement Trust v. Gemunder*, which resulted in a significant settlement for shareholders as well as new corporate governance policies.

Joe serves on the Board of Advisors for Emory University's Institute for Complex Litigation and Mass Claims, which facilitates bipartisan discussion of ways to improve the civil justice system through the hosting of judicial seminars, bar conferences, academic programs, and research. In 1999 and 2000, he served on the faculty at Duke University School of Law as a Senior Lecturing Fellow, and has taught classes on the art of negotiating at the University of South Carolina School of Law, Duke University School of Law and Charleston School of Law.

In 2013, he and the firm created the Ronald L. Motley Scholarship Fund at The University of South Carolina School of Law in memory and honor of his co-founding Motley Rice member and friend, Ron Motley.

AWARDS AND ACCOLADES:

Chambers USA

2019–2021 Product Liability: Plaintiffs – Nationwide, Band 1
2016, 2018 Product Liability: Plaintiffs – Nationwide, Band 2

Best Lawyers®

2013 "Lawyer of the Year" Charleston, SC: Mass tort litigation/class actions – plaintiffs
2007–2024 Mass tort litigation/class actions – plaintiffs;
 Personal injury litigation – plaintiffs
2024 Corporate Governance Law; Government Relations Practice; Product Liability Litigation

South Carolina Super Lawyers® list

2008–2021 Class action/mass torts; Securities litigation; General litigation

Lawdragon

2016, 2018–2022 Lawdragon 500

2019–2023 Lawdragon 500 Plaintiff Consumer Lawyers

2019–2024 Lawdragon 500 Plaintiff Financial Lawyers

South Carolina Association for Justice

2018 Founders' Award

Law360

2015 "Product Liability MVP"

Benchmark Litigation

2012–2013 National "Litigation Star": mass tort/product liability

2012–2017 South Carolina "Litigation Star": environmental, mass tort/product liability

The Legal 500 United States

2011–2012, 2014–2021 Legal 500 Leading Lawyer list Dispute resolution – product liability, mass tort and class action – toxic tort – plaintiff

The National Trial Lawyers

2020 Elite Trial Lawyers Lifetime Achievement Award

2014 Litigation Trailblazers

2010 Top 100 Trial Lawyers™ – South Carolina

SC Lawyers Weekly

2018 Hall of Fame honoree

2012 Leadership in Law Award

National Association of Attorneys General

1998 President's Award

University of South Carolina School of Law Alumni Association

2011 Platinum Compleat Lawyer Award

MUSC Children's Hospital

2010 Johnnie Dodds Award: in honor of his longtime support of the annual Bulls Bay Golf Challenge Fundraiser and continued work on behalf of our community's children

University of South Carolina

2011 Garnet Award: in recognition of Joe and his family for their passion for and devotion to Gamecock athletics

SC Junior Golf Association Programs

2011 Tom Fazio Service to Golf Award: in recognition of promotional efforts

COMMUNITY INVOLVEMENT:

Dee Norton Lowcountry Children's Center, Co-chair for inaugural Campaign for the Next Child

First Tee of Greater Charleston, Board of Advisors

American Heart Association of the Lowcountry, 2018 Heart Walk Chair

ASSOCIATIONS:

American Association for Justice

American Bar Association

American Inns of Court

American Constitution Society for Law and Policy

South Carolina Association for Justice

Andrew P. Arnold

LICENSED IN: NY, SC

ADMITTED TO PRACTICE BEFORE:

U.S. District Court for the Southern District of New York

EDUCATION:

J.D., with honors, University of North Carolina School of Law, 2013

B.A., with highest honors, University of North Carolina at Chapel Hill, 2002

Andrew Arnold focuses his practice on representing institutional investors in securities fraud class actions and individuals and governmental entities harmed by corporate wrongdoing in mass tort actions.

Andrew is a member of the firm's team representing dozens of states, counties, cities, towns, and townships in litigation targeting the alleged deceptive marketing and over-distribution of highly addictive opioid drugs, a contended cause of the nationwide opioid crisis.

Andrew joined Motley Rice co-founder Joe Rice in settlement negotiations in the Volkswagen Diesel Emissions Fraud class action on behalf of consumers whose vehicles were allegedly designed to bypass regulations. The \$15 billion settlement for 2.0-liter vehicles is the largest consumer auto-related consumer class action settlement in U.S. history. He was also a part of the Motley Rice negotiating team that helped secure resolutions with major U.S. auto manufacturers on behalf of Takata airbag victims.

Andrew also oversees the firm's Market Monitor portfolio monitoring service offered to public pension funds, unions, and other institutional investors. The service cross-references newly filed securities actions, ongoing litigation, and recent settlements with each client's portfolio to help trustees fulfill their fiduciary duties by recovering funds lost due to fraud.

Prior to joining Motley Rice, Andrew practiced commercial litigation and investor-state dispute settlement in the Washington, D.C. office of a large international law firm. Before entering the legal field, he worked as a software developer and database administrator for eight years, primarily in the health care industry.

AWARDS AND ACCOLADES:

Best Lawyers®

2021–2024 *Ones to Watch* list: Litigation – Securities

TEAM BIOS:

Frederick C. Baker

LICENSED IN: NY, SC

ADMITTED TO PRACTICE BEFORE:

U.S. Court of Appeals for the First, Second, Third, Fourth, Fifth, Tenth and Eleventh Circuits

U.S. District Court for the Southern District of New York and the District of South Carolina

EDUCATION:

J.D. / LL.M., Duke University School of Law, 1993

B.A., University of North Carolina at Chapel Hill, 1985

A veteran litigator with strong roots in complex litigation, Fred Baker works on a broad range of environmental, medical costs recovery, consumer and products liability cases and holds numerous leadership roles within the firm. He represents individuals, institutional investors, and governmental entities in a wide variety of cases.

Fred leads the firm's tobacco litigation, and was a member of the legal team that litigated the groundbreaking tobacco litigation on behalf of several State Attorneys General. Fred has also participated in the litigation of individual tobacco cases, entity tobacco cases and a tobacco class action.

In addition to his tobacco casework, Fred is part of the opioid litigation team which represents dozens of governmental entities, including states, cities, towns, counties and townships in litigation targeting the alleged misrepresentation and fraudulent distribution of harmful and addictive opioids by manufacturers and distributors.

Fred was also a key member of the firm's representation of people and businesses in Gulf Coast communities suffering as a result of the BP Deepwater Horizon oil spill. He held a central role in the negotiation process involving the two settlements reached with BP, one of which is the largest civil class action settlement in U.S. history. In addition, his environmental experience also includes representing a state government in a case against poultry integrators that alleged poultry waste polluted natural resources.

Fred has served as counsel in a number of class actions, including the two class action settlements arising out of the 2005 Graniteville train derailment chlorine spill. He was also closely involved in the litigation surrounding the statutory direct action settlement reached in the Manville bankruptcy court and a related West Virginia unfair trade practices insurance class action.

Fred began practicing with Motley Rice attorneys in 1994 and chairs the firm's attorney hiring committee.

AWARDS AND ACCOLADES:

Best Lawyers® Charleston, SC

2020–2024 Mass tort litigation / class actions – plaintiffs

2024 Personal injury litigation – plaintiffs

Lawdragon

2019 Lawdragon 500 Plaintiff Financial Lawyers

South Carolina Lawyers Weekly

2016 Leadership in Law Honoree

Louis M. Bograd

LICENSED IN: DC, KY

ADMITTED TO PRACTICE BEFORE:

U.S. Supreme Court; U.S. Court of Appeals for the First, Third, Fourth, Fifth, Sixth, Eighth, Ninth, Tenth, and D.C. Circuits; U.S.

District Court for the District of Columbia

EDUCATION:

J.D., Yale Law School, 1984

A.B., Princeton University, 1981

Louis Bograd is a nationally recognized authority on issues of federal preemption, drug and device litigation, and jurisdiction. He has devoted much of his professional career to litigating appeals on complex issues involving products liability, Medicaid lien reimbursements, constitutional rights, and civil liberties. At Motley Rice, Lou continues his focus on appellate issues and mass torts, further enhancing the firm's active and growing complex litigation practice. Lou serves as co-chair of the Law & Briefing Committee for the *National Prescription Opiate* MDL, which is focused on combatting the alleged deceptive marketing and over-distribution of opioids.

Prior to joining Motley Rice, Lou served as an appellate advocate and Chief Litigation Counsel for the Center for Constitutional Litigation where he led work in mass torts, the Class Action Fairness Act, and dispositive motions concerning consumer protection and products liability. Lou argued for plaintiffs before the U.S. Supreme Court regarding federal preemption of claims against generic drug manufacturers in *Pliva, Inc. v. Mensing* and has also participated in numerous other Supreme Court cases as counsel for petitioners, respondents, and amici curiae.

Lou has spoken on various legal topics at many seminars, CLE programs, and legal conferences across the country sponsored by, among others, the American Association for Justice, state trial lawyers associations, and Mass Torts Made Perfect. Lou has also presented at judicial education programs sponsored by the Pound Institute, the Brookings Institution, the American Enterprise Institute, the Northwestern University School of Law, and the George Mason University School of Law.

Lou's legal career began at Arnold & Porter LLP in Washington, D.C., where he managed and directed work on transfusion-associated HIV/AIDS cases on behalf of the American Red Cross. He subsequently served on the American Civil Liberties Union Foundation's national legal staff and as the legal director of the Alliance for Justice. Lou has also taught advanced torts and products liability law as an Adjunct Professor at the University of Kentucky College of Law.

SELECTED PUBLICATIONS:

- Louis M. Bograd & Andre M. Mura, *Buckman Stops Here! Limits on Preemption of State Tort Claims Involving Allegations of Fraud on the PTO or the FDA*, 41 Rutgers L. J. 309 (2009)
- Louis M. Bograd, *Be Careful What You Wish For: Drugmakers, the First Amendment, and Preemption*, 51 TRIAL 24 (Nov. 2015)
- Louis M. Bograd, *Preemption's Uncertain Path*, 47 TRIAL 20 (Nov. 2011)
- Louis M. Bograd, *W(h)ither Preemption?*, 45 TRIAL 24 (Nov. 2009)
- Louis M. Bograd, *Taking on Big Pharma- and the FDA*, 43 TRIAL 30 (Mar. 2007)

AWARDS AND ACCOLADES:**Best Lawyers®** Washington, DC**2024** Mass tort litigation / class actions – plaintiffs**ASSOCIATIONS:****American Association for Justice** Chair, Preemption Litigation Group; Member, Legal Affairs Committee**Max N. Gruetzmacher**

LICENSED IN: SC

ADMITTED TO PRACTICE BEFORE:

U.S. Court of Appeals for the Ninth Circuit; U.S. District Court for the District of South Carolina, and the Northern District of Illinois

EDUCATION:

J.D., Marquette University Law School, 2008

B.A., University of Wisconsin-Madison, 2004

Max Gruetzmacher focuses his practice on securities and consumer fraud, representing large public pension funds, unions and other institutional investors in securities and consumer fraud class actions and shareholder derivative suits, as well as consumers, businesses, and governmental entities in other types of complex civil litigation.

Max also brings substantial experience counseling the firm's attorneys and clients with respect to e-discovery strategy throughout the various stages of litigation, from pre-filing through trial.

Prior to joining the firm, Max gained experience in a variety of legal practice areas, including defense of pharmaceutical mass torts cases, of banks in mortgage-backed securities cases, and in appellate criminal defense.

AWARDS AND ACCOLADES:

The National Trial Lawyers

2022 Rising Stars of the Plaintiffs Bar**Charleston Regional Business Journal****2022** Forty Under 40**ASSOCIATIONS:****South Carolina Bar Association****Charleston County Bar Association****Serena P. Hollowell**

LICENSED IN: NY

ADMITTED TO PRACTICE BEFORE:

U.S. Court of Appeals for the First, Ninth, and Eleventh Circuits; U.S. District Court for the Northern District of Illinois, and the Southern and Eastern Districts of New York

EDUCATION:

J.D., Boston University School of Law, 2003

B.A., Occidental College, 1999

With nearly 20 years of complex litigation and securities experience, Serena Hollowell has been recognized by her peers as a leader in the plaintiffs' securities bar and a Plaintiffs' Lawyer "Trailblazer" in 2019 by *National Law Journal* for her work in securities opt-out litigation. As lead of Motley Rice's direct-action litigation efforts, and a leader of the firm's

securities fraud team, Serena litigates for some of the world's largest institutional investors, including pension funds, hedge funds, mutual funds, family offices, and other large institutional investors. She also regularly advises institutional investors and public entities regarding recovery opportunities in connection with fraud-related conduct.

Prior to her time at Motley Rice, Serena was the head of a direct-action practice and member of the securities class action group as a partner of a large securities law firm in New York. In that capacity, she was a key member of several litigation teams that achieved multi-million settlements for clients, aggregating close to \$500 million. Notable cases Serena was a leading/key member of prior to joining Motley Rice include:

- *In re Barrick Gold Securities Litigation* (\$140 million settlement*)
- *In re Computer Sciences Corp. Securities Litigation* (\$97.5 million settlement*) ("rocket docket" jurisdiction and estimated to be the third largest all cash settlement in the Fourth Circuit)
- *Public Employees' Retirement System of Mississippi v. Endo* (\$50 million settlement*) (state court Section 11 action believed to be the largest class settlement obtained pursuant to the Securities Act of 1933 in connection with a secondary public offering)
- *In re Intuitive Surgical Securities Litigation*, No. 5:13-cv-01920 (N.D. Cal.) (\$42.5 million settlement* for the class, including the Employees' Retirement System of the State of Hawaii)
- *In re NII Holdings, Inc. Securities Litigation* (\$41.5 million settlement*) ("rocket docket" jurisdiction where settlement was obtained even after company filed bankruptcy)

Serena has also led opt-out cases against companies, including Valeant Pharmaceuticals, Perrigo Company, and Teva Pharmaceuticals for a variety of institutional investors seeking to recoup losses stemming from alleged fraud-related conduct. With respect to Valeant, Serena and her team pursued claims under the New Jersey RICO statute, and was the first opt-out plaintiff to successfully defeat a motion to dismiss those claims. Certain Valeant actions have since been resolved and Serena continues to prosecute matters on behalf of others.

Serena was selected to *The National Law Journal's* "Elite Women of the Plaintiffs Bar" in 2020 for having consistently excelled in high stakes matters on behalf of plaintiffs. She was also recognized by them as a Plaintiffs' Lawyer "Trailblazer" in 2019 in part for her work on behalf of opt-out plaintiffs. 2020–2022 *Chambers USA* reports recognized her in the area of New York securities litigation for plaintiffs and legal publication *Law360* named her as a "Securities MVP" in 2019.

Serena is a frequent speaker in legal circles throughout the country on matters related to securities litigation and diversity and inclusion in the legal and financial sectors. She uses her platform to champion women's rights and promote diversity in the financial realm, including advocating for women and minority-led investment firms.

In 2022, Serena was invited to join *Law360's* Securities Editorial Advisory Board. Serena is also an active member of the National Association of Public Pension Attorneys (NAPPA), where she currently serves on both the NAPPA Securities Litigation Committee and the NAPPA Fiduciary & Governance Committee.

TEAM BIOS:

Serena has performed *pro bono* work for immigrant detainees through the American Immigrant Representation Project, in addition to volunteering with the Securities Arbitration Clinic at Brooklyn Law School, among other positions. She is conversational in Hindi and Urdu.

SELECTED PUBLICATIONS:

- *'Justices Should Acknowledge ESG's Importance to Investors'* Law360 (June 2021)
- *'Don't Forget the "E" and the "S" in ESG: Securities Lawsuits Are No Longer Only About Corporate Governance'* NAPPA Report (October 2021)
- *'Mutual Funds Should Consider Shareholder Litigation,'* Law360 (Oct. 8, 2019)
- *'Around the World in a Decade: The Evolving Landscape of Securities Litigation Post-Morrison,'* NAPPA (Nov. 26, 2019)
- *'Emulex Highlights Greater Scrutiny of Issues at High Court,'* Law360 (April 25, 2019)
- *'China Agritech's Positive Implications for Plaintiffs,'* Law360 (July 3, 2018)
- *'Direct Actions: A Path to Recovery for Foreign Purchases of Securities,'* The NAPPA Report (Oct. 31, 2017) *'Investor Recovery Strategies Following ANZ Securities,'* Law360 (July 12, 2017)
- *'Does "Dukes" Require Full "Daubert" Scrutiny at Class Certification?'* New York Law Journal (Nov. 25, 2011)

AWARDS AND ACCOLADES:

Super Lawyers

2022 New York Metro Super Lawyers – Securities

Chambers USA

2020–2022 Litigation: Securities: Plaintiffs – New York, Up and Coming

Benchmark Litigation

2020–2021 Future Star

National Law Journal

2020 Elite Women of the Plaintiffs' Bar

2019 Plaintiffs' Lawyers Trailblazers

Lawdragon 500

2019–2021 Leading Plaintiff Financial Lawyers

2019–2020 Leading Lawyers in America

Law360

2019 Securities MVP

2016 Rising Star

The Legal 500

2016–2017 Recommended in the Field of Securities Litigation

ASSOCIATIONS:

New York City Bar Association, Securities Litigation Committee

Federal Bar Council

South Asian Bar Association

National Association of Public Pension Attorneys

National Association of Women Lawyers

Mathew P. Jasinski

LICENSED IN: CT, NY

ADMITTED TO PRACTICE BEFORE:

U.S. Supreme Court; U.S. Court of Appeals for the First, Second, Third, and Federal Circuits; U.S. District Court for the District of Connecticut and Southern District of New York

EDUCATION:

J.D. *with high honors*, University of Connecticut School of Law, 2006

B.A. *summa cum laude*, University of Connecticut, 2003

Mathew Jasinski represents consumers, businesses, and governmental entities in class action and complex cases involving consumer protection, unfair trade practices, commercial, environmental and securities litigation. He also represents whistleblowers in *qui tam* cases under the False Claims Act.

Mathew's litigation experience includes all aspects of trial work, from case investigation to appeal. He has represented plaintiffs in class actions involving such claims as breach of contract and unfair trade practices. He has experience in complex commercial cases regarding claims of fraud and breach of fiduciary duty and has represented an institutional investor in its efforts to satisfy a judgment obtained against the operator of a Ponzi scheme. Mathew obtained a seven-figure arbitration award in a case involving secondary liability for an investment advisor's conduct under the Uniform Securities Act. Please remember that every case is different. Any result we achieve for one client in one matter does not necessarily indicate similar results can be obtained for other clients.

Mathew also serves the firm's appellate group, having argued cases in the U.S. Courts of Appeals for the First and Second Circuits, the Connecticut Appellate Court, and the Connecticut Supreme Court. He also has worked on numerous appeals before other state and federal appellate courts across the country.

Prior to joining Motley Rice in 2009, Mathew practiced complex commercial and business litigation at a large defense firm. He began his legal career as a law clerk for Justice David M. Borden (ret.) of the Connecticut Supreme Court. During law school, Mathew served as executive editor of the *Connecticut Law Review* and judging director of the Connecticut Moot Court Board. He placed first in various moot court and mock court competitions, including the Boston region mock trial competition of the American Association for Justice. As an undergraduate, Mathew served on the board of associate directors for the University of Connecticut's honors program and was recognized with the Donald L. McCullough Award for his student leadership.

Mathew continues to demonstrate civic leadership in the local Hartford community. He is vice chairman of the board of directors for the Hartford Symphony Orchestra, a deacon of the Asylum Hill Congregational Church, and a commissioner of the Hartford Parking Authority. Previously, Mathew served on the

city's Charter Revision Commission and its Young Professionals Task Force, an organization focused on engaging young professionals and positioning them for future business and community leadership.

PUBLISHED WORKS:

"On the Causes and Consequences of and Remedies for Interstate Malapportionment of the U.S. House of Representatives" (Jasinski and Ladewig, *Perspectives on Politics*, Vol. 6, Issue 1, March 2008)

"Hybrid Class Actions: Bridging the Gap Between the Process Due and the Process that Functions" (Jasinski and Narwold), *The Brief*, Fall 2009

AWARDS AND ACCOLADES:

Super Lawyers®

2013–2021 *Connecticut Super Lawyers Rising Stars* list
Business litigation; Class action/mass torts; Appellate

Lawdragon

2019–2021 Lawdragon 500 Plaintiff Financial Lawyers

Connecticut Law Tribune

2018 "New Leaders in Law"

Hartford Business Journal

2009 "Forty Under 40"

ASSOCIATIONS:

American Association for Justice

American Bar Association

Connecticut Bar Association

Oliver Ellsworth Inn of Court

Phi Beta Kappa

For full Super Lawyers selection methodology visit: www.superlawyers.com/about/selection_process.html

For current year CT data visit: www.superlawyers.com/connecticut/selection_details.html

Marlon E. Kimpson

LICENSED IN: SC

ADMITTED TO PRACTICE BEFORE:

U.S. District Court for the District of South Carolina, Eastern

District of Michigan

EDUCATION:

J.D., University of South Carolina School of Law, 1999

B.A., Morehouse College, 1991

Marlon Kimpson represents victims of corporate malfeasance, from investors in securities fraud cases to consumers harmed by large data and privacy breaches, as well as people injured or killed in catastrophic incidents. Building upon the firm's relationships with unions and governmental entities, Marlon represents individuals, state and municipality pension funds, multi-employer plans, unions and other institutional investors in securities fraud class actions and in mergers and acquisition cases, seeking asset recovery and improved corporate governance. Marlon's advocacy and leadership extends beyond the courtroom, including his appointment by President Biden in 2023 to serve on the White House Advisory Committee for Trade Policy and Negotiations.

Marlon litigated securities cases including: *In re Atheros Communications, Inc., Shareholder Litigation*; *In re Celera Corporation Shareholder Litigation*; *In re RehabCare Group, Inc. Shareholders Litigation*; *In re Coventry Healthcare, Inc., Shareholder Litigation*; and *In re Big Lots, Inc., Shareholder Litigation*. In 2020, Marlon, as local counsel, helped negotiate a \$192 million settlement* for institutional investors in *In re SCANA Corporation Securities Litigation*, a complex securities fraud matter related to alleged misrepresentations and omissions concerning the design, construction, and abandonment of SCANA's nuclear construction project in South Carolina. It is the largest securities class action recovery ever obtained in the District of South Carolina, the fifth largest securities class action recovery in the history of the Fourth Circuit, and among the top 100 securities class action recoveries nationwide. In 2017, he helped secure a \$16 million settlement* to resolve shareholders' claims in *Epstein v. World Acceptance Corp. et al.*, which alleged that World Acceptance misled investors about its lending practices and compliance with federal law. Marlon now represents shareholders in a federal derivative suit that alleges Wells Fargo and a number of the bank's executives breached their fiduciary duty by failing to address alleged discriminatory lending and hiring practices that negatively affected minority borrowers and employees.

Outside of his securities work, Marlon is co-lead counsel and a member of the Plaintiffs' Steering Committee for multidistrict litigation, *In re: Blackbaud Inc. Customer Data Security Breach Litigation*, filed in the District of South Carolina for consumers affected by a 2020 ransomware attack and resulting data breach that targeted software company Blackbaud. Marlon has been retained by Charleston County School District to represent it against social media platforms such as Meta, Instagram, Snapchat, and Tik Tok, which allegedly designed defective products that encourage addictive behavior in adolescents and result in emotional and physical harms, including death.

Marlon also represents dozens of governmental entities, including states, counties, cities, towns, and townships in litigation targeting the alleged deceptive marketing and over-distribution of highly addictive opioid drugs, a contended cause of the nationwide opioid crisis. His work includes helping to secure over \$500 million* for opioid abatement in the State of South Carolina.

Marlon started his legal career litigating cases on behalf of worker's harmed by asbestos exposures across the country. He has also represented victims of catastrophic personal injury, wrongful death and aviation disasters, including commercial and charter aviation cases with clients, defendants and accidents involving multiple countries. He was also instrumental in the Deepwater Horizon BP oil spill settlements claims programs on behalf of people and businesses.

Marlon is a former South Carolina State Senator for District 42 and represented citizens of Charleston and Dorchester Counties for nearly a decade. A frequent speaker, Marlon has presented at seminars and conferences across the country, including the Public Funds Summit, the National Association of State Treasurers, the South Carolina Black Lawyers' Association,

TEAM BIOS:

the National Conference on Public Employee Retirement Systems (NCPERS) and the National Association of Securities Professionals (NASP).

After five years in commercial banking, Marlon entered the field of law and served as a law clerk to Judge Matthew J. Perry of the U.S. District Court of South Carolina. His legal work and volunteer service also earned him the University of South Carolina School of Law bronze Compleat Award in 1999.

Marlon is active in his community and served on the Board of Directors for the Peggy Browning Fund. He has also held leadership roles with the University of South Carolina Board of Visitors, the Charleston Black Lawyers Association and the South Carolina Election Commission. In 2017, the American Association of Justice Minority Caucus awarded Marlon with its Johnnie L. Cochran, Jr. Soaring Eagle Award reserved for lawyers of color who have made outstanding contributions to the legal profession and paved the way for others. In 2018, Marlon was chosen as a Leadership in Law Honoree by *South Carolina Lawyers Weekly*. He is a lifetime member of the NAACP and a member of Sigma Pi Phi Boulé and Omega Psi Phi Fraternity, Inc.

AWARDS AND ACCOLADES:

Best Lawyers®

2015–2023 Mass tort litigation/class actions – plaintiffs

Lawdragon

2019–2023 Lawdragon 500 Plaintiff Consumer Lawyers

2019–2021 Lawdragon 500 Plaintiff Financial Lawyers

South Carolina Lawyers Weekly

2018 Leadership in Law Honoree

American Association for Justice

2017 Johnnie L. Cochran, Jr. Soaring Eagle Award

Benchmark Plaintiff

2012 National “Litigation Star”: mass tort/product liability

2012–2014 South Carolina “Litigation Star”: environmental, mass tort, securities

Coastal Conservation League

2016 Coastal Stewardship Award

United Food and Commercial Workers

2016 Legislative Activist of the Year

ASSOCIATIONS:

American Association for Justice

South Carolina Association for Justice

National Association of Public Pension Attorneys

American Bar Association

National Bar Association

Gregg S. Levin

LICENSED IN: DC, MA, SC

ADMITTED TO PRACTICE BEFORE:

U.S. Court of Appeals for the First, Second, Third, Fourth, Fifth, Seventh, Ninth and Eleventh Circuits

U.S. District Court for the District of Colorado, Northern District of Illinois, District of Massachusetts, and the Eastern District of Michigan

EDUCATION:

J.D., Vanderbilt University School of Law, 1987

B.A. *magna cum laude*, University of Rochester, 1984

With more than three decades of legal experience, Gregg Levin represents domestic and foreign institutional investors and union pension funds in corporate governance, directorial misconduct and securities fraud matters. His investigative, research and writing skills have supported Motley Rice as lead or co-lead counsel in numerous securities and shareholder derivative actions, including cases involving HP, Avon, and Cintas Corporation. Gregg manages complaint and brief writing for class action deal cases, shareholder derivative suits and securities fraud class actions.

Prior to joining Motley Rice, Gregg was an associate with Grant & Eisenhofer in Delaware, where he represented institutional investors in securities fraud actions and shareholder derivative actions in federal and state courts across the country, including the WorldCom, Telxon and Global Crossing cases. He also served as corporate counsel to a Delaware Valley-based retail corporation from 1996-2003, where he handled corporate compliance matters and internal investigations.

In 2019, Gregg was appointed as a Vice President of the Institute for Law and Economic Policy, a foundation whose goals include supplementing the resource-limited SEC by educating the public on the importance of private securities fraud litigation in maintaining corporate accountability. Since its inception in the 1990s, the institute has presented and published papers that have been cited in more than 60 federal cases, including several in the U.S. Supreme Court. Appearing in the media to discuss a variety of securities matters, Gregg has also presented in educational forums, including at the Ethics and Transparency in Corporate America Webinar held by the National Association of State Treasurers.

PUBLISHED WORKS:

Gregg is a published author on corporate governance and accountability issues, having written significant portions of the treatise *Shareholder Activism Handbook* (Aspen Publishers, November 2005), as well as several other articles of interest to institutional investors, including:

- “*In re Cox Communications: A Suggested Step in the Wrong Direction*” (*Bank and Corporate Governance Law Reporter*, September 2005)
- “Does Corporate Governance Matter to Investment Returns?” (*Corporate Accountability Report*, September 23, 2005)

- “*In re Walt Disney Co. Deriv. Litig. and the Duty of Good Faith under Delaware Corporate Law*” (*Bank and Corporate Governance Law Reporter*, September 2006)
- “Proxy Access Takes Center Stage: The Second Circuit’s Decision in American Federation of State County and Municipal Employees, Employees Pension Plan v. American International Group, Inc.” (*Bloomberg Law Reports*, February 5, 2007)
- “Investor Litigation in the U.S. -- The System is Working” (*Securities Reform Act Litigation Reporter*, February 2007)

AWARDS AND ACCOLADES:

Best Lawyers® Charleston, S.C.

2024 Mass tort litigation / class actions – plaintiffs

Law360

2022 “Securities MVP”

South Carolina Lawyers Weekly

2022 Leadership in Law Honoree

Lawdragon

2019 Lawdragon 500 Plaintiff Financial Lawyers

Joshua Littlejohn

LICENSED IN: SC

ADMITTED TO PRACTICE BEFORE:

U.S. Court of Appeals for the Third and Fourth Circuits; U.S. District Court for the District of Colorado, District of South Carolina

EDUCATION:

J.D., Charleston School of Law, 2007

B.A., University of North Carolina at Asheville, 1999

With a broad base of experience in complex litigation—including securities fraud, corporate governance, whistleblower cases under Dodd-Frank and the False Claims Act, and catastrophic injury and death cases—Josh Littlejohn is one of several lawyers leading Motley Rice’s securities litigation team, particularly in cases involving healthcare and e-commerce.

Josh represents public pension funds, unions and other institutional investors in both federal and state courts. He also represents people with catastrophic personal injuries and corporate whistleblowers. Josh works directly with clients and has been involved in all aspects of the litigation process, including case evaluation, fact and expert discovery, resolution and trial.

Throughout his career Josh has been involved in numerous complex securities matters including serving as lead or co-lead counsel against Alexion Pharmaceuticals; Amazon; Intel Corporation; Riot Blockchain; Wells Fargo & Company; 3D Systems Corporation; St. Jude Medical, Inc.; Omnicare; and numerous others. Along with other Motley Rice lawyers, Josh was South Carolina liaison counsel in a securities fraud class action that settled in 2020 filed by investors against SCANA Corporation over its failed nuclear reactor project. Josh regularly reviews and analyzes new securities fraud, shareholder derivative, and SEC whistleblower matters on behalf of our clients and the firm. He is currently part of the Motley Rice team evaluating cases related to exposure to contaminated ground water in Camp Lejeune, North Carolina.

In addition to securities and personal injury matters, Josh is a member of the Motley Rice team that evaluates and litigates violations of the federal False Claims Act and Anti-kickback Statute on behalf of corporate whistleblowers.

Aside from various securities and whistleblower matters, Josh was a part of the Motley Rice negotiating team that helped secure a resolution with a major U.S. auto manufacturer on behalf of Takata airbag victims. Early in his career, Josh worked on discovery in mass tort litigation against large drug manufacturers.

AWARDS AND ACCOLADES:

Lawdragon

2019 Lawdragon 500 Plaintiff Financial Lawyers

Super Lawyers®

2013–2017 *South Carolina Super Lawyers Rising Star* list
Securities litigation; Class action/mass torts; General litigation

ASSOCIATIONS:

American Bar Association

South Carolina Association for Justice

Donald A. Migliori

LICENSED IN: MA, MN, NY, RI, SC

ADMITTED TO PRACTICE BEFORE:

U.S. Court of Appeals for the First, Fourth, and Eleventh Circuits; U.S. District Court for the District of Rhode Island, District of Massachusetts, and Northern, Southern and Eastern Districts of New York

EDUCATION:

M.A./J.D., Syracuse University, 1993

A.B., Brown University, 1988

Building upon his experience in complex asbestos cases, the historic tobacco lawsuits and the September 11, 2001 terrorist attacks litigation, Don Migliori is a multifaceted litigator who can navigate both the courtroom and the negotiating table. He represents victims of defective medical devices and drugs, occupational diseases, terrorism, aviation disasters, antitrust, and securities and consumer fraud in mass torts and other cutting-edge litigation that spans the country.

Don serves in leadership roles for a number of multidistrict litigations, including being a key member of Motley Rice’s team that represents dozens of cities, towns, counties and townships in the *National Prescription Opiate* MDL against opioid manufacturers and distributors. He also represents states in similarly filed litigation. He played a significant role in negotiations on behalf of tens of thousands of women allegedly harmed by pelvic mesh/sling products and served as co-liaison counsel in the N.J. Bard pelvic mesh litigation in Atlantic County. Hundreds of cases have been filed in federal and state courts against multiple defendants.

He is also co-lead counsel for *In re Ethicon Physiomesch Flexible Composite Hernia Mesh Products Liability Litigation*, a member of the Plaintiffs’ Steering Committee for *In re Bard IVC Filters Products Liability Litigation*, as well as the *Depuy®*

TEAM BIOS:

Orthopaedics, Inc. ASR™ and Pinnacle® Hip Implant MDLs. Don has litigated against both Ethicon, a Johnson & Johnson subsidiary, and C.R. Bard previously in pelvic mesh litigation and also against C.R. Bard in the Composix® Kugel® hernia mesh multidistrict litigation, *In re Kugel Mesh Hernia Patch Products Liability Litigation*, the first MDL before the federal court of Rhode Island. Don also serves as co-lead plaintiffs' counsel and liaison counsel in the federal MDL, and as liaison counsel for the Composix® Kugel® Mesh lawsuits consolidated in Rhode Island state court on behalf of thousands of individuals alleging injury by the hernia repair patch.

As liaison counsel for all wrongful death and personal injury cases in the September 11th aviation security litigation, Don played a central role in the extensive discovery, mediations and settlements of more than 50 cases of aviation liability and damages against numerous defendants. He also represented families of the victims who opted out of the Victim Compensation Fund to seek greater answers, accountability and recourse. Additionally, he manages associated litigation as a lead attorney for *In re Terrorist Attacks on September 11, 2001*, MDL #1570, a groundbreaking case designed to bankrupt the financiers of al Qaeda.

Don contributed his experience in connection with the commencement of and strategy for shareholder derivative litigation brought on behalf Chiquita Brands International, Inc., alleging the defendants breached their fiduciary duties by paying bribes to terrorist organizations in violation of U.S. and Columbian law. He also served as trial counsel for PACE Industry Union-Management Pension Fund in a securities case against Forest Laboratories, Inc., and was involved in the initial liability discovery and trial strategy in an ongoing securities fraud class action involving Household International, Inc.

Don began working with Motley Rice attorneys in 1997 on behalf of the State Attorneys General in the historic lawsuit against Big Tobacco, resulting in the largest civil settlement in U.S. history. He tried several noteworthy asbestos cases on behalf of mesothelioma victims, including the state of Indiana's first contractor liability verdict and first premises liability verdict for wrongful exposure to asbestos. He continues to manage asbestos cases and actively litigates mesothelioma lawsuits and individual tobacco cases in the courtroom.

Don is a frequent speaker at legal seminars across the country and has appeared on numerous television and radio programs, as well as in print media to address legal issues related to terrorist financing, aviation security, class action litigation, premises liability and defective medical devices. A "Distinguished Practitioner in Residence" at Roger Williams University School of Law for the 2010-2011 academic year, Don taught mass torts as an adjunct professor for more than 10 years. Don is an AV® rated attorney by Martindale-Hubbell®.

AWARDS AND ACCOLADES:

Chambers USA

2021 Product Liability: Plaintiffs – Nationwide, Band 3

Best Lawyers® Charleston, SC

2020 "Lawyer of the Year" Mass tort litigation/class actions – plaintiffs

2011–2024 Mass tort litigation/class actions – plaintiffs

Super Lawyers® lists

2018–2021 *South Carolina Super Lawyers*: Class action/mass torts; Personal Injury – products: plaintiff; Aviation and aerospace

2009–2017 *Rhode Island Super Lawyers*

2012–2013 *Top 10 Rhode Island Super Lawyers* lists

The National Trial Lawyers

2010–present Top 100 Trial Lawyers™: Rhode Island

Lawdragon

2018–2023 Lawdragon 500

2019–2023 Lawdragon 500 Plaintiff Consumer Lawyers

2019–2021 Lawdragon 500 Plaintiff Financial Lawyers

2010 Lawdragon 3,000

Rhode Island Lawyers Weekly

2020 Leader in the Law

2011 Lawyer of the Year

Massachusetts Lawyers Weekly

2011 Lawyers of the Year

Benchmark Plaintiff

2012–2014 Rhode Island "Litigation Star": human rights and product liability

Providence Business News

2005 Forty Under 40

ASSOCIATIONS:

Law360 Product Liability Editorial Advisory Board, 2019, 2021

American Association for Justice, Board of Governors; former Executive Committee member

American Bar Association

Rhode Island Association for Justice, former President

The Fellows of the American Bar Foundation

Christopher F. Moriarty

LICENSED IN: SC

ADMITTED TO PRACTICE BEFORE:

U.S. Court of Appeals for the First, Second, Third, Fourth, Fifth, Ninth, and Tenth Circuits; U.S. District Court for the Northern District of Illinois, the Eastern District of Michigan, and the District of South Carolina

EDUCATION:

J.D., Duke University School of Law, 2011

M.A., Trinity College, University of Cambridge, 2007

Bar Vocational Course (Very Competent), Inns of Court School of Law, 2006

Graduate Diploma in Law (Commendation), BPP Law School, London, 2005

B.A., Trinity College, University of Cambridge, 2003

Christopher Moriarty litigates securities fraud and other complex litigation in the United States and consults institutional investors on opportunities to seek recovery in securities-related actions. His securities fraud class action practice encompasses every aspect of litigation, from case-starting to settlement. Notable securities fraud class actions in which he served as part of the lead counsel team include:

- *In re Twitter Inc. Securities Litigation*, No. 16-cv-05314-JST (N.D. Cal.) (\$809.5 million recovery*);
- *In re Barrick Gold Securities Litigation*, No. 13-cv-03851 (S.D.N.Y.) (\$140 million recovery*);
- *City of Brockton Retirement System v. Avon Products, Inc.*, 11 Civ. 4655 (PGG) (S.D.N.Y.) (\$62 million recovery*);
Hill v. State Street Corp., No. 09-cv-12136-GAO (D. Mass.) (\$60 million recovery*);
- *In re Hewlett-Packard Co. Securities Litigation*, No. 11-cv-1404 (RNBx) (C.D. Cal.) (\$57 million recovery*);
- *KBC Asset Management NV v. 3D Systems Corp.*, No. 15-cv-02393-MGL (D.S.C.) (\$50 million recovery*);
- *In re Medtronic, Inc. Securities Litigation*, No. 0:13-cv-0168 (D. Minn.) (\$43 million recovery*);
- *Första AP-Fonden and Danske Invest Management A/S v. St. Jude Medical, Inc.*, Civil No. 12-3070 (JNE/HB) (D. Minn.) (\$39.25 million recovery*);
- *Ross v. Career Education Corp.*, No. 12-cv-00276 (N.D. Ill.) (\$27.5 million recovery*); and
- *KBC Asset Management NV v. Aegerion Pharmaceuticals, Inc.*, No. 14-cv-10105-MLW (D. Mass.) (\$22.25 million recovery*).

Christopher has also represented investors in direct actions under federal securities laws, in shareholder derivative litigation, and in antitrust class actions; whistleblowers in proceedings before the U.S. Securities and Exchange Commission; and relators in qui tam litigation. In the international context, Christopher serves as U.S. counsel to the Stichting Petrobras Compensation Foundation in the Netherlands, which represents the interests of investors who traded in Petrobras securities outside the United States and who suffered losses as a result of an alleged long-running fraud and bribery scheme perpetrated by Petrobras and certain of its related entities and former executives.

In addition to his securities practice, Christopher represents dozens of governmental entities in litigation against several pharmaceutical drug manufacturers, distributors, and pharmacies in connection with the opioid epidemic. As part of that, he served as one of Washington State's litigation and trial counsel in its action against the "Big Three" distributors of prescription opioids that resulted in a \$518 million settlement after trial. He also successfully briefed and argued the oppositions to numerous motions to dismiss in the State of Alaska's action against numerous opioid manufacturers.*

As part of his pro bono practice, Christopher has drafted *amicus curiae* briefs in approximately 20 constitutional law cases before the U.S. Supreme Court (which has cited his work) and the federal courts of appeal. Outside of his legal practice, Christopher serves on the Board of Directors of Operation Sight, a non-profit that provides free cataract surgery and other services to those in need.

Christopher was called to the Bar in England and Wales by the Honourable Society of the Middle Temple in 2008.

SELECT PUBLICATIONS:

Christopher F. Moriarty, *Supreme Court Rules That Securities Act Time Bar Is Not Subject to American Pipe Tolling*, Class Action & Derivative Suits Newsletter, American Bar Association (Oct. 3, 2017)

SELECT PRESENTATIONS:

Panelist, Experts: Communicating Complex Ideas and Issues in Litigation Consistent with Messaging Trends, American Bar Association Litigation Section Annual Conference (May 6, 2022)

AWARDS AND ACCOLADES:

South Carolina Super Lawyers® Rising Stars list 2016–2021 Securities litigation

ASSOCIATIONS:

South Carolina Association for Justice
American Bar Association
South Carolina Bar Association
Charleston County Bar Association

William H. Narwold

LICENSED IN: CT, DC, NY, SC

ADMITTED TO PRACTICE BEFORE:

U.S. Supreme Court, U.S. Court of Appeals for the First, Second, Third, Fourth, Fifth, Sixth, Eighth, Ninth, Tenth, Eleventh, D.C., and Federal Circuits, U.S. District Court for the District of Connecticut, Eastern District of Michigan, Eastern and Southern Districts of New York, District of South Carolina

EDUCATION:

J.D. cum laude, University of Connecticut School of Law, 1979

B.A., Colby College, 1974

Bill Narwold has advocated for corporate accountability and fiduciary responsibility for nearly 40 years, representing consumers, governmental entities, unions and institutional investors. He litigates complex securities fraud, shareholder rights and consumer fraud lawsuits, as well as matters involving unfair trade practices, antitrust violations and whistleblower/qui tam claims.

TEAM BIOS:

Bill leads Motley Rice's securities and consumer fraud litigation teams and False Claim Act practice. He is also active in the firm's appellate practice. His experience includes being involved in more than 200 appeals before the U.S. Supreme Court, U.S. Courts of Appeal and multiple state courts.

Prior to joining Motley Rice in 2004, Bill directed corporate, securities, financial, and other complex litigation on behalf of private and commercial clients for 25 years at Cummings & Lockwood in Hartford, Connecticut, including 10 years as managing partner. Prior to his work in private practice, he served as a law clerk for the Honorable Warren W. Eginton of the U.S. District Court, District of Connecticut from 1979-1981.

Bill often acts as an arbitrator and mediator both privately and through the American Arbitration Association. He is a frequent speaker on legal matters, including class actions. Named one of 11 lawyers "who made a difference" by *The Connecticut Law Tribune*, Bill is recognized as an AV[®] rated attorney by Martindale-Hubbell[®].

Bill has served the Hartford community with past involvements including the Greater Hartford Legal Assistance Foundation, Lawyers for Children America, and as President of the Connecticut Bar Foundation. For more than twenty years, Bill served as a Director and Chairman of Protein Sciences Corporation, a biopharmaceutical company in Meriden, Connecticut.

AWARDS AND ACCOLADES:

Connecticut Law Tribune

2022 Connecticut Legal Awards "Distinguished Leaders" list

Best Lawyers[®]

2013, 2015, 2017, 2019, 2023 Hartford, Conn. "Lawyer of the Year": Litigation-Banking and Finance

2005-2024 Litigation-Banking and Finance; Mergers and acquisitions; Securities

2022-2024 Antitrust Law

Super Lawyers[®]

2009-2022 Connecticut Super Lawyers and New England Super Lawyers[®] lists

Securities litigation; Class action/mass torts

Lawdragon

2019-2021 Lawdragon 500 Plaintiff Financial Lawyers

Connecticut Bar Foundation

2008 Legal Services Leadership Award

ASSOCIATIONS:

American Bar Association

Connecticut Bar Foundation, Past President

Taxpayers Against Fraud

University of Connecticut Law School Foundation, past Board of Trustees member

For full Super Lawyers selection methodology visit: www.superlawyers.com/about/selection_process.html

For current year CT data visit: www.superlawyers.com/connecticut/selection_details.html

William S. Norton

LICENSED IN: MA, NY, SC

ADMITTED TO PRACTICE BEFORE:

U.S. Supreme Court; U.S. Court of Appeals for the First, Second, Third, Fourth and Ninth Circuits; U.S. District Court for the District of Colorado, Northern District of Illinois, District of Massachusetts, Eastern and Southern Districts of New York, and District of South Carolina

EDUCATION:

J.D., Boston University School of Law, 2004

B.A./B.S. *magna cum laude*, University of South Carolina, 2001

Bill Norton litigates securities fraud, corporate governance, False Claims Act, SEC whistleblower and other complex class action, consumer, and commercial matters. Bill has represented institutional and individual investors in securities fraud and shareholders actions before federal, state, and appellate courts throughout the country. He has also represented whistleblowers before the U.S. Securities and Exchange Commission through the Dodd-Frank Whistleblower Program and *qui tam* relators in actions under the False Claims Act.

Securities Fraud Litigation

Bill represents institutional investors as a member of the lead counsel teams in litigation involving Alexion Pharmaceuticals, Inc., Amazon.com, Inc., Intel Corporation, Qualcomm Inc., Seagate Technology Holdings plc, and Sotera Health Company. His previous securities fraud matters include:

- *In re SCANA Corporation Securities Litigation* (\$192.5 million recovery as Liaison Counsel*)
- *Bennett v. Sprint Nextel Corp.* (\$131 million recovery*)
- *City of Brockton Retirement System v. Avon Products, Inc.* (\$62 million recovery*)
- *Hill v. State Street Corporation* (\$60 million recovery*)
- *City of Sterling Heights General Employees' Retirement System v. Hospira, Inc.* (\$60 million recovery*)
- *In re Hewlett-Packard Company Securities Litigation* (\$57 million recovery*)
- *In re Medtronic, Inc. Securities Litigation* (\$43 million recovery*)
- *Hatamian v. Advanced Micro Devices, Inc.* (\$29.5 million recovery*)
- *Ross v. Career Education Corporation* (\$27.5 million recovery*)

Shareholder Derivative Litigation

Bill has represented shareholders in derivative actions, including:

- *Manville Personal Injury Settlement Trust v. Gemunder* (\$16.7 million payment and significant corporate governance reforms*)
- *In re Walgreen Co. Derivative Litigation* (corporate governance reforms concerning compliance with Controlled Substances Act*)

Merger and Acquisition Litigation

Bill has represented institutional shareholders in corporate M&A litigation, including:

- *In re Allion Healthcare, Inc. Shareholders Litigation* (\$4 million payment to shareholders*)
- *In re RehabCare Group, Inc., Shareholders Litigation* (\$2.5 million payment, modification of merger agreement, and additional disclosures to shareholders*)

- *In re Atheros Communications Shareholder Litigation* (preliminary injunction delaying shareholder vote and requiring additional disclosures to shareholders in \$3.1 billion merger*)
- *Maric Capital Master Fund, Ltd. v. PLATO Learning, Inc.* (preliminary injunction requiring additional disclosures to shareholders in \$143 million private-equity buyout*)

Other Commercial, Consumer Fraud, and Whistleblower Matters

Bill has represented clients in a variety of commercial, consumer fraud, and whistleblower matters, including:

- Satellite retailers in class action against EchoStar Corporation (\$83 million recovery*)
- Municipal bondholders in class action concerning alleged Ponzi scheme (\$7.8 million recovery*)
- A *qui tam* whistleblower in appeal, resulting in reinstatement of claim for employment retaliation*
- Consumers in class action against DirecTV regarding early cancellation fees
- German bank in litigation concerning collateralized debt obligations
- Investors in actions concerning variable life insurance policies funneled to the Madoff Ponzi scheme

Before joining Motley Rice, Bill practiced securities and commercial litigation in the New York office of an international law firm. In law school, Bill served as an Editor of the *Boston University Law Review* and was a G. Joseph Tauro Distinguished Scholar. He worked as a law clerk in the United States Attorney's Office for the District of Massachusetts, represented asylum seekers at Greater Boston Legal Services, and studied law at the University of Oxford. Before law school, Bill worked for the United States Attorney's Office for the District of South Carolina and volunteered with the Neighborhood Legal Assistance Program of Charleston. He graduated Phi Beta Kappa from the University of South Carolina Honors College. Bill is recognized as an AV®-rated attorney by Martindale-Hubbell®.

AWARDS AND ACCOLADES:

Lawdragon

2019 Lawdragon 500 Plaintiff Financial Lawyers

Super Lawyers®

2013–2019 *South Carolina Super Lawyers Rising Stars* list
Securities litigation; Class action/mass torts; General litigation

ASSOCIATIONS:

Federal Bar Association

American Bar Association

American Association for Justice

New York State Bar Association

South Carolina Bar Association

Charleston County Bar Association

Lance Oliver

LICENSED IN: AL, DC, FL, SC

ADMITTED TO PRACTICE BEFORE:

U.S. Court of Appeals for the District of Columbia, Fifth and the Eleventh Circuits; U.S. District Court for the District of Columbia, Middle and Southern Districts of Florida, and the Northern District of Illinois

EDUCATION:

J.D., Duke University School of Law, 2004

B.A., Samford University, 2001

Lance Oliver is a trial lawyer who litigates class actions, mass torts, and other complex matters. He has experience with all phases of litigation from filing the complaint, trying the case, and pursuing appeals. His practice focuses on securities and consumer fraud class actions, tobacco litigation, and defective products.

Lance has recently acted as lead trial counsel in a number of *Engle* progeny cases in Florida, representing smokers and their families against tobacco manufacturers. He argued a successful appeal to the Fourth District Court of Appeals in Florida, securing a verdict for a smoker's widow in a wrongful death suit against tobacco giants Philip Morris and R.J. Reynolds in *Philip Morris USA Inc. et al. v. Marchese*. He also served as counsel in *Berger v. Philip Morris USA Inc.*, which resulted in a verdict for a client who fell victim at a young age to the manufacturer's marketing campaigns targeting children.

Lance has also devoted a substantial amount of time to litigating securities fraud class actions, and has served as co-lead counsel for the class in many securities fraud cases including *Alaska Electrical Pension Fund, et al. v. Pharmacia Corp., et al.*, a securities fraud class action that resulted in a settlement for plaintiffs. More recently, Lance selected the jury as co-trial counsel for the end-payor class in *In re Solodyn (Minocycline Hydrochloride) Antitrust Litigation*, a pay-for-delay antitrust litigation.

Prior to joining Motley Rice in 2007, Lance served as an associate in the Washington, D.C., office of a national law firm, where he worked on complex products liability litigation at both the trial and appellate levels.

Lance is a member of the National Conference on Public Employee Retirement Systems (NCPERS) and the International Foundation of Employee Benefit Plans (IFEFP). After graduating from Duke Law School, he served as a law clerk to the Honorable James Hughes Hancock of the U.S. District Court, Northern District of Alabama. He is recognized as an AV® rated attorney by Martindale-Hubbell®. Lance is the Board of Directors Vice Chair of the Dee Norton Child Advocacy Center and the former Chair of the American Lung Association Local Leadership Board for Charleston.

AWARDS AND ACCOLADES:

Benchmark Litigation

2022 Plaintiff Litigator of the Year

2022 Impact Case Award

South Carolina Lawyers Weekly

2021 Leadership in Law Honoree

TEAM BIOS:

Lawdragon

2019–2021 Lawdragon 500 Plaintiff Financial Lawyers

South Carolina Super Lawyers® Rising Stars list

2013–2018 Securities litigation; Class action/mass torts

The National Trial Lawyers

2016 Top 100 Trial Lawyers™ South Carolina:

ASSOCIATIONS:

American Bar Association

Meghan S. B. Oliver

LICENSED IN: DC, SC, VA

ADMITTED TO PRACTICE BEFORE:

U.S. Court of Appeals for the Federal Circuit, U.S. District Court for the District of South Carolina

EDUCATION:

J.D., University of Virginia School of Law, 2004

B.A. with distinction, University of Virginia, 2000

Meghan Oliver's practice focuses on complex litigation and class actions, including work on securities fraud cases, general commercial litigation, and consumer fraud litigation.

She is actively involved in various class actions, including several against health insurers for drug and equipment overcharges, and one alleging that the Administrative Office of the U.S. Courts charges more for PACER services than is authorized by statute (*Nat'l Veterans Legal Services Program v. United States*, Case No. 16-745-ESH). She also represents large public pension funds, unions, and institutional investors in securities fraud class actions, including *In re Twitter, Inc. Securities Litigation*, No. 3:16-cv-05315-JST-SK and *In re Qualcomm Inc. Securities Litigation*, No. 17-CV-00121-JAH-WVG.

Additionally, Meghan helps to lead litigation filed for a class consisting of more than a million tax return preparers alleging the IRS charged unauthorized user fees for the issuance and renewal of preparer tax identification numbers, (*Steele v. United States*, Case No. 1:14-cv-1523-RCL).

She has also worked on several antitrust matters in the past, including *In re North Sea Brent Crude Oil Futures Litigation*, *In re Libor-Based Financial Instruments Antitrust Litigation*, and generic drug cases involving "reverse payment" agreements.

Prior to joining Motley Rice, Meghan worked as a business litigation and antitrust associate in Washington, D.C. There, she assisted in the trial of a multidistrict litigation antitrust case and assisted in multiple corporate internal investigations. She is a member of Phi Beta Kappa.

AWARDS AND ACCOLADES:

National Law Journal

2022 Litigation Trailblazer

Lawdragon

2019–2021 Lawdragon 500 Plaintiff Financial Lawyers

ASSOCIATIONS:

American Bar Association

Michael J. Pendell

LICENSED IN: CT, NY

ADMITTED TO PRACTICE BEFORE:

U.S. District Court for the District of Connecticut, Southern and Eastern Districts of New York

EDUCATION:

J.D., *summa cum laude*, Albany Law School, 2007

B.A., *cum laude*, Emerson College, 2000

Michael Pendell is a trial lawyer who represents people affected by corporate wrongdoing, including whistleblowers, people harmed by tobacco, prescription medications, dangerous medical devices, and victims of international terrorism. He also represents pension fund trustees and other institutional investors in securities, consumer fraud, and other complex class actions.

Michael served as trial counsel in a number of prescription opioid lawsuits representing dozens of governmental entities, including states, cities, and counties in litigation against several pharmaceutical drug manufacturers and distributors for the alleged deceptive marketing and distribution of highly addictive prescription opioids.

A former Naval Reservist who served in a security unit, Michael litigates on behalf of victims of foreign terrorism and international human rights abuses. Michael, along with other Motley Rice attorneys, is pursuing a civil action against the financiers and supporters of the September 11, 2001, terrorist attacks.

Michael represents personal injury clients, including people allegedly harmed by tobacco products and thousands alleging harm by dangerous medical devices. He served as trial counsel in the *Engle*-progeny litigation in Florida for smokers and families of deceased smokers against tobacco manufacturers. In transvaginal mesh litigation, he represented women implanted with Ethicon Gynecare Prolift transvaginal mesh devices claiming serious injuries and complications from the devices.

Michael represents institutional and individual investors in claims involving securities fraud. He played a central role on the litigation team that obtained a seven-figure arbitration award in a case involving secondary liability for an investment advisor's conduct under the Uniform Securities Act. Michael also represents clients in complex commercial cases regarding claims of fraud, breach of contract, and tortious interference, as well as representing whistleblowers in multiple cases involving the False Claims Act, including litigation filed against Afognak Native Corp., alleging Small Business Administration regulatory violations.

Prior to joining Motley Rice, Michael was an associate with a Connecticut-based law firm, where he litigated in both federal and state courts in commercial and construction law, media and administrative law, personal injury defense and labor and employment matters. He previously taught business law to B.A. and MBA candidates as an adjunct professor at Albertus Magnus College.

Michael served as a legal intern for the Honorable Randolph F. Treece of the U.S. District Court for the Northern District of New York and as a law clerk for the Major Felony Unit of the Albany County District Attorney's Office. He served as the executive editor for the New York State Bar Association Government Law & Policy Journal and senior editor for the Albany Law Review, which published his 2008 article entitled, "How Far is Too Far? The Spending Clause, the Tenth Amendment, and the Education State's Battle Against Unfunded Mandates."

As of January 2023, Michael serves on the Board of Directors for the Special Olympics of Connecticut.

AWARDS AND ACCOLADES:

Lawdragon

2019–2021 Lawdragon 500 Plaintiff Financial Lawyers

Super Lawyers®

2013–2018 Connecticut Super Lawyers Rising Stars list Securities litigation; Business litigation; Personal injury – products: plaintiff

ASSOCIATIONS:

American Association for Justice

Connecticut Bar Association

New York State Bar Association

* Prior results do not guarantee a similar outcome. For full Super Lawyers selection methodology visit: www.superlawyers.com/about/selection_process.html
For CT-specific methodology visit: www.superlawyers.com/connecticut/selection_details.html

SENIOR COUNSEL

Rebecca M. Katz

LICENSED IN: NY

ADMITTED TO PRACTICE BEFORE:

U.S. Court of Appeals for the Second Circuit; U.S. District Courts for the Southern, Eastern, and Western Districts of New York

EDUCATION:

J.D., Hofstra University School of Law, 1990

B.S., Hofstra University, 1987

As the head of Motley Rice's SEC whistleblower team, Rebecca Katz has dedicated over 30 years to representing defrauded investors and protecting whistleblowers who expose corporate misconduct.

Rebecca has successfully represented both U.S. and international clients in navigating the intricacies of the SEC whistleblower process—from filing the initial complaint through the final award stage. In addition to her renowned whistleblower work, Rebecca has experience litigating complex securities fraud cases, and has held senior leadership and partnership roles at two New York plaintiffs' litigation firms.

Formerly senior counsel for the SEC's Enforcement Division, Rebecca has been at the forefront of the field since the inception of the SEC Whistleblower Program under the Dodd-Frank Act in 2010. She has secured approximately 12% of the \$1.3 billion in total awards as of 2022, including the second largest award ever granted to a whistleblower.* Rebecca also represented two former financial advisers who alleged a brokerage firm made misleading statements related to a struggling investment product. The SEC ruled in favor of the whistleblowers and awarded them the maximum award percentage allowed.*

Guiding senior executives, mid-level managers and junior staff across a range of industries through the complex and dynamic whistleblower legal landscape, Rebecca provides strategic legal counsel to ensure—above all—strict whistleblower confidentiality and protection in reporting fraud to government enforcement agencies from the SEC and the DOJ to the IRS and CTFC.

Rebecca is a frequently speaker at legal conferences nationwide and provides insight on numerous issues involving the SEC whistleblower program and securities litigation for national and local media outlets, including *The Wall Street Journal*, *The New York Times*, *Reuters*, *Bloomberg Law*, *The National Law Journal*, and *Law360*, among others.

Rebecca serves on the Financial Fraud Committee for Taxpayers Against Fraud (TAF), a public interest, non-profit organization dedicated to defending and empowering whistleblowers who expose fraud in government and in financial markets.

A published author and former faculty member at the Practising Law Institute's Securities Litigation & Enforcement Institute (both in the U.S. and UK), Rebecca has lectured at the Fordham University School of Law's Eugene P. and Delia S. Murphy Conference on Corporate Law – Corporations, Investors and the Securities Markets. Rebecca was a member of the *Hofstra Law Review* while completing her law degree from Hofstra University School of Law.

AWARDS AND ACCOLADES:

Best Lawyers® New York, NY

2017–2024 Mass tort litigation / class actions – plaintiffs

Super Lawyers® lists

2008–2010, 2013–2023 New York Metro Super Lawyers – Securities

Hofstra University, Maurice A. Deane School of Law

2019 Outstanding Woman in Law honoree

Benchmark Plaintiff

2014 Top 150 Women in Litigation list: New York – securities

2013–2014 New York "Litigation Star" securities

ASSOCIATIONS:

American Association for Justice

Taxpayers Against Fraud (TAF), Member – Financial Fraud Committee

TEAM BIOS:

ASSOCIATES

Elizabeth A. Camputaro

LICENSED IN: SC

ADMITTED TO PRACTICE BEFORE:

U.S. Court of Appeals for the Federal and Fourth Circuits; U.S. District Court for the District of South Carolina

EDUCATION:

J.D. *magna cum laude*, Charleston School of Law, 2008

B.A., Columbia College, 2004

Elizabeth Camputaro is part of the team representing county and municipal governments in litigation involving opioid manufacturers and distributors for their alleged deceptive marketing and fraudulent distribution of highly addictive opioids.

In addition, Elizabeth has several years of experience representing institutional investors in complex securities fraud and shareholder derivative matters, including serving on litigation teams in class action suits filed against Medtronic, Inc, State Street Corp., Sprint Nextel Corp., and Advanced Micro Devices.

Prior to joining Motley Rice, Elizabeth served as a judicial law clerk for the Honorable Deadra L. Jefferson, Ninth Judicial Circuit. While in law school, Elizabeth was a member of the Federal Courts Law Review, contributed more than 100 hours of pro bono service, and served as a judicial extern for the Honorable Thomas L. Hughston, Ninth Judicial Circuit.

Active in her community, Elizabeth previously served on the South Carolina Bar Diversity Committee, and has served as an Election Commissioner for Beaufort and Summerville municipalities, Beaufort County Council Library Board Trustee, and international missionary with Project Medishare and One World Health.

ASSOCIATIONS:

American Bar Association

South Carolina Bar Association

Charleston Bar Association

Ebony Williams Bobbitt

LICENSED IN: SC, NC

EDUCATION:

J.D. *magna cum laude*, North Carolina Central University School of Law 2020

B.S., North Carolina Agricultural and Technical State University, 2012

Ebony Williams Bobbitt represents institutional investors and individuals in complex securities and consumer protection class actions that aspire to hold corporations accountable for alleged misconduct.

Ebony's casework includes litigating for U.S. tax return preparers who allege they were charged unlawful fees by the IRS to obtain their Preparer Tax Identification Numbers (PTIN) in *Adam Steele, et al. v. United States of America*, Case No. 1:14-cv-01523-RCL. She also represents a class of patients

who allege Cigna Health and Life Insurance Co. fraudulently inflated copayments and coinsurance by overcharging for medical services and products, *Neufeld v. Cigna Health and Life Insurance Company et al.*, Case No. 3:17-cv-01693.

Ebony has a background in criminal justice and worked for several years as a legal assistant for the New Hanover District Attorney's Office and as a deputy clerk for the New Hanover County Board of Commissioners prior to pursuing her law degree. She gained additional legal experience while interning with the North Carolina Department of Justice during the summer of 2018 and is a former Motley Rice law clerk.

Jessica C. Colombo

LICENSED IN: CT, NY

ADMITTED TO PRACTICE BEFORE:

U.S. Court of Appeals for the Second Circuit, U.S. District Court for the District of Connecticut

EDUCATION:

J.D. *with high honors*, University of Connecticut School of Law, 2017

B.A. *cum laude*, State University of New York at New Paltz, 2014

Jessica Colombo works to deter misconduct and fraud by representing individuals and institutional investors in complex securities and consumer protection class actions. In addition, Jessica's practice includes representing whistleblowers in cases involving the False Claims Act, and she contributes to the firm's appellate practice. She is also a part of the firm's team that represents dozens of governmental entities, including states, cities, towns, counties and townships in litigation against several pharmaceutical drug manufacturers and distributors for the alleged deceptive marketing and distribution of highly addictive prescription opioids.

Prior to joining Motley Rice, Jessica served as a law clerk to the Honorable Bethany J. Alvord of the Connecticut Appellate Court. She gained additional experience in complex consumer fraud and product liability litigation while serving as a Motley Rice law clerk in 2016. She also interned with the U.S. Attorney's Office for the District of Connecticut.

While completing her legal studies, Jessica served as Executive Editor of the *Connecticut Law Review*, a member of the Public Interest Law Group, and a volunteer with the International Refugee Assistance Project. She also represented criminal defendants in the University of Connecticut School of Law Criminal Trial Clinic. She received multiple CALI awards in Lawyering Process, Torts, Estate Plan/Tax Practice, and Trademark Law.

Jessica previously worked as a toll collector for the New York State Thruway Authority, where she was a member of the International Brotherhood of Teamsters, Local 72.

ASSOCIATIONS:

American Bar Association

Connecticut Bar Association

Neli Traykova Hines

LICENSED IN: DC, IL, SC

ADMITTED TO PRACTICE BEFORE:

U.S. District Court for the Northern District of Illinois

EDUCATION:

J.D., American University Washington College of Law, 2021

B.S., American University, 2016

Neli Traykova Hines pursues complex securities fraud class actions for institutional investors and individual shareholders who seek to recover losses caused by alleged corporate misconduct.

Neli contributed to the litigation and final approval of the \$809.5 million settlement with Twitter Inc. in 2021. She litigates for investors who allege medical drug manufacturer AbbVie engaged in illegal kickbacks and other misconduct to boost sales for its immunosuppressant drug Humira. Neli's casework also includes representing investors in securities fraud actions against Chegg, Inc. and Upstart Holdings.

While completing her legal studies, Neli worked as an honors legal intern at the U.S. Securities and Exchange Commission where she assisted with enforcement actions. She was also a student attorney with the Entrepreneurship Law Clinic at American University, counseling small businesses on corporate structuring, taxation, financing and growth and succession planning. Neli was a member of the Business Law Review and competed internationally in mediation and negotiation competitions as a member of the Alternative Dispute Resolution Honor Society.

She acquired additional experience as a FOIA government information specialist and a contracts specialist for the U.S. government prior to law school.

Neli serves her community as a volunteer mediator through the Mediation and Meeting Center of Charleston.

ASSOCIATIONS:**Washington D.C. Bar Association****South Carolina Bar Association****Charleston County Bar Association****Annie E. Kouba**

LICENSED IN: SC

ADMITTED TO PRACTICE BEFORE:

U.S. District Court for the District of South Carolina

EDUCATION:

J.D., University of North Carolina School of Law, 2016

M.S.W., University of North Carolina School of Social Work, 2016

B.A., *magna cum laude*, Lenoir-Rhyne University, 2012

Annie Kouba is a trial lawyer with a diverse practice representing global terror victims, survivors of childhood sexual abuse, children and families coping with mental health challenges allegedly caused by social media platforms, as well as public clients and government entities.

She is a part of Motley Rice's team of attorneys that represents dozens of cities, towns, counties, and townships in the *National Prescription Opiate* MDL against opioid manufacturers, distributors, and pharmacies for alleged deceptive marketing, fraudulent distribution and other business practices that contributed to the opioid crisis. Annie also has experience in the courtroom as a part of the Motley Rice trial team representing individuals alleging harm by defective medical devices.

Prior to joining Motley Rice, Annie interned with the North Carolina Department of Justice in the Health and Human Services Division where she drafted criminal briefs for the N.C. Court of Appeals and N.C. Supreme Court and assisted the president of the American Association of Public Welfare Attorneys. She also interned with the EMILY's List Political Opportunity Program and has worked as a *voir dire* consultant.

Annie concentrated in Community, Management, and Policy Practice at the University of North Carolina's School of Social Work Master's program where she specialized in the intersection of public policy and the law. Through a practicum with the program, Annie interned with the Compass Center for Women and Families in the Financial Literacy Education Program, where she served as a certified counselor with The Benefit Bank.

While pursuing her studies at the University of North Carolina School of Law, Annie served as a published staff member on the *First Amendment Law Review* and as vice president of the Carolina Public Interest Law Organization. She also contributed more than 100 hours in the Pro Bono Program there, through which she prepared tax returns for low-income citizens and researched and provided social work policy and legal perspective related to minors' rights after sexual assault for a guidebook from the NC Coalition Against Sexual Assault.

Annie serves on the board of the Green Heart Project, a volunteer-assisted service-learning organization connecting children living in food deserts with school gardens, healthy produce, and mentors.

AWARDS AND ACCOLADES:**Best Lawyers®****2024** *Ones to Watch* list: Litigation – Securities**South Carolina Bar Leadership Academy**

Class of 2019

National Law Journal**2023** Rising Stars of the Plaintiffs' Bar**ASSOCIATIONS:****American Association for Justice**, Political Action Committee Task Force**South Carolina Association for Justice**

TEAM BIOS:

Alexis N. Lilly

LICENSED IN: SC

EDUCATION:

J.D. *cum laude*, American University Washington College of Law, 2020

B.A. *magna cum laude*, The Ohio State University, 2017

Alexis Lilly protects public entities, institutional investors and individuals through complex litigation targeting corporate negligence and misconduct.

Alexis is a part of the firm's team that represents dozens of governmental entities, including states, counties, cities, towns, and townships in litigation targeting the alleged deceptive marketing and over-distribution of highly addictive opioid drugs, a contended cause of the nationwide opioid crisis.

A former Motley Rice law clerk, Alexis was the Technical Editor of the *American University Business Law Review*, Vol. 9, and served as a student attorney for American University Washington College of Law's Civil Advocacy Clinic in Washington, D.C., while completing her legal studies. She also assisted faculty as a Dean's Fellow for the school's Legal Rhetoric Department, served as a judicial intern for U.S. District Judge Rudolph Contreras of the U.S. District Court for D.C., and gained valuable experience as a law clerk for the U.S. Attorney's Office, District of Arizona.

Ridge Mazingo

LICENSED IN: SC

EDUCATION:

J.D., University of North Carolina School of Law, 2022

B.A. *summa cum laude*, North Carolina State University, 2018

Ridge represents institutional investors in complex securities fraud litigation. Since joining Motley Rice, he supported the securities litigation team with the judicial approval process of a \$809.5 million dollar settlement in a case, against the social media company Twitter for misleading shareholders. Ridge is also involved in securities litigation against Chegg, Inc. and Abbott Laboratories. As the son of two retired public-school educators, Ridge understands the importance of protecting pension fund investments so that hard-working men and women can retire with the dignity they deserve.

Ridge has also worked on various matters outside of the securities context representing clients in cases involving data breaches, catastrophic injury claims and anti-trust matters.

Prior to law school, Ridge gained valuable experience in state government as a Legislative Aide in the North Carolina House of Representatives and worked with a lobbying and consulting firm. While attending law school, Ridge was a member of the *North Carolina Law Review*, and held legal internships with the N.C. Department of Justice Consumer Protection Division and a mid-size regional firm focusing on civil defense and transactional matters.

Prior to college, Ridge was a Volunteer Firefighter for the Snow Hill Fire Department, where he received the 2011 Rookie of the Year commendation. Active in his community, Ridge volunteers with the Coastal Conservation League and the South Carolina Special Olympics.

Meredith B. Weatherby

LICENSED IN: SC, TX

ADMITTED TO PRACTICE BEFORE:

U.S. District Court for the Northern, Southern, Eastern and Western Districts of Texas

EDUCATION:

J.D., University of Texas School of Law, 2011

B.A., *with distinction*, University of North Carolina, Chapel Hill, 2008

Meredith Weatherby develops and litigates securities fraud class actions and shareholder derivative suits on behalf of institutional investors.

Meredith represents unions, public pensions and institutional investors in federal courts throughout the country. Her casework includes representing clients in a number of cases related to high frequency trading (HFT), including the groundbreaking securities fraud litigation against NASDAQ and the New York Stock Exchange that was recently revived upon appeal to the U.S. Court of Appeals for the Second Circuit. She was also involved in the securities class action against Twitter Inc. Previously, Meredith was a member of the teams representing investors in securities fraud class actions filed against Advanced Micro Devices, Barrick Gold and SAC Capital, among others.

Meredith also has experience litigating medical malpractice and negligence suits in state court.

Prior to joining Motley Rice, Meredith gained trial and settlement experience as an associate at a Dallas, Texas, law firm working in business and construction litigation. While attending the University of Texas School of Law, she clerked for an Austin firm, represented victims in court as a student attorney in the UT Law Domestic Violence Clinic and was a Staff Editor of the *Review of Litigation* journal. During her undergraduate and law school career, Meredith studied abroad in Paris, France, Geneva, Switzerland and Puebla, Mexico.

AWARDS AND ACCOLADES:

Best Lawyers®

2021-2024 *Ones to Watch* list: Litigation – Securities

ASSOCIATIONS:

Charleston County Bar Association

Erin Casey Williams

LICENSED IN: SC

ADMITTED TO PRACTICE BEFORE:

United States Court of Appeals for the Second Circuit; U.S. District Court for the District of South Carolina, Eastern District of Michigan, and Northern District of Illinois

EDUCATION:

J.D., University of Illinois College of Law, 2014

B.S. with honors, University of Illinois at Urbana-Champaign, 2011

Erin Casey Williams protects the interests of institutional investors and consumers through complex securities litigation.

Erin is a member of Motley Rice's litigation teams representing investors in securities fraud class action cases. She supports the firm's efforts in matters involving Qualcomm Incorporated and Investment Technology Group, Inc.

Erin assisted in the development of deposition strategies and completed discovery with the Motley Rice securities team before joining the firm in 2017. Her previous experience includes litigating claims involving medical malpractice, wrongful death, personal injury and complex family law matters at a Charleston, S.C., law firm. She also researched and drafted memoranda regarding construction defects, insurance defense, and tort liability for a national litigation support agency.

While pursuing her law degree, Erin interned for the Federal Defender Program in Chicago in addition to working as a judicial extern for the Honorable Michael T. Mason of the U.S. District Court for the Northern District of Illinois. She served as an associate editor of the *University of Illinois Law Review* and the Community Service Chair of the Women's Law Society.

AWARDS AND ACCOLADES:

Best Lawyers®

2024 *Ones to Watch* list: Litigation – Securities

ASSOCIATIONS:

American Bar Association

South Carolina Bar Association

South Carolina Association for Justice

South Carolina Women Lawyers Association

Charleston County Bar Association

STAFF ATTORNEYS

Vanessa A. Davis

LICENSED IN: SC

EDUCATION:

J.D., Charleston School of Law, 2013

B.A., College of Charleston, 2008

Vanessa Davis protects the rights of individual shareholders and institutional investors by litigating complex securities fraud class actions, in addition to her work advocating for state and local governments that seek to advance public health and safety interests.

Vanessa's practice includes representing Twitter shareholders in litigation that alleged the social media giant misrepresented

its daily user growth in 2015 in order to inflate its stock price. The suit resulted in an \$809.5 million proposed settlement in 2021 days before trial.

- Vanessa has additional experience in securities cases including:
- *Forsta AP-Fonden et al v. St. Jude Medical Inc et al* (\$39.25 million settlement in 2016*)
- *Hatamian v. Advanced Micro Devices, Inc.* (\$29.5 million settlement in 2017*)
- *KBC Asset Mgmt. v. 3D Systems Corp.* (\$50 million settlement in 2018*)
- *In re CenturyLink Sales Practices & Securities Litigation* (\$55 million settlement in 2021*)

Vanessa's work for state and local municipalities includes representing the City of Chicago in litigation alleging e-cigarette maker JUUL misled the public on the safety of its products while marketing to children. She is a part of Motley Rice's team of attorneys who represent dozens of governmental entities, including states, cities, towns, counties and townships in litigation against several pharmaceutical drug manufacturers and distributors for the alleged deceptive marketing of highly addictive opioids.

Prior to her work with Motley Rice, Vanessa represented clients in family court and clerked for an estate planning firm in Charleston, S.C. Vanessa also worked as a paralegal for a personal injury firm while completing her legal studies.

ASSOCIATIONS:

American Bar Association

Charleston County Bar Association

South Carolina Bar Association

Laura C. Rublee

LICENSED IN: SC

ADMITTED TO PRACTICE BEFORE: U.S. Court of Appeals for the Fourth Circuit; U.S. District Court for the Eastern and Western Districts of Virginia, and the Western District of North Carolina

EDUCATION:

J.D., Marshall-Wythe School of Law, College of William & Mary, 1985

B.A. with distinction, University of Virginia, 1977

Laura Rublee litigates for consumers, unions, public pensions and other institutional investors as a part of Motley Rice's securities and consumer fraud practice. Laura advances complex class actions that shine a light on alleged financial violations and corporate misconduct that negatively impact investors and consumers.

Laura's litigation experience includes representing a class of patients who allege Cigna Health and Life Insurance Co. fraudulently inflated copayments and coinsurance by overcharging for medical services and products, *Neufeld v. Cigna Health and Life Insurance Company et al.* She also represents more than a million tax return preparers who allege the IRS charged unauthorized user fees for the issuance and renewal of preparer tax identification numbers, *Steele v. United States*. Laura served on additional litigation teams in class action suits filed against Medtronic, Inc.; Sprint Nextel Corp.; and Twitter, Inc.

TEAM BIOS:

Prior to joining Motley Rice, Laura worked for several years as an escrow officer in Texas where she assisted with real estate transactions. She has additional experience as a staff attorney and associate for defense firms in South Carolina and Virginia. She also has a background in biophysics, having worked as laboratory specialist for several years before pursuing a law degree.

ASSOCIATIONS:

South Carolina Bar Association

SECURITIES LITIGATION PROFESSIONAL STAFF

Ellie Kimmel

EDUCATION:

B.A., University of South Florida, 1993

Business Analyst Ellie Kimmel began working with Motley Rice attorneys in 2000. Prior to her work with the securities litigation team, she was a founding member of the firm's Central Research Unit and also supervised the firm's file management. She currently completes securities research and client portfolio analysis for the firm's securities cases.

Ellie has a diverse background that includes experience in education as well as the banking industry. She began her career in banking operations, where she served as an operations manager and business analyst in corporate banking support for 14 years. She then spent seven years teaching high school economics, Latin and history before joining Motley Rice.

Evelyn Richards

EDUCATION:

A.S. *cum laude*, Computer Technology, Trident Technical College, 1995

J.D., University of South Carolina School of Law, 1989

B.A., English Literature and Religion, University of Virginia, 1986

Evelyn Richards joined Motley Rice in 2007. As a law clerk for the Securities and Consumer Fraud practice group, she plays a key role in supporting the securities litigation team through editing, cite-checking and Shepardizing complaints, briefs, and other legal documents. She also trains support staff on how to use The Bluebook.

Evelyn has over 25 years of experience in the legal field. As an Assistant Solicitor for the Ninth Circuit Solicitor's Office, she prosecuted child abuse and neglect and criminal cases. She also worked as a programmer/analyst for a few years. Prior to joining Motley Rice, Evelyn worked as an administrator for a large telecom, corporate and litigation firm, supervising all office operations, including human resources and accounting procedures. She also served as office manager for a small worker's compensation law office, where she managed trust and operating accounts and provided information technology support.

Evelyn's diverse background in information technology, management, programming and analysis adds great depth to the resources provided to Motley Rice clients.

Joshua Welch

EDUCATION:

M.B.A., The Citadel, 2017

B.S. with honors, The College of Charleston, 2015

As a Financial Analyst with the securities litigation team, Joshua Welch is responsible for monitoring client portfolios, analyzing investor losses, and conducting research on companies facing allegations of securities fraud. He also assists in submitting claims for securities class action settlements.

Joshua holds a Master of Business Administration degree from The Citadel, where he worked as a graduate assistant. As an undergraduate, he double-majored in Accounting and Business Administration.



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SC | RI | CT | NY | WV | DC | NJ | PA

William H. Narwold (CT, DC, NY, SC) is the attorney responsible for this communication. Prior results do not guarantee a similar outcome.

Motley Rice LLC, a South Carolina Limited Liability Company, is engaged in the New Jersey practice of law through Motley Rice New Jersey LLC. Esther Berezofsky attorney responsible for New Jersey practice.

PD: 11.13.2023

Exhibit J

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

BOSTON RETIREMENT SYSTEM,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

ALEXION PHARMACEUTICALS, INC.,
LEONARD BELL, DAVID L. HALLAL,
VIKAS SINHA,

Defendants.

Civ. No. 3:16-cv-2127 (AWT)

Hon. Alvin W. Thompson

**DECLARATION OF MICHAEL H. ROGERS ON BEHALF OF
LABATON SUCHAROW LLP IN SUPPORT OF APPLICATION FOR AN AWARD OF
ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, MICHAEL H. ROGERS, declare as follows, pursuant to 28 U.S.C. §1746:

1. I am a partner of the law firm of Labaton Sucharow LLP (“Labaton Sucharow”). I am submitting this declaration in support of my firm’s application for an award of attorneys’ fees and expenses in connection with services rendered in the above-entitled action (the “Action”) from inception through October 31, 2023 (the “Time Period”).

2. My firm, which serves as Co-Class Counsel in the Action, has been involved throughout the course of the litigation, which is described in the accompanying Joint Declaration of Gregg S. Levin and Michael H. Rogers in Support of (I) Class Representatives’ Motion for Final Approval of Class Action Settlement and Plan of Allocation and (II) Co-Class Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Litigation Expenses, filed herewith.

3. The information in this declaration regarding my firm’s time and expenses is taken from time and expense records prepared and maintained by the firm in the ordinary course of

business. These records (and backup documentation where necessary) were reviewed by me and others at my firm, under my direction, to confirm both the accuracy of the entries, as well as the necessity for and reasonableness of the time and expenses committed to the Action. As a result of this review and adjustments made, I believe that the time reflected in the firm's lodestar calculation and the expenses for which payment is sought are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the Action. In addition, I believe that the expenses are all of a type that would normally be paid by a fee-paying client in the private legal marketplace.

4. The schedule attached hereto as Exhibit A is a summary indicating the amount of time spent by attorneys and professional support staff members of my firm who were involved in the prosecution of the Action, and the lodestar calculation based on my firm's current hourly rates. For personnel who are no longer employed by my firm, the lodestar calculation is based upon the rates for such personnel in his or her final year of employment. The schedule was prepared from daily time records regularly prepared and maintained by my firm, which are available at the request of the Court. Time expended in preparing this application for fees and payment of expenses has not been included in this request.

5. The total number of reported hours spent on this Action by my firm during the Time Period is 20,417.1. The total lodestar amount for the reported attorney/professional staff time based on the firm's current rates is \$11,577,652.00.

6. The hourly rates for the attorneys and professional support staff of my firm included in Exhibit A are my firm's usual and customary hourly rates, which have been approved by courts in other contingent securities class action litigations. The firm's rates are set based on, among other factors, an annual analysis of rates utilized by firms performing comparable work and that have been approved by courts. Different timekeepers within the same employment category (*e.g.*,

partners, associates, staff attorneys, paralegals, etc.) may have different rates based on a variety of factors, including years of practice, years at the firm, year in the current position, and relevant experience. The firm's lodestar figures are based upon the firm's hourly rates, which do not include expense items. Expense items are recorded separately and are not duplicated in my firm's hourly rates.

7. My firm also seeks an award of \$541,950.58 in expenses incurred by Labaton Sucharow in connection with the prosecution of the Action. These expenses are summarized by category in Exhibit B. The following is additional information regarding certain of the expenses reported in Exhibit B:

(a) **Court, Witness & Service Fees:** \$3,437.50. These expenses have been paid by my firm to attorney service firms or courts in connection with attorney admissions and court filings.

(b) **Litigation Support:** \$31,078.88. These are the costs associated with gathering discovery relating to Class Representative, the Public Employee Retirement System of Idaho (hereinafter, "PERSI").

(c) **Experts/Consultants/Outside Investigators:** \$11,818.00.

(i) Loss Causation/Damages - \$9,475.00. These costs relate to some of the fees of Class Representatives' expert Chad Coffman, of Global Economics Group, and also the fees of a consulting economic expert who assisted the firm with various analyses of damages in the case. However, the bulk of the fees relating to expert analysis was paid through the Joint Litigation Expense Fund, discussed below and summarized in Exhibit D.

(ii) Pharmaceutical Industry - \$2,343.00. My firm also retained a consulting expert who provided expertise regarding the pharmaceutical industry generally, as well

as ethical codes of conduct and guidelines (and other applicable norms) governing pharmaceutical sales practices.

(d) **Work-Related Transportation, Hotels & Meals:** \$54,048.47. In connection with the prosecution of this case, the firm has paid for work-related transportation expenses, meals, and travel expenses related to, among other things, working late hours and traveling in connection with court hearings, depositions, the mediations, and meetings with PERSI. (Any first-class airfare has been reduced to be comparable to economy rates.)

(e) **Online Legal & Factual Research:** \$40,043.68. These expenses relate to the usage of electronic databases, such as Bloomberg, PACER, Westlaw, LexisNexis Risk Solutions and LexisNexis. These databases were used to obtain access to financial data, factual information, and legal research.

8. With respect to the standing of my firm, attached hereto as Exhibit C is a brief biography of my firm as well as biographies of the firm's partners and of counsels.

9. As mentioned above, my firm was also responsible for maintaining a joint litigation expense fund on behalf of Plaintiffs' Counsel (the "Joint Litigation Expense Fund" or the "Litigation Fund") in order to monitor the major expenses incurred in the Action and to facilitate their payment. The expenses incurred by the Joint Litigation Expense Fund are reported in Exhibit D, attached hereto. The Litigation Fund received contributions of \$220,000 from Labaton Sucharow and \$220,000 from Motley Rice LLC. (These contributions are reported in Exhibit B to each firm's individual fee and expense declaration so that each firm can be reimbursed for these contributions.) The Litigation Fund incurred a total of \$591,779.92 in expenses in connection with the prosecution of the Action, which were paid using the firms' contributions. Accordingly, there is a shortfall of \$151,779.92. This amount has been added to Labaton Sucharow's expense request

given its control of the Litigation Fund so that, upon Court approval, the unpaid expenses can be paid.

10. The following is additional information regarding certain of the Litigation Fund expenses summarized in Exhibit D:

(a) **Mediation Fees:** \$72,048.75. These are Class Representatives' share of the fees of Phillips ADR Enterprises. Judge Layn R. Phillips (Ret.) oversaw two mediation sessions between the Parties and negotiations over the span of a year, which ultimately resulted in the proposed Settlement.

(b) **Deposition Reporting and Transcripts:** \$143,134.18. These are the fees of videographers and court reporters in connection with the depositions taken or defended by Plaintiffs' Counsel.

(c) **Experts:** \$272,156.33. Co-Class Counsel retained several experts to provide advice throughout fact discovery, in connection with class certification, and to prepare expert reports:

(i) **Accounting:** \$6,331.50. These are the fees of a consulting accounting expert who provided analyses regarding corporate internal controls in the context of pharmaceutical sales practices and matters related to the work of Alexion's independent auditor, PricewaterhouseCoopers LLC.

(ii) **Loss Causation/Damages/Plan of Allocation:** \$265,824.83. These are the fees of Global Economics, which provided expert services in connection with Lead Plaintiffs' Motion for Class Certification, damages evaluation in connection with the mediations, and which prepared the proposed Plan of Allocation.

(d) **Counsel for Confidential Witnesses:** \$67,975.82. These are the fees of counsel retained to represent several confidential witnesses named in the complaints who were subpoenaed in the Action.

(e) **Litigation Support:** \$33,912.51. These are the fees of an e-discovery vendor retained to host documents provided by PERSI in connection with discovery in the Action.

11. The expenses pertaining to this case incurred by Labaton Sucharow and the Joint Litigation Expense Fund are reflected in the books and records of my firm. These books and records were prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of November, 2023.



MICHAEL H. ROGERS

Exhibit A

*Alexion Securities Litigation***EXHIBIT A****LODESTAR REPORT**

FIRM: LABATON SUCHAROW LLP

REPORTING PERIOD: INCEPTION THROUGH OCTOBER 31, 2023

PROFESSIONAL	STATUS	CURRENT RATE	HOURS	LODESTAR
Keller, C.	(P)	\$1,325	76.0	\$100,700.00
Johnson, J.	(P)	\$1,275	388.7	\$495,592.50
Gardner, J.	(P)	\$1,275	65.8	\$83,895.00
Zeiss, N.	(P)	\$1,075	106.0	\$113,950.00
Belfi, E.	(P)	\$1,075	92.8	\$99,760.00
Rogers, M.	(P)	\$1,000	1870.9	\$1,870,900.00
Fatale, A.	(P)	\$950	201.2	\$191,140.00
Rhodes, C.	(P)	\$900	150.2	\$135,180.00
Stocker, M.	(P)	\$900	65.7	\$59,130.00
McConville, F.	(P)	\$900	61.5	\$55,350.00
Christie, J.	(P)	\$700	417.7	\$292,390.00
Rosenberg, E.	(OC)	\$875	43.5	\$38,062.50
Cividini, D.	(OC)	\$750	617.5	\$463,125.00
Esmay, J.	(OC)	\$725	256.9	\$186,252.50
Kamhi, R.	(OC)	\$650	269.1	\$174,915.00
Schervish II, W.	(OC)	\$650	31.7	\$20,605.00
Yamada, R.	(A)	\$625	48.1	\$30,062.50
Barraza, C.	(A)	\$625	36.6	\$22,875.00
Fee, J.	(A)	\$600	248.9	\$149,340.00
Manningham, N.	(A)	\$575	40.1	\$23,057.50
Leggio, P.	(A)	\$550	1844.7	\$1,014,585.00
Hrutkay, M.	(A)	\$525	82.2	\$43,155.00
Strejlau, L.	(A)	\$525	36.5	\$19,162.50
Schmidt, M.	(A)	\$500	245.2	\$122,600.00
Salamon, L.	(A)	\$500	39.0	\$19,500.00
Rowley, R.	(A)	\$475	707.5	\$336,062.50
Stiene, C.	(A)	\$475	184.1	\$87,447.50
Hayashi, M.	(SA)	\$475	1447.5	\$687,562.50
Carrigan, R.	(SA)	\$450	2423.1	\$1,090,395.00
Pumo, D.	(SA)	\$450	2387.6	\$1,074,420.00
Kussin, T.	(SA)	\$430	1772.1	\$762,003.00

PROFESSIONAL	STATUS	CURRENT RATE	HOURS	LODESTAR
McGoey, A.	(SA)	\$425	122.0	\$51,850.00
Heim, J.	(SA)	\$375	2178.9	\$817,087.50
Greenbaum, A.	(I)	\$625	328.3	\$205,187.50
Pontrelli, J.	(I)	\$550	28.4	\$15,620.00
Clark, J.	(I)	\$500	162.5	\$81,250.00
Wroblewski, R.	(I)	\$450	270.0	\$121,500.00
Crowley, M.	(I)	\$435	470.5	\$204,667.50
Lindquist, S.	(I)	\$275	19.5	\$5,362.50
Yellin, M.	(I)	\$165	13.5	\$2,227.50
Ramphul, R.	(PL)	\$390	109.9	\$42,861.00
Sosnoski, D.	(PL)	\$390	46.9	\$18,291.00
Jones, A.	(PL)	\$390	20.4	\$7,956.00
Malonzo, F.	(PL)	\$380	34.1	\$12,958.00
Mundo, S.	(PL)	\$375	186.3	\$69,862.50
Pina, E.	(PL)	\$375	23.2	\$8,700.00
Auer, S.	(PL)	\$360	40.5	\$14,580.00
Schneider, P.	(PL)	\$360	22.3	\$8,028.00
Molloy, M.	(PL)	\$325	55.6	\$18,070.00
Viczian, R.	(PL)	\$325	25.9	\$8,417.50
TOTALS			20,417.1	\$11,577,652.00

Partner	(P)	Staff Attorney	(SA)
Of Counsel	(OC)	Investigator	(I)
Associate	(A)	Paralegal	(PL)

Exhibit B

*Alexion Securities Litigation***EXHIBIT B****EXPENSE REPORT**

FIRM: LABATON SUCHAROW LLP

REPORTING PERIOD: INCEPTION THROUGH OCTOBER 31, 2023

CATEGORY		TOTAL AMOUNT
Court / Witness / Service Fees		\$3,437.50
Long Distance Telephone / Fax/ Conference Calls		\$1,218.52
Postage / Overnight Delivery Services		\$2,878.02
Online Legal & Factual Research		\$40,043.68
Experts/Consultants/Outside Investigators		\$11,818.00
Pharmaceutical Industry	\$2,343.00	
Loss Causation/Damages	\$9,475.00	
Litigation Support		\$31,078.88
Work-Related Transportation / Hotels / Meals *		\$54,048.47
Duplicating		\$26,217.58
Outside:	\$304.38	
In-House Color: (51,926 copies at \$0.40 per page)	\$20,770.40	
In-House BW: (25,714 copies at \$0.20 per page)	\$5,142.80	
Contribution to Joint Litigation Expense Fund		\$220,000.00
Outstanding Joint Litigation Expense Fund Costs		\$151,779.92
TOTAL		\$541,950.58

* Included in this total is an estimate of \$1,000 for the costs of attending the final settlement hearing. If more than \$1,000 is incurred, \$1,000 will be the cap on the amount to be reimbursed to Labaton Sucharow. If less than \$1,000 is incurred, then only the amount incurred will be reimbursed.

Exhibit C

Alexion Securities Litigation

EXHIBIT C

LABATON SUCHAROW LLP RESUME

**Labaton
Sucharow**

Labaton Sucharow Credentials

2023



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ABOUT THE FIRM

Labaton Sucharow has recovered billions of dollars for investors, businesses, and consumers

Founded in 1963, Labaton Sucharow LLP has earned a reputation as one of the leading plaintiffs' firms in the United States. For more than half a century, Labaton Sucharow has successfully exposed corporate misconduct and recovered billions of dollars in the United States and around the globe on behalf of investors and consumers. Our mission is to continue this legacy and to continue to advance market fairness and transparency in the areas of securities, corporate governance and shareholder rights, and data privacy and cybersecurity litigation, as well as whistleblower representation. Our Firm has recovered significant losses for investors and secured corporate governance reforms on behalf of the nation's largest institutional investors, including public pension, Taft-Hartley, and hedge funds, investment banks, and other financial institutions.

Along with securing newsworthy recoveries, the Firm has a track record for successfully prosecuting complex cases from discovery to trial to verdict. As *Chambers and Partners* has noted, the Firm is "*considered one of the greatest plaintiffs' firms,*" and *The National Law Journal* "Elite Trial Lawyers" recently recognized our attorneys for their "*cutting-edge work on behalf of plaintiffs.*" Our appellate experience includes winning appeals that increased settlement values for clients and securing a landmark U.S. Supreme Court victory in 2013 that benefited all investors by reducing barriers to the certification of securities class action cases.

Our Firm provides global securities portfolio monitoring and advisory services to more than 250 institutional investors, including public pension funds, asset managers, hedge funds, mutual funds, banks, sovereign wealth funds, and multi-employer plans—with collective assets under management (AUM) in excess of \$3.75 trillion. We are equipped to deliver results due to our robust infrastructure of more than 70 full-time attorneys, a dynamic professional staff, and innovative technological resources. Labaton Sucharow attorneys are skilled in every stage of business litigation and have challenged corporations from every sector of the financial market. Our professional staff includes financial analysts, paralegals, e-discovery specialists, certified public accountants, certified fraud examiners, and a forensic accountant. We have one of the largest in-house investigative teams in the securities bar.





SECURITIES LITIGATION: As a leader in the securities litigation field, the Firm is a trusted advisor to more than 250 institutional investors with collective assets under management in excess of \$3.75 trillion. Our practice focuses on portfolio monitoring and domestic and international securities litigation for sophisticated institutional investors. Since the passage of the Private Securities Litigation Reform Act of 1995, we have recovered more than \$25 billion in the aggregate. Our success is driven by the Firm's robust infrastructure, which includes one of the largest in-house investigative teams in the plaintiffs' bar.

CORPORATE GOVERNANCE AND SHAREHOLDER RIGHTS LITIGATION: Our breadth of experience in shareholder advocacy has also taken us to Delaware, where we press for corporate reform through our Wilmington office. These efforts have already earned us a string of enviable successes, including the historic \$1 billion cash settlement three weeks before trial in *In re Dell Technologies Inc. Class V Stockholders Litigation*, the largest shareholder settlement ever in any state court in America and the 17th largest shareholder settlement of all time in federal and state court, and a \$153.75 million settlement on behalf of shareholders in *In re Freeport-McMoRan Copper & Gold Inc. Derivative Litigation*, one of the largest derivative settlements ever achieved in the Court of Chancery.

CONSUMER, CYBERSECURITY, AND DATA PRIVACY PRACTICE: Labaton Sucharow is dedicated to putting our expertise to work on behalf of consumers who have been wronged by fraud in the marketplace. Built on our world-class litigation skills, deep understanding of federal and state rules and regulations, and an unwavering commitment to fairness, our Consumer, Cybersecurity, and Data Privacy Practice focuses on protecting consumers and improving the standards of business conduct through litigation and reform. Our team achieved a historic \$650 million settlement in the *In re Facebook Biometric Information Privacy Litigation* matter—the largest consumer data privacy settlement ever, and one of the first cases asserting biometric privacy rights of consumers under Illinois' Biometric Information Privacy Act (BIPA).

WHISTLEBLOWER LITIGATION: Our Whistleblower Representation Practice leverages the Firm's securities litigation expertise to protect and advocate for individuals who report violations of the federal securities laws. We secured an award of \$83 million—the largest award granted to date by the SEC's Whistleblower Program—for three whistleblowers who tipped the SEC off to long-running misconduct at Merrill Lynch.

"Labaton Sucharow is 'superb' and 'at the top of its game.' The Firm's team of 'hard-working lawyers...push themselves to thoroughly investigate the facts' and conduct 'very diligent research.'"

– The Legal 500



SECURITIES CLASS ACTION LITIGATION

Labaton Sucharow is a leader in securities litigation and a trusted advisor to more than 250 institutional investors. Since the passage of the Private Securities Litigation Reform Act of 1995 (PSLRA), the Firm has recovered more than \$25 billion in the aggregate for injured investors through securities class actions prosecuted throughout the United States and against numerous public corporations and other corporate wrongdoers.

These notable recoveries would not be possible without our exhaustive case evaluation process. The Firm has developed a proprietary system for portfolio monitoring and reporting on domestic and international securities litigation, and currently provides these services to more than 250 institutional investors, which manage collective assets of more than \$3.75 trillion. The Firm's in-house investigators also gather crucial details to support our cases, whereas other firms rely on outside vendors or fail to conduct any confidential investigation at all.

As a result of our thorough case evaluation process, our securities litigators can focus solely on cases with strong merits. The benefits of our selective approach are reflected in the low dismissal rate of the securities cases we pursue, a rate well below the industry average. Over the past decade, we have successfully prosecuted headline-making class actions against AIG, Bear Stearns, Massey Energy, Schering-Plough, Fannie Mae, Amgen, Facebook, and SCANA, among others.

NOTABLE SUCCESSES

Labaton Sucharow has achieved notable successes in financial and securities class actions on behalf of investors, including the following:

In re American International Group, Inc. Securities Litigation, No. 04-cv- 8141 (S.D.N.Y.)

In one of the most complex and challenging securities cases in history, Labaton Sucharow secured more than **\$1 billion** in recoveries on behalf of co-lead plaintiffs Ohio Public Employees Retirement System, State Teachers Retirement System of Ohio, and Ohio Police and Fire Pension Fund in a case arising from allegations of bid rigging and accounting fraud. To achieve this remarkable recovery, the Firm took over 100 depositions and briefed 22 motions to dismiss. The full settlement entailed a \$725 million settlement with American International Group (AIG), \$97.5 million settlement with AIG's auditors, \$115 million settlement with former AIG officers and related defendants, and an additional \$72 million settlement with General Reinsurance Corporation, which was approved by the Second Circuit on September 11, 2013.

In re Countrywide Financial Corp. Securities Litigation, No. 07-cv-05295 (C.D. Cal.)

Labaton Sucharow, as lead counsel for the New York State Common Retirement Fund and the five New York City public pension funds, sued one of the nation's largest issuers of mortgage loans for credit risk misrepresentations. The Firm's focused investigation and discovery efforts uncovered incriminating evidence that led to a \$624 million settlement for investors. On February 25, 2011,



the court granted final approval to the settlement, which is one of the top 20 securities class action settlements in the history of the PSLRA.

In re HealthSouth Corp. Securities Litigation, No. 03-cv-01500 (N.D. Ala.)

Labaton Sucharow served as co-lead counsel to New Mexico State Investment Council in a case stemming from one of the largest frauds ever perpetrated in the healthcare industry. Recovering \$671 million for the class, the settlement is one of the top 15 securities class action settlements of all time. In early 2006, lead plaintiffs negotiated a settlement of \$445 million with defendant HealthSouth. On June 12, 2009, the court also granted final approval to a \$109 million settlement with defendant Ernst & Young LLP. In addition, on July 26, 2010, the court granted final approval to a \$117 million partial settlement with the remaining principal defendants in the case—UBS AG, UBS Warburg LLC, Howard Capek, Benjamin Lorello, and William McGahan.

In re Schering-Plough/ENHANCE Securities Litigation, No. 08-cv-00397 (D. N.J.)

As co-lead counsel, Labaton Sucharow obtained a \$473 million settlement on behalf of co-lead plaintiff Massachusetts Pension Reserves Investment Management Board. After five years of litigation, and three weeks before trial, the settlement was approved on October 1, 2013. This recovery is one of the largest securities fraud class action settlements against a pharmaceutical company. The Special Masters' Report noted, "The outstanding result achieved for the class is the direct product of outstanding skill and perseverance by Co-Lead Counsel . . . no one else . . . could have produced the result here—no government agency or corporate litigant to lead the charge and the Settlement Fund is the product solely of the efforts of Plaintiffs' Counsel."

In re Waste Management, Inc. Securities Litigation, No. H-99-2183 (S.D. Tex.)

In 2002, the court approved an extraordinary settlement that provided for the recovery of \$457 million in cash, plus an array of far-reaching corporate governance measures. Labaton Sucharow represented lead plaintiff Connecticut Retirement Plans and Trust Funds. At that time, this settlement was the largest common fund settlement of a securities action achieved in any court within the Fifth Circuit and the third largest achieved in any federal court in the nation. Judge Harmon noted, among other things, that Labaton Sucharow "obtained an outstanding result by virtue of the quality of the work and vigorous representation of the class."

In re General Motors Corp. Securities Litigation, No. 06-cv-1749 (E.D. Mich.)

As co-lead counsel in a case against automotive giant General Motors (GM) and its auditor Deloitte & Touche LLP (Deloitte), Labaton Sucharow obtained a settlement of \$303 million—one of the largest settlements ever secured in the early stages of a securities fraud case. Lead plaintiff Deka Investment GmbH alleged that GM, its officers, and its outside auditor overstated GM's income by billions of dollars and GM's operating cash flows by tens of billions of dollars, through a series of accounting manipulations. The final settlement, approved on July 21, 2008, consisted of a cash payment of \$277 million by GM and \$26 million in cash from Deloitte.

Wyatt v. El Paso Corp., No. H-02-2717 (S.D. Tex.)

Labaton Sucharow secured a \$285 million class action settlement against the El Paso Corporation on behalf of the co-lead plaintiff, an individual. The case involved a securities fraud stemming from



the company's inflated earnings statements, which cost shareholders hundreds of millions of dollars during a four-year span. On March 6, 2007, the court approved the settlement and also commended the efficiency with which the case had been prosecuted, particularly in light of the complexity of the allegations and the legal issues.

In re Bear Stearns Cos., Inc. Securities, Derivative & ERISA Litigation, No. 08-cv-2793 (S.D.N.Y.)

Labaton Sucharow served as co-lead counsel, representing lead plaintiff State of Michigan Retirement Systems and the class. The action alleged that Bear Stearns and certain officers and directors made misstatements and omissions in connection with Bear Stearns' financial condition, including losses in the value of its mortgage-backed assets and Bear Stearns' risk profile and liquidity. The action further claimed that Bear Stearns' outside auditor, Deloitte & Touche LLP, made misstatements and omissions in connection with its audits of Bear Stearns' financial statements for fiscal years 2006 and 2007. Our prosecution of this action required us to develop a detailed understanding of the arcane world of packaging and selling subprime mortgages. Our complaint has been called a "tutorial" for plaintiffs and defendants alike in this fast-evolving area. After surviving motions to dismiss, on November 9, 2012, the court granted final approval to settlements with the defendant Bear Stearns for \$275 million and with Deloitte for \$19.9 million.

In re Massey Energy Co. Securities Litigation, No. 10-CV-00689 (S.D. W.Va.)

As co-lead counsel representing the Commonwealth of Massachusetts Pension Reserves Investment Trust, Labaton Sucharow achieved a \$265 million all-cash settlement in a case arising from one of the most notorious mining disasters in US history. On June 4, 2014, the settlement was reached with Alpha Natural Resources, Massey's parent company. Investors alleged that Massey falsely told investors it had embarked on safety improvement initiatives and presented a new corporate image following a deadly fire at one of its coalmines in 2006. After another devastating explosion, which killed 29 miners in 2010, Massey's market capitalization dropped by more than \$3 billion. Judge Irene C. Berger noted, "Class counsel has done an expert job of representing all of the class members to reach an excellent resolution and maximize recovery for the class."

Eastwood Enterprises, LLC v. Farha (WellCare Securities Litigation), No. 07-cv-1940 (M.D. Fla.)

On behalf of the New Mexico State Investment Council and the Public Employees Retirement Association of New Mexico, Labaton Sucharow served as co-lead counsel and negotiated a \$200 million settlement over allegations that WellCare Health Plans, Inc., a Florida-based healthcare service provider, disguised its profitability by overcharging state Medicaid programs. Further, under the terms of the settlement approved by the court on May 4, 2011, WellCare agreed to pay an additional \$25 million in cash if, at any time in the next three years, WellCare was acquired or otherwise experienced a change in control at a share price of \$30 or more after adjustments for dilution or stock splits.

In re SCANA Corporation Securities Litigation, No. 17-cv-2616 (D.S.C.)

Labaton Sucharow served as co-lead counsel in this matter against a regulated electric and natural gas public utility, representing the class and co-lead plaintiff West Virginia Investment Management



Board. The action alleges that for a period of two years, the company and certain of its executives made a series of misstatements and omissions regarding the progress, schedule, costs, and oversight of a key nuclear reactor project in South Carolina. Labaton Sucharow conducted an extensive investigation into the alleged fraud, including by interviewing 69 former SCANA employees and other individuals who worked on the nuclear project. In addition, Labaton Sucharow obtained more than 1,500 documents from South Carolina regulatory agencies, SCANA's state-owned junior partner on the nuclear project, and a South Carolina newspaper, among others, pursuant to the South Carolina Freedom of Information Act (FOIA). This information ultimately provided the foundation for our amended complaint and was relied upon by the court extensively in its opinion denying defendants' motion dismiss. In late 2019, we secured a \$192.5 million recovery for investors—the largest securities fraud settlement in the history of the District of South Carolina.

In re Bristol-Myers Squibb Securities Litigation, No. 00-cv-1990 (D.N.J.)

Labaton Sucharow served as lead counsel representing the lead plaintiff, union-owned LongView Collective Investment Fund of the Amalgamated Bank (LongView), against drug company Bristol-Myers Squibb (BMS). LongView claimed that the company's press release touting its new blood pressure medication, Vanlev, left out critical information— that undisclosed results from the clinical trials indicated that Vanlev appeared to have life-threatening side effects. The FDA expressed serious concerns about these side effects and BMS released a statement that it was withdrawing the drug's FDA application, resulting in the company's stock price falling and losing nearly 30 percent of its value in a single day. After a five-year battle, we won relief on two critical fronts. First, we secured a \$185 million recovery for shareholders, and second, we negotiated major reforms to the company's drug development process that will have a significant impact on consumers and medical professionals across the globe. Due to our advocacy, BMS must now disclose the results of clinical studies on all of its drugs marketed in any country.

In re Fannie Mae 2008 Securities Litigation, No. 08-cv-7831 (S.D.N.Y.)

As co-lead counsel representing co-lead plaintiff Boston Retirement System, Labaton Sucharow secured a \$170 million settlement on March 3, 2015, with Fannie Mae. The lead plaintiffs alleged that Fannie Mae and certain of its current and former senior officers violated federal securities laws, by making false and misleading statements concerning the company's internal controls and risk management with respect to Alt-A and subprime mortgages. The lead plaintiffs also alleged that defendants made misstatements with respect to Fannie Mae's core capital, deferred tax assets, other-than- temporary losses, and loss reserves. Labaton Sucharow successfully argued that investors' losses were caused by Fannie Mae's misrepresentations and poor risk management, rather than by the financial crisis. This settlement is a significant feat, particularly following the unfavorable result in a similar case involving investors in Fannie Mae's sibling company, Freddie Mac.

In re Broadcom Corp. Class Action Litigation, No. 06-cv-05036 (C.D. Cal.)

Labaton Sucharow served as lead counsel on behalf of lead plaintiff New Mexico State Investment Council in a case stemming from Broadcom Corp.'s \$2.2 billion restatement of its historic financial statements for 1998-2005. In August 2010, the court granted final approval of a \$160.5 million settlement with Broadcom and two individual defendants to resolve this matter. It is the second largest up-front cash settlement ever recovered from a company accused of options backdating.



Following a Ninth Circuit ruling confirming that outside auditors are subject to the same pleading standards as all other defendants, the district court denied the motion by Broadcom’s auditor, Ernst & Young, to dismiss on the ground of loss causation. This ruling is a major victory for the class and a landmark decision by the court—the first of its kind in a case arising from stock-options backdating. In October 2012, the court approved a \$13 million settlement with Ernst & Young.

In re Satyam Computer Services Ltd. Securities Litigation, No. 09-md-2027 (S.D.N.Y.)

Satyam Computer Services Ltd. (Satyam), referred to as “India’s Enron,” engaged in one of the most egregious frauds on record. In a case that rivals the Enron and Bernie Madoff scandals, the Firm represented lead plaintiff UK-based Mineworkers’ Pension Scheme, which alleged that Satyam, related entities, Satyam’s auditors, and certain directors and officers made materially false and misleading statements to the investing public about the company’s earnings and assets, artificially inflating the price of Satyam securities. On September 13, 2011, the court granted final approval to a settlement with Satyam of \$125 million and a settlement with the company’s auditor, PricewaterhouseCoopers, in the amount of \$25.5 million. Judge Barbara S. Jones commended lead counsel during the final approval hearing, noting the “quality of representation[,] which I found to be very high.”

In re Mercury Interactive Corp. Securities Litigation, No. 05-cv-3395 (N.D. Cal.)

Labaton Sucharow served as co-lead counsel on behalf of co-lead plaintiff Steamship Trade Association/International Longshoremen’s Association Pension Fund, which alleged that Mercury Interactive Corp. (Mercury) backdated option grants used to compensate employees and officers of the company. Mercury’s former CEO, CFO, and General Counsel actively participated in and benefited from the options backdating scheme, which came at the expense of the company’s shareholders and the investing public. On September 25, 2008, the court granted final approval of the \$117.5 million settlement.

In re CannTrust Holdings Inc. Securities Litigation, No. 1:19-cv-06396-JPO (S.D.N.Y.)

As U.S. lead counsel, Labaton Sucharow represented lead plaintiffs Granite Point Master Fund, LP; Granite Point Capital; and Scorpion Focused Ideas Fund in this action against CannTrust Holdings Inc., a cannabis company primarily traded on the Toronto Stock Exchange and the New York Stock Exchange. Class actions against the company were commenced in both the U.S. and Canada. The U.S. class action asserts CannTrust made materially false and misleading statements and omissions concerning its compliance with relevant cannabis regulations and an alleged scheme to increase its cannabis production. The parties reached a landmark settlement totaling CA\$129.5 million to resolve claims in both countries. The U.S. settlement was approved on December 2, 2021.

In re Oppenheimer Champion Fund Securities Fraud Class Actions, No. 09- cv-525 (D. Colo.) and In re Core Bond Fund, No. 09-cv-1186 (D. Colo.)

Labaton Sucharow served as lead counsel and represented individuals and the proposed class in two related securities class actions brought against Oppenheimer Funds, Inc., among others, and certain officers and trustees of two funds—Oppenheimer Core Bond Fund and Oppenheimer



Champion Income Fund. The lawsuits alleged that the investment policies followed by the funds resulted in investor losses when the funds suffered drops in net asset value although they were presented as safe and conservative investments to consumers. In May 2011, the Firm achieved settlements amounting to \$100 million: \$52.5 million in *In re Oppenheimer Champion Fund Securities Fraud Class Actions* and a \$47.5 million settlement in *In re Core Bond Fund*.

In re Computer Sciences Corporation Securities Litigation, No. 11-cv-610 (E.D. Va.)

As lead counsel representing Ontario Teachers' Pension Plan Board, Labaton Sucharow secured a \$97.5 million settlement in this "rocket docket" case involving accounting fraud. The settlement was the third largest all-cash recovery in a securities class action in the Fourth Circuit and the second largest all-cash recovery in such a case in the Eastern District of Virginia. The plaintiffs alleged that IT consulting and outsourcing company, Computer Sciences Corporation (CSC), fraudulently inflated its stock price by misrepresenting and omitting the truth about the state of its most visible contract and the state of its internal controls. In particular, the plaintiffs alleged that CSC assured the market that it was performing on a \$5.4 billion contract with the UK National Health Service when CSC internally knew that it could not deliver on the contract, departed from the terms of the contract, and as a result, was not properly accounting for the contract. Judge T.S. Ellis III stated, "I have no doubt—that the work product I saw was always of the highest quality for both sides."

In re Nielsen Holdings PLC Securities Litigation, No. 18-7143 (S.D.N.Y.)

As lead counsel representing Public Employees' Retirement System of Mississippi, Labaton Sucharow achieved a \$73 million settlement in a securities class action against the data analytics company Nielsen Holdings PLC over allegations the company misrepresented the strength and resiliency of its business and the impact of the European Union's General Data Protection Regulation (GDPR). On January 4, 2021, the Firm overcame defendants' motion to dismiss, and the case advanced into discovery. We mediated and ultimately reached an agreement to settle the matter for \$73 million in February 2022. The settlement was preliminarily approved by the court on April 4, 2022. The court granted final approval of the settlement on July 21, 2022.

In re Resideo Technologies Inc. Securities Litigation, No. 19-cv-2863 (D. Minn.)

The Firm served as co-lead counsel representing Naya Capital Management in an action alleging Resideo failed to disclose the negative effects of a spin-off on the company's product sales, supply chain, and gross margins, and misrepresented the strength of its financial forecasts. On March 30, 2021, the Firm overcame defendants' motion to dismiss in its entirety, and discovery in the action commenced promptly. Discussion of resolving the claims began in January 2021, resulting in an agreement in principle to settle the action for \$55 million July 2021. The \$55 million settlement was granted final approval on March 24, 2022.

Public Employees' Retirement System of Mississippi v. Endo Int'l plc, et al., No. 2017-02081-MJ (Pa. Ct. of C.P. Montgomery Cty.)

Labaton Sucharow served as lead counsel in a securities class action against Endo Pharmaceuticals. The case settled for \$50 million, the largest class settlement obtained in any court pursuant to the Securities Act of 1933 in connection with a secondary public offering. The action alleged that Endo



failed to disclose adverse trends facing its generic drugs division in advance of a secondary public offering that raised \$2 billion to finance the acquisition of Par Pharmaceuticals in 2015. The Firm overcame several procedural hurdles to reach this historic settlement, including successfully opposing defendants' attempts to remove the case to federal court and to dismiss the class complaint in state court. The court approved the settlement on December 5, 2019.

In re JELD-WEN Holding, Inc. Securities Litigation, No. 3:20-cv-00112-JAG (E.D. Va.)

Representing Public Employees' Retirement System of Mississippi, Labaton Sucharow was court-appointed co-lead counsel in a securities class action lawsuit against JELD-WEN Holding, Inc. and certain of its executives related to allegedly false and misleading statements and omissions concerning JELD-WEN's allegedly anticompetitive conduct and financial results in the doorskins and interior molded door markets and the merit of a lawsuit filed against JELD-WEN by an interior door manufacturer. The parties reached an agreement to settle the action for \$40 million in April 2021. The court granted final approval of the settlement on November 22, 2021.

City of Warren Police and Fire Retirement System v. World Wrestling Entertainment, Inc. et al., No. 20-cv-02031 (S.D.N.Y.)

Labaton Sucharow served as court-appointed lead counsel in a securities class action against World Wrestling Entertainment, Inc. (WWE). The Firm represented Firefighters Pension System of the City of Kansas City Missouri Trust in the action alleging WWE defrauded investors by making false and misleading statements in connection with certain of its key overseas businesses in the Middle East North Africa region from February 7, 2019, through February 5, 2020. The lead plaintiff further alleged that the price of WWE publicly traded common stock was artificially inflated as a result of the company's allegedly false and misleading statements and omissions, and that the price declined when the truth was allegedly revealed through a series of partial revelations. The parties reached an agreement to settle the action for in November 2020, and on June 30, 2021, the court granted final approval of the \$39 million settlement.

In re Uniti Group Inc. Securities Litigation, No. 4:19-cv-00756 (E.D Ark.)

Labaton Sucharow served as co-lead counsel in a securities class action against Uniti Group Inc. in an action alleging misstatements and omissions concerning the validity and propriety of the April 24, 2015 REIT Spin-Off, through which Uniti was formed, and the Master Lease Uniti entered into with Windstream Services with respect to telecommunications equipment. On March 31, 2021, the Court issued an Order denying Defendants' motion to dismiss in its entirety and denied Defendants' motion for reconsideration of that ruling on December 22, 2021. In discovery, the parties participated in dozens of depositions and produced and reviewed millions of pages of documents. The parties held a private mediation on March 24, 2022 and on March 25, 2022 the parties settled the action for \$38, 875, 000, which was approved by the Court on November 7, 2022.

Pension Trust Fund for Operating Engineers v. DeVry Education Group, Inc., No. 16-cv-05198 (N.D. Ill.)

In a case that underscores the skill of our in-house investigative team, Labaton Sucharow secured a \$27.5 million recovery in an action alleging that DeVry Education Group, Inc. issued false statements



to investors about employment and salary statistics for DeVry University graduates. The Firm took over as lead counsel after a consolidated class action complaint and an amended complaint were both dismissed. Labaton Sucharow filed a third amended complaint on January 29, 2018, which included additional allegations based on internal documents obtained from government entities through the Freedom of Information Act and allegations from 13 new confidential witnesses who worked for DeVry. In denying defendants' motion to dismiss, the court concluded that the "additional allegations . . . alter[ed] the alleged picture with respect to scienter" and showed "with a degree of particularity . . . that the problems with DeVry's [representations] . . . were broad in scope and magnitude."

ODS Capital LLC v. JA Solar Holdings Co. Ltd. et al., No. 18-cv-12083 (S.D.N.Y.)

In a hard-won victory for investors, the Firm secured a \$21 million settlement in a securities class action against JA Solar Holdings Co. Ltd and certain of its executives. In December 2018, Labaton Sucharow filed a securities class action lawsuit on behalf of ODS Capital LLC. The litigation involved allegations that Defendants made misstatements or omissions that artificially depressed the price of JA Solar securities in order to avoid paying a fair price during the company's take-private transaction. As court-appointed co-lead counsel, Labaton Sucharow revived the suit in an August 2022 Second Circuit ruling, after a lower court initially granted JA Solar's dismissal bid. Following remand to the district court, the parties reached a settlement in principle in November 2022, and on July 13, 2023, the court granted final approval of the settlement.

Vancouver Alumni Asset Holdings Inc. v. Daimler A.G., et al., No. 16-cv-2942 (C.D. Cal)

Serving as lead counsel on behalf of Public School Retirement System of Kansas City, Missouri, Labaton Sucharow secured a \$19 million settlement in a class action against automaker Daimler AG. The action arose out of Daimler's misstatements and omissions touting its Mercedes-Benz diesel vehicles as "green" when independent tests showed that under normal driving conditions the vehicles exceeded the nitrous oxide emissions levels set by U.S. and E.U. regulators. Defendants lodged two motions to dismiss the case. However, the *Daimler* litigation team was able to overcome both challenges, and on May 31, 2017, the court granted in part and denied in part Defendants' motions and allowed the case to proceed to discovery. The court then stayed the action after the U.S. Department of Justice intervened. The *Daimler* litigation team worked with the DOJ and defendants to partially lift the stay in order to allow lead plaintiffs to seek limited discovery. Thereafter, in December 2019, the parties agreed to settle the action for \$19 million.

Avila v. LifeLock, Inc., No. 15-cv-1398 (D. Ariz.)

As co-lead counsel representing Oklahoma Police Pension and Retirement System and Oklahoma Firefighters Pension and Retirement System, the Firm secured a \$20 million settlement in a securities class action against LifeLock. The action alleged that LifeLock misrepresented the capabilities of its identity theft alerts to investors. While LifeLock repeatedly touted the "proactive," "near real-time" nature of its alerts, in reality the timeliness of such alerts to customers did not resemble a near real-time basis. The LifeLock litigation team played a critical role in securing the \$20 million settlement. After being dismissed by the District Court twice, the LifeLock team was able to successfully appeal the case to the Ninth Circuit and secured a reversal of the District Court's



dismissals. The case settled shortly after being remanded to the District Court. On July 22, 2020, the court issued an order granting final approval of the settlement.

Pierrelouis v. Gogo Inc., et al., No. 18-C-4473 (N.D. Ill.)

Serving as co-counsel, we secured a \$17.3 million settlement in class action against inflight entertainment company Gogo, Inc. The suit alleged that Gogo made false and misleading public statements about its “2Ku” in-flight antenna-and-satellite Wi-Fi system, which it installed on partner airplanes although executives had knowledge that the systems would not work following the application of de-icing fluid to those planes. The case had been dismissed the suit without prejudice in 2019, prior to our involvement. In April 2021, we survived motion to dismiss following the inclusion of additional allegations and details gained from interviews from anonymous former employees. In October 2021, the parties agreed to settle the matter for \$17.3 million. Final Judgment and order was entered on October 13, 2022.

In re Prothena Corporation PLC Securities Litigation, No. 18-cv-6425 (S.D.N.Y)

Labaton Sucharow, as co-lead counsel, secured a \$15.75 million recovery in a securities class action against development-stage biotechnology company, Prothena Corp. The action alleged that Prothena and certain of its senior executives misleadingly cited the results of an ongoing clinical study of NEOD001—a drug designed to treat amyloid light chain amyloidosis and one of Prothena’s principal assets. Despite telling investors that early phases of testing were successful, defendants later revealed that the drug was “substantially less effective than a placebo.” Upon this news, Prothena’s stock price dropped nearly 70 percent. On August 26, 2019, the parties executed a Stipulation and Agreement of Settlement for \$15.75 million. Final Judgment was entered on December 4, 2019.

In re Acuity Brands, Inc. Securities Litigation, No. 18-cv-02140 (N.D. Ga.)

Labaton Sucharow served as co-lead counsel representing Public Employees' Retirement System of Mississippi in a securities class action lawsuit against Acuity Brands, Inc., a leading provider of lighting solutions for commercial, institutional industrial, infrastructure, and residential applications throughout North America and select international markets. The suit alleged that Acuity misled investors about the impact of increased competition on its business, including its relationship with its largest retail customer, Home Depot. Despite defendants’ efforts, the court denied their motion to dismiss in significant part in August 2019 and granted class certification in August 2020, rejecting their arguments in full. Defendants appealed the class certification order to the Eleventh Circuit Court of Appeals, which the Firm vigorously opposed. Subsequently, the parties mediated and agreed on a \$15.75 million settlement-in-principle in October 2021. In light of the settlement-in-principle, the Eleventh Circuit stayed the appeal and removed the case from the docket. The court approved the settlement on June 7, 2022.

LEAD COUNSEL APPOINTMENTS IN ONGOING LITIGATION

Labaton Sucharow’s institutional investor clients are regularly chosen by federal judges to serve as lead plaintiffs in prominent securities litigations brought under the PSLRA. Dozens of public pension funds and union funds have selected Labaton Sucharow to represent them in federal securities class actions and advise them as securities litigation/investigation counsel.



In re PG&E Corporation Securities Litigation, No. 18-cv-03509 (N.D. Cal.)

Labaton Sucharow represents the Public Employees Retirement Association of New Mexico in a securities class action lawsuit against PG&E related to wildfires that devastated Northern California in 2017.

Boston Retirement System v. Uber Technologies, Inc., et al., No. 19-cv-6361-RS (N.D. Cal.)

Labaton Sucharow serves as lead counsel in a securities class action against Uber Technologies, Inc., arising in connection with the company's more than \$8 billion IPO. The action alleges that Uber's IPO registration statement and prospectus made material misstatements and omissions in violation of Sections 11, 12(a)(2), and 15 of the Securities Act of 1933.

Hill v. Silver Lake Group, L.L.C. (Intelsat S.A.), No. 20-CV-2341 (N.D. Cal.)

The court appointed Labaton Sucharow as lead counsel in the *Intelsat* securities litigation, noting that the Firm "has strong experience prosecuting securities class actions and has served as lead counsel in many high-profile securities actions.

Defined Benefit Plan of Mid-Jersey Trucking Industry and Teamsters Local 701 Pension and Annuity Fund v. PayPal Holdings, Inc., et al, No. 3:22-cv-05864

Labaton Sucharow was appointed co-lead counsel in a securities class action against PayPal Holdings, Inc. ("PayPal"). The action alleges that during the class period PayPal touted the massive growth in new active accounts as one of the most important indicators of the company's performance while failing to disclose that many of the additional users acquired through its cash account creation incentive campaigns were illusory, because those incentive campaigns were easily susceptible to fraud and ultimately generated no future revenue for the company.

Weston v. DocuSign, Inc., No. 22-824 (N.D. Cal.)

Labaton Sucharow was appointed lead counsel in a securities class action against DocuSign, which offers software that helps people send and sign agreements and other documents electronically. The Firm represents Deka International S.A. Luxembourg and Public Employee Retirement System of Idaho, two entities with the greatest financial interest in the case—more than \$45 million net losses. At issue is whether the company misled investors about the strength of its business "falsely assuring investors it would continue experiencing growth and demand for its product after COVID-19 restrictions were lifted."

Allison v. Oak Street Health Inc., No. 22- cv-0149 (N.D. Ill.)

Labaton Sucharow represents Boston Retirement System in a securities class action against Oak Street Health alleging the Company was engaged in overly-aggressive patient acquisition and recruitment strategies that placed the Company at heightened and significant risk of government scrutiny and prosecution.



In re Okta, Inc. Securities Litigation., No. 22-cv-02990-SI (N.D. Cal.)

Labaton Sucharow serves as lead counsel representing the Nebraska Investment Council in a securities class action against data security company Okta, Inc. (“Okta”) arising from Okta’s May 2021 acquisition of Auth0, Inc. (“Auth0”).

Lamontagne v. Tesla Inc., No. 23-869 (N.D. Cal.)

Labaton Sucharow represents Oakland County Voluntary Employees’ Beneficiary Association and Oakland County Employees’ Retirement System in a securities class action lawsuit against Tesla, Inc. (“Tesla”) stemming from allegations that the company overstated the purported safety-enhancing features and capabilities of its autopilot technology.

City of Warwick Retirement System v. Catalent, Inc., No. 23-1108 (DNJ)

Labaton Sucharow represents SEB Investment Management AB and Public Employees’ Retirement System of Mississippi as co-lead counsel in a securities class action against Catalent, Inc. (“Catalent”) following reports that the release of COVID-19 vaccines produced by Catalent had been delayed by regulators because of improper sterilization at one of Catalent’s key facilities as well as allegations that the company misrepresented demand for its products.



AWARDS AND ACCOLADES

CONSISTENTLY RANKED AS A LEADING FIRM:



The *National Law Journal* "2023 Elite Trial Lawyers" recognized Labaton Sucharow as the **2023 Securities Litigation and Shareholder Rights Firm of the Year** and **Diversity Initiative Firm of the Year**. The Firm was also a finalist for **Plaintiffs Firm of the Year** and **Consumer Protection Firm of the Year**. Additionally, the Firm was recognized as **2022 Securities Law Firm of the Year** and **2022 Shareholder Rights Litigation Firm of the Year**.



Benchmark Litigation recognized Labaton Sucharow both nationally and regionally, in **New York** and **Delaware**, in its 2024 edition and named 9 Partners as **Litigation Stars** and **Future Stars** across the U.S. The Firm received top rankings in the **Securities** and **Dispute Resolution** categories. The publication also named the Firm a "**Top Plaintiffs Firm**" in the nation.



Labaton Sucharow is recognized by *Chambers USA 2023* among the leading plaintiffs' firms in the nation, receiving a total of three practice group rankings and eight partners ranked or recognized. *Chambers* notes that the Firm is "**top flight all-round,**" a "**very high-quality practice,**" with "**good, sensible lawyers.**"



Labaton Sucharow has been recognized as one of the **Nation's Best Plaintiffs' Firms** by *The Legal 500*. In 2023, the Firm earned a **Tier 1 ranking in Securities Litigation** and was also ranked for its excellence in **M&A Litigation**. 11 Labaton Sucharow attorneys were ranked or recommended in the guide noting the Firm as "**superb,**" "**very knowledgeable and experienced,**" and "**excellent at identifying the strongest claims in each case and aggressively prosecuting those claims without wasting time and resources on less strategically relevant issues.**"



Lawdragon recognized 15 Labaton Sucharow attorneys among the **500 Leading Plaintiff Financial Lawyers** in the country in their 2023 guide. The guide recognizes attorneys that are "the best in the nation – many would say the world – at representing plaintiffs." *Lawdragon* also included one of our Partners in their **Hall of Fame**.



Labaton Sucharow was named a **2021 Securities Group of the Year** by *Law360*. The award recognizes the attorneys behind significant litigation wins and major deals that resonated throughout the legal industry.



Labaton Sucharow was named **Gender Diversity North America Firm of the Year** by *Euromoney's* 2023 Women in Business Law Americas Awards. The Firm was also named a finalist in six additional categories. *Euromoney's* WIBL Awards recognizes firms advancing diversity in the profession.



PRO BONO AND COMMUNITY INVOLVEMENT

It is not enough to achieve the highest accolades from the bench and bar, and demand the very best of our people. At Labaton Sucharow, we believe that community service is a crucial aspect of practicing law and that pursuing justice is at the heart of our commitment to our profession and the community at large. As a result, we shine in pro bono legal representation and as public and community volunteers.

Our Firm has devoted significant resources to pro bono legal work and public and community service. In fact, our Pro Bono practice is recognized by *The National Law Journal* as winner of the “**Law Firm of the Year**” in Immigration for 2019 and 2020. We support and encourage individual attorneys to volunteer and take on leadership positions in charitable organizations, which have resulted in such honors as the Alliance for Justice’s “**Champion of Justice**” award, a tenant advocacy organization’s “**Volunteer and Leadership Award,**” and board participation for the Ovarian Cancer Research Fund.

Our continued support of charitable and nonprofit organizations, such as the Legal Aid Society, City Bar Justice Center, Public Justice Foundation, Change for Kids, Sidney Hillman Foundation, and various food banks and other organizations, embodies our longstanding commitment to fairness, equality, and opportunity for everyone in our community, which is manifest in the many programs in which we participate.

Immigration Justice Campaign

Our attorneys have scored numerous victories on behalf of asylum seekers around the world, particularly from Cuba and Uganda, as well as in reuniting children separated at the border. Our Firm also helped by providing housing, clothing, and financial assistance to those who literally came to the U.S. with only the clothes on their back.

Advocacy for the Mentally Ill

Our attorneys have provided pro bono representation to mentally ill tenants facing eviction and worked with a tenants’ advocacy organization defending the rights of city residents.

Federal Pro Se Legal Assistance Project

We represented pro se litigants who could not afford legal counsel through an Eastern District of New York clinic. We assisted those pursuing claims for racial and religious discrimination, helped navigate complex procedural issues involving allegations of a defamatory accusation made to undermine our client’s disability benefits, and assisted a small business owner allegedly sued for unpaid wages by a stranger.

New York City Bar Association Thurgood Marshall Scholar

We are involved in the Thurgood Marshall Summer Law Internship Program, which places diverse New York City public high school students with legal employers for the summer. This program runs



annually, from April through August, and is part of the City Bar's continuing efforts to enhance the diversity of the legal profession.

Diversity Fellowship Program

We provide a fellowship as a key component of the Firm's objective to recruit, retain, and advance diverse law students. Positions are offered to exceptional law students who can contribute to the diversity of our organization and the broader legal community.

Brooklyn Law School Securities Arbitration Clinic

Our Firm partnered with Brooklyn Law School to establish a securities arbitration clinic. The program, which ran for five years, assisted defrauded individual investors who could not otherwise afford to pay for legal counsel and provided students with real-world experience in securities arbitration and litigation.

Change for Kids

We support Change for Kids (CFK) as a strategic partner of P.S. 182 in East Harlem. One school at a time, CFK rallies communities to provide a broad range of essential educational opportunities at under-resourced public elementary schools, as well as enables students to discover their unique strengths and develop the requisite confidence to achieve.

Lawyers' Committee for Civil Rights Under Law

We are long-time supporters of the Lawyers' Committee for Civil Rights Under Law, a nonpartisan, nonprofit organization formed in 1963 at the request of President John F. Kennedy. The Lawyers' Committee involves the private bar in providing legal services to address racial discrimination. We have been involved at the federal level on U.S. Supreme Court nominee analyses and national voters' rights initiatives. Edward Labaton is a member of the Board of Directors.

Sidney Hillman Foundation

Our Firm supports the Sidney Hillman Foundation. Created in honor of the first president of the Amalgamated Clothing Workers of America, Sidney Hillman, the foundation supports investigative and progressive journalism by awarding monthly and yearly prizes.



COMMITMENT TO DIVERSITY, EQUITY, AND INCLUSION

Labaton Sucharow

DEI
DIVERSITY
EQUITY &
INCLUSION

“Now, more than ever, it is important to focus on our diverse talent and create opportunities for young lawyers to become our future leaders.

We are proud that our DEI Committee provides a place for our diverse lawyers to expand their networks and spheres of influence, develop their skills, and find the sponsorship and mentorship necessary to rise and realize their full potential.” – Carol C. Villegas, Partner

Over sixty years, Labaton Sucharow has earned global recognition for its success in securing historic recoveries and reforms for investors and consumers. We strive to attain the same level of achievement in promoting fairness and equality within our practice and throughout the legal profession and believe this can be realized by building and maintaining a team of professionals with a broad range of backgrounds, orientations, and interests. Partner Christine M. Fox serves as Chair of the Committee.

As a national law firm serving a global clientele, diversity is vital to reaching the right result and provides us with distinct points of view from which to address each client’s most pressing needs and complex legal challenges. Problem solving is at the core of what we do...and equity and inclusion serve as a catalyst for understanding and leveraging the myriad strengths of our diverse workforce.

Research demonstrates that diversity in background, gender, and ethnicity leads to smarter and more informed decision-making, as well as positive social impact that addresses the imbalance in business today—leading to generations of greater returns for all. We remain committed to developing initiatives that focus on tangible diversity, equity, and inclusion goals involving recruiting, professional development, retention, and advancement of diverse and minority candidates, while also raising awareness and supporting real change inside and outside our Firm.

In recognition of our efforts, we’ve been named Gender Diversity North America Firm of the Year and Diverse Women Lawyers North America Firm of the Year by *Euromoney* and have been consistently shortlisted for their Women in Business Law Awards, including in the Americas Firm of the Year, Women in Business Law, United States – North East, Career Development, and Talent Management categories. In addition, the Firm is a repeated recipient of *The National Law Journal* “Elite Trial Lawyers” Diversity Initiative Award and has been selected as a finalist for *Chambers & Partners’* Diversity and Inclusion Awards in the Outstanding Firm and Inclusive Firm of the Year categories. Our Firm understands the importance of extending leadership positions to diverse lawyers and is committed to investing time and resources to develop the next generation of leaders and counselors. We actively recruit, mentor, and promote to partnership minority and female lawyers.





Labaton Sucharow

WOMEN'S INITIATIVE



Women's Networking and Mentoring Initiative

Labaton Sucharow is the first securities litigation firm with a dedicated program to foster growth, leadership, and advancement of female attorneys. Established more than a decade ago, our Women's Initiative has hosted seminars, workshops, and networking events that encourage the advancement of female lawyers and staff, and bolster their participation as industry collaborators and celebrated thought innovators. We engage important women who inspire us by sharing their experience, wisdom, and lessons learned. We offer workshops on subject matter that ranges from professional development, negotiation, and public speaking, to business development and gender inequality in the law today.

Institutional Investing in Women and Minority-Led Investment Firms

Our Women's Initiative hosts an annual event on institutional investing in women and minority-led investment firms that was shortlisted for a *Chambers & Partners' Diversity & Inclusion* award. By bringing pension funds, diverse managers, hedge funds, investment consultants, and legal counsel together and elevating the voices of diverse women, we address the importance and advancement of diversity investing. Our 2018 inaugural event was shortlisted among *Euromoney's Best Gender Diversity Initiative*.

MINORITY SCHOLARSHIP AND INTERNSHIP

To take an active stance in introducing minority students to our practice and the legal profession, we established the Labaton Sucharow Minority Scholarship and Internship years ago. Annually, we present a grant and Summer Associate position to a first-year minority student from a metropolitan New York law school who has demonstrated academic excellence, community commitment, and unwavering personal integrity. Several past recipients are now full-time attorneys at the Firm. We also offer two annual summer internships to Hunter College students.

WHAT THE BENCH SAYS ABOUT US

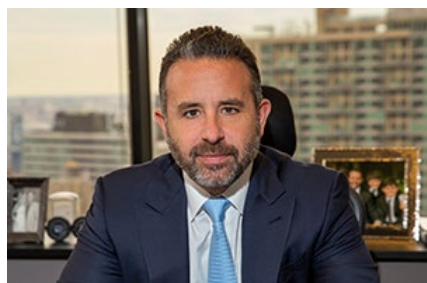
The Honorable Judge Lewis Liman of the Southern District of New York, upon appointing Labaton Sucharow as co-lead counsel, noted the following:

"Historically, there has been a dearth of diversity within the legal profession. Although progress has been made...still just one tenth of lawyers are people of color and just over a third are women. A firm's commitment to diversity...demonstrate[s] that it shares with the courts a commitment to the values of equal justice under law...[and] is one that is able to attract, train, and retain lawyers with the most latent talent and commitment regardless of race, ethnicity, gender, or sexual orientation."



PROFESSIONAL PROFILES

Labaton
Sucharow



Christopher J. Keller Chairman

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Christopher J. Keller is Chairman of Labaton Sucharow LLP and head of the Firm's Executive Committee. He is based in the Firm's New York office. Chris focuses on complex securities litigation cases and works with institutional investor clients, including some of the world's largest public and private pension funds with tens of billions of dollars under management.

In his role as Chairman, Chris is responsible for establishing and executing upon Labaton Sucharow's strategic priorities, including advancing business initiatives and promoting a culture of performance, collaboration, and collegiality. Commitment to these priorities has helped the Firm deepen its practice area expertise, extend its worldwide reach and earn industry recognition for workplace culture.

Chris's distinction in the plaintiffs' bar has earned him recognition from *Lawdragon* as an Elite Lawyer in the Legal Profession and among the country's Leading Lawyers, Leading Litigators, and Leading Plaintiff Financial Lawyers. *Chambers & Partners USA* has recognized him as a Noted Practitioner, and he has received recommendations from *The Legal 500* for excellence in the field of securities litigation.

Described by *The Legal 500* as a "sharp and tenacious advocate" who "has his pulse on the trends," Chris has been instrumental in the Firm's appointments as lead counsel in some of the largest securities matters arising out of the financial crisis, such as actions against Countrywide (\$624 million settlement), Bear Stearns (\$275 million settlement with Bear Stearns Companies and \$19.9 million settlement with Deloitte & Touche LLP, Bear Stearns' outside auditor), and Goldman Sachs.

Chris is a frequent commentator on legal issues and has been featured in the *Wall Street Journal*, *Financial Times*, *Law360*, and *National Law Journal*, among others. Educating institutional investors is a significant element of Chris's advocacy efforts for shareholder rights. He is regularly called upon for presentations on developing trends in the law and new case theories at annual meetings and seminars for institutional investors.

Chris has been integral in the prosecution of traditional fraud cases such as *In re Schering-Plough Corporation/ENHANCE Securities Litigation*; *In re Massey Energy Co. Securities Litigation*, where the Firm obtained a \$265 million all-cash settlement with Alpha Natural Resources, Massey's parent company; as well as *In re Satyam Computer Services, Ltd. Securities Litigation*, where the Firm obtained a settlement of more than \$150 million. Chris was also a principal litigator on the trial team of *In re Real Estate Associates Limited Partnership Litigation*. The six-week jury trial resulted in a \$185 million plaintiffs' verdict, one of the largest jury verdicts since the passage of the Private Securities Litigation Reform Act.



Educating institutional investors is a significant element of Chris's advocacy efforts for shareholder rights. He is regularly called upon for presentations on developing trends in the law and new case theories at annual meetings and seminars for institutional investors.

Chris is a member of several professional groups, including the New York State Bar Association and the New York County Lawyers' Association. He is a prior member of the Board of Directors of the City Bar Fund, the nonprofit 501(c)(3) arm of the New York City Bar Association aimed at engaging and supporting the legal profession in advancing social justice.


 Labaton
Sucharow


Eric J. Belfi Partner

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Eric J. Belfi is a Partner in the New York office of Labaton Sucharow LLP and a member of the Firm's Executive Committee. An accomplished litigator with a broad range of experience in commercial matters, Eric represents many of the world's leading pension funds and other institutional investors. Eric actively focuses on domestic and international securities and shareholder litigation, as well as direct actions on behalf of governmental entities. As an integral member of the Firm's Case Development Group, Eric has brought numerous high-profile domestic securities cases that resulted from the credit crisis, including the prosecution against Goldman Sachs. Along with his domestic securities litigation practice, Eric leads the Firm's Non-U.S. Securities Litigation Practice, which is dedicated exclusively to analyzing potential claims in non-U.S. jurisdictions and advising on the risks and benefits of litigation in those forums. Overseeing the Financial Products and Services Litigation Practice, Eric focuses on bringing individual actions against malfeasant investment bankers, including cases against custodial banks that allegedly committed deceptive practices relating to certain foreign currency transactions. Additionally, Eric advises his domestic and international clients on complex ESG issues.

Eric is recognized by *Chambers & Partners USA* and *Lawdragon* has recognized him as one of the country's Leading Litigators and Leading Plaintiff Financial Lawyers as the result of their research into top verdicts and settlements, and input from "lawyers nationwide about whom they admire and would hire to seek justice for a claim that strikes a loved one."

In his work with the Case Development Group, Eric was actively involved in securing a combined settlement of \$18.4 million in *In re Colonial BancGroup, Inc. Securities Litigation*, regarding material misstatements and omissions in SEC filings by Colonial BancGroup and certain underwriters. Eric's experience includes noteworthy M&A and derivative cases such as *In re Medco Health Solutions Inc. Shareholders Litigation* in which he was integrally involved in the negotiation of the settlement that included a significant reduction in the termination fee.

Under Eric's direction, the Firm's Non-U.S. Securities Litigation Practice—one of the first of its kind—also serves as liaison counsel to institutional investors in such cases, where appropriate. Eric represents nearly 30 institutional investors in over a dozen non-U.S. cases against companies including SNC-Lavalin Group Inc. in Canada, Vivendi Universal, S.A. in France, OZ Minerals Ltd. in Australia, Lloyds Banking Group in the U.K., and Olympus Corporation in Japan. Eric's international experience also includes securing settlements on behalf of non-U.S. clients including the U.K.-based Mineworkers' Pension Scheme in *In re Satyam Computer Securities Services Ltd. Securities Litigation*, an action related to one of the largest securities frauds in India, which resulted in \$150.5 million in collective settlements. While representing two of Europe's leading pension funds, Deka Investment GmbH and Deka International S.A., Luxembourg, in *In re General Motors Corp. Securities*



Litigation, Eric was integral in securing a \$303 million settlement in relation to multiple accounting manipulations and overstatements by General Motors.

As head of the Financial Products and Services Litigation Practice, Eric represented the Commonwealth of Virginia in its False Claims Act case against Bank of New York Mellon, Inc, among other matters.

Prior to joining Labaton Sucharow, Eric served as an Assistant Attorney General for the State of New York and as an Assistant District Attorney for the County of Westchester. As a prosecutor, Eric investigated and prosecuted white-collar criminal cases, including many securities law violations. He presented hundreds of cases to the grand jury and obtained numerous felony convictions after jury trials.

Eric is a member of the National Association of Public Pension Attorneys (NAPPA) Securities Litigation Working Group and the Cold Spring Harbor Laboratory Corporate Advisory Board. He is a frequent speaker in the U.S. and abroad on the topics of shareholder litigation and U.S.-style class actions in European countries and has also discussed socially responsible investments for public pension funds including at a roundtable called “The Impact of Non-U.S. Securities Actions and the Rise of ESG Litigation on Dutch Investors.”

Eric earned his Juris Doctor from St. John’s University School of Law and received his bachelor’s degree from Georgetown University.

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Jake Bissell-Linsk is a Partner in the New York office of Labaton Sucharow LLP. Jake focuses his practice on securities fraud class actions.

Jake has been recognized as a Rising Star of the Plaintiffs Bar by *The National Law Journal* "Elite Trial Lawyers" and *New York Law Journal's* New York Legal Awards as a Rising Star, as well as a Next Generation Lawyer by *Lawdragon*.

Jake has litigated federal securities cases in jurisdictions across the country at both the District Court and Appellate Court level. He is currently litigating cases against Lucid Motors and Lordstown Motors involving de-SPAC mergers in the automotive industry; against Intelsat alleging insiders sold \$246 million in stock shortly after learning the FTC would reject a bet-the-company deal; against AT&T, citing 58 former AT&T employees, regarding misleading reports of the success of its video streaming service DirecTV Now; and against Cronos alleging it improperly booked revenue from round-trip transactions for cannabis processing.

In addition to these varied securities fraud cases, Jake has litigated a number of cases involving take-private mergers, including several cases involving Chinese-based and Cayman-incorporated firms that were delisted from U.S. exchanges.

Jake has played a pivotal role in securing favorable settlements for investors in a variety of securities class actions, including recent cases against Nielsen (\$73 million settlement), in a suit that involved allegations of inflated goodwill and the effect of the EU's GDPR on the company, and Mindbody (\$9.75 million settlement), in a suit alleging false guidance and inadequate disclosures prior to a private equity buyout.

Jake's pro bono experience includes assisting pro se parties through the Federal Pro Se Legal Assistance Project.

Jake was previously a Litigation Associate at Davis Polk & Wardwell LLP, where he worked on complex commercial litigation including contract disputes, bankruptcies, derivative suits, and securities claims. He also assisted defendants in government investigations and provided litigation advice on M&A transactions.

Jake earned his Juris Doctor, *magna cum laude*, from the University of Pennsylvania Law School. He served as Senior Editor of the University of Pennsylvania Law Review and Associate Editor of the East Asia Law Review. While in law school, Jake interned for Judge Melvin L. Schweitzer at the New York Supreme Court (Commercial Division). He received his bachelor's degree, *magna cum laude*, from Hamline University.

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Michael P. Canty is a Partner in the New York office of Labaton Sucharow LLP, where he serves on the Firm's Executive Committee and as its General Counsel. In addition, he leads one of the Firm's Securities Litigation Teams and serves as head of the Firm's Consumer Cybersecurity and Data Privacy Group.

Highly regarded as one of the country's elite litigators, Michael has been recognized by *The Legal 500* and *Benchmark Litigation* as a Litigation Star. In addition, he has been named a Plaintiffs' Trailblazer, Class Action / Mass Tort Litigation Trailblazer, and a NY Trailblazer by *The National Law Journal* and the *New York Law Journal*, respectively, for his impact on the practice and business of law. *Lawdragon* has recognized him as one of the country's Leading Litigators, Leading Plaintiff Financial Lawyers, and Leading Plaintiff Consumer Lawyers.

Michael has successfully prosecuted a number of high-profile securities matters on behalf of institutional investors. Recent notable settlements include *Hatamian v. Advanced Micro Devices, Inc.* (\$29.5 million settlement), *Ronge v. Camping World Holdings* (\$12.5 million settlement), and *Palm Tran, Inc. Amalgamated Transit Union Loc. 1577 Pension Plan v. Credit Acceptance Corp.* (\$12 million settlement).

In addition to his securities practice, Michael has extensive experience representing consumers in high-profile data privacy litigation. Most notably, one of Michael's most recent successes was the historic \$650 million settlement in the *In re Facebook Biometric Information Privacy Litigation* matter—the largest consumer data privacy settlement ever and one of the first cases asserting consumers' biometric privacy rights under Illinois' Biometric Information Privacy Act (BIPA). Michael currently serves as co-lead counsel in *Garner v. Amazon.com, Inc.* alleging Amazon's illegal wiretapping and surreptitious recording through its Alexa-enabled devices.

Prior to joining Labaton Sucharow, Michael served as an Assistant U.S. Attorney in the U.S. Attorney's Office for the Eastern District of New York, where he was the Deputy Chief of the Office's General Crimes Section. During his time as a federal prosecutor, Michael also served in the Office's National Security and Cybercrimes Section. Prior to this, he served as an Assistant District Attorney for the Nassau County District Attorney's Office, where he handled complex state criminal offenses and served in the Office's Homicide Unit.

Michael has extensive trial experience both from his days as a prosecutor in New York City for the U.S. Department of Justice and as a Nassau County Assistant District Attorney. Michael served as trial counsel in more than 35 matters, many of which related to violent crime, white-collar, and terrorism-related offenses. He played a pivotal role in *United States v. Abid Naseer*, where he prosecuted and convicted an al-Qaeda operative who conspired to carry out attacks in the United



States and Europe. Michael also led the investigation in *United States v. Marcos Alonso Zea*, a case in which he successfully prosecuted a citizen for attempting to join a terrorist organization in the Arabian Peninsula and for providing material support for planned attacks.

Before becoming a prosecutor, Michael worked as a Congressional Staff Member for the U.S. House of Representatives. He primarily served as a liaison between the Majority Leader's Office and the Government Reform and Oversight Committee. During his time with the House of Representatives, Michael managed congressional oversight of the United States Postal Service and reviewed and analyzed counter-narcotics legislation as it related to national security matters.

Michael is a frequent commentator on legal issues and has been featured in *The Washington Post*, *Law360*, and *The National Law Journal*, among others and has appeared on CBS and NPR.

He is a member of the Federal Bar Council American Inn of Court, which endeavors to create a community of lawyers and jurists and promotes the ideals of professionalism, mentoring, ethics, and legal skills. He is also a member of the National Association of Public Pension Attorneys.

Michael earned his Juris Doctor, *cum laude*, from St. John's University's School of Law. He received his Bachelor of Arts, *cum laude*, from Mary Washington College.



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James Christie is a Partner in the New York office of Labaton Sucharow LLP. James focuses on prosecuting complex securities fraud cases on behalf of institutional investors. He is currently involved in litigating cases against major U.S. and non-U.S. corporations, such as Alexion Pharmaceuticals, 2U, Precision Castparts, Flex, iQIYI, and Weatherford International. James also serves as Assistant General Counsel to the Firm and is a Co-Chair of the Firm's Technology Committee.

Seen as a rising star in securities litigation, James has been named a "Next Generation Lawyer" by *The Legal 500*, a "Rising Star of the Plaintiffs Bar" by *The National Law Journal*, and has been named to *Benchmark Litigation's* "40 & Under Hot List." He was recognized by *Law360* as a 2023 Securities "Rising Star," noting his leadership in several high-profile matters.

James was an integral part of the Firm team that helped recover \$192.5 million for investors in a settlement for *In re SCANA Corporation Securities Litigation*. James also assisted in recovering \$20 million on behalf of investors in a securities class action against LifeLock Inc., where he played a significant role in obtaining a key appellate victory in the Ninth Circuit Court of Appeals reversing the district court's order dismissing the case with prejudice. In addition, James assisted in the \$14.75 million recovery secured for investors against PTC Therapeutics Inc., a pharmaceutical manufacturer of orphan drugs, in *In re PTC Therapeutics, Inc. Securities Litigation*. He was also part of the team that represented the lead plaintiff, the Public Employees' Retirement System of Mississippi, in *Public Employees' Retirement System of Mississippi v. Sprouts Farmers Market Inc.*, which resulted in a \$9.5 million settlement against Sprouts Farmers Market and several of its senior officers and directors.

James previously served as a Judicial Intern in the U.S. District Court for the Eastern District of New York under the Honorable Sandra J. Feuerstein.

He is a member of the American Bar Association, the Federal Bar Council, and an active member of the Georgia Association of Public Pension Trustees' Rules Committee.

James earned his Juris Doctor from St. John's University School of Law, where he was the Senior Articles Editor of the *St. John's Law Review*, and his Bachelor of Science, *cum laude*, from St. John's University Tobin College of Business.


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Thomas A. Dubbs is a Partner in the New York office of Labaton Sucharow LLP. Tom focuses on the representation of institutional investors in domestic and multinational securities cases. Tom serves or has served as lead or co-lead counsel in some of the most important federal securities class actions in recent years, including those against American International Group, Goldman Sachs, the Bear Stearns Companies, Facebook, Fannie Mae, Broadcom, and WellCare.

Tom is highly-regarded in his practice. He has been named a top litigator by *Chambers & Partners USA* for more than 10 consecutive years and has been consistently ranked as a Leading Lawyer in Securities Litigation by *The Legal 500*. *Law360* named him an MVP of the Year for distinction in class action litigation and he has been recognized by *The National Law Journal* and *Benchmark Litigation* for excellence in securities litigation. *Lawdragon* has recognized Tom as one of the country's Leading Plaintiff Financial Lawyers and named him to their Hall of Fame. Tom has also received a rating of AV Preeminent from the publishers of the Martindale-Hubbell directory. In addition, *The Legal 500* has inducted Tom into its Hall of Fame—an honor presented to only four plaintiffs' securities litigators “who have received constant praise by their clients for continued excellence.”

Tom has played an integral role in securing significant settlements in several high-profile cases, including *In re American International Group, Inc. Securities Litigation* (settlements totaling more than \$1 billion); *In re Bear Stearns Companies, Inc. Securities Litigation* (\$275 million settlement with Bear Stearns Companies plus a \$19.9 million settlement with Deloitte & Touche LLP, Bear Stearns' outside auditor); *In re HealthSouth Securities Litigation* (\$671 million settlement); *Eastwood Enterprises LLC v. Farha et al. (WellCare Securities Litigation)* (over \$200 million settlement); *In re Fannie Mae 2008 Securities Litigation* (\$170 million settlement); *In re Broadcom Corp. Securities Litigation* (\$160.5 million settlement with Broadcom, plus \$13 million settlement with Ernst & Young LLP, Broadcom's outside auditor); *In re St. Paul Travelers Securities Litigation* (\$144.5 million settlement); *In re Amgen Inc. Securities Litigation* (\$95 million settlement); and *In re Vesta Insurance Group, Inc. Securities Litigation* (\$78 million settlement).

Representing an affiliate of the Amalgamated Bank, Tom successfully led a team that litigated a class action against Bristol-Myers Squibb, which resulted in a settlement of \$185 million as well as major corporate governance reforms. He has argued before the U.S. Supreme Court and has argued 10 appeals dealing with securities or commodities issues before the U.S. Courts of Appeals.

Due to his reputation in securities law, Tom frequently lectures to institutional investors and other groups, such as the Government Finance Officers Association, the National Conference on Public Employee Retirement Systems, and the Council of Institutional Investors. He is a prolific author of articles related to his field, including “Textualism and Transnational Securities Law: A Reappraisal of



Justice Scalia's Analysis in *Morrison v. National Australia Bank*," which he penned for the *Southwestern Journal of International Law*. He has also written several columns in U.K. publications regarding securities class actions and corporate governance.

Prior to joining Labaton Sucharow, Tom was Senior Vice President & Senior Litigation Counsel for Kidder, Peabody & Co. Incorporated, where he represented the company in many class actions, including the *First Executive* and *Orange County* litigation and was first chair in many securities trials. Before joining Kidder, Tom was head of the litigation department at Hall, McNicol, Hamilton & Clark, where he was the principal partner representing Thomson McKinnon Securities Inc. in many matters, including the *Petro Lewis* and *Baldwin-United* class actions.

Tom serves as a FINRA Arbitrator and is an Advisory Board Member for the Institute for Transnational Arbitration. He is a member of the New York State Bar Association and the Association of the Bar of the City of New York, as well as a patron of the American Society of International Law. Tom is an active member of the American Law Institute and is currently an adviser on the proposed Restatement of the Law Third, Conflict of Laws; he was also a member of the Consultative Groups for the Restatement of the Law Fourth, U.S. Foreign Relations Law, and the Principles of Law, Aggregate Litigation. Tom also serves on the Board of Directors for The Sidney Hillman Foundation.

Tom earned his Juris Doctor and his bachelor's degree from the University of Wisconsin-Madison. He received his master's degree from the Fletcher School of Law and Diplomacy, Tufts University.

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Alfred L. Fatale III is a Partner in the New York office of Labaton Sucharow LLP and currently leads a team of attorneys focused on litigating securities claims arising from initial public offerings, secondary offerings, and stock-for-stock mergers.

Alfred's success in moving the needle in the legal industry has earned him recognition from *Chambers & Partners USA* as well as *The National Law Journal* as a Plaintiffs' Lawyer Trailblazer, and *The American Lawyer* as a Northeast Trailblazer. *Business Today* named Alfred one of the "Top 10 Most Influential Securities Litigation Lawyer in New York." *Lawdragon* has recognized him as one of the country's Leading Plaintiff Financial Lawyers, Leading Litigators, and among the Next Generation Lawyers. *Benchmark Litigation* also recognized him as a Future Star and named him to their "40 & Under List."

Alfred represents individual and institutional investors in cases related to the protection of the financial markets and public securities offerings in trial and appellate courts throughout the country. In particular, he is leading the Firm's efforts to litigate securities claims against several companies in state courts following the U.S. Supreme Court's decision in *Cyan, Inc. v. Beaver County Employees Retirement Fund*. Since joining the Firm in 2016, Alfred has lead the investigation and prosecution of several successful cases, including *In re ADT Inc. Securities Litigation*, resulting in a \$30 million recovery; *In re BrightView Holdings, Inc. Securities Litigation*, resulting in a \$11.5 million recovery; *John Ford, Trustee of the John Ford Trust v. UGI Corporation*, resulting in a \$10.25 million recovery; *Plymouth County Retirement Association v. Spectrum Brands Holdings Inc.*, resulting in a \$9 million recovery; *In re SciPlay Corp. Securities Litigation*, resulting in an \$8.275 million recovery; and *In re Livent Corp. Securities Litigation*, resulting in a \$7.4 million recovery. Alfred is also overseeing the firm's efforts in litigating several cases in federal courts. This includes a securities class action against Uber Technologies Inc. arising from the company's \$8 billion IPO. Prior to joining Labaton Sucharow, Alfred was an Associate at Fried, Frank, Harris, Shriver & Jacobson LLP, where he advised and represented financial institutions, investors, officers, and directors in a broad range of complex disputes and litigations including cases involving violations of federal securities law and business torts.

Alfred is an active member of the American Bar Association and the New York City Bar Association.

Alfred earned his Juris Doctor from Cornell Law School, where he was a member of the *Cornell Law Review* as well as the Moot Court Board. He also served as a Judicial Extern under the Honorable Robert C. Mulvey. He received his bachelor's degree, *summa cum laude*, from Montclair State University.

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Christine M. Fox is a Partner in the New York office of Labaton Sucharow LLP. With more than 25 years of securities litigation experience, Christine prosecutes complex securities fraud cases on behalf of institutional investors. In addition to her litigation responsibilities, Christine serves as the Chair of the Firm's DEI Committee.

Christine is recognized by *Lawdragon* as one of the Leading Plaintiff Financial Lawyers in America.

Christine is actively involved in litigating matters against FirstCash Holdings, Hain Celestial, Oak Street Health, Catalent, Barclays, and Unity Software. She has played a pivotal role in securing favorable settlements for investors in class actions against Barrick Gold Corporation, one of the largest gold mining companies in the world (\$140 million recovery); Nielsen, a data analytics company that provides clients with information about consumer preferences (\$73 million recovery); CVS Caremark, the nation's largest pharmacy retail chain (\$48 million recovery); Nu Skin Enterprises, a multilevel marketing company (\$47 million recovery); and Intuitive Surgical, a manufacturer of robotic-assisted technologies for surgery (\$42.5 million recovery); and World Wrestling Entertainment, a media and entertainment company (\$39 million recovery).

Christine is actively involved in the Firm's pro bono immigration program and reunited a father and child separated at the border. She is currently working on their asylum application.

Prior to joining the Firm, Christine worked at a national litigation firm focusing on securities, antitrust, and consumer litigation in state and federal courts. She played a significant role in securing class action recoveries in a number of high-profile securities cases, including *In re Merrill Lynch Co., Inc. Research Reports Securities Litigation* (\$475 million recovery); *In re Informix Corp. Securities Litigation* (\$136.5 million recovery); *In re Alcatel Alsthom Securities Litigation* (\$75 million recovery); and *In re Ambac Financial Group, Inc. Securities Litigation* (\$33 million recovery).

She is a member of the American Bar Association, New York State Bar Association, and Puerto Rican Bar Association.

Christine earned her Juris Doctor from the University of Michigan Law School and received her bachelor's degree from Cornell University.

Christine is conversant in Spanish.

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Jonathan Gardner serves as the Managing Partner of Labaton Sucharow LLP and as a member of its Executive Committee. He is based in the Firm's New York office. Jonathan helps direct the growth and management of the Firm.

With more than 30 years of experience, Jonathan oversees all of the Firm's litigation matters, including prosecuting complex securities fraud cases on behalf of institutional investors. Jonathan has played an integral role in developing the Firm's groundbreaking ADR Practice in response to the use of mandatory arbitration clauses by companies in consumer contracts.

A *Benchmark Litigation* "Star" acknowledged by his peers as "engaged and strategic," Jonathan has also been named an MVP by *Law360* for securing hard-earned successes in high-stakes litigation and complex global matters. He is ranked by *Chambers & Partners USA* describing him as "an outstanding lawyer who knows how to get results" and recommended by *The Legal 500*, whose sources remarked on Jonathan's ability to "understand the unique nature of complex securities litigation and strive for practical yet results-driven outcomes" and his "considerable expertise and litigation skill and practical experience that helps achieve terrific results for clients." Jonathan is also recognized by *Lawdragon* as one of the country's Leading Lawyers, Leading Litigators in America, and Leading Plaintiff Financial Lawyers.

Jonathan has played an integral role in securing some of the largest class action recoveries against corporate offenders since the global financial crisis. He led the Firm's team in the investigation and prosecution of *In re Barrick Gold Securities Litigation*, which resulted in a \$140 million recovery. He has also served as the lead attorney in several cases resulting in significant recoveries for injured class members, including *In re Hewlett-Packard Company Securities Litigation* (\$57 million recovery); *Public Employees' Retirement System of Mississippi v. Endo International PLC* (\$50 million recovery); *Medoff v. CVS Caremark Corporation* (\$48 million recovery); *In re Nu Skin Enterprises, Inc., Securities Litigation*, (\$47 million recovery); *In re Intuitive Surgical Securities Litigation* (\$42.5 million recovery); *In re Carter's Inc. Securities Litigation* (\$23.3 million recovery against Carter's and certain officers, as well as its auditing firm PricewaterhouseCoopers); *In re Aeropostale Inc. Securities Litigation* (\$15 million recovery); *In re Lender Processing Services Inc.* (\$13.1 million recovery); and *In re K-12, Inc. Securities Litigation* (\$6.75 million recovery).

Jonathan has led the Firm's representation of investors in many high-profile cases including *Rubin v. MF Global Ltd.*, which involved allegations of material misstatements and omissions in a Registration Statement and Prospectus issued in connection with MF Global's IPO. The case resulted in a recovery of \$90 million for investors. Jonathan also represented lead plaintiff City of Edinburgh Council as Administering Authority of the Lothian Pension Fund in *In re Lehman Brothers Equity/Debt Securities Litigation*, which resulted in settlements exceeding \$600 million against



Lehman Brothers' former officers and directors, Lehman's former public accounting firm, as well the banks that underwrote Lehman Brothers' offerings. In representing lead plaintiff Massachusetts Bricklayers and Masons Trust Funds in an action against Deutsche Bank, Jonathan secured a \$32.5 million recovery for a class of investors injured by the bank's conduct in connection with certain residential mortgage-backed securities.

Jonathan has also been responsible for prosecuting several of the Firm's options backdating cases, including *In re Monster Worldwide, Inc. Securities Litigation* (\$47.5 million settlement); *In re SafeNet, Inc. Securities Litigation* (\$25 million settlement); *In re Semtech Securities Litigation* (\$20 million settlement); and *In re MRV Communications, Inc. Securities Litigation* (\$10 million settlement). He also was instrumental in *In re Mercury Interactive Corp. Securities Litigation*, which settled for \$117.5 million, one of the largest settlements or judgments in a securities fraud litigation based on options backdating. Jonathan also represented the Successor Liquidating Trustee of Lipper Convertibles, a convertible bond hedge fund, in actions against the fund's former independent auditor and a member of the fund's general partner as well as numerous former limited partners who received excess distributions. He successfully recovered over \$5.2 million for the Successor Liquidating Trustee from the limited partners and \$29.9 million from the former auditor.

Jonathan is a member of the Federal Bar Council, New York State Bar Association, and the Association of the Bar of the City of New York.

Jonathan earned his Juris Doctor from St. John's University School of Law. He received his bachelor's degree from American University.

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Thomas G. Hoffman, Jr. is a Partner in the New York office of Labaton Sucharow LLP. Thomas focuses on representing institutional investors in complex securities actions.

Thomas was instrumental in securing a \$1 billion recovery in the eight-year litigation against AIG and related defendants in *In re American International Group, Inc. Securities Litigation*. He also was a key member of the Labaton Sucharow teams that secured significant recoveries for investors in *In re 2008 Fannie Mae Securities Litigation* (\$170 million); *In re The Allstate Corporation Securities Litigation* (\$90 million settlement, pending final approval); *In re STEC, Inc. Securities Litigation* (\$35.75 million settlement); and *In re Facebook, Inc., IPO Securities and Derivative Litigation* (\$35 million settlement).

Thomas earned his Juris Doctor from UCLA School of Law, where he was Editor-in-Chief of the *UCLA Entertainment Law Review* and served as a Moot Court Executive Board Member. In addition, he served as a judicial extern to the Honorable William J. Rea, United States District Court for the Central District of California. Thomas received his bachelor's degree, with honors, from New York University.

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James W. Johnson is a Partner in the New York office of Labaton Sucharow LLP. Jim focuses on litigating complex securities fraud cases. In addition to his active caseload, Jim holds a variety of leadership positions within the Firm, including serving on the Firm's Executive Committee.

Jim is "well respected in the field," earning him recognition from *Chambers & Partners USA*, *The Legal 500*, *Benchmark Litigation*, and *Lawdragon*, who named him as one of the country's Leading Lawyers, Leading Litigators, and Leading Plaintiff Financial Lawyers. *Business Today* named Jim one of the "Top 10 Most Influential Securities Litigation Lawyer in New York." He has also received a rating of AV Preeminent from the publishers of the *Martindale-Hubbell* directory.

In representing investors who have been victimized by securities fraud and breaches of fiduciary responsibility, Jim's advocacy has resulted in record recoveries for wronged investors. Currently, he is prosecuting the high-profile case against financial industry leader Goldman Sachs—*In re Goldman Sachs Group, Inc. Securities Litigation*.

A recognized leader in his field, Jim has successfully litigated a number of complex securities and RICO class actions. These include *In re HealthSouth Corp. Securities Litigation* (\$671 million settlement); *Eastwood Enterprises LLC v. Farha et al. (WellCare Securities Litigation)* (\$200 million settlement); *In re Amgen Inc. Securities Litigation* (\$95 million settlement); *In re Vesta Insurance Group, Inc. Securities Litigation* (\$79 million settlement); and *In re SCANA Securities Litigation* (\$192.5 million settlement). Other notable successes include *In re National Health Laboratories, Inc. Securities Litigation*, which resulted in a recovery of \$80 million in the federal action and a related state court derivative action, and *In re Bristol Myers Squibb Co. Securities Litigation*, in which the court approved a \$185 million settlement including significant corporate governance reforms and recognized plaintiff's counsel as "extremely skilled and efficient."

Jim also represented lead plaintiffs in *In re Bear Stearns Companies, Inc. Securities Litigation*, securing a \$275 million settlement with Bear Stearns Companies, plus a \$19.9 million settlement with Deloitte & Touche LLP, Bear Stearns' outside auditor. In *County of Suffolk v. Long Island Lighting Co.*, Jim represented the plaintiff in a RICO class action, securing a jury verdict after a two-month trial that resulted in a \$400 million settlement. The Second Circuit quoted the trial judge, the Honorable Jack B. Weinstein, as stating, "Counsel [has] done a superb job [and] tried this case as well as I have ever seen any case tried." On behalf of the Chugach Native Americans, he also assisted in prosecuting environmental damage claims resulting from the Exxon Valdez oil spill.

Jim is a Member of the American Bar Association and the Association of the Bar of the City of New York, where he served on the Federal Courts Committee. He is also a Fellow in the Litigation Council of America and a Member of the Advisory Board of the Institute for Law and Economic Policy.

The logo for Labaton Sucharow, consisting of a dark blue square with the text "Labaton" on the top line and "Sucharow" on the bottom line in white, sans-serif font.

Jim earned his Juris Doctor from New York University School of Law and his bachelor's degree from Fairfield University.



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Francis P. McConville is a Partner in the New York office of Labaton Sucharow LLP. Francis focuses on prosecuting complex securities fraud cases on behalf of institutional investor clients. As a lead member of the Firm's Case Development Group, he focuses on the identification, investigation, and development of potential actions to recover investment losses resulting from violations of the federal securities laws and various actions to vindicate shareholder rights in response to corporate and fiduciary misconduct.

Francis has been named a "Rising Star" of securities litigation in *Law360's* list of attorneys under 40 whose legal accomplishments transcend their age. *Lawdragon* has recognized him as one of the country's Leading Plaintiff Financial Lawyers and Next Generation Lawyers. *Benchmark Litigation* also recognized him as a Future Star and named him to their "40 & Under List."

Francis has played a key role in filing several matters on behalf of the Firm, including *In re PG&E Corporation Securities Litigation*; *In re SCANA Securities Litigation* (\$192.5 million settlement); and *In re Nielsen Holdings PLC Securities Litigation* (\$73 million settlement).

Prior to joining Labaton Sucharow, Francis was a Litigation Associate at a national law firm primarily focused on securities and consumer class action litigation. Francis has represented institutional and individual clients in federal and state court across the country in class action securities litigation and shareholder disputes, along with a variety of commercial litigation matters. He assisted in the prosecution of several matters, including *Kiken v. Lumber Liquidators Holdings, Inc.* (\$42 million recovery); *Hayes v. MagnaChip Semiconductor Corp.* (\$23.5 million recovery); and *In re Galena Biopharma, Inc. Securities Litigation* (\$20 million recovery).

Francis has served on *Law360's* Securities Editorial Advisory Board.

Francis received his Juris Doctor, *magna cum laude*, from New York Law School, where he was named a John Marshall Harlan Scholar, and received a Public Service Certificate. Francis served as Associate Managing Editor of the *New York Law School Law Review* and worked in the Urban Law Clinic. He earned his Bachelor of Arts degree from the University of Notre Dame.

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Domenico “Nico” Minerva is a Partner in the New York office of Labaton Sucharow LLP. A former financial advisor, his work focuses on securities, antitrust, and consumer class actions and shareholder derivative litigation, representing Taft-Hartley, public pension funds, hedge funds, asset managers, insurance companies, and banks across the world. Nico advises leading pension funds and other institutional investors on issues related to corporate fraud in the U.S. securities markets.

Nico is described by clients as “always there for us” and known to provide “an honest answer and describe all the parameters and/or pitfalls of each and every case.” As a result of his work, the Firm has received a Tier 2 ranking in Antitrust Civil Litigation and Class Actions from *Legal 500*. *Lawdragon* has recognized Nico as one of the country’s Leading Plaintiff Financial Lawyers.

Nico’s extensive securities litigation experience includes the case against global security systems company Tyco and co-defendant PricewaterhouseCoopers (*In re Tyco International Ltd., Securities Litigation*), which resulted in a \$3.2 billion settlement—the largest single-defendant settlement in post-PSLRA history.

He also has counseled companies and institutional investors on corporate governance reform. Nico has played an important role in *In re Dell Technologies Inc. Class V Stockholders Litigation*. The \$1 billion recovery in Dell currently stands as the largest shareholder settlement ever in any state court in America and the 17th largest shareholder settlement of all time in federal and state court.

Nico has also done substantial work in antitrust class actions. These include pay-for-delay or “product hopping” cases in which pharmaceutical companies allegedly obstructed generic competitors in order to preserve monopoly profits on patented drugs, such as *Mylan Pharmaceuticals Inc. v. Warner Chilcott Public Limited Co.*, *In re Lidoderm Antitrust Litigation*, *In re Solodyn (MinocyclineHydrochloride) Antitrust Litigation*, *In re Niaspan Antitrust Litigation*, *In re Aggrenox Antitrust Litigation*, and *Sergeants Benevolent Association Health & Welfare Fund et al. v. Actavis PLC et al.* In the anticompetitive matter *The Infirmary LLC vs. National Football League Inc et al.*, Nico played an instrumental part in challenging an exclusivity agreement between the NFL and DirectTV over the service’s “NFL Sunday Ticket” package. He also litigated on behalf of indirect purchasers in a case alleging that growers conspired to control and suppress the nation’s potato supply, *In re Fresh and Process Potatoes Antitrust Litigation*.

On behalf of consumers, Nico represented a plaintiff in *In Re ConAgra Foods Inc.*, over misleading claims that Wesson-brand vegetable oils are 100% natural.

An accomplished speaker, Nico has given numerous presentations to investors on topics related to corporate fraud, wrongdoing, and waste and has also discussed socially responsible investments for



public pension funds including at a roundtable called “The Impact of Non-U.S. Securities Actions and the Rise of ESG Litigation on Dutch Investors.” He is also an active member of the National Association of Public Pension Plan Attorneys.

Nico earned his Juris Doctor from Tulane University Law School, where he completed a two-year externship with the Honorable Kurt D. Engelhardt of the United States District Court for the Eastern District of Louisiana. He received his bachelor's degree from the University of Florida.

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Michael H. Rogers is a Partner in the New York office of Labaton Sucharow LLP. An experienced litigator, Mike focuses on prosecuting complex securities fraud cases on behalf of institutional investors.

He is actively involved in prosecuting *In re Goldman Sachs, Inc. Securities Litigation* and *Murphy v. Precision Castparts Corp.*, among other cases.

Mike is recommended by *The Legal 500*.

Mike has been a member of the lead counsel teams in many successful class actions, including those against Countrywide Financial (\$624 million settlement), HealthSouth (\$671 million settlement), State Street (\$300 million settlement), SCANA (\$192.5 million settlement), CannTrust (CA \$129.5 million settlement), Mercury Interactive (\$117.5 million settlement), Computer Sciences Corp. (\$97.5 million settlement), Jeld-Weld Holding (\$40 million recovery), Virtus Investment Partners (\$20 million settlement), and Acuity Brands (\$15.75 million settlement).

Prior to joining Labaton Sucharow, Mike was an attorney at Kasowitz, Benson, Torres & Friedman LLP, where he practiced securities and antitrust litigation, representing international banking institutions bringing federal securities and other claims against major banks, auditing firms, ratings agencies and individuals in complex multidistrict litigation. He also represented an international chemical shipping firm in arbitration of antitrust and other claims against conspirator ship owners. Mike began his career as an attorney at Sullivan & Cromwell, where he was part of Microsoft's defense team in the remedies phase of the Department of Justice antitrust action against the company.

Mike earned his Juris Doctor, *magna cum laude*, from the Benjamin N. Cardozo School of Law, Yeshiva University, where he was a member of the *Cardozo Law Review*. He earned his bachelor's degree, *magna cum laude*, from Columbia University.

Mike is proficient in Spanish.

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Ira A. Schochet is a Partner in the New York office of Labaton Sucharow LLP. A seasoned litigator with three decades of experience, Ira focuses on class actions involving securities fraud. Ira has played a lead role in securing multimillion dollar recoveries in high-profile cases such as those against Countrywide Financial Corporation (\$624 million), Weatherford International Ltd (\$120 million), Massey Energy Company (\$265 million), Caterpillar Inc. (\$23 million), Autoliv Inc. (\$22.5 million), and Fifth Street Financial Corp. (\$14 million).

A highly regarded industry veteran, Ira has been recommended in securities litigation by *The Legal 500*, named a Leading Plaintiff Financial Lawyer by *Lawdragon* and been awarded an AV Preeminent rating, the highest distinction, from Martindale-Hubbell.

Ira is a longtime leader in the securities class action bar and represented one of the first institutional investors acting as a lead plaintiff in a post-Private Securities Litigation Reform Act case and ultimately obtained one of the first rulings interpreting the statute's intent provision in a manner favorable to investors in *STI Classic Funds, et al. v. Bollinger Industries, Inc.* His efforts are regularly recognized by the courts, including in *Kamarasy v. Coopers & Lybrand*, where the court remarked on "the superior quality of the representation provided to the class." In approving the settlement he achieved in *In re InterMune Securities Litigation*, the court complimented Ira's ability to secure a significant recovery for the class in a very efficient manner, shielding the class from prolonged litigation and substantial risk.

Ira has also played a key role in groundbreaking cases in the field of merger and derivative litigation. In *In re Freeport-McMoRan Copper & Gold Inc. Derivative Litigation*, he achieved the second largest derivative settlement in the Delaware Court of Chancery history, a \$153.75 million settlement with an unprecedented provision of direct payments to stockholders by means of a special dividend. In another first-of-its-kind case, Ira was featured in *The AmLaw Litigation Daily* as Litigator of the Week for his work in *In re El Paso Corporation Shareholder Litigation*. The action alleged breach of fiduciary duties in connection with a merger transaction, including specific reference to wrongdoing by a conflicted financial advisory consultant, and resulted in a \$110 million recovery for a class of shareholders and a waiver by the consultant of its fee.

From 2009-2011, Ira served as President of the National Association of Shareholder and Consumer Attorneys (NASCAT), a membership organization of approximately 100 law firms that practice class action and complex civil litigation. During this time, he represented the plaintiffs' securities bar in meetings with members of Congress, the Administration, and the SEC.

From 1996 through 2012, Ira served as Chairman of the Class Action Committee of the Commercial and Federal Litigation Section of the New York State Bar Association. During his tenure, he served

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on the Executive Committee of the Section and authored important papers on issues relating to class action procedure including revisions proposed by both houses of Congress and the Advisory Committee on Civil Procedure of the United States Judicial Conference. Examples include “Proposed Changes in Federal Class Action Procedure,” “Opting Out on Opting In,” and “The Interstate Class Action Jurisdiction Act of 1999.” Ira has also lectured extensively on securities litigation at seminars throughout the country.

Ira earned his Juris Doctor from Duke University School of Law and his bachelor’s degree, *summa cum laude*, from the State University of New York at Binghamton.

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Brendan W. Sullivan is a Partner in the Delaware office of Labaton Sucharow LLP. He focuses on representing investors in corporate governance and transactional matters, including class action litigation.

Prior to joining Labaton Sucharow, Brendan was an Associate at Paul, Weiss, Rifkind, Wharton & Garrison LLP where he gained substantial experience in class and derivative matters relating to mergers and acquisitions and corporate governance. During law school, he was a Summer Associate at Morris, Nichols and a Law Clerk for Honorable Judge Leonard P. Stark, U.S. District Court for the District of Delaware.

Brendan's pro bono experience includes representing a Delaware charter school in a mediation concerning a malpractice claim against its former auditor.

Brendan earned his Juris Doctor from Georgetown University Law Center where he was the Notes Editor on the *Georgetown Law Journal* and his Bachelor of Arts in English from the University of Delaware.

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Irina Vasilchenko is a Partner in the New York office of Labaton Sucharow LLP and head of the Firm's Associate Training Program. Irina focuses on prosecuting complex securities fraud cases on behalf of institutional investors and has over a decade of experience in such litigation.

Irina is recognized as an up-and-coming litigator whose legal accomplishments transcend her age. She has been named repeatedly to *Benchmark Litigation's* "40 & Under List" and also has been recognized as a Future Star by *Benchmark Litigation* and a Rising Star by *Law360*, one of only six securities attorneys in its 2020 list. Additionally, *Lawdragon* has named her one of the Leading Plaintiff Financial Lawyers in America.

Currently, Irina is involved in prosecuting the high-profile case against financial industry leader Goldman Sachs, *In re Goldman Sachs Group, Inc. Securities Litigation*, arising from its Abacus and other subprime mortgage-backed CDOs during the Financial Crisis, including defending against an appeal of the class certification order to the U.S. Supreme Court and to the Second Circuit. She is also actively prosecuting *Weston v. DocuSign, Inc.*; and *In re Teladoc Health, Inc. Securities Litigation*.

Recently, Irina played a pivotal role in securing a historic \$192.5 million settlement for investors in energy company SCANA Corp. over a failed nuclear reactor project in South Carolina, as well as a \$19 million settlement in a shareholders' suit against Daimler AG over its Mercedes Benz diesel emissions scandal. Since joining Labaton Sucharow, she also has been a key member of the Firm's teams that have obtained favorable settlements for investors in numerous securities cases, including *In re Massey Energy Co. Securities Litigation* (\$265 million settlement); *In re Fannie Mae 2008 Securities Litigation* (\$170 million settlement); *In re Amgen Inc. Securities Litigation* (\$95 million settlement); *In re Hewlett-Packard Company Securities Litigation* (\$57 million settlement); *Vancouver Alumni Asset Holdings Inc. v. Daimler A.G.* (\$19 million settlement); *Perrelouis v. Gogo Inc.* (\$17.3 million); *In re Acuity Brands, Inc. Securities Litigation* (\$15.75 million settlement); and *In re Extreme Networks, Inc. Securities Litigation* (\$7 million settlement).

Irina maintains a commitment to pro bono legal service, including representing an indigent defendant in a criminal appeal case before the New York First Appellate Division, in association with the Office of the Appellate Defender. As part of this representation, she argued the appeal before the First Department panel. Prior to joining Labaton Sucharow, Irina was an Associate in the general litigation practice group at Ropes & Gray LLP, where she focused on securities litigation.

She is a member of the New York State Bar Association and New York City Bar Association.

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Irina received her Juris Doctor, *magna cum laude*, from Boston University School of Law, where she was an editor of the *Boston University Law Review* and was the G. Joseph Tauro Distinguished Scholar, the Paul L. Liacos Distinguished Scholar, and the Edward F. Hennessey Scholar. Irina earned a Bachelor of Arts in Comparative Literature, *summa cum laude* and Phi Beta Kappa, from Yale University.

Irina is fluent in Russian and proficient in Spanish.



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Carol C. Villegas is a Partner in the New York office of Labaton Sucharow LLP. Carol focuses on prosecuting complex securities fraud and consumer cases on behalf of institutional investors and individuals. Leading one of the Firm's litigation teams, she is actively overseeing litigation against Lordstown, PayPal, Oak Street Health, DocuSign, Flo Health, Amazon, and Hain, among others. In addition to her litigation responsibilities, Carol holds a variety of leadership positions within the Firm, including serving on the Firm's Executive Committee, as Chair of the Firm's Women's Networking and Mentoring Initiative, and as the Chief of Compliance.

Carol's development of innovative case theories in complex cases, her skillful handling of discovery work, and her adept ability during oral arguments has earned her accolades from *Chambers & Partners USA* as well as *Law360* as a Class Action MVP, *The National Law Journal* as a Plaintiffs' Trailblazer, and the *New York Law Journal* as a Top Woman in Law, New York Trailblazer, and Distinguished Leader. *Business Today* named Carol one of the "Top 10 Most Influential Securities Litigation Lawyer in New York." *The National Law Journal* "Elite Trial Lawyers" has repeatedly recognized her superb ability to excel in high-stakes matters on behalf of plaintiffs and selected her to its class of Elite Women of the Plaintiffs Bar. She has also been recognized as a Litigation Star by *Benchmark Litigation* and a Next Generation Partner by *The Legal 500*, where clients praised her for helping them "better understand the process and how to value a case." *Lawdragon* has named her one of the country's Leading Lawyers, Leading Litigators, Leading Plaintiff Financial Lawyers, and Leading Plaintiff Consumer Lawyers. Additionally, *Crain's New York Business* selected Carol to its list of Notable Women in Law. *Euromoney's* "Women in Business Law Awards" has also shortlisted Carol as a Securities Litigator of the Year and a Privacy and Data Protection Lawyer of the Year, and *Chambers and Partners* selected Carol as a finalist for Diversity & Inclusion: Outstanding Contribution, and *New York Law Journal's* New York Legal Awards selected her as a Lawyer of the Year finalist.

Notable recent successes include *In re Nielsen Holdings PLC Securities Litigation* (\$73 million settlement) and *City of Warren Police and Fire Retirement System v. World Wrestling Entertainment, Inc.* (\$39 million settlement). Carol has also played a pivotal role in securing favorable settlements for investors, including in cases against DeVry, a for-profit university; AMD, a multi-national semiconductor company; Liquidity Services, an online auction marketplace; Aeropostale, a leader in the international retail apparel industry; Vocera, a healthcare communications provider; and Prothena, a biopharmaceutical company, among others. Carol has also helped revive a securities class action against LifeLock after arguing an appeal before the Ninth Circuit. The case settled shortly thereafter.

Prior to joining Labaton Sucharow, Carol served as the Assistant District Attorney in the Supreme Court Bureau for the Richmond County District Attorney's office, where she took several cases to



trial. She began her career as an Associate at King & Spalding LLP, where she worked as a federal litigator.

Carol is an active member of the New York State Bar Association's Women in the Law Section and Chair of the Board of Directors of the City Bar Fund, the nonprofit 501(c)(3) arm of the New York City Bar Association. She is also a member of the National Association of Public Pension Attorneys, the National Association of Women Lawyers, and the Hispanic National Bar Association. In addition, Carol previously served on *Law360's* Securities Editorial Board.

Carol earned her Juris Doctor from New York University School of Law, where she was the recipient of The Irving H. Jurow Achievement Award for the Study of Law and received the Association of the Bar of the City of New York Diversity Fellowship. She received her bachelor's degree, with honors, from New York University.

She is fluent in Spanish.

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Michael C. Wagner is a Partner in the Delaware office of Labaton Sucharow LLP. Michael focuses on representing shareholders in corporate governance and transactional matters, including class action and derivative litigation.

He has successfully prosecuted cases against Dole, Versum Materials, Arthrocare, and Genetech, among others.

Michael is recommended by *The Legal 500* and has been recognized by *Lawdragon* as one of the Leading Plaintiff Financial Lawyers in America.

Previously, Michael was a Partner at Smith, Katzenstein & Jenkins, LLP and at Kessler Topaz Meltzer & Check, LLP. As a litigator for more than 25 years, he has prosecuted a wide variety of matters for investors, in Delaware and in other jurisdictions across the country, at both the trial and appellate levels. He has previously represented investment banks, venture capital funds, and hedge fund managers as well as Fortune 500 companies.

His pro bono work includes guardianship and PFA matters.

Michael earned his Juris Doctor from the University of Pittsburgh School of Law. He served as Associate Editor before becoming Lead Executive Editor for the *Journal of Law and Commerce*. Michael received his bachelor's degree from Franklin and Marshall College.

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Mark S. Willis is a Partner in the D.C. office of Labaton Sucharow LLP. With more than three decades of experience, his practice focuses on domestic and international securities litigation. Mark advises leading pension funds, investment managers, and other institutional investors from around the world on their legal remedies when impacted by securities fraud and corporate governance breaches.

Mark is recommended by *The Legal 500* for excellence in securities litigation and has been named one of *Lawdragon's* Leading Plaintiff Financial Lawyer in America. Under his leadership, the Firm has been awarded *Law360* Practice Group of the Year Awards for Class Actions and Securities.

In U.S. matters, Mark currently represents Caisse de dépôt et placement du Québec, one of Canada's largest institutional investors, against PayPal in one of the largest ongoing U.S. shareholder class actions, as well as the Utah Retirement Systems in several pending shareholder actions. He represented institutions from the UK, Spain, the Netherlands, Denmark, Germany, Belgium, Canada, Japan and the U.S. in a novel lawsuit in Texas against BP plc that salvaged claims dismissed from the parallel U.S. class action. In the *Converium* class action, Mark represented a Greek institution in a nearly four-year battle that eventually became the first U.S. class action settled on two continents (i.e., New York and Amsterdam). The Dutch portion of this \$145 million trans-Atlantic recovery involved a landmark decision that substantially broadened that court's jurisdictional reach to a scenario where the claims were not brought under Dutch law, the wrongdoing occurred outside the Netherlands, and none of the parties were domiciled there. In the *Parmalat* case, known as the "Enron of Europe" due to the size and scope of the fraud, Mark represented a group of European institutions and eventually recovered nearly \$100 million and negotiated governance reforms with two large European banks, making this the first time in a shareholder class action that such reforms were secured from non-issuer defendants.

Mark also heads the firm's Non-U.S. practice, advising clients in over 100 cases in jurisdictions such as Australia, Japan, Brazil, Canada, the UK, Germany, the Netherlands, Italy, Denmark, and elsewhere. This practice is wholly unique in that it is genuinely global, independent, and fully comprehensive.

Mark has written on corporate, securities, and investor protection issues—often with an international focus—in industry publications such as *International Law News*, *Professional Investor*, *European Lawyer*, and *Investment & Pensions Europe*. He has also authored several chapters in international law treatises on European corporate law and on the listing and subsequent disclosure obligations for issuers listing on European stock exchanges. He also speaks at conferences and at client forums on investor protection through the U.S. federal securities laws, corporate governance measures, and the impact on shareholders of non-U.S. investor remedies.

The logo for Labaton Sucharow, consisting of a dark blue square with the text "Labaton" on the top line and "Sucharow" on the bottom line in white, sans-serif font.

Mark earned his Juris Doctor from the Pepperdine University School of Law and his master's degree from Georgetown University Law Center.

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Nicole M. Zeiss is a Partner in the New York office of Labaton Sucharow. A litigator with two decades of experience, Nicole leads the Firm's Settlement Group, which analyzes the fairness and adequacy of the procedures used in class action settlements. Her practice focuses on negotiating and documenting complex class action settlements and obtaining the required court approval of the settlements, notice procedures, and payments of attorneys' fees.

Nicole was part of the Labaton Sucharow team that successfully litigated the \$185 million settlement in *In re Bristol-Myers Squibb Securities Litigation*. She played a significant role in *In re Monster Worldwide, Inc. Securities Litigation* (\$47.5 million settlement). Nicole also litigated on behalf of investors who have been damaged by fraud in the telecommunications, hedge fund, and banking industries. Over the past decade, Nicole has been actively involved in finalizing the Firm's securities class action settlements, including in cases against Massey Energy Company (\$265 million), SCANA (\$192.5 million), Fannie Mae (\$170 million), and Schering-Plough (\$473 million), among many others.

Prior to joining Labaton Sucharow, Nicole practiced poverty law at MFY Legal Services. She also worked at Gaynor & Bass practicing general complex civil litigation, particularly representing the rights of freelance writers seeking copyright enforcement.

Nicole is a member of the New York City Bar Association and the New York State Bar Association. Nicole also maintains a commitment to pro bono legal services.

She received a Juris Doctor from the Benjamin N. Cardozo School of Law, Yeshiva University, and earned a Bachelor of Arts in Philosophy from Barnard College.

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Garrett J. Bradley is Of Counsel to Labaton Sucharow LLP. Garrett has decades of experience helping institutional investors, public pension funds, and individual investors recover losses attributable to corporate fraud. A former state prosecutor, Garrett has been involved in hundreds of securities fraud class action lawsuits that have, in aggregate, recouped hundreds of millions of dollars for investors. Garrett's past and present clients include some of the country's largest public pension funds and institutional investors.

Garrett has been consistently named a "Super Lawyer" in securities litigation by *Super Lawyers*, a Thomson Reuters publication, and was previously named a "Rising Star." He was selected as one of "New England's 2020 Top Rated Lawyers" by *ALM Media* and *Martindale-Hubbell*. The American Trial Lawyers Association has named him one of the "Top 100 Trial Lawyers in Massachusetts." The Massachusetts Academy of Trial Attorneys gave him their Legislator of the Year award, and the Massachusetts Bar Association named him Legislator of the Year.

Prior to joining the firm, Garrett worked as an Assistant District Attorney in the Plymouth County District Attorney's office. He also served in the Massachusetts House of Representatives, representing the Third Plymouth District, for sixteen years.

Garrett is a Fellow of the Litigation Counsel of America, an invitation-only society of trial lawyers comprised of less than 1/2 of 1% of American lawyers. He is also a member of the Public Justice Foundation and the Million Dollar Advocates Forum.

Garrett earned his Juris Doctor from Boston College Law School and his Bachelor of Arts from Boston College.

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Guillaume Buell is Of Counsel to Labaton Sucharow LLP. With over a decade of experience in securities law, Guillaume represents investors based in the United States, the United Kingdom, and Europe in connection with domestic and international securities litigation, corporate governance matters, and shareholder rights disputes. His clients include a wide range of pension funds, asset managers, insurance companies, and other sophisticated investors. As part of the Firm's Non-U.S. Securities Litigation Practice, which is one of the first of its kind, Guillaume serves as liaison counsel to institutional investors in select overseas matters. He also advises clients in connection with complex consumer matters.

Guillaume has played an important role in cases against CVS Caremark, Uniti Group, Nu Skin Enterprises, Conduent, Stamps.com, Genworth Financial, Rent-A-Center, and Castlight Health among others.

Prior to joining Labaton Sucharow, Guillaume was an attorney with Cahill Gordon & Reindel LLP in New York and Hicks Davis Wynn, P.C. in Houston, where he provided legal counsel to a wide range of Fortune 500 and other corporate clients in the aviation, construction, energy, financial, consumer, pharmaceutical, and insurance sectors in state and federal litigations, government investigations, and internal investigations.

Guillaume is an active member of the National Association of Public Pension Attorneys (NAPPA), where he serves as an appointed member of its Securities Litigation Committee, Fiduciary & Governance Committee, and the New Member Education Committee. In addition, he is actively involved with the National Conference on Public Employee Retirement Systems, the Association of Canadian Pension Management, the Michigan Association of Public Employee Retirement Systems, the National Association of Shareholder and Consumer Attorneys, and the International Foundation of Employee Benefit Plans.

Guillaume received his Juris Doctor from Boston College Law School and was the recipient of the Boston College Law School Award for outstanding contributions to the law school community. He was also a member of the National Environmental Law Moot Court Team, which advanced to the national quarterfinals and received best oralists recognition. While in law school, Guillaume was a Judicial Intern with the Honorable Loretta A. Preska, United States District Court for the Southern District of New York, and an Intern with the Government Bureau of the Attorney General of Massachusetts. He received his Bachelor of Arts, *cum laude* with departmental honors, from Brandeis University.

Guillaume is fluent in French and conversant in German. He is an Eagle Scout and actively involved in his hometown's local civic organizations.

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Hui Chang is Of Counsel in the New York office of Labaton Sucharow LLP and concentrates her practice in the area of shareholder litigation and client relations. As a co-manager of the Firm's Non-U.S. Securities Litigation Practice, Hui focuses on advising institutional investor clients regarding fraud-related losses on securities, and on the investigation and development of securities fraud class, group, and individual actions outside of the United States.

Hui previously served as a member of the Firm's Case Development Group, where she was involved in the identification, investigation, and development of potential actions to recover investment losses resulting from violations of the federal securities laws, and corporate and fiduciary misconduct, and assisted the Firm in securing a number of lead counsel appointments in several class actions.

Prior to joining Labaton Sucharow, Hui was a Litigation Associate at a national firm primarily focused on securities class action litigation, where she played a key role in prosecuting a number of high-profile securities fraud class actions, including *In re Petrobras Sec. Litigation* (\$3 billion recovery).

Hui earned her Juris Doctor from the University of California, Hastings College of Law, where she worked as a Graduate Research Assistant and a Moot Court Teaching Assistant. She received her bachelor's degree from the University of California, Berkeley.

Hui is fluent in Portuguese and proficient in Taiwanese.

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Derick I. Cividini is Of Counsel in the New York office of Labaton Sucharow LLP and serves as the Firm's Director of E-Discovery. Derick focuses on prosecuting complex securities fraud cases on behalf of institutional investors, including class actions, corporate governance matters, and derivative litigation. As the Director of E-discovery, he is responsible for managing the Firm's discovery efforts, particularly with regard to the implementation of e-discovery best practices for ESI (electronically stored information) and other relevant sources.

Derick was part of the team that represented lead plaintiff City of Edinburgh Council as Administering Authority of the Lothian Pension Fund in *In re Lehman Brothers Equity/Debt Securities Litigation*, which resulted in settlements totaling \$516 million against Lehman Brothers' former officers and directors as well as most of the banks that underwrote Lehman Brothers' offerings.

Prior to joining Labaton Sucharow, Derick was a litigation attorney at Kirkland & Ellis LLP, where he practiced complex civil litigation. Earlier in his litigation career, he worked on product liability class actions with Hughes Hubbard & Reed LLP.

Derick earned his Juris Doctor and Master of Business Administration from Rutgers University and received his bachelor's degree in Finance from Boston College.

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Joseph H. Einstein is Of Counsel in the New York office of Labaton Sucharow LLP. A seasoned litigator, Joe represents clients in complex corporate disputes, employment matters, and general commercial litigation. He has litigated major cases in state and federal courts and has argued many appeals, including appearing before the U.S. Supreme Court.

Joe has an AV Preeminent rating, the highest distinction, from the publishers of the Martindale-Hubbell directory.

His experience encompasses extensive work in the computer software field including licensing and consulting agreements. Joe also counsels and advises business entities in a broad variety of transactions.

Joe serves as a Mediator for the U.S. District Court for the Southern District of New York. He has served as a Commercial Arbitrator for the American Arbitration Association and currently is a FINRA Arbitrator and Mediator. Joe is a former member of the New York State Bar Association Committee on Civil Practice Law and Rules, and the Council on Judicial Administration of the Association of the Bar of the City of New York. He also is a former member of the Arbitration Committee of the Association of the Bar of the City of New York.

Joe received his Bachelor of Laws and Master of Laws from New York University School of Law. During his time at NYU, Joe was a Pomeroy and Hirschman Foundation Scholar and served as an Associate Editor of the *New York University Law Review*.

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Lara Goldstone is Of Counsel in the New York office of Labaton Sucharow LLP. Lara advises leading pension funds and other institutional investors in the United States and Canada on issues related to corporate fraud in the U.S. securities markets. Her work focuses on monitoring the well-being of institutional investments and counseling clients on best practices in securities, antitrust, corporate governance and shareholder rights and consumer class action litigation.

Lara has achieved significant settlements on behalf of clients. She represented investors in high-profile cases against LifeLock, KBR, Fifth Street Finance Corp., NII Holdings, Rent-A-Center, and Castlight Health. Lara has also served as legal adviser to clients who have pursued claims in state court, derivative actions in the form of serving books and records demands, non-U.S. actions and antitrust class actions including pay-for-delay or “product hopping” cases in which pharmaceutical companies allegedly obstructed generic competitors in order to preserve monopoly profits on patented drugs, such as *In re Generic Pharmaceuticals Pricing Antitrust Litigation*.

Before joining Labaton Sucharow, Lara worked as a Legal Intern in the Larimer County District Attorney’s Office and the Jefferson County District Attorney’s Office. She also volunteered at Crossroads Safehouse, which provided legal representation to victims of domestic violence. Prior to her legal career, Lara worked at Industrial Labs where she worked closely with Federal Drug Administration standards and regulations. In addition, she was a teacher in Irvine, California.

She is a member of the Firm’s Women’s Initiative.

Lara earned her Juris Doctor from the University of Denver Sturm College of Law, where she was a judge of the Providence Foundation of Law & Leadership Mock Trial and a competitor of the Daniel S. Hoffman Trial Advocacy Competition. She received her bachelor’s degree from George Washington University, where she was a recipient of a Presidential Scholarship for academic excellence.

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Elizabeth Rosenberg is Of Counsel in the New York office of Labaton Sucharow LLP. Elizabeth focuses on litigating complex securities fraud cases on behalf of institutional investors, with a focus on obtaining court approval of class action settlements, notice procedures and payment of attorneys' fees.

Prior to joining Labaton Sucharow, Elizabeth was an Associate at Whatley Drake & Kallas LLP, where she litigated securities and consumer fraud class actions. Elizabeth began her career as an Associate at Milberg LLP where she practiced securities litigation and was also involved in the pro bono representation of individuals seeking to obtain relief from the World Trade Center Victims' Compensation Fund.

Elizabeth earned her Juris Doctor from Brooklyn Law School. She received her bachelor's degree from the University of Michigan.

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William “Bill” Schervish is Of Counsel in the New York office of Labaton Sucharow LLP and serves as the Firm's Director of Financial Research. As a key member of the Firm's Case Development Group, Bill identifies, analyzes, and develops cases alleging securities fraud and other forms of corporate misconduct that expose the Firm's institutional clients to legally recoverable losses. Bill also evaluates and develops cases on behalf of confidential whistleblowers for the Securities and Exchange Commission.

Bill has been practicing securities law for more than 15 years. As a complement to his legal experience, Bill is a Certified Public Accountant (CPA), a CFA® Charterholder, and a Certified Fraud Examiner (CFE) with extensive work experience in accounting and finance.

Prior to joining the Firm, Bill worked as a finance attorney at Mayer Brown LLP, where he drafted and analyzed credit default swaps, indentures, and securities offering documents on behalf of large banking institutions. Bill's professional background also includes positions in controllership, securities analysis, and commodity trading. He began his career as an auditor at PricewaterhouseCoopers.

Bill earned a Juris Doctor, *cum laude*, from Loyola University and received a Bachelor of Science, *cum laude*, in Business Administration from Miami University, where he was a member of the Business and Accounting Honor Societies.

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John Vielandi is Of Counsel in the New York office of Labaton Sucharow LLP. John researches, analyzes and assesses potential new shareholder litigations with a focus on breaches of fiduciary duty and mergers and acquisitions.

John has successfully prosecuted cases against Versum Materials, Inc.; Stamps.com Inc.; and Expedia Group, Inc.

John joined the Firm from Bernstein Litowitz Berger & Grossmann, where he was a key member of the teams that litigated numerous high profile actions, including *City of Monroe Employees' Retirement System v. Rupert Murdoch et al.* and *In re Vaalco Energy, Inc. Consolidated Stockholder Litigation*. While in law school, John was a legal intern at the New York City Office of Administrative Trials and Hearings and a judicial intern for the Honorable Carolyn E. Demarest of the New York State Supreme Court.

John earned his Juris Doctor from Brooklyn Law School, where he was the Notes and Comments Editor for the *Journal of Corporate, Financial and Commercial Law*, and was awarded the CALI Excellence for the Future Award. He received his bachelor's degree from Georgetown University.

Exhibit D

*Alexion Securities Litigation***EXHIBIT D**

LABATON SUCHAROW LLP

JOINT LITIGATION EXPENSE FUND

<i>CONTRIBUTIONS:</i>	<i>TOTALS</i>
Labaton Sucharow LLP	\$220,000.00
Motley Rice LLC	\$220,000.00
<i>TOTAL CONTRIBUTIONS</i>	<i>\$440,000.00</i>
<i>EXPENSES INCURRED BY THE JOINT LITIGATION EXPENSE FUND:</i>	
Experts	\$272,156.33
Damages/Loss Causation/Plan of Allocation	\$265,824.83
Accounting	\$6,331.50
Counsel for Confidential Witnesses	\$67,975.82
Swiss Counsel for Proceedings under Hague Convention	\$2,552.33
Deposition Reporting Services	\$143,134.18
Mediation	\$72,048.75
Litigation Support*	\$33,912.51
<i>TOTAL EXPENSES OF JOINT LITIGATION EXPENSE FUND</i>	<i>\$591,779.92</i>
<i>OUTSTANDING BALANCE IN JOINT LITIGATION EXPENSE FUND AS OF OCTOBER 31, 2023</i>	<i>(\$151,779.92)</i>

* The Litigation Support costs include \$200/month in ongoing storage costs through March 31, 2024 related to the electronic documents of PERSI. Once the Settlement reaches its Effective Date, this data will no longer be stored and the ongoing costs will cease.

Exhibit K

Paul M. Basta
Alice Belisle Eaton
Kyle J. Kimpler
Robert A. Britton
Brian Bolin
Sean A. Mitchell

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 373-3000
Facsimile: (212) 757-3990

Counsel to Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
REVLON, INC., <i>et al.</i> , ¹)	Case No. 22-10760 (DSJ)
)	
Debtors.)	(Jointly Administered)
)	

**NINTH MONTHLY FEE STATEMENT OF
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
FOR COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS ATTORNEYS FOR DEBTORS
FOR PERIOD FROM MARCH 1, 2023 THROUGH APRIL 3, 2023**

¹ The last four digits of Debtor Revlon, Inc.’s tax identification number are 2955. Due to the large number of debtor entities in these Chapter 11 Cases, for which the Court has granted joint administration, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/Revlon>. The location of the Debtors’ service address for purposes of these Chapter 11 Cases is: 55 Water St., 43rd Floor, New York, NY 10041-0004.

Name of Applicant:	Paul, Weiss, Rifkind, Wharton & Garrison LLP
Authorized to Provide Professional Services to:	Debtors and Debtors in Possession
Date of Retention:	July 21, 2022, <i>nunc pro tunc</i> to June 15, 2022
Period for which compensation and reimbursement is sought:	March 1, 2023 through April 3, 2023
Monthly Fees Incurred:	\$5,184,952.50
20% Holdback:	(\$1,036,990.50)
Total Compensation Less 20% Holdback:	\$4,147,962.00
Monthly Expenses Incurred:	\$72,933.20
Total Fees and Expenses Due:	\$4,220,895.20
This is a: <u> X </u> monthly <u> </u> interim <u> </u> final application	

Pursuant to sections 327, 330, and 331 of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York (the “Local Rules”), the *Order Authorizing the Retention and Employment of Paul, Weiss, Rifkind, Wharton & Garrison LLP as Attorneys for the Debtors and Debtors in Possession Nunc Pro Tunc to the Petition Date* [ECF No. 253] (the “Retention Order”), and the *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [ECF No. 259] (the “Interim Compensation Order”),² Paul, Weiss, Rifkind, Wharton & Garrison LLP

² Capitalized terms used herein but not otherwise defined herein have the meanings ascribed to them in the Interim Compensation Order.

(“Paul Weiss”), counsel for the above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby submits this ninth monthly fee statement (the “Ninth Monthly Fee Statement”), seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Debtors, for the period from March 1, 2023 through April 3, 2023 (the “Ninth Monthly Fee Period”). By this Ninth Monthly Fee Statement, Paul Weiss seeks payment in the amount of \$4,220,895.20, which is comprised of (i) \$4,147,962.00, which represents eighty percent (80%) of the total amount of compensation sought for actual and necessary services rendered during the Ninth Monthly Fee Period, and (ii) reimbursement of \$72,933.20, which represents one hundred percent (100%) of actual and necessary expenses incurred in connection with such services, subject in each case to certain voluntary reductions.³

Services Rendered and Expenses Incurred

1. Attached as Exhibit A is a summary of Paul Weiss’s professionals by individual, setting forth the (i) name, title, and department of each individual who provided services in connection with the Chapter 11 Cases during the Ninth Monthly Fee Period, (ii) aggregate hours spent by each individual, (iii) hourly billing rate for each such individual at Paul Weiss’s current billing rates, (iv) amount of fees earned by each Paul Weiss professional, and (v) year of bar admission for each attorney. The blended hourly billing rate of Paul Weiss attorneys during the Ninth Monthly Fee Period is approximately \$1,351.07. The blended hourly rate of paralegals and non-legal staff during the Ninth Monthly Fee Period is approximately \$429.99.

³ Paul, Weiss voluntarily reduced its fees by \$186,458.50 and its expenses by \$4,848.76 in the Ninth Monthly Fee Period. Consequently, Paul, Weiss does not seek payment of these fees and expenses in this Ninth Monthly Fee Statement.

2. Attached as Exhibit B is a summary of the services rendered and compensation sought, by project category, for the Ninth Monthly Fee Period.

3. Attached as Exhibit C is a summary of expenses incurred and reimbursement sought, by expense type, for the Ninth Monthly Fee Period.

4. Attached as Exhibit D is itemized time detail of Paul Weiss professionals for the Ninth Monthly Fee Period and summary materials related thereto.

Notice and Objection Procedures

5. Notice of this Ninth Monthly Fee Statement shall be given by hand or overnight delivery or email where available upon: (i) Revlon, Inc., 55 Water Street, 43rd Floor, New York, NY 10041-0004, Attention: Andrew Kidd; (ii) Debtors' Counsel, Paul, Weiss, Rifkind, Wharton & Garrison, LLP, 1285 Avenue of the Americas, New York, NY, 10019, Attention: Robert A. Britton; (iii) the Office of the United States Trustee Region 2, 201 Varick Street, Suite 1006, New York, NY 10014 Attention: Brian Masumoto; (iv) counsel to the Official Committee of Unsecured Creditors, Brown Rudnick LLP, 7 Times Square, New York, NY 10036, Attention: Robert J. Stark and Bennett S. Silverberg; and (v) counsel to the ad hoc group of term lenders, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, NY 10017, Attention: Eli J. Vonnegut.

6. Objections to this Ninth Monthly Fee Statement, if any, must be filed with the Court and served upon the Notice Parties so as to be received no later than **15 days after filing of the Ninth Monthly Fee Statement** (the "Objection Deadline"), setting forth the nature of the objection and the amount of fees or expenses at issue (an "Objection").

7. If no Objections to this Ninth Monthly Fee Statement are filed and served as set forth above, the Debtors shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses identified herein.

8. If an Objection to this Ninth Monthly Fee Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Ninth Monthly Fee Statement to which the Objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such an Objection is not resolved, it shall be preserved and scheduled for consideration by the Court at the next interim fee application hearing.

Dated: May 1, 2023
New York, New York

PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP

/s/ Robert A. Britton

Paul M. Basta

Alice Eaton

Kyle J. Kimpler

Robert A. Britton

Brian Bolin

Sean A. Mitchell

**PAUL, WEISS, RIFKIND, WHARTON &
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Counsel for Debtors and Debtors in Possession

Exhibit A

Compensation by Professional

**SUMMARY OF COMPENSATION BY PROFESSIONAL
 FOR SERVICES RENDERED FOR THE PERIOD
FROM MARCH 1, 2023 THROUGH APRIL 3, 2023**

Professional Partners and Counsel	Title	Department	Year Admitted	Hourly Billing Rate (\$)	Total Billed Hours	Total Compensation (\$)
Robert Atkins	Partner	Litigation	1988	2,175.00	12.30	26,752.50
Paul Basta	Partner	Restructuring	1993	2,175.00	49.40	107,445.00
Thomas de la Bastide	Partner	Corporate	1997	2,175.00	114.60	249,255.00
Robert Holo	Partner	Tax	1993	2,175.00	49.30	107,227.50
John C. Kennedy	Partner	Corporate	1989	2,175.00	38.10	82,867.50
Elizabeth M. Sacksteder	Partner	Litigation	1989	2,175.00	10.00	21,750.00
Alice Eaton	Partner	Restructuring	2000	2,095.00	63.90	133,870.50
Randy Luskey	Partner	Litigation	2005	1,995.00	14.90	29,725.50
William Clareman	Partner	Litigation	2007	1,920.00	7.70	14,784.00
Claudine Meredith-Goujon	Partner	Corporate	1999	1,920.00	36.80	70,656.00
Robert Britton	Partner	Restructuring	2008	1,815.00	217.20	394,218.00
Brian Bolin	Partner	Restructuring	2011	1,755.00	71.50	125,482.50
Christodoulos Kautzanis	Partner	Corporate	2012	1,695.00	8.20	13,899.00
Sean Mitchell	Partner	Restructuring	2016	1,695.00	82.20	139,329.00
Ron Aizen	Counsel	Executive Compensation	2006	1,650.00	36.70	60,555.00
Cynthia Akard	Counsel	Executive Compensation	1998	1,650.00	6.00	9,900.00
Peter Carey	Counsel	Litigation		1,650.00	3.80	6,270.00
David Epstein	Counsel	Corporate	2008	1,650.00	151.80	250,470.00
Jacob Glazeski	Counsel	Executive Compensation	2009	1,650.00	5.20	8,580.00
Sarah Harnett	Counsel	Restructuring	2009	1,650.00	8.10	13,365.00
Marta P. Kelly	Counsel	Corporate	1999	1,650.00	4.30	7,095.00
Anne McGinnis	Counsel	Tax	2014	1,650.00	95.10	156,915.00
William O'Brien	Counsel	Environmental		1,650.00	4.70	7,755.00
Paul Paterson	Counsel	Litigation	2010	1,650.00	20.20	33,330.00
Keerthika Subramanian	Counsel	Corporate	2011	1,650.00	143.30	236,445.00
Gabriella Toossi	Counsel	Corporate	2010	1,650.00	3.40	5,610.00
Total Partners and Counsel:					1,258.70	2,313,552.00

Associates	Department	Year Admitted	Hourly Billing Rate (\$)	Total Billed Hours	Total Compensation (\$)
Jill Braibanti	Corporate	2010	1,380.00	143.40	197,892.00
David Cole	Litigation	2003	1,380.00	6.50	8,970.00
Douglas Keeton	Restructuring	2016	1,380.00	18.70	25,806.00
Rebekah Scherr	Corporate	2015	1,380.00	31.70	43,746.00
Kamil R. Ammari	Litigation	2017	1,355.00	5.40	7,317.00
Irene Blumberg	Restructuring	2018	1,315.00	298.20	392,133.00
Jessica Choi	Restructuring	2018	1,315.00	3.40	4,471.00
Marta Ferrari	Corporate	2018	1,315.00	271.40	356,891.00
Gary Kavarsky	Corporate	2018	1,315.00	60.00	78,900.00
Bharath Mohan	Corporate	2018	1,312.56	40.20	52,765.00
Salvatore Daniele	Corporate	2019	1,270.00	28.50	36,195.00
Robin Hellebrekers	Executive Compensation	2019	1,270.00	17.70	22,479.00
Valentine Lysikatos Carey	Tax	2019	1,270.00	74.60	94,742.00
Omid Rahnama	Restructuring	2019	1,270.00	74.50	94,615.00
Hunter Blain	Corporate	2020	1,225.00	20.70	25,357.50
Lara Luo	Restructuring	2020	1,225.00	269.50	330,137.50
Alexandra Ritschard	Executive Compensation	2017	1,225.00	7.70	9,432.50
John R. Hotes	Corporate	2021	1,125.00	47.10	52,987.50
Emily G. Sasso	Litigation	2021	1,125.00	14.70	16,537.50
Brian Huang	Corporate	2022	995.00	48.50	48,257.50
John Maccio	Corporate	2022	995.00	8.40	8,358.00
Alana Page	Restructuring	2022	995.00	320.50	318,897.50
Danielle Rabinowitz	Tax	2022	995.00	91.30	90,843.50
Evan Rocher	Corporate	2022	995.00	24.20	24,079.00
Benjamin Shack Sackler	Litigation	2022	995.00	23.30	23,183.50
Sam Baham	Restructuring	Not yet admitted	825.00	28.00	23,100.00
Leo Cen	Corporate	Not yet admitted	825.00	48.40	39,930.00
Matthew Dwelle	Corporate	Not yet admitted	825.00	29.40	24,255.00
Julia Heasley	Restructuring	Not yet admitted	825.00	263.40	217,305.00
Matthew M. Higgins	Litigation	Not yet admitted	825.00	4.60	3,795.00
Jordyn Manly	Litigation	Not yet admitted	825.00	14.90	12,292.50
RaCia Poston	Litigation	Not yet admitted	825.00	16.30	13,447.50
Vida Robinson	Restructuring	Not yet admitted	825.00	44.80	36,960.00
Total Associates:				2,399.90	2,736,078.50

Staff Attorneys	Year Admitted	Hourly Billing Rate (\$)	Total Billed Hours	Total Compensation (\$)
Maria Castro-James	2005	595.00	25.70	15,291.50
Melinda Feher	2007	595.00	43.50	25,882.50
Max Melion	2007	595.00	25.00	14,875.00
Courtney Miller	2009	595.00	20.50	12,197.50
Claudia Novod	2004	595.00	26.30	15,648.50
Total Staff Attorneys:			141.00	83,895.00

Paralegals and Other Non-Legal Staff	Hourly Billing Rate (\$)	Total Billed Hours	Total Compensation (\$)
Marguerite Melvin	470.00	27.80	13,066.00
Shawn Muscat	470.00	6.90	3,243.00
Joseph Rwambuya	470.00	13.00	6,110.00
Marina Angelopoulos	410.00	7.70	3,157.00
Julia Hossain	410.00	52.40	21,484.00
Natasha Grant	380.00	4.30	1,634.00
Daniel McLaughlin	380.00	3.30	1,254.00
Janet Peros	380.00	0.30	114.00
Ai Na Liu	350.00	3.90	1,365.00
Total Paralegals and Other Non-Legal Staff:		119.60	51,427.00

PROFESSIONALS	BLENDED RATE (\$)	TOTAL BILLED HOURS	TOTAL COMPENSATION (\$)
Partners and Counsel	1,838.05	1,258.70	2,313,552.00
Associates	1,140.08	2,399.90	2,736,078.50
Staff Attorneys	595.00	141.00	83,895.00
Paralegals/Non-Legal Staff	429.99	119.60	51,427.00
Blended Attorney Rate	1,351.07	3,799.60	5,133,525.50
Total Fees Incurred:		3,919.20	5,184,952.50

Exhibit B

Compensation by Task Code

**AGGREGATE TIME SUMMARY BY TASK CODE
FOR THE PERIOD FROM MARCH 1, 2023 THROUGH APRIL 3, 2023**

Task Code	Project Category	Total Hours	Total Fees (\$)
701	Adversary Proceedings and Contested Matters	19.00	23,534.50
702	Asset Sales and Dispositions	14.90	16,404.00
703	Automatic Stay Matters	10.80	10,102.00
704	Business Operations	11.60	17,966.00
705	Case Administration	120.00	104,620.50
706	Chapter 11 Filing	-	-
707	Claims Administration and Objections	363.50	501,527.50
708	Corporate Governance and Board Matters	62.20	81,493.00
709	Corporate and Securities Matters	462.20	613,000.00
710	Creditor and Stakeholder Issues	13.20	17,157.00
711	DIP / Cash Collateral / Exit Financing	931.90	1,420,478.00
712	Employee Matters	74.70	110,713.50
713	Executory Contracts and Leases	202.20	226,405.00
714	Fee/Employment Applications (Other)	69.50	62,120.00
715	Fee/Employment Applications (Paul, Weiss)	214.50	170,544.50
716	Hearings	32.40	52,070.00
717	Insurance Matters	35.90	60,490.50
718	International/Cross-Border Issues	0.50	657.50
719	Investigation of Potential Claims	0.30	495.00
720	Plan and Disclosure Statement	924.10	1,181,619.00
721	Schedules and Statements	-	-
722	Tax Issues	336.80	488,895.00
723	Travel Time	-	-
724	U.S. Trustee Communications and Issues	1.00	1,355.00
725	Use, Sale, and Lease of Property	-	-
726	Utilities Issues	-	-
727	Vendor/Supplier Matters	18.00	23,305.00
	TOTAL	3,919.20	\$ 5,184,952.5

Exhibit C

Expense Summary

**AGGREGATE ITEMIZED DISBURSEMENTS FOR THE PERIOD
FROM MARCH 1, 2023 THROUGH APRIL 3, 2023**

Expenses Category	Total Expenses (\$)
Business Expenses	740.11
Duplicating Expenses	3,151.00
Information Retrieval Services	6,489.61
Local Transportation Expenses	401.54
Mail & Messengers	332.39
Miscellaneous	1,006.06
Overtime Expenses	3,120.44
Professional Services	56,702.65
Reporting	989.40
TOTAL	72,933.20

Exhibit D

Itemized Time Records

Client: 002500 Revlon, Inc.

Invoice #: 1433832

Matter: 00370 Revlon - Chapter 11 Cases

Date: 04/28/2023

TIME SUMMARY

Name	Dept	Title	Oldest Entry	Latest Entry	Hours
Atkins, Robert	Lit	Partner	03/03/23	03/24/23	12.30
Basta, Paul M.	Rstr	Partner	03/01/23	04/03/23	49.40
Bolin, Brian	Rstr	Partner	03/01/23	04/03/23	71.50
Britton, Robert	Rstr	Partner	03/01/23	04/03/23	217.20
Clareman, William	Lit	Partner	03/02/23	04/02/23	7.70
de la Bastide, Thomas V	Corp	Partner	03/01/23	04/03/23	114.60
Eaton, Alice	Rstr	Partner	03/01/23	04/03/23	63.90
Holo, Robert	Tax	Partner	03/01/23	04/03/23	49.30
Kaoutzanis, Christodoulos	Corp	Partner	03/23/23	04/02/23	8.20
Kennedy, John C	Corp	Partner	03/09/23	04/03/23	38.10
Luskey, Randy	Lit	Partner	03/03/23	03/28/23	14.90
Meredith-Goujon, Claudine K	Corp	Partner	03/01/23	04/03/23	36.80
Mitchell, Sean A.	Rstr	Partner	03/01/23	03/21/23	82.20
Sacksteder, Elizabeth M	Lit	Partner	03/02/23	03/21/23	10.00
Aizen, Ron	ECP	Counsel	03/01/23	04/02/23	36.70
Akard, Cynthia	ECP	Counsel	03/03/23	03/24/23	6.00
Carey, Peter	Lit	Counsel	03/02/23	04/03/23	3.80
Epstein, David	Corp	Counsel	03/01/23	04/03/23	151.80
Glazeski, Jacob	ECP	Counsel	03/01/23	03/20/23	5.20
Harnett, Sarah	Rstr	Counsel	03/01/23	03/31/23	8.10
Kelly, Marta P.	Corp	Counsel	03/03/23	03/24/23	4.30
McGinnis, Anne	Tax	Counsel	03/02/23	04/03/23	95.10
O'Brien, William	Env	Counsel	03/15/23	04/03/23	4.70
Paterson, Paul	Lit	Counsel	03/02/23	04/03/23	20.20
Subramanian, Keerthika	Corp	Counsel	03/01/23	04/03/23	143.30
Toossi, Gabriella	Corp	Counsel	03/01/23	03/11/23	3.40
Ammari, Kamil R.	Lit	Associate	03/01/23	03/31/23	5.40
Baham, Sam	Rstr	Associate	03/01/23	03/29/23	28.00
Blain, Hunter	Corp	Associate	03/01/23	04/03/23	20.70
Blumberg, Irene	Rstr	Associate	03/01/23	04/03/23	298.20
Braibanti, Jill	LEGL	Associate	03/01/23	04/03/23	143.40
Cen, Leo	Corp	Associate	03/01/23	04/03/23	48.40
Choi, Jessica I.	Rstr	Associate	03/08/23	03/10/23	3.40
Cole, David	Lit	Associate	03/10/23	04/03/23	6.50
Daniele, Salvatore	Corp	Associate	03/01/23	04/03/23	28.50
Dwelle, Matthew E	Corp	Associate	03/01/23	04/03/23	29.40
Ferrari, Marta	Corp	Associate	03/01/23	04/03/23	271.40
Heasley, Julia	Rstr	Associate	03/01/23	04/03/23	263.40
Hellebrekers, Robin	ECP	Associate	03/01/23	03/29/23	17.70
Higgins, Matthew M	Lit	Associate	03/01/23	03/31/23	4.60
Hotes, John R	Corp	Associate	03/01/23	04/03/23	47.10
Huang, Brian	Corp	Associate	03/01/23	04/03/23	48.50

Client: 002500 Revlon, Inc.

Invoice #: 1433832

Matter: 00370 Revlon - Chapter 11 Cases

Date: 04/28/2023

Name	Dept	Title	Oldest Entry	Latest Entry	Hours
Kavarsky, Gary	Corp	Associate	03/01/23	04/03/23	60.00
Keeton, Douglas	Rstr	Associate	03/01/23	04/03/23	18.70
Luo, Lara	Rstr	Associate	03/01/23	04/03/23	269.50
Lysikatos Carey, Valentine	Tax	Associate	03/01/23	04/03/23	74.60
Maccio, John	Corp	Associate	03/15/23	04/03/23	8.40
Manly, Jordyn R	Lit	Associate	03/21/23	04/03/23	14.90
Mohan, Bharath	Corp	Associate	11/03/22	03/31/23	40.20
Page, Alana	Rstr	Associate	03/01/23	04/03/23	320.50
Poston, RaCia D	Lit	Associate	03/05/23	03/30/23	16.30
Rabinowitz, Danielle	Tax	Associate	03/01/23	03/31/23	91.30
Rahnama, Omid	Rstr	Associate	03/01/23	04/03/23	74.50
Ritschard, Alexandra	ECP	Associate	03/01/23	03/29/23	7.70
Robinson, Vida	Rstr	Associate	03/01/23	04/03/23	44.80
Rocher, Evan	Corp	Associate	03/01/23	04/03/23	24.20
Sasso, Emily G	Lit	Associate	03/07/23	03/15/23	14.70
Scherr, Rebekah	Corp	Associate	03/03/23	03/30/23	31.70
Shack Sackler, Benjamin	Lit	Associate	03/08/23	03/31/23	23.30
Castro-James, Maria	Lit	Staff Attorney	03/17/23	03/29/23	25.70
Feher, Melinda	Lit	Staff Attorney	03/21/23	04/03/23	43.50
Melion, Max	Corp	Staff Attorney	03/07/23	03/22/23	25.00
Miller, Courtney A. R.	Lit	Staff Attorney	03/20/23	03/29/23	20.50
Novod, Claudia	Lit	Staff Attorney	03/27/23	04/03/23	26.30
Non-Legal Support					119.60
TOTAL					3,919.20

TIME DETAIL

Name	Dept	Title	Date	Task	Description	Hours
Page, Alana	Rstr	Associate	03/01/23	701	Conduct legal research re stay pending appeal (2.9); draft memorandum re same (1.5).	4.40
Paterson, Paul	Lit	Counsel	03/02/23	701	Review and analyze expert invoices for submission (0.1); correspond with K. Ammari re same (0.1).	0.20
Carey, Peter	Lit	Counsel	03/02/23	701	Teleconference with J. Rhee, A. Hinds-Pearl (Revlon), and C. Azrak re investigative outreach.	0.30
Page, Alana	Rstr	Associate	03/02/23	701	Correspond with P. Paterson re litigation expert (0.2); conduct legal research re stay pending appeal (1.2); correspond with A. Eaton and I. Blumberg re same (0.3).	1.70
Clareman, William	Lit	Partner	03/02/23	701	Teleconference with A. Gover (Gover) re investigative report (0.4); correspond with K. Kimpler re same (0.3); teleconference with L. Clayton re same (0.3).	1.00
Britton, Robert	Rstr	Partner	03/06/23	701	Conference with A. Kidd re investigation.	0.20

Client: 002500 Revlon, Inc.

Invoice #: 1433832

Matter: 00370 Revlon - Chapter 11 Cases

Date: 04/28/2023

Name	Dept	Title	Date	Task	Description	Hours
Ammari, Kamil R.	Lit	Associate	03/08/23	701	Correspond with W. Clareman and team re additional research tasks (0.1); correspond with B. Shack Sackler and team re updates to litigation slides (0.1); review and analyze same (0.1).	0.30
Ammari, Kamil R.	Lit	Associate	03/09/23	701	Correspond with S. Muscat re expert invoices.	0.10
Sacksteder, Elizabeth M	Lit	Partner	03/09/23	701	Meet with W. Clareman and P. Paterson re potential tort claimant objections to plan.	0.50
Muscat, Shawn	Lit	Paralegal	03/09/23	701	Assist J. Hurwitz with research re expert production.	0.30
Muscat, Shawn	Lit	Paralegal	03/10/23	701	Assist A. Jones with setting up FTP to the client.	0.30
Page, Alana	Rstr	Associate	03/11/23	701	Draft confirmation order (4.2); conduct research re same (1.7).	5.90
Sacksteder, Elizabeth M	Lit	Partner	03/14/23	701	Review and analyze materials re hair relaxer product history and chemical formulation (1.0); correspond with L. Clayton, PW team re same (0.2).	1.20
Paterson, Paul	Lit	Counsel	03/15/23	701	Correspond with A. Jones re responses to discovery requests.	0.10
Muscat, Shawn	Lit	Paralegal	03/15/23	701	Assist E. Sasso with calendaring litigation deadlines for team.	0.30
Ammari, Kamil R.	Lit	Associate	03/15/23	701	Correspond with P. Paterson, E. Sasso re time to respond to discovery requests (0.2); correspond with A. Jones and associate team re additional research (0.1).	0.30
Clareman, William	Lit	Partner	03/15/23	701	Teleconference with R. Britton re hair straightener discovery (0.1); teleconference with plaintiffs' counsel re settlement (0.8).	0.90
Higgins, Matthew M	Lit	Associate	03/16/23	701	Review and analyze materials re expert fees.	0.20
Ammari, Kamil R.	Lit	Associate	03/16/23	701	Correspond with L. Maiga and PW team re additional document postings.	0.10
Luskey, Randy	Lit	Partner	03/23/23	701	Correspond with E. Sacksteder, PW team re joint defense.	0.20
Carey, Peter	Lit	Counsel	04/03/23	701	Correspond with A. Hinds-Pearl (Revlon) re draft subpoena language.	0.50
Heasley, Julia	Rstr	Associate	03/01/23	702	Correspond with E. Rocher and C. Nanfara re settlement agreement notice (0.1); correspond with L. Luo and E. Quinones re warehouse sale issues (0.2); review and analyze same (0.2); review and analyze draft amendment to purchase sale agreement and de minimis asset sale procedures (0.1).	0.60
Cen, Leo	Corp	Associate	03/01/23	702	Review and revise APA and bill of sale per comments from PW bankruptcy team (0.5); correspond with A&M team re same (0.1); correspond with M. Bharath re same (0.2).	0.80
Blumberg, Irene	Rstr	Associate	03/02/23	702	Correspond with J. Heasley re de minimis settlement (0.2); review and analyze same (0.3).	0.50
Blumberg, Irene	Rstr	Associate	03/02/23	702	Review and analyze notice re Jacksonville sale.	0.10

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Name	Dept	Title	Date	Task	Description	Hours
Heasley, Julia	Rstr	Associate	03/02/23	702	Draft notice seeking DIP lender consent to de minimis settlement (0.4); correspond with R. Britton, I. Blumberg, and A. Gerber re same (0.5); correspond with DPW team and Proskauer team re same (0.2); draft notice re de minimis warehouse sale (0.3); circulate same to DPW team and other creditor groups (0.2); draft asset purchase motion (0.1).	1.70
Heasley, Julia	Rstr	Associate	03/03/23	702	Draft asset sale motion (1.3); correspond with I. Blumberg, A. Gerber, and DPW team re de minimis settlement (0.2).	1.50
Blumberg, Irene	Rstr	Associate	03/07/23	702	Correspond with A. Awrabi re de minimis settlement tracker.	0.10
Cen, Leo	Corp	Associate	03/08/23	702	Correspond with B. Mohan re APA.	0.30
Mohan, Bharath	Corp	Associate	03/08/23	702	Conference with I. Blumberg regarding M&A emergence workstreams (0.3); correspond with same, PW team regarding same (0.7).	1.00
Cen, Leo	Corp	Associate	03/09/23	702	Revise APA.	0.20
Scherr, Rebekah	Corp	Associate	03/09/23	702	Draft HSR filing re ad hoc group member's acquisition of equity in Revlon.	2.40
Cen, Leo	Corp	Associate	03/10/23	702	Correspond with B. Mohan re APA.	0.10
Cen, Leo	Corp	Associate	03/13/23	702	Correspond with B. Mohan re APA updates.	0.10
Mohan, Bharath	Corp	Associate	03/13/23	702	Teleconference with L. Luo re APA (0.2); correspond with L. Cen, PW team re reorganization corporate questions (0.3)	0.50
Page, Alana	Rstr	Associate	03/16/23	702	Correspond with R. Scherr re HSR filing (0.2); correspond with E. Ross, PJT, A&M teams re same (0.3).	0.50
Mohan, Bharath	Corp	Associate	03/16/23	702	Correspond with L. Cen, PW team re M&A workstreams (0.6) teleconference with PJT team re asset purchase agreement (0.2); review and analyze same (0.3); teleconference with L. Cen re same (0.2)	1.30
Cen, Leo	Corp	Associate	03/21/23	702	Review and revise APA issues list.	0.60
Braibanti, Jill	LEGL	Associate	03/23/23	702	Review and analyze revised Project Array APA re IP matters.	0.30
Cen, Leo	Corp	Associate	03/24/23	702	Correspond with Mohan, A&M re APA.	0.40
Rahnama, Omid	Rstr	Associate	03/24/23	702	Review and analyze draft asset purchase agreement re vendor asset (0.7); correspond with B. Mohan re same (0.2).	0.90
O'Brien, William	Env	Counsel	04/03/23	702	Correspond with R. Britton, PW team, Company re on due diligence re client properties.	0.50
Cen, Leo	Corp	Associate	04/03/23	702	Review and analyze diligence issues in connection with asset sale (0.3); correspond with B. Mohan, PW team re same (0.2).	0.50
Robinson, Vida	Rstr	Associate	03/02/23	703	Draft automatic stay letter (0.5); correspond with S. Mitchell re same (0.1).	0.60
Robinson, Vida	Rstr	Associate	03/07/23	703	Correspond with A. Page re automatic stay issues (0.3); correspond with S. Mitchell re same (0.3).	0.60

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Name	Dept	Title	Date	Task	Description	Hours
Robinson, Vida	Rstr	Associate	03/07/23	703	Correspond with S. Mitchell re automatic stay letters (0.2); coordinate filing of same (0.2).	0.40
Page, Alana	Rstr	Associate	03/07/23	703	Review and analyze automatic stay letters (0.3); draft suggestion of bankruptcy (0.3); correspond with V. Robinson re same (0.3); correspond with A. Gerber (Revlon) re same (0.2).	1.10
Page, Alana	Rstr	Associate	03/08/23	703	Draft automatic stay letter (0.3); correspond with S. Mitchell re same (0.2); coordinate filing of same (0.5).	1.00
Britton, Robert	Rstr	Partner	03/13/23	703	Correspond with S. Fier re stay violation issues.	0.20
Melvin, Marguerite	Corp	Paralegal	03/14/23	703	Review and analyze Louisiana court case filing involving Revlon, May v. L'Oréal, per A. Page (0.4); research re same (0.6).	1.00
Page, Alana	Rstr	Associate	03/14/23	703	Review and revise suggestions of bankruptcy (0.4); prepare summary of outstanding items for S. Mitchell re same (0.3); conference with V. Robinson and S. Mitchell re same (0.2); correspond with A. Gerber re same (0.2); review and analyze pleadings in MDL (0.3).	1.40
Robinson, Vida	Rstr	Associate	03/14/23	703	Correspond with A. Page, S. Mitchell re automatic stay issues (0.4); correspond with I. Blumberg re automatic stay issues (0.3).	0.70
Page, Alana	Rstr	Associate	03/15/23	703	Correspond with A. Gerber (Revlon), S. Mitchell re automatic stay letters (0.3); coordinate mailing of same (0.2); correspond with N. La Forge re automatic stay letters (0.3); draft automatic stay letter (0.5).	1.30
Robinson, Vida	Rstr	Associate	03/15/23	703	Draft automatic stay letter (0.3); correspond with A. Page re letters (0.1).	0.40
Robinson, Vida	Rstr	Associate	03/17/23	703	Correspond with A. Page re automatic stay letters.	0.20
Mitchell, Sean A.	Rstr	Partner	03/19/23	703	Correspond with Fier, Revlon re stay issues.	0.30
Page, Alana	Rstr	Associate	03/20/23	703	Review and revise automatic stay letters (1.3); correspond with S. Mitchell, S. Rosenthal (Revlon), PW team re same (0.3).	1.60
Blumberg, Irene	Rstr	Associate	03/01/23	704	Correspond with A. Gerber re change to invoice and product flow model (0.5); analyze issues re same (0.8); correspond with D. Shiffman re same (0.3); correspond with D. Epstein, D. Keeton, and E. Rocher re same (0.4).	2.00
Blumberg, Irene	Rstr	Associate	03/02/23	704	Review and analyze comments from D. Epstein re invoice processing system (0.2); correspond with Y. Cuesta and Revlon team re same (0.1); coordinate discussion re same (0.2).	0.50
Braibanti, Jill	LEGL	Associate	03/02/23	704	Correspond with I. Blumberg re new invoice, product flow model question from Revlon.	0.10
Blumberg, Irene	Rstr	Associate	03/03/23	704	Coordinate discussion re new invoice model.	0.20
Epstein, David	Corp	Counsel	03/06/23	704	Correspond with T. de la Bastide, Revlon re new invoice and product flow model.	0.10

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Name	Dept	Title	Date	Task	Description	Hours
Page, Alana	Rstr	Associate	03/07/23	704	Coordinate digital strategy meetings with management.	0.30
Britton, Robert	Rstr	Partner	03/08/23	704	Analyze earnings report (0.4); correspond with Page re earnings report (0.2).	0.60
Page, Alana	Rstr	Associate	03/09/23	704	Coordinate digital strategy meetings with management.	0.50
Page, Alana	Rstr	Associate	03/10/23	704	Coordinate digital strategy meeting with Company.	0.20
O'Brien, William	Env	Counsel	03/22/23	704	Review and analyze environmental agreement (0.8); correspond with I. Blumberg, PW team re same (0.2).	1.00
O'Brien, William	Env	Counsel	03/29/23	704	Correspond with M. Ferrari, PW team re environmental issues related to specific property (0.3); review and analyze materials re same (1.1).	1.40
Carey, Peter	Lit	Counsel	03/30/23	704	Confer with A. Hinds-Pearl (Revlon) re response to related to diverted payments issue (0.4); review and analyze background materials re same (0.5).	0.90
O'Brien, William	Env	Counsel	03/30/23	704	Review and analyze PW response to client questions re environmental issues.	0.20
Britton, Robert	Rstr	Partner	03/30/23	704	Conference with Caruso (A&M) re business developments (0.7); correspond with Ross (PJT) re same (0.6); conference with Ross (PJT), PJT and A&M teams re same (0.6).	1.90
Carey, Peter	Lit	Counsel	03/31/23	704	Teleconference with A. Hinds-Pearl (Revlon) re diverted funds (0.8); revise response to questions re diverted payments (0.4); correspond with A. Hinds-Pearl re same (0.3).	1.50
O'Brien, William	Env	Counsel	04/02/23	704	Correspond with client on environmental status of mortgaged properties.	0.20
Blumberg, Irene	Rstr	Associate	03/01/23	705	Correspond with E. Rocher re data sheets and organization chart (0.1); review and analyze hearing agenda (0.3); correspond with J. Heasley and PW team re same (0.2); review and analyze notice of adjournment (0.2); correspond with J. Heasley re same (0.1).	0.90
Rahnama, Omid	Rstr	Associate	03/01/23	705	Correspond with S. Mitchell and R. Britton re upcoming hearing (0.4); teleconference with Chambers re same (0.2).	0.60
Luo, Lara	Rstr	Associate	03/01/23	705	Correspond with I. Blumberg, PW team re various works in process.	0.40
Heasley, Julia	Rstr	Associate	03/01/23	705	Correspond with A. Pereyra and Conference Services re hearing logistics (0.2); draft docket update for circulation to PW team, Company, PJT, and A&M (0.6).	0.80
Britton, Robert	Rstr	Partner	03/01/23	705	Correspond with P. Basta re strategy and next steps (0.3); correspond with I. Blumberg re case status and workstreams (0.3).	0.60

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Name	Dept	Title	Date	Task	Description	Hours
Hossain, Julia	Rstr	Paralegal	03/01/23	705	Review and analyze notice of agenda (0.2); file notice of adjournment (0.3); prepare daily docket update (0.5); file stipulation (0.3); coordinate service for same (0.1).	1.40
Heasley, Julia	Rstr	Associate	03/02/23	705	Revise works in process tracker.	0.10
Hossain, Julia	Rstr	Paralegal	03/02/23	705	Save pleadings from docket update onto system (0.4); prepare daily docket update (0.1).	0.50
Heasley, Julia	Rstr	Associate	03/03/23	705	Revise works in process tracker re updated items (0.1); draft docket update summary for circulation to PW, Company, PJT, and A&M (0.3).	0.40
Hossain, Julia	Rstr	Paralegal	03/03/23	705	Coordinate service of pleadings (0.2); prepare docket update (0.4).	0.60
Luo, Lara	Rstr	Associate	03/06/23	705	Revise work in process tracker.	0.60
Hossain, Julia	Rstr	Paralegal	03/06/23	705	Register attorneys and other Revlon professionals for hearing on March 7 (0.4); file omnibus reply (0.4); coordinate service of reply (0.1); review and analyze notice of agenda for March 7 (0.1); file same (0.2); coordinate service of hearing notice (0.1); prepare daily docket update (0.4).	1.70
Heasley, Julia	Rstr	Associate	03/06/23	705	Revise works in process tracker (0.5); correspond with I. Blumberg and A. Page re chambers materials (0.2); draft docket update summary for circulation with PW team, Company, PJT, and A&M (0.3).	1.00
Blumberg, Irene	Rstr	Associate	03/06/23	705	Review and analyze March 7 hearing agenda (0.3); correspond with J. Heasley re same (0.2); correspond with L. Luo re case management order (0.1); revise matter coordination notes (1.0).	1.60
Hossain, Julia	Rstr	Paralegal	03/07/23	705	Coordinate listen-only hearing line (0.3); prepare daily docket update (0.3).	0.60
Britton, Robert	Rstr	Partner	03/07/23	705	Partially attend conference with I. Blumberg, PW team re work in process.	0.50
Heasley, Julia	Rstr	Associate	03/07/23	705	Coordinate logistics for hearing (0.4); revise works in process tracker (0.8); correspond with I. Blumberg, PW team re same (0.4); conference with I. Blumberg and PW team re works in process (0.7); draft docket summary for circulation with PW, Company, PJT, and A&M (0.1).	2.40
Luo, Lara	Rstr	Associate	03/07/23	705	Conference with I. Blumberg, PW team re works in process (0.7); correspond with same re same (0.1).	0.80
Eaton, Alice	Rstr	Partner	03/07/23	705	Partially attend work in process meeting with I. Blumberg, PW team.	0.30
Page, Alana	Rstr	Associate	03/07/23	705	Review and revise work in process list (0.3); partially attend work in process meeting with R. Britton, PW team (0.6); prepare for same (0.4).	1.30
Blumberg, Irene	Rstr	Associate	03/07/23	705	Review and revise work in process list (0.6); correspond with J. Heasley re same (0.2); attend work in process meeting with R. Britton, PW team (0.7).	1.50

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Name	Dept	Title	Date	Task	Description	Hours
Luo, Lara	Rstr	Associate	03/08/23	705	Correspond with Blumberg, PW team re works in process.	0.10
Britton, Robert	Rstr	Partner	03/08/23	705	Correspond with P. Basta re administrative issues (0.4); correspond with W. Clareman re workstreams (0.2).	0.60
Hossain, Julia	Rstr	Paralegal	03/08/23	705	Order hearing transcript (0.2); prepare daily docket update (0.1); add exhibit pages to pleading (0.3).	0.60
Page, Alana	Rstr	Associate	03/08/23	705	Correspond with R. Britton re workstream allocation (0.2); correspond with S. Baham and V. Robinson re same (0.2); correspond with S. Baham re same (0.2).	0.60
Hossain, Julia	Rstr	Paralegal	03/09/23	705	Revise CNO to prepare for filing (0.1); file omnibus CNO (0.3); coordinate service of same (0.1); prepare daily docket update (0.3).	0.80
Heasley, Julia	Rstr	Associate	03/09/23	705	Update works in process tracker (0.2); correspond with A. Page and Conference Reservations re hearing logistics (0.3); draft docket summary for circulation to PW, Company, PJT, and A&M teams (0.2).	0.70
Luo, Lara	Rstr	Associate	03/09/23	705	Correspond with I. Blumberg, PW team re various works in process.	0.10
Heasley, Julia	Rstr	Associate	03/10/23	705	Correspond with A. Pereyra re hearing logistics (0.1); draft docket update summary for circulation to PW, Company, PJT, and A&M (0.1).	0.20
Hossain, Julia	Rstr	Paralegal	03/10/23	705	Prepare daily docket update (0.3); file declaration (0.3); coordinate service of same (0.1).	0.70
Luo, Lara	Rstr	Associate	03/10/23	705	Correspond with I. Blumberg and PW team re works in process.	0.40
Luo, Lara	Rstr	Associate	03/11/23	705	Correspond with I. Blumberg and PW team re various works in process.	0.20
Britton, Robert	Rstr	Partner	03/11/23	705	Conference with A. Kidd (Revlon) re next steps in case strategy.	0.50
Hossain, Julia	Rstr	Paralegal	03/13/23	705	Prepare daily docket update.	0.20
Melvin, Marguerite	Corp	Paralegal	03/13/23	705	Download and save the March 7, 2023 Revlon hearing transcript (0.1); correspond with Blumberg, PW team re same (0.1).	0.20
Heasley, Julia	Rstr	Associate	03/13/23	705	Circulate works in process tracker to I. Blumberg and PW associate team for comment (0.1); correspond with same re same (0.1); revise same (0.2); circulate docket update to PW, Company, PJT, and A&M (0.1); correspond with A. Page re hearing logistics (0.1).	0.60
Luo, Lara	Rstr	Associate	03/13/23	705	Revise work in process tracker.	0.50
Heasley, Julia	Rstr	Associate	03/14/23	705	Conference with L. Luo and PW team re works in process.	0.60
Luo, Lara	Rstr	Associate	03/14/23	705	Conference with I. Blumberg and PW team re works in process (0.6); correspond with same re same (0.2).	0.80
Hossain, Julia	Rstr	Paralegal	03/14/23	705	Prepare daily docket update.	0.30

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Name	Dept	Title	Date	Task	Description	Hours
Britton, Robert	Rstr	Partner	03/14/23	705	Partially attend work in process meeting with Blumberg, PW team.	0.60
Page, Alana	Rstr	Associate	03/14/23	705	Conference with I. Blumberg, PW team re works in progress.	0.80
Rahnama, Omid	Rstr	Associate	03/14/23	705	Partially attend weekly works in progress meeting with I. Blumberg and PW team.	0.30
Mitchell, Sean A.	Rstr	Partner	03/14/23	705	Partially attend conference with L. Luo, PW team re works in process.	0.50
Blumberg, Irene	Rstr	Associate	03/14/23	705	Review and revise work in process list (0.5); prepare for work in process meeting (0.3); attend same with L. Luo, PW team (0.8); revise matter coordination notes (1.1).	2.70
Hossain, Julia	Rstr	Paralegal	03/15/23	705	Prepare daily docket update.	0.30
Luo, Lara	Rstr	Associate	03/15/23	705	Correspond with I. Blumberg, PW team re various works in process.	0.10
Heasley, Julia	Rstr	Associate	03/15/23	705	Draft docket update (0.2); circulate same to PW, Company, PJT, A&M (0.1).	0.30
Page, Alana	Rstr	Associate	03/16/23	705	Correspond with M. Melvin, J. Hossain re upcoming filings.	0.30
Heasley, Julia	Rstr	Associate	03/16/23	705	Revise docket summary (0.1); circulate same to PW, Company, PJT, and A&M (0.1).	0.20
Hossain, Julia	Rstr	Paralegal	03/16/23	705	Prepare daily docket update.	0.30
Blumberg, Irene	Rstr	Associate	03/16/23	705	Revise case coordination notes.	0.90
Heasley, Julia	Rstr	Associate	03/17/23	705	Prepare docket update (0.1); circulate same to PW, Company, PJT, and A&M (0.1).	0.20
Luo, Lara	Rstr	Associate	03/17/23	705	Correspond with I. Blumberg, PW team re various works in process.	0.20
Britton, Robert	Rstr	Partner	03/17/23	705	Conference with A. Kidd re updates.	0.50
Hossain, Julia	Rstr	Paralegal	03/17/23	705	Prepare daily docket update.	0.80
Heasley, Julia	Rstr	Associate	03/20/23	705	Coordinate works in process meeting (0.1); revise works in process tracker (0.3); revise docket summary (0.1); circulate same to PW, Company, PJT, and A&M (0.1).	0.60
Hossain, Julia	Rstr	Paralegal	03/20/23	705	Prepare daily docket update.	0.30
Hossain, Julia	Rstr	Paralegal	03/21/23	705	Prepare daily docket update (0.2); save docket pleadings onto iManage (0.3).	0.50
Heasley, Julia	Rstr	Associate	03/21/23	705	Revise works in process tracker (0.6); correspond with G. Fragosso (A&M) re same (0.1); conference with I. Blumberg and PW team re same (0.7); draft hearing agenda (0.1); draft docket update for circulation to PW, Company, PJT, and A&M (0.2); correspond with I. Blumberg and PW team re case management procedures (0.1).	1.80
Britton, Robert	Rstr	Partner	03/21/23	705	Attend work in process meeting with I. Blumberg, PW team.	0.70
Luo, Lara	Rstr	Associate	03/21/23	705	Conference with I. Blumberg, PW team re works in process (0.7); revise work in process tracker (0.3).	1.00

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Name	Dept	Title	Date	Task	Description	Hours
Page, Alana	Rstr	Associate	03/21/23	705	Revise work in process list (0.2); attend weekly work in process meeting with I. Blumberg, PW team (0.7).	0.90
Keeton, Douglas	Rstr	Associate	03/21/23	705	Partially attend meeting with I. Blumberg, PW team regarding case status.	0.50
Blumberg, Irene	Rstr	Associate	03/21/23	705	Review and revise work in process list (0.6); prepare for work in process meeting (0.3); attend work in process meeting with R. Britton, PW team (0.7); revise matter coordination notes (1.1).	2.70
Mitchell, Sean A.	Rstr	Partner	03/21/23	705	Attend work in process meeting with I. Blumberg, PW team.	0.70
Heasley, Julia	Rstr	Associate	03/22/23	705	Revise works in process tracker (0.1); prepare docket update for circulation with PW, Company, PJT, and A&M (0.1).	0.20
Hossain, Julia	Rstr	Paralegal	03/22/23	705	Prepare daily docket update.	0.30
Heasley, Julia	Rstr	Associate	03/23/23	705	Revise works in process tracker per updated objection deadlines (0.2); draft docket summary for circulation to PW, Company, PJT, and A&M (0.3).	0.50
Hossain, Julia	Rstr	Paralegal	03/23/23	705	Prepare daily docket update.	0.40
Robinson, Vida	Rstr	Associate	03/23/23	705	Correspond with L. Luo re MORS.	0.20
Luo, Lara	Rstr	Associate	03/23/23	705	Correspond with I. Blumberg, PW team re various works in process.	0.40
Eaton, Alice	Rstr	Partner	03/23/23	705	Teleconference with S. Zelin re status update (0.2); teleconference with A. Kidd (Revlon) re same (0.2).	0.40
Robinson, Vida	Rstr	Associate	03/24/23	705	Correspond with J. Ellis re MORS (0.2); review and analyze same (1.1); conference with M. Melvin re MOR review (0.4).	1.70
Hossain, Julia	Rstr	Paralegal	03/24/23	705	Prepare daily docket update.	0.20
Heasley, Julia	Rstr	Associate	03/24/23	705	Correspond with D. Kopf re case calendar (0.1); update works in process tracker (0.1); prepare docket update for circulation to PW, Company, PJT, and A&M (0.1).	0.30
Melvin, Marguerite	Corp	Paralegal	03/24/23	705	Teleconference with V. Robinson re fact checking draft December and January monthly operating reports (MORS) for all Revlon debtors (0.3); review and analyze each of the 51 December, 2022 MORS (3.3).	3.60
Page, Alana	Rstr	Associate	03/24/23	705	Review and analyze workstream allocations and case developments.	0.20
Manly, Jordyn R	Lit	Associate	03/25/23	705	Conduct legal research re MDL proceedings.	0.60
Robinson, Vida	Rstr	Associate	03/26/23	705	Review and analyze December MORS.	1.50
Hossain, Julia	Rstr	Paralegal	03/27/23	705	Prepare notice of cancellation of hearing (0.3); prepare amended notice of confirmation hearing (0.4); incorporate comments into amended notice (0.2); prepare agenda for hearing on 4/3 (0.9); prepare daily docket update (0.5).	2.30

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Date: 04/28/2023

Name	Dept	Title	Date	Task	Description	Hours
Heasley, Julia	Rstr	Associate	03/27/23	705	Revise calendars per updated dates (0.1); correspond with L. Luo re MORs research (0.1); correspond with L. Luo re workstreams (0.2); correspond with I. Blumberg re same (0.2); coordinate hearing logistics (0.1); review and analyze hearing agenda (0.1); draft docket update for circulation to PW, Company, PJT, and A&M (0.2); revise works in process tracker (0.4).	1.40
Robinson, Vida	Rstr	Associate	03/27/23	705	Correspond with L. Luo re MORs (0.1); review and analyze MORs (0.6).	0.70
Melvin, Marguerite	Corp	Paralegal	03/27/23	705	Review and compare December 2022 Monthly Operating Reports against information in the MOR General Notes and Attachments for accuracy, per V. Robinson.	2.80
Page, Alana	Rstr	Associate	03/27/23	705	Correspond with M. Melvin and J. Hossain re binders for Chambers (0.3); prepare agenda for confirmation hearing (0.2).	0.50
Luo, Lara	Rstr	Associate	03/27/23	705	Correspond with Blumberg, PW team re various outstanding works in process.	0.40
Heasley, Julia	Rstr	Associate	03/28/23	705	Conference with I. Blumberg, PW team re works in process (0.7); conference with A. Page re same (0.4); revise tracker re same (0.2); correspond with L. Luo and PW team re revised hearing date (0.1); prepare hearing binders (1.7); prepare docket summary for circulation to PW, Company, PJT, and A&M (0.1).	3.20
Britton, Robert	Rstr	Partner	03/28/23	705	Attend work in process meeting with Blumberg, PW team (0.7); conference with Basta re status of workstreams (0.3); correspond with Blumberg and Luo re same (0.5); correspond with Eaton re status and next steps (0.5); review and analyze cancellation notice (0.3); correspond with Blumberg re same (0.1).	2.40
Hossain, Julia	Rstr	Paralegal	03/28/23	705	Update notice of cancellation and amended confirmation notice (0.3); correspond with Blumberg, PW team re same (0.1); file notice of cancellation and amended confirmation notice (0.5); coordinate service of same (0.2); prepare agenda draft for 4/3/23 hearing (0.7); prepare hearing binder index (1.3); pull pleadings for binder (1.6); incorporate comments into hearing binder index (2.5).	7.20
Robinson, Vida	Rstr	Associate	03/28/23	705	Review and analyze MORs (1.4); review and analyze 426 report (0.5); correspond with L. Luo re same (0.2).	2.10
Melvin, Marguerite	Corp	Paralegal	03/28/23	705	Review and compare fifty-one Revlon monthly operating reports for January 2023 against information in the MOR Global Notes for accuracy, per V. Robinson.	3.00

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Date: 04/28/2023

Name	Dept	Title	Date	Task	Description	Hours
Page, Alana	Rstr	Associate	03/28/23	705	Attend weekly work in process meeting with R. Britton, PW team (0.7); conference with J. Heasley re confirmation workstreams (0.4); revise agenda for confirmation hearing (0.5); correspond with I. Blumberg re binders for Chambers (0.4).	2.00
Luo, Lara	Rstr	Associate	03/28/23	705	Conference with Blumberg, PW team re works in process.	0.70
Blumberg, Irene	Rstr	Associate	03/28/23	705	Review and revise WIP list (0.4); prepare for meeting (0.3); attend WIP meeting with R. Britton, PW team (0.7); revise matter coordination notes (0.3).	1.70
Basta, Paul M.	Rstr	Partner	03/28/23	705	Conference with R. Britton re status of workstreams.	0.30
Luo, Lara	Rstr	Associate	03/29/23	705	Review and analyze draft MORs and Rule 2015.3 report.	0.80
Hossain, Julia	Rstr	Paralegal	03/29/23	705	Prepare shipping label for binder delivery to court (0.1); request transcript precedent for A. Page (0.5); file notice of hearing and monthly fee statement (0.5); coordinate service or same (0.1); prepare daily docket update (0.4).	1.60
Heasley, Julia	Rstr	Associate	03/29/23	705	Coordinate binders for Chambers and for R. Britton (0.9); coordinate delivery of same with G. Williams and Mailroom (0.7); draft notice of rescheduled hearing (0.2); correspond with I. Blumberg, PW team re same (0.2); coordinate hearing logistics (0.4); prepare docket summary for circulation to PW, Company, PJT, and A&M (0.2).	2.60
Britton, Robert	Rstr	Partner	03/29/23	705	Review works in process tracker.	0.30
Robinson, Vida	Rstr	Associate	03/29/23	705	Correspond with J. Heasley re binders for chambers (0.2); coordinate preparation of same (0.4); review and analyze final MORs (0.2); correspond with R. Britton re same (0.1).	0.90
Heasley, Julia	Rstr	Associate	03/30/23	705	Coordinate binder delivery for R. Britton with mailroom (0.2); coordinate hearing logistics (0.5).	0.70
Page, Alana	Rstr	Associate	03/30/23	705	Prepare confirmation hearing agenda (1.3); correspond with R. Britton re same (0.2); share same with Chambers (0.1).	1.60
Hossain, Julia	Rstr	Paralegal	03/30/23	705	Prepare daily docket update.	0.40
Heasley, Julia	Rstr	Associate	03/31/23	705	Review and revise draft hearing agenda (1.9); correspond with I. Blumberg, PW team re same (0.1); coordinate hearing logistics with R. Li (0.2); draft correspondence to Chambers re confirmation pleadings (0.6); prepare docket summary for circulation to PW, Company, PJT, and A&M (0.3).	3.10

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Date: 04/28/2023

Name	Dept	Title	Date	Task	Description	Hours
Melvin, Marguerite	Corp	Paralegal	03/31/23	705	Coordinate filing of MORs (1.1); review and analyze with M. Voss, T. Hill and J. Han the e-filing process of the Monthly Operating Reports (0.5); review and e-file twelve December 2022 and twelve January 2023 Monthly Operating Reports (1.3); review and e-file Official Form 426 (0.3); coordinate service of all Monthly Operating Reports for December 2022 and January 2023, and the Periodic Report re Value (1.1); register multiple professionals for the April 3 2023 Zoom hearing (0.5).	4.80
Heasley, Julia	Rstr	Associate	04/01/23	705	Coordinate binders for confirmation hearing (1.2); quality check binders (0.5).	1.70
Heasley, Julia	Rstr	Associate	04/02/23	705	Draft correspondence to Chambers re Word version of filing (0.2); coordinate hearing binders (3.1); draft amended agenda (1.8); correspond with I. Blumberg and PW team re same (0.2).	5.30
Hossain, Julia	Rstr	Paralegal	04/02/23	705	Revise amended hearing agenda (1.4); file same and coordinate service (0.3).	1.70
Heasley, Julia	Rstr	Associate	04/03/23	705	Coordinate hearing logistics for confirmation hearing (2.0); revise works in process checklist (0.5); coordinate logistics for upcoming hearings (0.2).	2.70
Hossain, Julia	Rstr	Paralegal	04/03/23	705	Bridge hearing line for confirmation hearing (0.3); coordinate service of filings (0.2); prepare daily docket shell (0.5).	1.00
Blumberg, Irene	Rstr	Associate	04/03/23	705	Revise matter coordination notes for post-confirmation reallocations (1.1); correspond with R. Britton re same (0.3).	1.40
Page, Alana	Rstr	Associate	04/03/23	705	Prepare binders for confirmation hearing (1.0); coordinate logistics for confirmation hearing (0.9); review and revise work in progress tracker (0.3).	2.20
Robinson, Vida	Rstr	Associate	03/01/23	707	Research re bar date orders (1.8); research re voting procedures (1.7); correspond with L. Luo re same (0.3); teleconference with L. Luo, Kroll teams re late filed claims (0.4).	4.20
Britton, Robert	Rstr	Partner	03/01/23	707	Conference with hair straightener plaintiffs, L. Luo re bar date issues (0.5); correspond with P. Basta re same (0.3); correspond with S. Mitchell re same (0.5); conference with A. Eaton, PW team re hair relaxer objection (0.4); conference with A. Kidd (Revlon) re same (0.5); conference with A. Eaton, PW team, E. Vonnegut (DPW) re same (0.8); conference with L. Luo, Kroll team re late filed proofs of claim (0.4); review and analyze objections (0.6); correspond with J. Heasley re filings (0.3); review and analyze new filings (0.4); review and analyze straightener motions (0.4); correspond with S. Mitchell re hearing date (0.2).	5.30

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Name	Dept	Title	Date	Task	Description	Hours
Eaton, Alice	Rstr	Partner	03/01/23	707	Teleconference with E. Vonnegut (DPW) and R. Britton re hair relaxer objection (0.8); teleconference with R. Britton, PW team re hair relaxer objection (0.4); correspond with R. Britton re bar date issues (0.2); teleconference with A. Kidd re same (0.2); correspond with S. Mitchell re reply to objection (0.2); correspond with S. Mitchell re stipulation and next steps (0.3).	2.10
Heasley, Julia	Rstr	Associate	03/01/23	707	Correspond with S. Mitchell re draft objection to bar date extensions (0.2); revise same (0.1); draft hearing agenda re bar date extension motions (0.7); correspond with I. Blumberg, PW team re same (0.1); draft notice of adjournment re same (0.4); correspond with claimants' counsel, S. Mitchell, and paralegals re same (0.2); correspond with A. Eaton re copies of pleadings (0.1); correspond with L. Luo re bar date extension reply (0.2); draft same (1.8).	3.80
Luo, Lara	Rstr	Associate	03/01/23	707	Conference with counsel to hair straightening plaintiffs and R. Britton re stipulation (0.5); conference with E. Vonnegut (DPW), DPW team, and PW team re same (0.5); conference with I. Blumberg and PW team re same (0.5); conference with I. Blumberg and Kroll re processing of hair straightening claims (0.3); correspond with S. Mitchell and PW team re same (1.3); analyze issues re same (1.1); draft supplemental bar date order and notice (2.1); conduct research for precedent re same (3.5).	9.80
Basta, Paul M.	Rstr	Partner	03/01/23	707	Review and analyze hair straightening matters.	1.00
Blumberg, Irene	Rstr	Associate	03/01/23	707	Correspond with stakeholders re claims objection (0.6); review and analyze background re claim (0.2); correspond with T. Behnke re same (0.2).	1.00
Mitchell, Sean A.	Rstr	Partner	03/01/23	707	Draft bar date objection and further comments thereto (1.5); teleconference with hair relaxer claimants counsel re claims issues and related follow ups (1.5); teleconference with S. Massman, DPW team re claims issues (0.6); research in connection with claims and insurance issues (2.0).	5.60
Blumberg, Irene	Rstr	Associate	03/01/23	707	Teleconference with B. Silverberg (BR) re hair relaxer claims (0.2); correspond with L. Luo re same (0.1); correspond with R. Britton re extended bar date (0.2); correspond with L. Luo and V. Robinson re same (0.3).	0.80
Britton, Robert	Rstr	Partner	03/02/23	707	Revise bar date reply (0.9); conference with P. Basta re same (0.3); conference with Perelman re same (0.4); conference with A. Kidd re same (0.5); conference with S. Massman re same (0.4); conference with P. Basta, Freshfields re claims issues (0.5).	3.00

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Name	Dept	Title	Date	Task	Description	Hours
Luo, Lara	Rstr	Associate	03/02/23	707	Correspond with S. Mitchell re hair straightening claims (0.5); conference with G. Brunswick and Kroll re publication of bar date notice (0.9); conference with G. Brunswick and A. Page re hair straightening claims (0.3); conference with A. Orchowski, A. Page and Kroll team re same (0.8); analyze issues re supplemental bar date, voting of late claims, and notice (3.2); correspond with S. Mitchell and PW team re same (1.8); revise supplemental bar date order (1.4).	8.90
Heasley, Julia	Rstr	Associate	03/02/23	707	Draft reply to motions to extend bar date (0.9); correspond with S. Mitchell, L. Luo re same (0.1); teleconference with J. Delaney (W&L) re second omnibus claims objection inquiry (0.1); review and analyze same (0.2); correspond with I. Blumberg, A&M team re same (0.1); teleconference with J. Delaney re talc claimant inquiry (0.1); review and analyze same (0.1).	1.60
Robinson, Vida	Rstr	Associate	03/02/23	707	Research re bar date notices (0.5); correspond with R. Britton, PW team re same (0.2).	0.70
Page, Alana	Rstr	Associate	03/02/23	707	Review and analyze issues re custom proofs of claim (0.5); teleconference with G. Brunswick (Kroll), L. Luo re hair straightener claims (0.3); partially attend teleconference with L. Luo, PW team, and Kroll team re solicitation of hair straightener claims (0.4); review and analyze issues re same (0.5).	1.70
Basta, Paul M.	Rstr	Partner	03/02/23	707	Partially attend videoconference with D. Perelman (Revlon), A. Eaton, PW team re hair straightening updates.	0.50
Basta, Paul M.	Rstr	Partner	03/02/23	707	Conference with Freshfields, R. Britton, PW teams re claims issues (0.5); review and analyze materials re same (0.2); conference with R. Britton re bar date issues (0.3).	1.00
Eaton, Alice	Rstr	Partner	03/02/23	707	Conference with D. Perelman (Revlon), P. Basta, PW team re supplemental bar date (0.7); correspond with L. Luo re same (0.3).	1.00
Britton, Robert	Rstr	Partner	03/03/23	707	Conference with L. Luo re bar date order (0.4); teleconference with A. Eaton, R. Luskey re supplemental bar date and next steps (0.7); review and analyze research re claims issues (0.3); review and analyze Kroll input re solicitation issues (0.2); conference with R. Luskey re hair straightener complaints (0.4).	2.00
Heasley, Julia	Rstr	Associate	03/03/23	707	Partially attend teleconference with I. Blumberg, PW, and A&M re claims reconciliation issues (0.2); correspond with S. Mitchell re reply to bar date extension motion (0.1); research re same (1.5); revise draft objection (1.2); correspond with L. Luo re same (0.1); correspond with S. Mitchell re same (0.3); revise same (0.7).	4.10

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Name	Dept	Title	Date	Task	Description	Hours
Luskey, Randy	Lit	Partner	03/03/23	707	Review and analyze hair straightener complaints (0.3); conference with R. Britton re same (0.4); teleconference with A. Eaton, R. Britton re same (0.7).	1.40
Luo, Lara	Rstr	Associate	03/03/23	707	Conference with T. Behnke and I. Blumberg re claims reconciliation (0.5); correspond with I. Blumberg re same (0.3); conference with E. Vonnegut, DPW team re hair straightening claims (0.5); conference with R. Britton re bar date order (0.4); conference with Kroll team re same (0.2); revise supplemental bar date order (0.7); correspond with S. Mitchell, PW team, and Kroll re same (1.2); correspond with A. Page re revised proof of claim form (0.5); analyze same (0.5); review and analyze research re hair straightening claims issues (1.4); revise summary of same (0.7); analyze issues re hair straightening claims, voting late claims, and notice (1.2); analyze proposed notice of plan (0.6); correspond with A. Eaton and PW team re same (0.8).	9.50
Eaton, Alice	Rstr	Partner	03/03/23	707	Correspond with S. Mitchell re supplemental bar date and next steps (0.3); teleconference with R. Britton, R. Luskey, re same (0.7); review and analyze notice and draft order for supplemental bar date (0.5); teleconference with A. Kidd re same (0.2).	1.70
Robinson, Vida	Rstr	Associate	03/03/23	707	Conduct research re voting requirements and bar date orders (3.4); draft memo re same (1.7); correspond with L. Luo re same (1.2); correspond with L. Luo re same (0.2); draft section of motion re same (1.3).	7.80
Page, Alana	Rstr	Associate	03/03/23	707	Conduct legal research re custom proof of claim forms in mass tort cases (1.6); prepare summary of same for R. Britton (0.9); draft custom proof of claim form (2.5); correspond with S. Mitchell re custom POC (0.2); draft argument for response to hair straightener claimants' motions to extend the bar date (0.5).	5.70
Blumberg, Irene	Rstr	Associate	03/03/23	707	Conference with T. Behnke, L. Luo re claims reconciliation (0.5); correspond with S. Mitchell re hair straightener issues (0.1).	0.60
Atkins, Robert	Lit	Partner	03/03/23	707	Correspond with R. Britton re hair straightener claims (0.3); review and analyze materials re same (0.3).	0.60
Mitchell, Sean A.	Rstr	Partner	03/03/23	707	Teleconference with S. Massman, DPW team re bar date issues (0.8); review and revise reply to bar date extension motions (1.7); research re same (0.4); review and analyze bar date order and various forms (2.0); teleconference with R. Luskey, PW team re same (0.7).	5.60

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Name	Dept	Title	Date	Task	Description	Hours
Britton, Robert	Rstr	Partner	03/04/23	707	Review and analyze proof of claim form (0.4); review and analyze bar date order (0.4); correspond with P. Basta re status of same (0.1); conference with A. Kidd re same (0.3); correspond with S. Mitchell re next steps re same (0.3); correspond with L. Luo re same (0.2); correspond with S. Mitchell and PW team re reply and related pleadings (0.5).	2.20
Heasley, Julia	Rstr	Associate	03/04/23	707	Revise hair straightener statement re motions to extend bar date (2.8); research and analyze case law re bar date social media noticing programs and constitutional sufficiency (1.0); correspond with S. Mitchell and L. Luo re same (0.1); revise statement re same (0.6); conduct research re discharge and constitutional sufficiency of notice (0.2).	4.70
Paterson, Paul	Lit	Counsel	03/04/23	707	Correspond with S. Mitchell and PW team re hair straightening objection and analysis.	0.10
Luo, Lara	Rstr	Associate	03/04/23	707	Conference with A. Orchowski (Kroll) re hair straightening claims and voting (0.4); revise hair straightening bar date order (0.8); revise reply re same (4.0); correspond with J. Heasley, PW team, Kroll, DPW team, and Company re same (1.6); analyze research and issues re same (1.1).	7.90
Page, Alana	Rstr	Associate	03/04/23	707	Revise custom proof of claim form (0.5); correspond with B. Atkins and PW team re same (0.2); correspond with Kroll team re same (0.2); revise custom proof of claim form (0.3).	1.20
Eaton, Alice	Rstr	Partner	03/04/23	707	Correspond with S. Mitchell, PW team re brief and research for hair relaxer reply (0.8); correspond with R. Britton re same (0.7).	1.50
Mitchell, Sean A.	Rstr	Partner	03/04/23	707	Draft reply to bar date extension motions (2.8); review and analyze caselaw re same (0.7); review and comment on draft bar date order (0.8); review precedent in connection therewith (0.7).	5.00
Luskey, Randy	Lit	Partner	03/05/23	707	Review and analyze hair straightening POC form (0.3); correspond with R. Britton re same (0.1).	0.40
Heasley, Julia	Rstr	Associate	03/05/23	707	Revise draft reply to bar date extension motions (2.5); correspond with L. Luo, PW team, Company re same (0.3); compile documents re same for R. Britton's review and analysis (1.3); revise draft reply (0.7); conduct research re notice requirements (0.3).	5.10
Muscat, Shawn	Lit	Paralegal	03/05/23	707	Proofread upcoming filings re supplemental bar date for PW associates team (1.3); review and analyze MDL litigation filings re hair straightening claims (2.4); prepare binders of documents for upcoming hearing on supplemental bar date (1.3).	5.00
Paterson, Paul	Lit	Counsel	03/05/23	707	Teleconference with R. Poston re hair relaxer objection (0.3); correspond with S. Mitchell, S. Muscat, and PW team re same (0.2); review and analyze news articles re same (0.1); correspond with R. Poston re claimant analysis (0.2).	0.80

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Name	Dept	Title	Date	Task	Description	Hours
Luo, Lara	Rstr	Associate	03/05/23	707	Conference with R. Britton, Revlon, and PW team re hair straightening notice (1.0); revise hair straightening bar date order (1.2); correspond with R. Britton, PW team, DPW team, Kroll, and Company re same (1.5); analyze issues re supplemental bar date (0.3) conduct research re same (0.7); revise reply re same (0.8).	5.50
Britton, Robert	Rstr	Partner	03/05/23	707	Conference with D. Perelman (Revlon) re hair straightening bar date notice issues (1.1); correspond with L. Luo re same (0.2); correspond with A. Eaton re response to hair straightening motions (0.5); correspond with P. Basta re same (0.3); conference with A. Kidd re same (0.3); conference with S. Massman (DPW) re same (0.4); revise reply to same (1.6); correspond with J. Heasley re same (0.6); revise order re same (0.5); prepare for argument re same (0.2).	5.70
Poston, RaCia D	Lit	Associate	03/05/23	707	Review and analyze filings in MDL litigation re hair straightening issues (6.1); correspond with P. Paterson, S. Mitchell, and PW team re same (0.4); teleconference with P. Paterson re same (0.3).	6.80
Eaton, Alice	Rstr	Partner	03/05/23	707	Teleconference with E. Vonnegut, DPW team re supplemental bar date (0.8); correspond with A. Kidd, P. Basta, and R. Britton re same (0.8); review and analyze materials from R. Britton and PW team re research and supplemental bar date (0.2); review and analyze custom proof of claim form (0.8); review and analyze comments to reply brief (0.5); teleconference with S. Fier (Revlon), Company re supplemental bar date next steps (0.8).	3.90
Basta, Paul M.	Rstr	Partner	03/05/23	707	Review and analyze update regarding hair straightening issues.	2.00
Page, Alana	Rstr	Associate	03/05/23	707	Correspond with DPW team re hair straightener POC form (0.2); review and revise same (1.2); correspond with Kroll re online claims portal (0.1); conduct legal research re custom proof of claims forms (0.8).	2.30
Mitchell, Sean A.	Rstr	Partner	03/05/23	707	Teleconference with S. Fier, client re claims issues (0.9); teleconference with D. Kratzer, DPW team re claims issues (0.7); review and comment on reply papers and bar date order (3.5).	5.10

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Name	Dept	Title	Date	Task	Description	Hours
Heasley, Julia	Rstr	Associate	03/06/23	707	Revise draft reply to bar date extension motions (0.8); proofread same (0.5); prepare same for filing (0.2); correspond with S. Mitchell, PW team re same (0.3); correspond with Mailroom and Reprographics re updated binders for same (0.3); research re constitutional discharge and notice requirements (0.4); review and analyze number of named plaintiffs in each pleading (0.3); correspond with R. Britton re same and bar date order provisions (0.4); revise hearing agenda for hair straightening motions (0.7); correspond with PW team re same (0.2); research re class action proof of claim issues (1.7); summarize same (0.3); organize research (0.2); research and analyze group proof of claim issues (1.9).	8.20
Luskey, Randy	Lit	Partner	03/06/23	707	Teleconference with S. Fier, P. Basta, client team re hair straightener litigation and MDL (0.7); correspond with PW team re insurance issues and next steps (0.3).	1.00
Paterson, Paul	Lit	Counsel	03/06/23	707	Correspond with W. Clareman re hair straightening claims (0.3); review and analyze draft pleadings re same (0.3); teleconference with A. Eaton re confirmation (0.3).	0.90
Britton, Robert	Rstr	Partner	03/06/23	707	Research re claim issues (1.6); correspond with S. Mitchell re same (0.3); correspond with L. Luo re same (0.5); revise reply to hair straightening motions (1.4); prepare for hearing on same (2.5); teleconference with P. Basta re hearing (0.4); conference with A. Kidd (Revlon), A. Eaton, P. Basta re same (0.8); conference with plaintiffs re same (0.5).	8.00
Luo, Lara	Rstr	Associate	03/06/23	707	Revise supplemental bar date order (1.8); revise POC form (1.0); correspond with Kroll re same and noticing plan (1.8); correspond with R. Britton, DPW team, PW team, and Company re same (1.7); coordinate filing of same (0.6).	6.90
Muscat, Shawn	Lit	Paralegal	03/06/23	707	Assist PW associate team with preparing to file response to hair straightener claimants' bar date motion.	1.00
Ammari, Kamil R.	Lit	Associate	03/06/23	707	Confer with W. Clareman re issue in connection with hair straightening proof of claim form (0.3); research relevant materials re same (0.9); review and analyze materials re same (0.5).	1.70
Rahnama, Omid	Rstr	Associate	03/06/23	707	Correspond with S. Mitchell and Chambers re hair straightening issues.	0.50
Eaton, Alice	Rstr	Partner	03/06/23	707	Review and analyze briefing for reply to motions to extend bar date (0.6); research materials re supplemental bar date (0.2); review and analyze materials re proof of claim (0.2); correspond with R. Britton re same (0.3); partially attend teleconference with A. Kidd, P. Basta, and R. Britton re supplemental bar date publicity (0.5).	1.80

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Name	Dept	Title	Date	Task	Description	Hours
Sacksteder, Elizabeth M	Lit	Partner	03/06/23	707	Teleconference with P. Basta re bar date for hair relaxer claims (0.1); teleconference with client re considerations for managing claims (0.6); correspond with W. Clareman re HIPAA issue (0.1).	0.80
Blumberg, Irene	Rstr	Associate	03/06/23	707	Correspond with F. Yudkin re claims objection (0.2); analyze issues re same (0.3); correspond with Kroll re same (0.2).	0.70
Basta, Paul M.	Rstr	Partner	03/06/23	707	Teleconference with A. Kidd, R. Britton, PW team re supplemental bar date hearing (0.8); teleconference with R. Britton re same (0.4); teleconference with R. Luskey, S. Fier, client re hair straightening issues (0.7); review and analyze materials re same (0.1).	2.00
Page, Alana	Rstr	Associate	03/06/23	707	Correspond with L. Luo re POC form (0.3); conduct legal research re same (1.9); conduct legal research re supplemental bar date order (0.5); revise POC form (0.2); teleconference with S. Massman re same (0.1); correspond with A. Kidd (Revlon), Revlon team re reply to bar date extension motions (0.2); correspond with A. Orchowski (Kroll) re online POC portal (0.4).	3.60
Atkins, Robert	Lit	Partner	03/06/23	707	Teleconference with Britton, PW team re product liability claims (0.5); review and analyze complaints and MDL orders (1.6).	2.10
Mitchell, Sean A.	Rstr	Partner	03/06/23	707	Prepare for hearing on supplemental bar date (1.5); research in connection with bar date issues (1.1); review precedents re same (0.4); review and comment on draft reply (1.0).	4.00
Mitchell, Sean A.	Rstr	Partner	03/06/23	707	Correspond with Fier re claims issues (0.9); conference with hair relaxer counsel re claims issues (1.0).	1.90
Clareman, William	Lit	Partner	03/06/23	707	Review and analyze issues re hair straightener claims.	0.30
Sasso, Emily G	Lit	Associate	03/07/23	707	Conduct research re hair relaxer claim (2.7); draft memo re same (2.0).	4.70
Clareman, William	Lit	Partner	03/07/23	707	Review and analyze issues re hair straightening POC form (0.9); teleconference with P. Paterson, PW team re same (0.2).	1.10
Ammari, Kamil R.	Lit	Associate	03/07/23	707	Correspond with E. Sasso and PW team re hair straightening issues.	0.50

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Name	Dept	Title	Date	Task	Description	Hours
Eaton, Alice	Rstr	Partner	03/07/23	707	Teleconference with P. Basta re preparation for hair straightening hearing (0.8); correspond with R. Britton and PW team re same (0.7); attend update teleconference with A. Kidd, P. Basta re hearing preparation (0.4); correspond with R. Britton re supplemental bar date hearing and notice (0.2); teleconference with A. Kidd re same (0.3); teleconference with Raines, Cohen Ziffer re hair relaxer questions (0.5); review and analyze bar date order (0.4); review and analyze various materials from team re research on hair relaxer motions (0.3); review and analyze various materials re supplemental notice and bar date and updates from Kroll (0.5).	4.10
Heasley, Julia	Rstr	Associate	03/07/23	707	Correspond with L. Luo and E. Rocher re bar date order and individual proofs of claim (0.3); correspond with L. Luo and PW team re case law re bar date extension (0.7); review and analyze Court website re claims register (0.1).	1.10
Luskey, Randy	Lit	Partner	03/07/23	707	Review and analyze hair straightening issues (0.2); conference with P. Paterson and PW team re same (0.2); review and analyze new transfer orders to MDL (0.3); conference with Sacksteder re next steps in hair straightener litigation (0.5).	1.20
Britton, Robert	Rstr	Partner	03/07/23	707	Prepare for bar date motion hearing (2.3); revise bar date order (0.6); correspond with L. Luo re same (0.4); conference with A. Kidd re bar date hearing (0.4); conference with D. Perelman (Revlon) re noticing issues (0.5); conference with S. Massman (DPW) re bar date order (0.2).	4.40
Paterson, Paul	Lit	Counsel	03/07/23	707	Correspond with R. Britton re hair relaxer claims (0.4); teleconference with W. Clareman, PW team re same (0.2); review and analyze documents re same (0.3).	0.90
Luo, Lara	Rstr	Associate	03/07/23	707	Conference with Raines, Cohen Ziffer re claims issues (0.5); correspond with Mitchell re same (0.3); revise bar date order per court comments (1.0); correspond with Britton, PW team, DPW, Company re same (0.7); correspond with Page re revisions to POC form (0.4); correspond with Johnson, Kroll team re court ordered relief re bar date (1.0).	3.90
Sacksteder, Elizabeth M	Lit	Partner	03/07/23	707	Teleconference with Atkins re resolution of relaxer claims (0.5); review and analyze NIH study findings (0.2); correspond with Atkins and Luskey re liquidation of relaxer claims (0.1).	0.80
Mitchell, Sean A.	Rstr	Partner	03/07/23	707	Prepare for hair relaxer hearing.	1.30
Page, Alana	Rstr	Associate	03/07/23	707	Prepare for hearing on supplemental bar date order (0.5); review and analyze custom proof of claim forms in mass tort cases (0.3); revise proof of claim form based on comments at hearing (0.8); conduct research re bar date order (1.2); share revised bar date order with Chambers (0.2).	3.00

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Name	Dept	Title	Date	Task	Description	Hours
Blumberg, Irene	Rstr	Associate	03/07/23	707	Correspond with creditor re claim inquiry (0.2); correspond with stakeholder re same (0.3); correspond with claimant re same (0.2).	0.70
Atkins, Robert	Lit	Partner	03/07/23	707	Confer with R. Luskey and E. Sacksteder re product liability claims (0.5); research re same (0.9).	1.40
Blumberg, Irene	Rstr	Associate	03/07/23	707	Correspond with T. Behnke re new claims per extended bar date.	0.20
Basta, Paul M.	Rstr	Partner	03/07/23	707	Conference with Eaton re hair straightening hearing (0.8); conference with Kidd, Eaton re same (0.4); correspond with Mitchell, PW team re insurance in connection with hair straightening motions (0.2); correspond with R. Luskey, PW team re hair straightening noticing strategy and MDL (0.3).	1.70
Luskey, Randy	Lit	Partner	03/08/23	707	Correspond with Britton, PW team re MDL (0.3); conference with P. Basta and PW team re MDL and claims process (0.6).	0.90
Heasley, Julia	Rstr	Associate	03/08/23	707	Teleconference with M. Misquith (MS) re second omnibus claims objection (0.2); correspond with other claimants re same (0.2); revise tracker of responses re same (0.2).	0.60
Britton, Robert	Rstr	Partner	03/08/23	707	Conference with S. Fier (Revlon) re BMS (0.5); conference with S. Mitchell re same (0.4); correspond with L. Luo re same (0.2); review and revise noticing documents (0.6).	1.70
Luo, Lara	Rstr	Associate	03/08/23	707	Conference with T. Behnke, S. Mitchell re hair straightening claims.	0.40
Sacksteder, Elizabeth M	Lit	Partner	03/08/23	707	Partially attend conference with Luskey, PW team re strategy for hair relaxer claims reconciliation.	0.40
Choi, Jessica I.	Rstr	Associate	03/08/23	707	Review and analyze hair relaxer claims procedures.	0.60
Robinson, Vida	Rstr	Associate	03/08/23	707	Correspond with S. Mitchell and J. Choi re claims reconciliation (0.7); analyze issues re same (0.6).	1.30
Blumberg, Irene	Rstr	Associate	03/08/23	707	Correspond with J. Heasley re claimant outreach.	0.10
Atkins, Robert	Lit	Partner	03/08/23	707	Confer with Luskey, PW team re product liability claims (1.0); review and analyze materials re same (0.7).	1.70
Paterson, Paul	Lit	Counsel	03/09/23	707	Conference with W. Clareman and E. Sacksteder re hair relaxer and insurance issues.	0.50
Luskey, Randy	Lit	Partner	03/09/23	707	Conference with A. Kidd (Revlon) re hair straightening issues (0.5); review and revise PR plan and FAQ (0.4); correspond with R. Britton, PW team re hair straightening MDL status and strategy (0.3).	1.20
Mitchell, Sean A.	Rstr	Partner	03/09/23	707	Correspond with Luo, PW team re hair straightening issues.	0.60
Atkins, Robert	Lit	Partner	03/09/23	707	Teleconference with D. Cole re MDL (0.6); correspond with Britton, PW team re bankruptcy filings with respect to MDL (1.2); teleconference with Fier, Revlon re product liability claims (0.5).	2.30

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Name	Dept	Title	Date	Task	Description	Hours
Luo, Lara	Rstr	Associate	03/09/23	707	Conference with T. Behnke (A&M), Kroll team re processing of hair straightening claims (0.6); conference with R. Britton, Fox Swibel re hair straightening claims (0.4); conference with R. Britton, DPW team re same (0.8); correspond with S. Mitchell re same (0.4); correspond with Finegan, Kroll team re noticing and hair straightening claims website (0.8); analyze issues re same (0.5); analyze issues and precedent re hair straightening settlement (1.0).	4.50
Eaton, Alice	Rstr	Partner	03/09/23	707	Correspond with L. Luo re hair straightener claims, notices and ballots.	0.60
Britton, Robert	Rstr	Partner	03/09/23	707	Conference with L. Luo, E. Vonnegut (DPW) re hair straightening settlement proposal (0.8); conference with Fox Swibel counsel, L. Luo re same (0.4); correspond with L. Luo, Kroll team re claims and noticing issues (0.9); analyze same (0.3); correspond with L. Luo re claims issues (0.2); correspond with R. Luskey re investigation of claims (0.2); correspond with L. Luo re BMS issues (0.2); meet with E. Sasso re hair straightening research issues (0.3).	3.30
Clareman, William	Lit	Partner	03/09/23	707	Conference with E. Sacksteder and P. Paterson re hair straightening insurance issues (0.5); review and analyze same (0.2).	0.70
Heasley, Julia	Rstr	Associate	03/10/23	707	Correspond with E. Rocher and K. Brown (Myers Fletcher) re claim inquiry (0.3); analyze same (0.1).	0.40
Luskey, Randy	Lit	Partner	03/10/23	707	Review and revise PR statement re hair straightening issues (0.4); review and analyze MDL discussion in Plan (0.3); conference with R. Britton re same (0.1).	0.80
Luo, Lara	Rstr	Associate	03/10/23	707	Correspond with Kroll re hair straightening claims portal (0.7); revise plan re hair straightening claim proposed settlement language (1.2); correspond with S. Mitchell re same (0.2); conference with plaintiffs' counsel re same (0.3); conference with R. Britton re same (0.3); correspond with S. Mitchell and PW team re same (0.8); review and analyze precedent re same (0.5); review and analyze issues re same (0.9); correspond with Finegan and Kroll re hair straightening claims noticing issues and strategy (0.8); review and analyze same (0.6).	6.30
Britton, Robert	Rstr	Partner	03/10/23	707	Conference with insurer's counsel re claims settlement construct (0.4); conference with plaintiffs' counsel re same (0.5); conference with S. Mitchell, Company re same (0.6); conference with A. Eaton re hair relaxer claims (0.3); correspond with P. Basta re same (0.5); conference with A. Kidd (Revlon) re same (0.6); conference with E. Vonnegut (DPW) re same (0.5); conference with L. Luo re same (0.3); review and analyze same (0.8); correspond with S. Mitchell re BMS (0.2).	4.70

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Name	Dept	Title	Date	Task	Description	Hours
Basta, Paul M.	Rstr	Partner	03/10/23	707	Teleconference with D. Perelman and A. Kidd re Revlon hair straightening media strategy.	0.40
Eaton, Alice	Rstr	Partner	03/10/23	707	Teleconference with R. Britton re hair relaxer claims (0.3); review and analyze hair relaxer claims and related issues (0.6); teleconference with Zacchai re media strategy (0.3).	1.20
Atkins, Robert	Lit	Partner	03/10/23	707	Correspond with Fier, Revlon, Luskey re hair straightening issues.	0.90
Cole, David	Lit	Associate	03/10/23	707	Correspond with Atkins, PW team re hair straightening claims (0.3); research re same (0.4); review and analyze complaints re same (0.5).	1.20
Luskey, Randy	Lit	Partner	03/11/23	707	Review and analyze recently filed hair straightener MDL actions and transfer orders.	0.50
Luo, Lara	Rstr	Associate	03/11/23	707	Correspond with S. Mitchell, PW team, and Cohen Ziffer re proposed edits to plan re hair straightening claims.	0.50
Luo, Lara	Rstr	Associate	03/12/23	707	Revise plan re hair straightening claims proposed settlement (1.5); correspond with R. Britton, PW team, Cohen Ziffer and DPW re same (0.9).	2.40
Heasley, Julia	Rstr	Associate	03/12/23	707	Correspond with R. Britton and plaintiffs' counsel re transcript of hearing on hair straightening claims.	0.10
Luskey, Randy	Lit	Partner	03/13/23	707	Review and analyze product history chronology in preparation for client teleconference (0.6); review and analyze hair straightener MDL joint status report (0.3); correspond with R. Britton, PW team re same (0.1).	1.00
Mitchell, Sean A.	Rstr	Partner	03/13/23	707	Teleconference with S. Massman (DPW), L. Luo, PW team re hair straightening claims (0.3); conference with L. Luo, Company, PW team re BMS claims and related issues (0.4); review and analyze same (2.2).	2.90
Britton, Robert	Rstr	Partner	03/13/23	707	Correspond with R. Atkins re hair straightening claims issues.	0.20
Heasley, Julia	Rstr	Associate	03/13/23	707	Analyze bar date and claims objection issues (0.4); correspond with L. Luo re same (0.1); correspond with J. Delaney (W&L) re same (0.2).	0.70
Luo, Lara	Rstr	Associate	03/13/23	707	Conference with S. Massman (DPW), R. Britton, PW team re hair straightening claims settlement proposal (0.3); conference with D. Kratzer (DPW) re same (0.3); conference with S. Mitchell, Company, PW team re BMS claims (0.4); correspond with E. Sasso, R. Britton re hair straightening research (0.4); correspond with R. Britton and DPW re hair straightening settlement issues (0.6); conference with K. McKenna (Cohen Ziffer) re same (0.7); review and analyze hair straightening insurance issues (2.0); correspond with K. McKenna (Cohen Ziffer), PW team re same (1.6); revise plan re hair straightening proposed settlement (1.5); conference with Fox Swibel re same (0.3).	8.10

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Name	Dept	Title	Date	Task	Description	Hours
Sacksteder, Elizabeth M	Lit	Partner	03/13/23	707	Correspond with S. Mitchell re treatment of insurance for hair straightening claims.	0.20
Britton, Robert	Rstr	Partner	03/13/23	707	Conference with E. Sasso re claim research issues (0.6); conference with E. Vonnegut, DPW re hair straightener issues (0.8); correspond with L. Luo re claims issues and plan markup (0.4).	1.80
Cole, David	Lit	Associate	03/13/23	707	Research re hair straightening claims (0.5); review and analyze complaints re same (0.6); correspond with Atkins re same (0.3).	1.40
Heasley, Julia	Rstr	Associate	03/14/23	707	Draft third omnibus claims objection.	0.90
Paterson, Paul	Lit	Counsel	03/14/23	707	Correspond with W. Clareman re hair relaxer discovery request (0.2); review and analyze same (0.3).	0.50
Luskey, Randy	Lit	Partner	03/14/23	707	Conference with P. Basta, Revlon R&D and sales teams re hair straightener product histories, product formulas, and historical market share (1.1); correspond with Revlon re document requests (0.3).	1.40
Ammari, Kamil R.	Lit	Associate	03/14/23	707	Review and analyze hair relaxer claimants' notice of deposition and request for documents.	0.10
Cole, David	Lit	Associate	03/14/23	707	Prepare for client meeting re potential claims for relaxer products (0.7); research re same (0.3); teleconference with S. Fier (Revlon), Revlon team re same (0.6); correspond with same re same (0.3).	1.90
Luo, Lara	Rstr	Associate	03/14/23	707	Conference with B. Silverberg (Brown Rudnick) re hair straightening proposed settlement (0.1); conference with Fox Swibel re same (0.1); conference with BMS re BMS claims (0.4); correspond with Kroll, A. Page and PW team re same (0.3); revise plan re proposed hair straightening settlement (0.9); analyze Fox Swibel comments to plan re hair straightening proposed settlement (0.4); correspond with R. Britton, PW team, Cohen Ziffer re same (0.6); correspond with Dubin and Kroll re processing of hair straightening proofs of claim (0.7).	3.50
Higgins, Matthew M	Lit	Associate	03/14/23	707	Review and analyze hair straightener claimants' notice of deposition and document production.	0.20
Sasso, Emily G	Lit	Associate	03/15/23	707	Correspond with S. Mitchell re deposition and RFPs from hair relaxer claimants.	0.40
Heasley, Julia	Rstr	Associate	03/15/23	707	Draft third omnibus claims objection.	1.10
O'Brien, William	Env	Counsel	03/15/23	707	Review and analyze proposed request for compliance extension for VOC limits in Canada (0.6); correspond with Gerber, Revlon re discharge of Superfund claim (0.4).	1.00
Luo, Lara	Rstr	Associate	03/15/23	707	Conference with J. Raines (Cohen) re proposed hair straightening insurance language (0.9); correspond with A. Orchowski (Kroll), Kroll re BMS claims (0.5); conference with R. Britton, plaintiffs' counsel re hair straightening proposed settlement (0.8); analyze issues re hair straightening settlement, insurance (1.5); revise plan re same (1.1).	4.80

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Britton, Robert	Rstr	Partner	03/15/23	707	Correspond with L. Luo re BMS claims.	0.20
Page, Alana	Rstr	Associate	03/15/23	707	Review and analyze online portal for hair straightening proofs of claim.	0.30
Blumberg, Irene	Rstr	Associate	03/15/23	707	Correspond with J. Heasley, T. Behnke re claims objection order.	0.10
Basta, Paul M.	Rstr	Partner	03/15/23	707	Analyze issues re hair straightening claims.	2.00
Heasley, Julia	Rstr	Associate	03/16/23	707	Correspond with I. Blumberg, J. Grenias re third omnibus claims objection.	0.20
Britton, Robert	Rstr	Partner	03/16/23	707	Correspond with S. Esserman re bar date order (0.2); conference with S. Esserman (plaintiff counsel) re same (0.2).	0.40
Paterson, Paul	Lit	Counsel	03/16/23	707	Correspond with R. Britton re hair straightener settlement (0.1); correspond with P. Paterson re responses to document requests (0.1).	0.20
Atkins, Robert	Lit	Partner	03/16/23	707	Review and analyze bankruptcy and MDL filings.	0.90
Hossain, Julia	Rstr	Paralegal	03/17/23	707	Obtain 3/7 hearing transcript for L. Luo.	0.20
Blumberg, Irene	Rstr	Associate	03/17/23	707	Review and revise third claims objection (1.1); correspond with J. Heasley re same (0.3).	1.40
Luo, Lara	Rstr	Associate	03/17/23	707	Conference with plaintiffs' counsel re hair straightening voting (0.3); conference with A. Orchowski (Kroll) re same (0.2); conference with plaintiffs' counsel and Kroll re same (0.3); analyze issues re same (0.6); correspond with R. Britton, Kroll re same (0.8).	2.20
Heasley, Julia	Rstr	Associate	03/17/23	707	Revise third omnibus claims objection (0.5); correspond with T. Behnke, I. Blumberg re same (0.1).	0.60
Luo, Lara	Rstr	Associate	03/18/23	707	Conference with R. Britton, S. Massman re hair straightening claims (0.3); analyze issues re same (0.4); correspond with R. Britton, plaintiffs' counsel re same (0.5).	1.20
Luo, Lara	Rstr	Associate	03/19/23	707	Correspond with S. Mitchell re hair straightening claims (0.4); analyze issues re same (0.6); conduct research re same (0.5).	1.50
Luskey, Randy	Lit	Partner	03/19/23	707	Review and analyze claim forms recently received re hair relaxer litigation.	0.50
Basta, Paul M.	Rstr	Partner	03/19/23	707	Correspond with Robert Britton, Alice Eaton and Sean Mitchell regarding hair straightening issues.	1.00
Cole, David	Lit	Associate	03/20/23	707	Partially attend meeting with Atkins, PW team re strategy (0.2); research re same (0.1).	0.30
Heasley, Julia	Rstr	Associate	03/20/23	707	Correspond with L. Luo and PW team re claims amount and amendment in connection with objection (0.3); draft external response re same (0.2).	0.50
Paterson, Paul	Lit	Counsel	03/20/23	707	Correspond with Britton re hair straightener discovery requests and withdrawal.	0.10
Luo, Lara	Rstr	Associate	03/20/23	707	Correspond with R. Britton, PW team, Kroll re hair straightening claims issues.	0.40

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Luskey, Randy	Lit	Partner	03/20/23	707	Teleconference with R. Atkins, PW team re product chronology and next steps in MDL defense.	0.40
Atkins, Robert	Lit	Partner	03/20/23	707	Teleconference with R. Luskey and D. Cole re strategy (0.4); prepare for same (0.1).	0.50
Blumberg, Irene	Rstr	Associate	03/20/23	707	Teleconference with T. Behnke re claims issues (0.5); revise notes re same (0.3).	0.80
Luo, Lara	Rstr	Associate	03/21/23	707	Conference with R. Britton, S. Esserman re hair straightening claims (0.4); analyze issues re same (0.5).	0.90
Britton, Robert	Rstr	Partner	03/21/23	707	Conference with S. Esserman re claims issues (0.4); correspond with S. Esserman re same (0.2); correspond with Gache, Kroll re same (0.6); conference with R. Atkins re same (0.4); conference with A. Kidd re same (0.3).	1.90
Luskey, Randy	Lit	Partner	03/21/23	707	Prepare for meeting with R. Atkins, PW team re MDL claims forms (0.1); attend same (0.4).	0.50
O'Brien, William	Env	Counsel	03/21/23	707	Correspond with Restaino, Gerber re treatment of claim in bankruptcy.	0.40
Atkins, Robert	Lit	Partner	03/21/23	707	Teleconference with Luskey, PW team re proof of claims (0.4); conference with J. Manly re MDL (0.2); correspond with same re same (0.2).	0.80
Heasley, Julia	Rstr	Associate	03/21/23	707	Draft notice of withdrawal re second omnibus claims objection (0.3); draft CNO re same (0.2); draft revised proposed order re same (0.4); correspond with I. Blumberg, J. Greanias re same (0.6); analyze issue re same (0.3); research re tax claim (0.7).	2.50
Blumberg, Irene	Rstr	Associate	03/21/23	707	Review and revise CNO and revised proposed order re second omnibus objection (0.6); correspond with J. Heasley re same (0.4); correspond with T. Behnke, A&M re same (0.3); correspond with F. Yudkin re same (0.1).	1.40
Cole, David	Lit	Associate	03/21/23	707	Research re ongoing hair straightening litigations.	0.30
Manly, Jordyn R	Lit	Associate	03/21/23	707	Teleconference with R. Atkins re MDL complaint.	0.20
Mitchell, Sean A.	Rstr	Partner	03/21/23	707	Conference with counsel to hair straightener claimants re hair straightening issue (0.4); conference with R. Luskey, PW team re litigation issues re same (0.4); correspond with same re same (0.3).	1.10
Luskey, Randy	Lit	Partner	03/22/23	707	Review and analyze sales data reports (0.4); correspond client re joint defense discussions (0.2).	0.60
Luo, Lara	Rstr	Associate	03/22/23	707	Analyze hair straightening claims issues.	0.20
Heasley, Julia	Rstr	Associate	03/22/23	707	Teleconference with J. Greanias (A&M) re second omnibus claims objection revised schedules (0.2); prepare filing version of same (0.5); correspond with I. Blumberg, J. Greanias re same (0.2); revise second omnibus claims objection CNO (0.5).	1.40
Manly, Jordyn R	Lit	Associate	03/22/23	707	Meet with D. Cole re MDL complaint.	0.20

Client: 002500 Revlon, Inc.

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Matter: 00370 Revlon - Chapter 11 Cases

Date: 04/28/2023

Name	Dept	Title	Date	Task	Description	Hours
Cole, David	Lit	Associate	03/22/23	707	Meet with Manly re status of MDL and ongoing litigations (0.2); correspond with same re same (0.1).	0.30
Blumberg, Irene	Rstr	Associate	03/22/23	707	Correspond with J. Heasley re second omnibus claims objection order (0.5); review and revise same (0.4).	0.90
Manly, Jordyn R	Lit	Associate	03/23/23	707	Create list of defense counsel from MDL filings.	4.20
Heasley, Julia	Rstr	Associate	03/23/23	707	Review and analyze filing version of second omnibus claims objection CNO (0.4); correspond with R. Britton, J. Hossain re same (0.2); prepare proposed order for Court (0.4).	1.00
Hossain, Julia	Rstr	Paralegal	03/23/23	707	Review and analyze CNO and second omnibus claims objection (0.3); prepare CNO and omnibus claims objection for filing (0.3); coordinate service of notice of withdrawal of objection to claim and CNO (0.2); file notice of withdrawal of objection to claim and CNO to claims objection (0.4).	1.20
Blumberg, Irene	Rstr	Associate	03/23/23	707	Correspond with J. Heasley re order for second omnibus claims objection.	0.30
Manly, Jordyn R	Lit	Associate	03/24/23	707	Finalize list of defendants' counsel in MDL (1.3); teleconference with counsel to co-defendants re status of MDL (0.5); review and analyze MDL filings to prepare potential litigation strategy (3.6).	5.40
Cole, David	Lit	Associate	03/24/23	707	Meet with Atkins re status of MDL proceedings (0.3); prepare for same (0.2).	0.50
Luskey, Randy	Lit	Partner	03/24/23	707	Teleconference with L. Leskin (A&P), R. Atkins re MDL litigation (0.6); correspond with client re Longacre retention (0.1); correspond with W. Clareman, PW team re African Pride market share (0.3).	1.00
Atkins, Robert	Lit	Partner	03/24/23	707	Meet with D. Cole re status of MDL proceedings (0.3); attend teleconference with L. Leskin, R. Luskey re same (0.6); correspond with R. Britton re same (0.2).	1.10
Luo, Lara	Rstr	Associate	03/24/23	707	Analyze hair straightening issues.	0.10
Blumberg, Irene	Rstr	Associate	03/26/23	707	Correspond with A. Orchowski (Kroll) re unliquidated claims.	0.20
Blumberg, Irene	Rstr	Associate	03/27/23	707	Correspond with R. Britton, T. Behnke, BR re claims administration (0.3); correspond with R. Britton re motion to reconsider (0.2); correspond with M. Melvin re precedent for same (0.3); review same (0.2).	1.00
Luo, Lara	Rstr	Associate	03/27/23	707	Conference with NS PR Law re hair straightening motion (0.2); analyze procedures re same (0.4); correspond with Britton, PW team re same (0.4).	1.00
Britton, Robert	Rstr	Partner	03/27/23	707	Conference with plaintiffs re reconsideration motion (0.4); correspond with Court re same (0.2).	0.60
Page, Alana	Rstr	Associate	03/27/23	707	Analyze and revise voting results and proofs of claim (1.3); teleconference with M. Chester (A&M) re same (0.2).	1.50

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Name	Dept	Title	Date	Task	Description	Hours
Melvin, Marguerite	Corp	Paralegal	03/27/23	707	Research precedent objections to motions for reconsideration of orders for I. Blumberg.	2.80
Heasley, Julia	Rstr	Associate	03/27/23	707	Correspond with claimant re claim status question.	0.10
Heasley, Julia	Rstr	Associate	03/28/23	707	Review and analyze omnibus claims objection procedures and order (0.1); correspond with L. Luo re same (0.1).	0.20
Luo, Lara	Rstr	Associate	03/28/23	707	Correspond with Blumberg, A&M re claims issues.	0.20
Luskey, Randy	Lit	Partner	03/28/23	707	Review and analyze proof of claim numbers (0.1); correspond with Luo, PW team re same (0.2).	0.30
Cole, David	Lit	Associate	03/28/23	707	Research re hair straightening claims issues (0.2); correspond with Luskey, PW team re same (0.2).	0.40
Blumberg, Irene	Rstr	Associate	03/29/23	707	Teleconference with T. Behnke (A&M), BR, GUC trustee re claims reconciliation.	0.60
Peros, Janet	Othr	Paralgl	04/01/23	707	Research and analyze cases re claims issues for J. Heasley.	0.30
Manly, Jordyn R	Lit	Associate	04/03/23	707	Review and analyze scientific articles at issue in MDL.	4.30
Cole, David	Lit	Associate	04/03/23	707	Review and analyze NIH reports and scientific literature in connection with MDL.	0.20
Blumberg, Irene	Rstr	Associate	03/02/23	708	Correspond with E. Quinones re board meeting materials.	0.10
Rahnama, Omid	Rstr	Associate	03/02/23	708	Review and analyze draft board minutes (0.9); correspond with J. Heasley re same (0.2).	1.10
Page, Alana	Rstr	Associate	03/05/23	708	Draft materials for Revlon, Inc. Board meeting.	1.60
Basta, Paul M.	Rstr	Partner	03/06/23	708	Attend Conflicts Committee meeting with Company, A. Eaton, and PW team.	1.00
Eaton, Alice	Rstr	Partner	03/06/23	708	Prepare for Conflicts Committee meeting (0.4); teleconference with P. Basta, A. Kidd, and R. Britton re same (0.3); attend Conflicts Committee meeting (1.0).	1.70
Mitchell, Sean A.	Rstr	Partner	03/06/23	708	Prepare for Conflicts Committee meeting re hair straightening issues (0.3); attend same (0.7).	1.00
Britton, Robert	Rstr	Partner	03/06/23	708	Attend Conflicts Committee teleconference re claim issues (0.7); conference with Aronzon (BoD) re same (0.5).	1.20
Page, Alana	Rstr	Associate	03/06/23	708	Draft materials for Revlon, Inc. Board meeting on chapter 11 updates and next steps.	1.90
Blumberg, Irene	Rstr	Associate	03/06/23	708	Correspond with R. Britton re March 13 board meeting materials (0.2); review and revise draft of same (1.1).	1.30
Harnett, Sarah	Rstr	Counsel	03/07/23	708	Correspond with A. Eaton re board deck on emergence (0.2); review and analyze materials re same (0.3).	0.50
Blumberg, Irene	Rstr	Associate	03/07/23	708	Review and revise board meeting materials (0.8); correspond with A. Page re same (0.3).	1.10
Page, Alana	Rstr	Associate	03/07/23	708	Revise materials for board meeting re general bankruptcy update.	1.00

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Name	Dept	Title	Date	Task	Description	Hours
Heasley, Julia	Rstr	Associate	03/08/23	708	Correspond with E. Quinones re board minute review.	0.10
Page, Alana	Rstr	Associate	03/08/23	708	Correspond with A. Jones re board materials (0.2); correspond with PW team, E. Quinones (Revlon) re board materials (0.2).	0.40
Britton, Robert	Rstr	Partner	03/09/23	708	Correspond with I. Blumberg re governance term sheet.	0.20
Shack Sackler, Benjamin	Lit	Associate	03/09/23	708	Review, analyze, and redact Board materials as requested by client.	1.30
Eaton, Alice	Rstr	Partner	03/09/23	708	Review and revise board meeting materials.	0.30
Shack Sackler, Benjamin	Lit	Associate	03/10/23	708	Review and redact Board materials for privilege (1.2); correspond with P. Paterson and PW team re same (0.2).	1.40
Britton, Robert	Rstr	Partner	03/10/23	708	Review and revise Restructuring Committee materials.	0.30
Paterson, Paul	Lit	Counsel	03/10/23	708	Review and comment on proposed redactions for privilege of various board minutes (1.1); correspond with A. Alvarez (Revlon) re same (0.1).	1.20
Britton, Robert	Rstr	Partner	03/12/23	708	Conference with A. Eaton, PW team re board meeting (0.4); conference with Sgro re same (0.3); conference with A. Kidd (Revlon) re same (0.3).	1.00
Ferrari, Marta	Corp	Associate	03/12/23	708	Review and revise board materials for exit financing descriptions.	0.30
Eaton, Alice	Rstr	Partner	03/12/23	708	Teleconference with R. Britton, PW team re board meeting (0.2); review and analyze materials re same (0.3).	0.50
Paterson, Paul	Lit	Counsel	03/13/23	708	Review and comment on proposed redactions of board materials for privilege.	0.60
Page, Alana	Rstr	Associate	03/13/23	708	Correspond with B. Mohan re organizational documents for reorganized company.	0.10
Eaton, Alice	Rstr	Partner	03/13/23	708	Review and analyze materials to prepare for board meeting (0.4); attend board meeting re emergence, next steps (1.0).	1.40
Britton, Robert	Rstr	Partner	03/13/23	708	Attend annual board meeting re emergence, next steps (1.0); attend Restructuring Committee meeting re compensation issues (0.5); correspond with A. Eaton re board meeting (0.3); conference with Sgro re same (0.3); conference with A. Kidd re same (0.5).	2.60
Basta, Paul M.	Rstr	Partner	03/13/23	708	Attend Revlon Board of Directors meeting re emergence, next steps.	1.00
Paterson, Paul	Lit	Counsel	03/15/23	708	Review and analyze materials from client re redactions to board materials.	0.20
Basta, Paul M.	Rstr	Partner	03/16/23	708	Teleconference with S. Zelin (PJT) re Revlon updates.	0.50
Harnett, Sarah	Rstr	Counsel	03/20/23	708	Teleconference with I. Blumberg re board deck on emergence (0.1); correspond with A. Page re same (0.1).	0.20

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Name	Dept	Title	Date	Task	Description	Hours
Eaton, Alice	Rstr	Partner	03/21/23	708	Correspond with R. Britton re Restructuring Committee meeting (0.3); correspond with Gover re same (0.2).	0.50
Blumberg, Irene	Rstr	Associate	03/22/23	708	Review and revise March 23 Restructuring Committee materials (0.5); correspond with A. Page re same (0.2).	0.70
Page, Alana	Rstr	Associate	03/22/23	708	Draft slides for Restructuring Committee meeting (1.2); revise same (1.3).	2.50
Eaton, Alice	Rstr	Partner	03/23/23	708	Attend Restructuring Committee meeting re emergence.	0.80
Basta, Paul M.	Rstr	Partner	03/23/23	708	Attend Restructuring Committee meeting re emergence (0.8); prepare for same (0.2).	1.00
Mohan, Bharath	Corp	Associate	03/26/23	708	Correspond with K. Subramanian re LLCA.	0.80
Mohan, Bharath	Corp	Associate	03/27/23	708	Teleconference with B. Mohan re governance issues for emergence (0.5); correspond with K. Subramanian re same (0.2); review and analyze LLCA (2.0); teleconference with L. Cen re LLCA (2.5).	5.20
Heasley, Julia	Rstr	Associate	03/27/23	708	Correspond with E. Quinones (Revlon) re board minutes review.	0.10
Cen, Leo	Corp	Associate	03/27/23	708	Teleconference with B. Mohan re governance issues for emergence (0.5); teleconference with B. Mohan re LLCA (2.5); review and revise governance term sheet and Revlon LLCA (3.8).	6.80
Mohan, Bharath	Corp	Associate	03/28/23	708	Teleconference with L. Cen re LLCA comments from Akin and DPW (2.1); review and analyze Akin markup of LLCA (0.9).	3.00
Cen, Leo	Corp	Associate	03/28/23	708	Review and revise Revlon LLCA (1.8); teleconference with B. Mohan re LLCA comments from Akin and DPW (2.1).	3.90
Cen, Leo	Corp	Associate	03/29/23	708	Revise LLCA and Annex A (3.1); teleconference with B. Mohan re LLCA (1.5).	4.60
Mohan, Bharath	Corp	Associate	03/29/23	708	Teleconference with L. Cen re LLCA (1.5); review revised LLCA from DPW (1.0); conference with DPW re same (0.5); revise LLCA (1.1).	4.10
Mohan, Bharath	Corp	Associate	03/31/23	708	Teleconference with Ajay (DPW) and L. Cen re LLCA draft.	0.30
Cen, Leo	Corp	Associate	03/31/23	708	Conference with Ajay (DPW) and B. Mohan re LLCA (0.3); attention to LLCA (0.2).	0.50
Cen, Leo	Corp	Associate	04/01/23	708	Review LLCA (0.1); correspond with B. Mohan re same (0.1).	0.20
Heasley, Julia	Rstr	Associate	04/03/23	708	Correspond with E. Quinones re board minute review.	0.10
Hotes, John R	Corp	Associate	03/01/23	709	Revise Form 10-K (0.4); draft Securities checklist re emergence documentation (0.4).	0.80

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Date: 04/28/2023

Name	Dept	Title	Date	Task	Description	Hours
Rahnama, Omid	Rstr	Associate	03/01/23	709	Review and revise equity rights offering procedures, subscription form, and class 4 equity election form (0.9); review and revise draft ERO calendar (0.7); correspond with D. Keeton re same (0.4); correspond with E. Ross (PJT) re rights offering (0.2); correspond with K. Villareal (Paul Hastings) re posting memo (0.3); draft posting memo re same (0.8); correspond with S. Fischer and M. Rivkin (DPW) re debt commitment letter (0.2); review and revise draft subscription agent agreement (0.5); correspond with G. Brunswick re same (0.2); correspond with J. Heasley re backstop agreement (0.2).	4.40
Subramanian, Keerthika	Corp	Counsel	03/01/23	709	Correspond with E. Quinones re Broadridge request (0.2); correspond with E. Quinones and D. Epstein re 10-K review (0.3); correspond with E. Quinones re warrant agreement (0.2); correspond with I. Blumberg re public/private slides (0.2); correspond with PW team, E. Quinones, and A. Alvarez re updates to Edgar (1.1); correspond with J. Heasley and J. Hotes re Securities issues in emergence checklist (0.3); correspond with PW team re DS and 10-K risk factors annotation exercise (0.3); correspond with M. Higgins re products liability disclosure in 10-K (0.2); review and analyze 10-K draft (3.1).	5.90
Ammari, Kamil R.	Lit	Associate	03/01/23	709	Review and analyze securities filings for litigation analysis (0.1); correspond with K. Subramanian and M. Higgins re same (0.5).	0.60
Keeton, Douglas	Rstr	Associate	03/01/23	709	Review and revise rights offering procedures (1.2); correspond with O. Rahnama re same (0.5); correspond with E. Ross, PJT re rights offering (0.3).	2.00
Harnett, Sarah	Rstr	Counsel	03/01/23	709	Review and analyze revisions to 10-K (0.2); correspond with I. Blumberg re same (0.1).	0.30
Huang, Brian	Corp	Associate	03/01/23	709	Correspond with PW team re Revlon going private considerations upon emergence (0.1); provide revisions to Revlon's address update filing with EDGAR (0.3).	0.40
Epstein, David	Corp	Counsel	03/01/23	709	Review and analyze 10-K (0.4); provide comments to same (0.3).	0.70
Page, Alana	Rstr	Associate	03/01/23	709	Review and comment on chapter 11 disclosure in 10-K.	0.80
Dwelle, Matthew E	Corp	Associate	03/01/23	709	Review and analyze DS risk factors against 10-K risk factors (0.9); send findings to K. Subramanian for review and analysis (0.1).	1.00
Higgins, Matthew M	Lit	Associate	03/01/23	709	Revise 10-K for K. Subramanian.	0.90
Hossain, Julia	Rstr	Paralegal	03/02/23	709	Proofread revised rights offering procedures, revised subscription form, and class 4 equity election form (4.5); file same (0.5).	5.00

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Name	Dept	Title	Date	Task	Description	Hours
Blumberg, Irene	Rstr	Associate	03/02/23	709	Review and analyze 10-K (0.5); correspond with A. Page re same (0.2).	0.70
Rahnama, Omid	Rstr	Associate	03/02/23	709	Review and revise draft rights offering procedures (0.3); review and revise subscription form (0.2); review and revise Class 4 Equity Election Form (0.3); draft posting memo in connection with rights offering and register freeze (2.5); correspond with D. Keeton, M. Serish (Paul Hastings), and J. Weichselbaum (Latham) re same (0.7); teleconference with K. Villareal (Paul Hastings) re register freeze (0.2); teleconference with J. Weichselbaum (Latham) re register freeze (0.3); revise draft rights offering calendar (0.3); correspond with D. Keeton and T. Archbell (Kroll) re same (0.3).	5.10
Subramanian, Keerthika	Corp	Counsel	03/02/23	709	Correspond with M. Higgins re subsequent events disclosure in 10-K (0.2); correspond with L. Luo re products liability disclosure in 10-K (0.3); correspond with M. Dwelle re same (0.4); correspond with M. Dwelle re running mark-up to 10-K (0.2); correspond with M. Higgins and K. Ammari re bullets for subsequent events (0.2); correspond with E. Quinones re NEO compensation teleconference (0.2); correspond with M. Dwelle re 10-K ETA for PW bankruptcy team's comments (0.1); correspond with D. Keeton re DTC eligibility of Revlon's equity upon emergence (0.2); correspond with R. Britton re emergence matters (0.3); correspond with E. Quinones re 10-K (0.2); teleconference with E. Quinones re same (0.5); correspond with warrant agent re engagement (0.2).	3.00
Page, Alana	Rstr	Associate	03/02/23	709	Draft notice of revised ROPs, subscription form, and class 4 election form (1.1); revise 10-K (0.3); correspond with J. Hotes re same (0.1).	1.50
Higgins, Matthew M	Lit	Associate	03/02/23	709	Revise 10-k based on K. Ammari's feedback (0.5); process expert invoice (0.1); conduct research re potential new 10-K section for K. Subramanian (0.7).	1.30
Keeton, Douglas	Rstr	Associate	03/02/23	709	Review and revise rights offering procedures (0.9); review and revise subscription form (0.5); review and revise posting memos (0.5); confer with O. Rahnama re same (0.3); correspond with O. Rahnama and Kroll team re rights offering and register freeze (0.3); correspond with Kroll team re rights offering and next steps (0.3).	2.80
Dwelle, Matthew E	Corp	Associate	03/02/23	709	Compile running mark-up of 10-K from various PW teams (0.3); send risk factor information to PW bankruptcy team (0.3).	0.60
Hossain, Julia	Rstr	Paralegal	03/03/23	709	File notice of revised rights offering procedures.	0.40

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Name	Dept	Title	Date	Task	Description	Hours
Rahnama, Omid	Rstr	Associate	03/03/23	709	Review and revise draft lender posting memorandum (0.8); correspond with D. Keeton re same (0.3); correspond with lender professionals (Latham, Akin, Paul Hastings, DPW) re same (0.3); correspond with K. Zuzolo (Akin), D. Keeton, and others re rights offering procedures and subscription form (0.4); review and revise same (0.3).	2.10
Liu, Ai Na	Othr	Paralgl	03/03/23	709	Conduct research re precedents 10-K documents at the request of K. Subramanian, J. Hotes, B. Huang and M. Dwelle.	2.00
Page, Alana	Rstr	Associate	03/03/23	709	Review and revise FINRA letter.	0.50
Blumberg, Irene	Rstr	Associate	03/03/23	709	Correspond with A. Page re FINRA letter (0.1); review and analyze same (0.2); correspond with M. Kelly re HSR analysis (0.2); correspond with D. Kratzer re same (0.1); correspond with K. Zuzolo re same (0.1).	0.70
Scherr, Rebekah	Corp	Associate	03/03/23	709	Prepare Hart-Scott-Rodino (HSR) filing obligation analysis for ad hoc group members.	1.10
Subramanian, Keerthika	Corp	Counsel	03/03/23	709	Correspond with C. Nanfara and PW team re FINRA letter (0.2); correspond with AST and E. Quinones re warrant agent engagement (0.3); correspond with J. Heasley, PW team re securities items on precedent emergence checklists (0.2); review and analyze comments to 10-K from various PW teams (1.1); correspond with G. Reed, C. Akard and E. Quinones re NEO compensation (0.2).	2.00
Kelly, Marta P.	Corp	Counsel	03/03/23	709	Analyze competition filings.	0.30
Keeton, Douglas	Rstr	Associate	03/03/23	709	Review and revise rights offering procedures and posting memo (0.5); correspond with O. Rahnama re same (0.2); further revise same (0.6); review and analyze chapter 11 plan in connection with materials from Wilmington (0.3); correspond with PW team re same (0.2).	1.80
Subramanian, Keerthika	Corp	Counsel	03/04/23	709	Analyze securities law disclosure question (0.6); correspond with I. Blumberg and J. Hotes re same (0.5).	1.10
Blumberg, Irene	Rstr	Associate	03/04/23	709	Correspond with R. Britton re disclosure inquiry (0.2); correspond with K. Subramanian re same (0.2).	0.40
Hotes, John R	Corp	Associate	03/06/23	709	Conference with E. Quinones (Revlon) re proxy disclosure of executive compensation (0.4); draft securities related documentation required for emergence from bankruptcy (0.3).	0.70
Huang, Brian	Corp	Associate	03/06/23	709	Revise warrant agreement (0.4); organize 10-K files (0.1).	0.50

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Name	Dept	Title	Date	Task	Description	Hours
Subramanian, Keerthika	Corp	Counsel	03/06/23	709	Prepare mark-up of entire draft 10-K (9.1); correspond with E. Quinones re same (0.4); correspond with AST/EQ re warrant agent engagement matters (1.1); correspond with I. Blumberg and L. Luo re queries from warrant agent (0.2); correspond with G. Marchesini, DPW team re same (0.1); correspond with J. Hotes re emergence checklist (0.2); correspond with I. Blumberg, PW team re next steps for warrant agreement (0.2); correspond with I. Blumberg re securities law disclosure question (0.1).	11.40
Blumberg, Irene	Rstr	Associate	03/06/23	709	Correspond with K. Subramanian re disclosure inquiry.	0.10
Rahnama, Omid	Rstr	Associate	03/06/23	709	Correspond with D. Keeton, M. Sidorenkov (A&M), T. Archbell (Kroll), and B. Stewart (DPW) re rights offering (0.4); revise rights offering documents (0.7).	1.10
Scherr, Rebekah	Corp	Associate	03/07/23	709	Review and analyze HSR analysis.	0.30
Huang, Brian	Corp	Associate	03/07/23	709	Revise Warrant Agreement (0.6); correspond with Marchesini, DPW team re same (0.1); review and analyze earnings release draft (0.3).	1.00
Heasley, Julia	Rstr	Associate	03/07/23	709	Review and compile documents for revised rights offering procedures, revised subscription form, and revised Class 4 election form (0.2); compile subscription agent agreement (0.2); correspond with O. Rahnama, PW team re same (0.2).	0.60
Hotes, John R	Corp	Associate	03/07/23	709	Review and revise warrant agreement.	0.20
Subramanian, Keerthika	Corp	Counsel	03/07/23	709	Correspond with T. Wiener (AST) re warrant agreement (0.1); correspond with DPW team and E. Quinones (Revlon) re latest mark-up of warrant agreement (0.2); correspond with A. McGinnis re tax issues related to warrant agreement (0.2); correspond with B. Huang re warrant agreement (0.3); correspond with E. Quinones, AST team, and Kroll team re agent engagement, CUSIP, DTC eligibility and related matters (2.1); teleconference with B. Stewart, DPW team re DTC eligibility and CUSIP (0.2); correspond with E. Quinones re draft earnings release (0.1); revise draft earnings release (0.3); correspond with I. Blumberg and E. Quinones re same (0.3); correspond with I. Blumberg and DPW team re warrant agreement (0.2); review and analyze cleansing materials from A&M (1.1); correspond with M. Sidorenkov, A&M re same (0.2); correspond with O. Rahnama re upcoming NDA obligations (0.1); correspond with Kroll team and PW team re FINRA response letter (0.2); correspond with E. Quinones re proxy statement references in 10-K (0.2); correspond with I. Blumberg, PW team and Revlon team re 8-K obligations re extension of emergence DIP milestone (0.8); correspond with E. Quinones re DIP language in earnings release (0.1).	6.70

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Name	Dept	Title	Date	Task	Description	Hours
Melion, Max	Corp	Staff Attorney	03/07/23	709	Correspond with Kelly re HSR updates.	0.20
Blumberg, Irene	Rstr	Associate	03/07/23	709	Correspond with K. Subramanian re warrant agreement (0.1); review and revise earnings release language (0.4); correspond with K. Subramanian re same (0.2); correspond with same re 8k (0.2); correspond with R. Britton re earnings release (0.1).	1.00
Kelly, Marta P.	Corp	Counsel	03/08/23	709	Correspond with M. Melion re HSR filings.	0.20
Subramanian, Keerthika	Corp	Counsel	03/08/23	709	Correspond with I. Blumberg and A. Page re updates to 10-K relating to hair relaxing claims (0.3); correspond with A. McGinnis re tax comments to latest draft of warrant agreement (0.1); correspond with J. Hotes re warrant agreement next steps (0.1); correspond with J. Hotes re emergence checklist (0.1); correspond with I. Blumberg re earnings release (0.1); correspond with I. Blumberg re milestone extension 8-K (0.1); correspond with E. Quinones re earnings release (0.1); correspond with E. Quinones re 10-K disclosure points (0.2); correspond with E. Quinones re 10-K questions from PwC (0.2); correspond with E. Quinones re cleansing 8-K (0.2); correspond with J. Hotes re milestone extension 8-K (0.1); correspond with I. Blumberg, L. Luo, and J. Hotes re warrant agreement (0.2); correspond with I. Blumberg, PW team re emergence checklist (0.1); revise 10-K (2.2).	4.10
Blumberg, Irene	Rstr	Associate	03/08/23	709	Correspond with K. Subramanian re 10k (0.2); analyze issues re same (0.4); correspond with R. Britton, K. Subramanian re earnings release (0.2).	0.80
Hotes, John R	Corp	Associate	03/08/23	709	Revise draft warrant agreement.	0.70
Rwambuya, Joseph	Corp	Paralegal	03/08/23	709	Organize bylaws for S. Daniele (0.2); review and analyze same (1.8).	2.00
Eaton, Alice	Rstr	Partner	03/08/23	709	Review and analyze 8K (0.2); correspond with M. Sidorenkov, A&M re cleansing questions (0.2).	0.40
Huang, Brian	Corp	Associate	03/08/23	709	Correspond with I. Blumberg, PW team re Warrant Agreement (0.1); correspond with J. Heasley, PW team re emergence checklist (0.1).	0.20
Scherr, Rebekah	Corp	Associate	03/08/23	709	Correspond with I. Blumberg re HSR filing obligation analysis for ad hoc group members.	0.30
Kelly, Marta P.	Corp	Counsel	03/09/23	709	Review and analyze issues related to HSR filing.	0.70
Liu, Ai Na	Othr	Paralgl	03/09/23	709	Compile precedent securities filings for M. Dwelle's review.	0.50
Huang, Brian	Corp	Associate	03/09/23	709	Correspond with I. Blumberg, PW team re 8-K for DIP milestone extension (0.1); research re plan supplement disclosure (0.1); correspond with E. Quinones, Revlon team to discuss proxy statement reference in 10-K (0.1).	0.30
Heasley, Julia	Rstr	Associate	03/09/23	709	Correspond with E. Quinones (Revlon) and N. Scully re warrant agreement account.	0.20

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Name	Dept	Title	Date	Task	Description	Hours
Mohan, Bharath	Corp	Associate	03/09/23	709	Research regarding conversion mechanics (1.5); conference with Massman, DPW regarding SHA (0.2); correspond with same re same (0.2).	1.90
Hotes, John R	Corp	Associate	03/09/23	709	Draft Form 8-K disclosing amended bankruptcy agreements (1.3); revise warrant agreement (0.3).	1.60
Melion, Max	Corp	Staff Attorney	03/09/23	709	Prepare documents for HSR filing.	4.30
Subramanian, Keerthika	Corp	Counsel	03/09/23	709	Correspond with I. Blumberg, PW team re emergence checklist (0.3); correspond with J. Hotes re extension 8-K (1.1); review and analyze same (0.4); correspond with I. Blumberg, PW bankruptcy team and Company re extension 8-K (0.3); correspond with J. Hotes, PW team, Company and A&M re cleansing (1.1); correspond with I. Blumberg re warrant agreement (0.2); correspond with J. Kennedy re extension 8-K (0.1); correspond with I. Blumberg, PW bankruptcy team re SEC disclosure implications re BCA and DCL extensions (1.1); review and revise extension 8-K (0.4); conference with E. Quinones (Revlon) re 10-K (0.6); review and analyze materials re warrant agreement (0.9).	6.50
Blumberg, Irene	Rstr	Associate	03/09/23	709	Review and analyze notice re form of warrant agreement (0.2); coordinate finalization and filing of form of warrant agreement (0.9).	1.10
Rahnama, Omid	Rstr	Associate	03/09/23	709	Review and revise draft 8-K re backstop agreements amendments (0.8); correspond with K. Subramanian re same (0.1); correspond with D. Keeton, K. Subramanian, and S. Ford (DPW) re amendments to backstop agreements (0.2).	1.10
Kennedy, John C	Corp	Partner	03/09/23	709	Review and analyze 8-K (0.1); correspond with K. Subramanian re same (0.2).	0.30
Dwelle, Matthew E	Corp	Associate	03/09/23	709	Correspond with PW Research Department re precedent securities filings.	0.10
Britton, Robert	Rstr	Partner	03/09/23	709	Correspond with D. Keeton, Company re backstop transfers (0.4); analyze issues re same (0.2); correspond with I. Blumberg re warrants (0.3); correspond with I. Blumberg re 8-K (0.2).	1.10
Scherr, Rebekah	Corp	Associate	03/10/23	709	Review and prepare HSR filing analysis for ad hoc group members.	0.60
Kennedy, John C	Corp	Partner	03/10/23	709	Correspond with K. Subramanian re 10-K.	0.40
Mohan, Bharath	Corp	Associate	03/10/23	709	Teleconference with S. Massman (DPW) re asset purchase agreement (0.2); correspond with L. Cen, PW team re conversions (0.5).	0.70
Hotes, John R	Corp	Associate	03/10/23	709	Revise registration rights agreement (2.3); finalize Form 8-K re amended bankruptcy agreements (1.0); coordinate filing same (0.2).	3.50

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Name	Dept	Title	Date	Task	Description	Hours
Subramanian, Keerthika	Corp	Counsel	03/10/23	709	Correspond with E. Quinones (Revlon) and J. Kennedy re proxy statement references in 10-K (0.2); revise 10-K (2.1); correspond with I. Blumberg, PW bankruptcy team re registration rights agreement (0.4); correspond with J. Heasley, PW bankruptcy team re securities items in emergence checklist (0.2); correspond with I. Blumberg, PW team re March 10th extension 8-K (0.2); correspond with E. Quinones (Revlon) re subsequent events of 10-K (0.2); correspond with PW bankruptcy team and E. Quinones (Revlon) re cleansing obligations (0.3); correspond with I. Blumberg re products liability disclosure (0.3); revise same (0.2).	4.10
Blumberg, Irene	Rstr	Associate	03/10/23	709	Correspond with R. Britton, S. Massman re cleansing, NDA request (0.2); analyze issues re same (0.2); correspond with M. Sidorenkov re same (0.3); correspond with K. Subramanian re 8k for same (0.2).	0.90
Blumberg, Irene	Rstr	Associate	03/11/23	709	Review and analyze R. Britton comments to TDPs (0.2); correspond with J. Heasley re same (0.5); revise same (1.0); correspond with J. Heasley re emergence checklist (0.2); review and comment on plan supplement notice (0.5); correspond with A. Page, J. Heasley re same (0.2).	2.60
Heasley, Julia	Rstr	Associate	03/12/23	709	Correspond with I. Blumberg, E. Quinones, and A. Page re 10-K cites (0.4); conduct research re same (0.3).	0.70
Page, Alana	Rstr	Associate	03/12/23	709	Coordinate bankruptcy review of 10-K.	0.20
Blumberg, Irene	Rstr	Associate	03/12/23	709	Correspond with K. Subramanian, A. Page re 10k.	0.50
Epstein, David	Corp	Counsel	03/12/23	709	Review and analyze 10-K.	0.30
Subramanian, Keerthika	Corp	Counsel	03/12/23	709	Correspond with I. Blumberg re GUC trust agreement language re securities issues (0.2); correspond with I. Blumberg and J. Hotes re registration rights agreement (0.3); review and analyze cleansing materials prepared by A&M (0.4); provide comments re same (0.6); prepare draft 8-K re cleansing materials (1.1); prepare non-GAAP reconciliation rider (0.7); correspond with A&M and I. Blumberg re 8-K (0.4); correspond with I. Blumberg, PW team re 10-K (1.1); review and analyze board deck re securities updates (0.6); correspond with E. Quinones and J. Kennedy re same (0.3); correspond with I. Blumberg, PW team re warrant agreement (0.3); correspond with O. Rahnama re DS risk factors (0.1).	6.10
Huang, Brian	Corp	Associate	03/12/23	709	Review and analyze 10-K draft (0.1); correspond with J. Hotes, PW team re 10-K drafts (0.1).	0.20
Ammari, Kamil R.	Lit	Associate	03/13/23	709	Review and analyze draft 10-K.	0.10
Harnett, Sarah	Rstr	Counsel	03/13/23	709	Review and analyze revised draft 10-K (0.6); correspond with A. Page re same (0.1).	0.70

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Subramanian, Keerthika	Corp	Counsel	03/13/23	709	Correspond with A. Alvarez (Revlon) re D&O questionnaire (0.3); correspond with Revlon and A&M teams re process for next 8-K (0.2); correspond with I. Blumberg re warrant agreement process (0.1); review and analyze registration rights agreement (0.5); provide comments to same (0.6); correspond with B. Huang and J. Hotes re 10-K request (0.1); review and analyze revised deck from A&M team (0.4); correspond with A. Page re 10-K (1.1); correspond with I. Blumberg, PW team and Revlon team re upcoming 8-K (0.3); correspond with E. Quinones re outstanding 10-K items (0.4).	4.00
Britton, Robert	Rstr	Partner	03/13/23	709	Revise 10-K (0.5); correspond with A. Page re same (0.1).	0.60
Higgins, Matthew M	Lit	Associate	03/13/23	709	Review and analyze 10-K for K. Subramanian.	0.60
Hotes, John R	Corp	Associate	03/13/23	709	Draft Form 8-K re cleansing materials (0.7); revise registration rights agreement (2.0); revise warrant agreement (0.2).	2.90
Huang, Brian	Corp	Associate	03/13/23	709	Correspond with K. Subramanian, PW Team re circulation of 10-K draft redline against 2021 draft.	0.20
Page, Alana	Rstr	Associate	03/13/23	709	Review and comment on 10-K (3.6); correspond with K. Subramanian, PW team re same (0.6).	4.20
Blumberg, Irene	Rstr	Associate	03/13/23	709	Review and analyze 10k (0.3); correspond with A. Page re same (0.2).	0.50
Mitchell, Sean A.	Rstr	Partner	03/13/23	709	Comment on draft 10K.	0.60
Rahnama, Omid	Rstr	Associate	03/13/23	709	Correspond with B. Stewart and S. Ford (DPW) re backstop escrow agreement.	0.20
Kelly, Marta P.	Corp	Counsel	03/14/23	709	Review and revise HSR filing.	0.20
Heasley, Julia	Rstr	Associate	03/14/23	709	Correspond with E. Quinones (Revlon) and N. Scully (Kroll) re tax forms for rights offering account.	0.10
Scherr, Rebekah	Corp	Associate	03/14/23	709	Review and revise HSR filing.	1.10
Huang, Brian	Corp	Associate	03/14/23	709	Summarize research findings for filing separate 8-K for the Plan Supplement (0.5); coordinate with I. Blumberg, PW team re 10-K comments (0.1).	0.60
Dwelle, Matthew E	Corp	Associate	03/14/23	709	Review and revise 2022 10-K.	1.50
Kennedy, John C	Corp	Partner	03/14/23	709	Review and analyze draft 10k (3.2); correspond with J. Hotes re same (0.4).	3.60
Eaton, Alice	Rstr	Partner	03/14/23	709	Correspond with J. Kennedy re MNPI (0.3); teleconference with A. Kidd re same (0.2).	0.50
Hotes, John R	Corp	Associate	03/14/23	709	Revise Form 10-K (1.0); draft Form 8-K regarding cleansing materials (1.6); revise registration rights agreement (1.3).	3.90
Britton, Robert	Rstr	Partner	03/14/23	709	Correspond with J. Hotes re 8-K.	0.20
Melion, Max	Corp	Staff Attorney	03/14/23	709	Revise HSR filing at the direction of R. Scherr.	1.10
Blumberg, Irene	Rstr	Associate	03/14/23	709	Correspond with K. Subramanian re 10k.	0.20

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Name	Dept	Title	Date	Task	Description	Hours
Subramanian, Keerthika	Corp	Counsel	03/14/23	709	Correspond with J. Hotes re registration rights agreement (0.2); correspond with Axelrod, Brown Rudnick re status of warrant agreement (0.1); correspond with J. Hotes re follow up questions to registration rights agreement (0.1); correspond with I. Blumberg, PW team re 8-K precedents re plan supplement (0.1); review and analyze revised cleansing deck from A&M (0.3); correspond with M. Sidorenkov (A&M) re same (0.2); correspond with PW team and E. Quinones re outstanding items in 10-K (2.2); correspond with L. Luo and J. Hotes re registration rights holder base (0.1); revise draft 10-K (5.1); review and analyze draft 8-K (0.3); correspond with J. Hotes re same (0.1); correspond with I. Blumberg and J. Hotes re registration rights agreement distribution (0.2); correspond with J. Hotes re bankruptcy team's comments to 8-K (0.1); correspond with T. Archbell, Kroll team re DTC eligibility and CUSIP inquiries (0.1); revise 10-K based on PW finance team's comments (1.7); correspond with Hotes, PW team re 10-K process (0.4).	11.30
Page, Alana	Rstr	Associate	03/14/23	709	Correspond with R. Scherr re HSR filing issues.	0.40
Rahnama, Omid	Rstr	Associate	03/14/23	709	Correspond with D. Keeton, J. Weichshelbaum (Latham), and K. Villareal (Paul Hastings) re rights offering.	0.20
Page, Alana	Rstr	Associate	03/14/23	709	Review and comment on 10-K.	0.70
Keeton, Douglas	Rstr	Associate	03/15/23	709	Review and comment on 10-K.	0.30

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Name	Dept	Title	Date	Task	Description	Hours
Subramanian, Keerthika	Corp	Counsel	03/15/23	709	Correspond with PW finance team re open items in 10-K (0.2); respond to queries from E. Quinones re 10-K (0.5); correspond with J. Hotes re 8-K (0.2); correspond with J. Hotes re registration rights agreement (0.1); correspond with I. Blumberg re timing of filing of plan supplement and related 8-K timing (0.1); correspond with E. Quinones re issue in 10-K (0.1); correspond with B. Huang re comments in 10-K mark-up (0.3); correspond with E. Quinones re timing of filing of 8-K (0.1); correspond with E. Quinones, J. Kennedy, and J. Hotes re timing and sequence of 10-K, earnings release, and earnings 8-K filing (0.5); correspond with I. Blumberg, PW bankruptcy team and PW securities team re MNPI request from PJT (1.1); correspond with J. Heasley re securities questions flagged in emergence checklist (0.1); correspond with A. Page and E. Quinones re support for certain items in 10-K (0.3); correspond with A. McGinnis re tax issues in latest iteration of warrant agreement (0.5); correspond with J. Kennedy, L. Wee, and PW securities team re warrant agreement and registration rights agreement (0.5); correspond with J. Kennedy and J. Hotes re disclosure issues for 8-K (0.2); correspond with I. Blumberg re disclosure approach for 8-K (0.3); correspond with J. Kennedy and J. Hotes re same (0.2); revise 10-K mark-up received from B. Huang (3.1); distribute same to E. Quinones (0.1).	8.50
Melion, Max	Corp	Staff Attorney	03/15/23	709	Correspond with R. Scherr re weekly HSR team update meeting.	0.20
Epstein, David	Corp	Counsel	03/15/23	709	Review and comment on 10-K.	0.60
Britton, Robert	Rstr	Partner	03/15/23	709	Correspond with K. Subramanian and PW team re 8-K.	0.30
Page, Alana	Rstr	Associate	03/15/23	709	Correspond with R. Scherr re HSR filing (0.4); compile documents for same (0.3); correspond with E. Ross (PJT), M. Sidorenkov (A&M) re same (0.2).	0.90
Blumberg, Irene	Rstr	Associate	03/15/23	709	Correspond with K. Subramanian, team re MNPI question.	0.20
Rahnama, Omid	Rstr	Associate	03/15/23	709	Review and analyze backstop commitment agreement in connection with inquiry and transfers (0.7); correspond with D. Keeton re same (0.3); correspond with R. Britton re backstop transfers (0.1).	1.10
Scherr, Rebekah	Corp	Associate	03/15/23	709	Revise HSR filing re ad hoc group member's acquisition of equity.	1.10
Hotes, John R	Corp	Associate	03/15/23	709	Revise Form 10-K (0.5); revise registration rights agreement (0.5); conference with J. Kennedy re trading question (0.2).	1.20

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Name	Dept	Title	Date	Task	Description	Hours
Kennedy, John C	Corp	Partner	03/15/23	709	Review and revise 10-K (1.1); correspond with J. Hotes re same (0.2); review and analyze registration rights agreement (3.1); review and analyze 8-K (0.2); correspond with J. Hotes re same (0.2); conference with J. Hotes re trading question (0.2).	5.00
Huang, Brian	Corp	Associate	03/15/23	709	Correspond with K. Subramanian, PW team re comments to 10-K (0.5); revise 10-K to incorporate comments from PW team (2.3); review and analyze sale process overview deck for MNPI (1.2).	4.00
Dwelle, Matthew E	Corp	Associate	03/15/23	709	Review and analyze Sale Process presentation for MNPI (0.2); correspond with K. Subramanian re same (0.1); correspond with B. Huang, PW team re 2022 10-K updates (0.1).	0.40
Scherr, Rebekah	Corp	Associate	03/16/23	709	Review and revise HSR filing re ad hoc group member's acquisition of equity.	2.80
Hotes, John R	Corp	Associate	03/16/23	709	Revise registration rights agreement (3.1); correspond with K. Subramanian re revisions to registration rights agreement and warrant agreement (0.5); revise warrant agreement (0.6).	4.20
Huang, Brian	Corp	Associate	03/16/23	709	Circulate latest draft of 10-K comments to Blumberg, PW team (0.2); review and analyze warrant agreement comments from PW team (0.2); correspond with Blumberg, DPW and BR teams re emergence checklist securities items (0.4); review and analyze cleansing 8-K (0.2); correspond with Subramanian, PW and Revlon teams re cleansing 8-K proof (0.2).	1.20
Dwelle, Matthew E	Corp	Associate	03/16/23	709	Proofread cleansing 10-K for March 17th filing.	0.20
Cen, Leo	Corp	Associate	03/16/23	709	Correspond with Mohan re entity conversion.	0.10

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Name	Dept	Title	Date	Task	Description	Hours
Subramanian, Keerthika	Corp	Counsel	03/16/23	709	Correspond with B. Huang re 10-K (0.1); correspond with R. Britton, PW bankruptcy team re PJT MNPI request (0.2); correspond with J. Hotes re registration rights agreement (0.3); correspond with J. Kennedy and J. Hotes re registration rights agreement (0.7); correspond with J. Hotes re next steps on registration rights agreement and warrant agreement (0.2); review and analyze comments from Akin to registration rights agreement (0.6); correspond with E. Quinones and PW bankruptcy team re back up support for certain items in 10-K (0.3); teleconference with E. Quinones (Revlon) re 8-K process and timing (0.5); correspond with S. Mitchell, R. Britton, and PJT re MNPI request (0.3); correspond with J. Kennedy and B. Huang re warrant agreement (0.2); correspond with A. McGinnis re tax changes to warrant agreement (0.2); correspond with Massman, DPW team re tax changes to warrant agreement (0.1); correspond with I. Blumberg re stockholders' agreement (0.2); correspond with J. Kennedy, J. Hotes, and E. Quinones re Q4 earnings events (0.1); correspond with I. Blumberg re timing of filing of registration rights agreement (0.1); review and analyze registration rights agreement (0.5); correspond with J. Hotes re same (0.1); correspond with J. Kennedy and J. Hotes re status of stockholders' agreement and potential LLC post emergence structure (0.1); correspond with B. Mohan re term sheet (0.1); correspond with M. Sidorenkov, A&M re 8-K timing (0.1); teleconference with S. Massman (DPW), DPW and PW teams re plan supplement (0.5); correspond with J. Kennedy and J. Hotes re new deadlines for registration rights agreement and warrant agreement (0.1); correspond with J. Kennedy re teleconference with D. Dostal (DPW) (0.1); revise draft of 8-K (0.2); distribute same to PW team and E. Quinones (0.2); correspond with Broadridge and J. Hotes, PW team re 8-K logistics (0.2); correspond with E. Quinones re timing of 8-K (0.1).	6.40
Melion, Max	Corp	Staff Attorney	03/16/23	709	Revise HSR filing at the request of R. Scherr.	3.70
Kennedy, John C	Corp	Partner	03/16/23	709	Review and analyze warrant agreement (2.2); correspond with K. Subramanian and J. Hotes re registration rights agreement (0.5); teleconference with Steward (DPW), Davis Polk team re registration rights agreement (0.3); review and analyze 8-K drafts (0.3).	3.30
Eaton, Alice	Rstr	Partner	03/16/23	709	Teleconference with A. Kidd (Revlon) re MNPI.	0.40
Subramanian, Keerthika	Corp	Counsel	03/17/23	709	Correspond with E. Quinones re 8-K filing (0.4); correspond with M. Sidorenkov (A&M) re 8-K filing (0.1); correspond with J. Heasley re emergence checklist (0.1); review and analyze registration rights agreement (2.1).	2.70

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Akard, Cynthia	ECP	Counsel	03/17/23	709	Review and analyze Form 4.	0.30
Melion, Max	Corp	Staff Attorney	03/17/23	709	Revise HSR filing at the request of R. Scherr.	6.00
Dwelle, Matthew E	Corp	Associate	03/17/23	709	File as-filed proof and SEC receipt of March 17th 10-K.	0.10
Scherr, Rebekah	Corp	Associate	03/17/23	709	Prepare Hart-Scott-Rodino Act filing (7.3); conference with A. Page, PJT re same (0.3); conference with A. Page, A&M re same (0.3).	7.90
Page, Alana	Rstr	Associate	03/17/23	709	Conference with R. Scherr, E. Ross (PJT) re document collection for HSR filing (0.3); conference with R. Scherr, M. Sidorenkov (A&M) re same (0.3); correspond with R. Scherr re same (0.2); prepare documents for HSR filing document collection (0.7).	1.50
Rahnama, Omid	Rstr	Associate	03/17/23	709	Correspond with D. Keeton and T. Archbell (Kroll) re rights offering matters (0.3); revise rights offering materials (0.7).	1.00
Keeton, Douglas	Rstr	Associate	03/17/23	709	Correspond with T. Archbell, Kroll regarding rights offering issues.	0.30
Melion, Max	Corp	Staff Attorney	03/18/23	709	Revise HSR filing at the request of R. Scherr.	2.40
Scherr, Rebekah	Corp	Associate	03/18/23	709	Continue to prepare Hart-Scott-Rodino Act filing.	2.40
Subramanian, Keerthika	Corp	Counsel	03/19/23	709	Correspond with J. Kennedy and J. Hotes re registration rights agreement.	0.20
Scherr, Rebekah	Corp	Associate	03/19/23	709	Revise HSR filing.	1.80
Kennedy, John C	Corp	Partner	03/19/23	709	Review and analyze registration rights agreement.	3.50
Kelly, Marta P.	Corp	Counsel	03/20/23	709	Revise HSR filing.	0.60
Subramanian, Keerthika	Corp	Counsel	03/20/23	709	Correspond with E. Quinones and J. Kennedy re Rule 144 (0.2); teleconference with J. Kennedy and J. Hotes re registration rights agreement (0.5); teleconference with I. Blumberg, PW, DPW team re emergence checklist (0.5); teleconference with B. Stewart, DPW team re emergence checklist (0.5); review and analyze emergence checklist (0.4); provide comments to same (0.6); correspond with J. Hoesley and I. Blumberg re same (0.4); correspond with I. Blumberg re confirmation 8-K (0.2); correspond with J. Kennedy re emergence preparations (0.3); correspond with I. Blumberg re LLC structure (0.2); correspond with A. McGinnis re same (0.2); correspond with T. Archbell, Kroll team re emergence preparation (0.3).	4.30
Scherr, Rebekah	Corp	Associate	03/20/23	709	Revise HSR filing.	4.60
Melion, Max	Corp	Staff Attorney	03/20/23	709	Review and analyze foreign regulatory obligations at the direction of R. Scherr.	5.80
Hotes, John R	Corp	Associate	03/20/23	709	Revise registration rights agreement (2.9); teleconference with J. Kennedy, K. Subramanian re revisions to registration rights agreement (0.5); teleconference with I. Blumberg, PW, DPW team re emergence documentation (0.5); teleconference with B. Stewart, Davis Polk re status of emergence documentation (0.5).	4.40

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Name	Dept	Title	Date	Task	Description	Hours
Huang, Brian	Corp	Associate	03/20/23	709	Correspond with Subramanian, PW and Kroll teams re emergence (0.1); teleconference with Blumberg, PW team re emergence checklist (0.5); teleconference with Blumberg, DPW, BR and PW re emergence checklist (0.5).	1.10
Dwelle, Matthew E	Corp	Associate	03/20/23	709	Teleconference with Blumberg, PW team re emergence checklist (0.5); teleconference with Blumberg, DPW, BR, Akin, and PW re emergence checklist (0.5).	1.00
Kennedy, John C	Corp	Partner	03/20/23	709	Conference with Subramanian, PW team re registration rights agreement (0.5); review and analyze revised draft of registration rights agreement (1.1); correspond with Subramanian re trading question (0.2); correspond with same re future 8-K filings (0.2).	2.00
Rahnama, Omid	Rstr	Associate	03/20/23	709	Correspond with D. Keeton and T. Archbell (Kroll) re class 4 equity election (0.3); review and analyze revised backstop commitment analysis (0.7); correspond with N. Scully (Kroll) re same (0.4); review and analyze RSA in connection with same (0.3); correspond with Akin (Savin, Zuzolo) re backstop agreement (0.1); attend emergence conference with Blumberg, PW team, DPW, Akin (0.5); correspond with K. Okimoto (Kroll) re class 4 equity election (0.3).	2.60
Kennedy, John C	Corp	Partner	03/21/23	709	Correspond with Subramanian, PW team re 10-K (0.2); correspond with Ferrari, PW team re debt financing (0.2).	0.40
Britton, Robert	Rstr	Partner	03/21/23	709	Correspond with O. Rahnama re rights offering issues.	0.20
Scherr, Rebekah	Corp	Associate	03/21/23	709	Conference with Akin re ex-US competition filings analysis (0.5); conference with M. Melion re same (0.1).	0.60
Akard, Cynthia	ECP	Counsel	03/21/23	709	Review and analyze disclosure issues.	0.40
Huang, Brian	Corp	Associate	03/21/23	709	Meet with T. Archbell, Kroll team re emergence checklist workstreams.	0.90
Dwelle, Matthew E	Corp	Associate	03/21/23	709	Meet with T. Archbell (Kroll) re emergence (0.9); revise emergence checklist (0.3).	1.20
Hotes, John R	Corp	Associate	03/21/23	709	Teleconference with T. Archbell (Kroll) re process for issuance of new securities upon emergence.	0.80
Melion, Max	Corp	Staff Attorney	03/21/23	709	Conference with R. Scherr re weekly HSR team updates (0.1); analyze HSR issues at the direction of R. Scherr (0.2).	0.30
Kelly, Marta P.	Corp	Counsel	03/21/23	709	Conduct competition filings analysis.	0.60
Keeton, Douglas	Rstr	Associate	03/21/23	709	Conference with T. Archbell, Kroll regarding rights offering mechanics.	0.50

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Name	Dept	Title	Date	Task	Description	Hours
Rahnama, Omid	Rstr	Associate	03/21/23	709	Correspond with T. Archbell (Kroll), B. Britton, D. Keeton, and A. Kidd (Revlon) re backstop and rights offering (0.4); correspond with D. Keeton and R. Steward (DPW) re same (0.2); video conference with T. Archbell, Kroll, D. Keeton, PW team re same (0.5); review and analyze draft escrow agent fee proposal (0.4); correspond with R. Britton, A. Kidd re same (0.1); review and analyze class 4 equity election analysis (0.7); review and analyze RSA in connection with same (0.3); correspond with D. Scully re same (0.2); correspond with N. Scully re backstop trades (0.1)	2.90
Subramanian, Keerthika	Corp	Counsel	03/21/23	709	Correspond with B. Stewart re BLORs (0.1); correspond with E. Quinones and J. Kennedy re 10-K/A (0.2); correspond with J. Hotes re securities exemptions (0.1); discuss 10-K/A with E. Quinones (0.5); correspond with B. Mohan re entity conversions (0.3); conference with T. Archbell, Kroll to discuss emergence checklist (0.9); correspond with AST for engagement purposes (0.1); correspond with J. Hotes, PW team re follow up securities action items arising from call with Kroll (1.1); correspond with C. Akard re 10-K/A (0.3); review and revise 10-K/A (2.1).	5.70
Rahnama, Omid	Rstr	Associate	03/22/23	709	Correspond with S. Francesca (Cowen) and A. Kidd (Revlon) re backstop trades.	0.20
Rahnama, Omid	Rstr	Associate	03/22/23	709	Correspond with S. Francesca (Cowen) and A. Kidd (Revlon) re backstop trades (0.2); conference with DPW (R. Stewart and others) re backstop netting agreement (0.5); correspond with D. Keeton and T. Archbell (Kroll) re same (0.3).	1.00
Subramanian, Keerthika	Corp	Counsel	03/22/23	709	Correspond with T. Archbell, Kroll re warrant agreement (0.1); review and analyze 2024 Notes documents for purposes of preparing for potential bond offering (1.1); correspond with C. Akard re Form 4 (0.2); correspond with J. Hotes, PW team, Kroll and AST re checklist (0.2); correspond with J. Kennedy, PW team re bond offering (0.6); review and analyze materials re Form 15 deregistration (2.1).	4.30
Melion, Max	Corp	Staff Attorney	03/22/23	709	Analyze HSR issues at the direction of R. Scherr.	1.00
Hotes, John R	Corp	Associate	03/22/23	709	Review and analyze background information re proposed notes offering (0.6); draft checklist re documentation required for proposed notes offering (0.9).	1.50
Huang, Brian	Corp	Associate	03/22/23	709	Draft Form 4 for sales of shares.	1.50
Kelly, Marta P.	Corp	Counsel	03/22/23	709	Analyze HSR issues.	0.60
Scherr, Rebekah	Corp	Associate	03/22/23	709	Conduct ex-US antitrust filings analysis.	1.30
Akard, Cynthia	ECP	Counsel	03/23/23	709	Review and analyze Form 4.	0.30
Kelly, Marta P.	Corp	Counsel	03/23/23	709	Conduct HSR/competition filings analysis.	0.50

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Name	Dept	Title	Date	Task	Description	Hours
Huang, Brian	Corp	Associate	03/23/23	709	Revise Form 4 for sales of shares (0.7); teleconference with Blumberg, PW, DPW and BR teams re emergence checklist (0.5); correspond with Blumberg, PW team re same (0.2).	1.40
Dwelle, Matthew E	Corp	Associate	03/23/23	709	Correspond with Archbell, Kroll and AST re emergence (0.8); revise closing checklist based on preliminary research (2.0); analyze various securities issues (1.0).	3.80
Rahnama, Omid	Rstr	Associate	03/23/23	709	Correspond with Revlon (M. Kvarda, and A. Kidd) and F. Sena (Cowen) re backstop trades (0.2); correspond with DPW (A. Libby, R Stewart, H. Zhang) re backstop trades (0.4); review and analyze backstop commitment agreement in connection with same (0.6) correspond with R. Chiappetta (Alston) re backstop trades (0.2); correspond with J. Galaz (A&M) and T. Archbell (Kroll) re backstop trades (0.4)	1.80
Subramanian, Keerthika	Corp	Counsel	03/23/23	709	Review JPM financing structure slides (0.3); correspond with J. Hotes, PW team re same (0.3); revise same (0.2); distribute same to PJT team (0.1); revise bond offering checklist (0.3); correspond with J. Hotes re same (0.1); correspond with C. Akard and B. Huang re Form 4 for D. Perelman (0.3); correspond with A. Lele (DPW) re LLCA and certificate of formation (0.1); correspond with J. Heasley and M. Dwelle re emergence checklist (0.2); teleconference with J. Kennedy, PW team re bond offering (0.4); correspond with E. Quinones re 10-K/A (0.2); teleconference with I. Blumberg, PW team re emergence checklist (0.5); correspond with B. Huang and M. Dwelle re emergence checklist (0.2); correspond with J. Hotes re RRA (0.1).	3.30
Hotes, John R	Corp	Associate	03/23/23	709	Review background documentation regarding potential bond offering (0.9); meet with J. Kennedy, PW team regarding potential bond offering (0.4); draft ancillary documentation regarding potential bond offering (1.2); draft summary of securities law exemptions relating to securities issued upon emergence (1.1); draft checklist regarding documentation required for emergence (0.8); correspond with I. Blumberg regarding emergence documentation (0.3).	4.70
Scherr, Rebekah	Corp	Associate	03/23/23	709	Analyze ex-US revenue and asset allocation for ex-US competition analysis.	0.80
McLaughlin, Daniel	Othr	Paralgl	03/23/23	709	Conduct research re Form 15 Deregistration Materials for M. Dwelle.	1.20
Hotes, John R	Corp	Associate	03/24/23	709	Draft checklist regarding emergence documentation (0.4); revise registration rights agreement (3.9).	4.30

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Name	Dept	Title	Date	Task	Description	Hours
Rahnama, Omid	Rstr	Associate	03/24/23	709	Correspond with J. Galaz (A&M) and N. Scully (Kroll) re backstop trades (0.5); correspond with D. Keeton re backstop trade (0.3); correspond with R. Stewart (DPW) re escrow agent (0.2); review and revise escrow agent agreement (0.4); correspond with T. Archbell and N. Scully (Kroll) re backstop parties and equity election (0.5); correspond with A. Kidd and E. Quinones (Revlon) re escrow agent agreement and KYC (0.3); correspond with A. Ameduri (Akin) Kroll (T. Archbell), and D. Keeton re backstop trades and rights offering (0.4).	2.60
Subramanian, Keerthika	Corp	Counsel	03/24/23	709	Correspond with M. Dwelle re emergence checklist (0.1); correspond with M. Dwell re delivery of LLCA draft and certificate of formation to Kroll (0.2); correspond with J. Hotes re annotation of RRA (0.1); correspond with M. Dwelle and Kroll re DTC eligibility matters (1.1); review annotation of RRA (1.1); correspond with C. Akard re 10-K/A (0.1); correspond with B. Huang re transfer agent engagement letter (0.1).	2.80
Scherr, Rebekah	Corp	Associate	03/24/23	709	Analyze foreign revenue and asset allocation for ex-US competition filings analysis.	1.40
Kennedy, John C	Corp	Partner	03/24/23	709	Review and analyze registration rights agreement (1.2); correspond with Subramanian, PW team re debt reporting (0.4).	1.60
Kelly, Marta P.	Corp	Counsel	03/24/23	709	Revise HSR/competition filings analysis.	0.60
Dwelle, Matthew E	Corp	Associate	03/24/23	709	Revise closing checklist (1.8); correspond with K. Subramanian re status of securities workstreams (0.2).	2.00
Huang, Brian	Corp	Associate	03/24/23	709	Review and analyze SEC Form 15 requirements (0.4); correspond with Subramanian, PW team re SEC Form 15 requirements (0.1); draft AST transfer agent agreement (1.9).	2.40
Akard, Cynthia	ECP	Counsel	03/24/23	709	Review and analyze 10-K/A compensation disclosure issues (1.4); revise draft 10-K/A (1.9).	3.30
Subramanian, Keerthika	Corp	Counsel	03/25/23	709	Correspond with J. Kennedy and C. Kaoutzannis re bond reporting covenant (0.1); correspond with J. Hotes re bond reporting covenant (0.1); review and analyze RRA mark-up (0.5); correspond with J. Hotes re same (0.1); correspond with J. Kennedy, DPW, A. McGinnis and E. Quinones re warrant agreement (0.2); correspond with J. Hotes re revisions to RRA (0.1).	1.10
Rahnama, Omid	Rstr	Associate	03/25/23	709	Correspond with K. Zuzolo (Akin) and T. Archbell (Kroll) re rights offering	0.40
Keeton, Douglas	Rstr	Associate	03/25/23	709	Correspond with Archbell (Kroll) regarding funding mechanics under backstop agreement.	0.30
Dwelle, Matthew E	Corp	Associate	03/25/23	709	Correspond with B. Huang and J. Hotes re updates to closing checklist.	0.80

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Name	Dept	Title	Date	Task	Description	Hours
Huang, Brian	Corp	Associate	03/25/23	709	Review and revise emergence checklist from a capital markets perspective.	0.40
Kennedy, John C	Corp	Partner	03/25/23	709	Review and analyze registration rights agreement markup (0.8); review and analyze financing slides (0.4).	1.20
Subramanian, Keerthika	Corp	Counsel	03/26/23	709	Correspond with J. Kennedy re warrant agreement and LLCA (0.2); correspond with B. Mohan re LLCA (0.8); correspond I. Blumberg, PW team re emergence coordination (0.4).	1.40
Dwelle, Matthew E	Corp	Associate	03/26/23	709	Update emergence checklist (0.3); correspond with K. Subramanian re same (0.1).	0.40
Kennedy, John C	Corp	Partner	03/26/23	709	Review and analyze warrant agreement (1.0); correspond with Subramanian, PW team re same (0.2).	1.20
Scherr, Rebekah	Corp	Associate	03/27/23	709	Revise ex-US competition filings analysis.	0.70
Huang, Brian	Corp	Associate	03/27/23	709	Teleconference with Subramanian, Archbell, DPW, Kroll, AST and PW teams re emergence workstreams (0.5); revise AST Transfer Agent Agreement (0.7); correspond with Heasley, PW team re emergence checklist updates (0.1); review and analyze emergence checklist for capital markets items (0.2); revise Warrant Agreement (0.5); correspond with Mohan, PW team re LLCA IPO provisions (0.3); correspond with Subramanian, PW team re warrant agreement (0.1).	2.40
Kennedy, John C	Corp	Partner	03/27/23	709	Correspond with Subramanian, PW team re registration rights agreement (0.5); review and analyze revised registration rights agreement (0.6); review and analyze warrant agreement comments (0.6).	1.70
Dwelle, Matthew E	Corp	Associate	03/27/23	709	Meet with Subramanian, Kroll and AST re emergence checklist (0.5); correspond with J. Heasley re emergence checklist (0.5); revise emergence checklist (1.3).	2.30
Kaoutzanis, Christodoulos	Corp	Partner	03/27/23	709	Correspond with J. Hotes, DPW team re RRA open items (0.2); review and analyze RRA (0.2); correspond with J. Kennedy re: reporting covenant (0.3).	0.70

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Name	Dept	Title	Date	Task	Description	Hours
Subramanian, Keerthika	Corp	Counsel	03/27/23	709	Correspond with M. Dwelle re emergence checklist (0.2); correspond with Archbell (Kroll) re DTC questionnaire (0.1); teleconference with M. Dwelle, Kroll, AST and DPW re emergence items (0.5); corresponded with AST and B. Huang re changes to engagement letter (0.1); correspond with B. Mohan re LLCA (0.1); correspond with M. Dwelle re warrant agreement (0.1); correspond with E. Quinones re warrant agreement (0.1); correspond with M. Dwelle and Kroll re emergence checklist call (0.1); correspond with C. Kaoutzanis and D. Epstein re call to discuss bond (0.1); revise warrant agreement (1.1); correspond with B. Huang re same (0.1); review and analyze portions of the LLCA (0.8); correspond with B. Huang re same (0.2); revise emergence checklist (1.1); correspond with M. Dwelle re same (0.1); correspond with A. Page re pre-ownership disclosure in pension document (0.2); correspond with R. Aizen re publicly traded language in employment agreement (0.1); review and analyze outstanding points in RRA (0.2). correspond with L. Luo re potential bond offering (0.1); corresponded with J. Kennedy and C. Kaoutzanis re securities issues in Bruno's steps deck (0.1).	5.50
Keeton, Douglas	Rstr	Associate	03/27/23	709	Correspond O. Rahnama regarding rights offering procedures (0.1); review and analyze summary of transfer provisions (0.2).	0.30
Rahnama, Omid	Rstr	Associate	03/27/23	709	Draft correspondence re backstop transfer issue (0.3); correspond with D. Keeton and A. Ameduri (Akin) re same (0.5); correspond with R. Britton T. Archbell (Kroll) and R. Chiappetta (Alston) re backstop transfers (0.9).	1.70
Hotes, John R	Corp	Associate	03/27/23	709	Finalize registration rights agreement (0.7); conference with B. Stewart (DPW) and T. Archbell (Kroll) re emergence documentation (0.6); conference with B. Stewart (DPW) re revisions to registration rights agreement (0.4).	1.70
Mohan, Bharath	Corp	Associate	03/28/23	709	Teleconference with Blumberg, PW, BR, DPW, and Akin teams re emergence checklist (0.5); meet with J. Braibanti, L. Cen re diligence (0.4); correspond with L. Cen, PW team re same (0.4).	1.30
Braibanti, Jill	LEGL	Associate	03/28/23	709	Teleconference with L. Cen and B. Mohan re contracts diligence for restructuring.	0.40
Rahnama, Omid	Rstr	Associate	03/28/23	709	Correspond with R. Britton and A. Ameduri (Akin) re backstop trades (0.4); review backstop and RSA transfers in connection with discrepancy and rights offering (0.7); review rights offering procedures, backstop commitment agreement, and RSA re same (0.5); call with Kroll (Archbell), A&M (J. Galaz), and D. Keeton re same (0.5);	2.10

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Name	Dept	Title	Date	Task	Description	Hours
Subramanian, Keerthika	Corp	Counsel	03/28/23	709	Correspond with J. Hotes re notice provision in RRA (0.1); corresponded with B. Mohan re LLCA (0.1); correspond with J. Kennedy and C. Kaoutzanis re latest timing for agreements (0.1); correspond with B. Huang re item 1.03 8-K (0.1); correspond with R. Aizen and J. Hotes re publicly traded language in employment agreement (1.2); correspond with J. Hotes, PW team re open securities tasks (0.4); correspond with L. Luo and I. Blumberg re bond offering (0.1); correspond with J. Hotes re RRA (0.1); correspond with Kroll and M. Dwelle re preliminary DTC matters (1.1); conference with I. Blumberg, PW team re emergence checklist (0.5); correspond with Blumberg, PW team re agreements needed for emergence (0.8).	4.60
Kennedy, John C	Corp	Partner	03/28/23	709	Correspond with Subramanian, PW team re auditor review (0.5); review and analyze revised registration rights agreement (0.4); correspond with Subramanian, PW team re same (0.5); review and analyze reorganization slides (0.5); correspond with C. Kaoutzanis re same (0.2).	2.10
Hotes, John R	Corp	Associate	03/28/23	709	Revise and finalize registration rights agreement (1.3); teleconference with Blumberg, PW, DPW, BR, Akin teams re emergence checklist (0.5).	1.80
Dwelle, Matthew E	Corp	Associate	03/28/23	709	Meet with Blumberg, PW team, Akin, DPW, BR re checklist (0.5); revise emergence checklist (1.5); prepare preliminary DTC instruction letter (0.6).	2.60
Huang, Brian	Corp	Associate	03/28/23	709	Revise Transfer Agent Agreement (0.1); correspond with Mohan, PW team re LLCA (0.1); correspond with Blumberg, PW team re 8-K for confirmation of the plan (0.1); draft 8-K re confirmation of the plan (3.5); teleconference with Blumberg, PW team, BR, Akin, DPW re emergence checklist (0.5); review and analyze Warrant Agreement filing version from DPW (0.3).	4.60
Cen, Leo	Corp	Associate	03/28/23	709	Meet with J. Braibanti and B. Mohan re diligence (0.4); review and analyze diligence (0.3).	0.70
Huang, Brian	Corp	Associate	03/29/23	709	Correspond with Blumberg, PW team re documents to be filed with the Bankruptcy Court (0.1); research SEC deregistration requirements (0.5); revise Form 15 deregistration timeline (0.3); correspond with Subramanian, PW team re SEC deregistration requirements (0.1); research re Section 1145 exemption from registration (2.9).	3.90
Heasley, Julia	Rstr	Associate	03/29/23	709	Correspond with E. Quinones (Revlon) and I. Blumberg re backstop agreement.	0.20
Britton, Robert	Rstr	Partner	03/29/23	709	Correspond with A. Eaton re backstop issues (0.3); correspond with O. Rahnama re same (0.4); analyze same (0.5).	1.20

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Name	Dept	Title	Date	Task	Description	Hours
Dwelle, Matthew E	Corp	Associate	03/29/23	709	Correspond with Archbell, Kroll, AST, BR, Akin, DPW and PW teams re securities items on emergence checklist (0.7); prepare Annex D to emergence checklist re Form 15 rules and timing requirements (1.0).	1.70
Rahnama, Omid	Rstr	Associate	03/29/23	709	Review and revise draft rights offering procedures and subscription form (0.8); correspond with T. Archbell (Kroll) and J. Galaz (A&M) re backstop transfers and rights offering (0.5); correspond with R Britton re rights offering and creditor inquiry (0.3)	1.60
Subramanian, Keerthika	Corp	Counsel	03/29/23	709	Review 10-K/A (3.1); correspond with A. Alvarez re same (0.1); correspond with J. Hotes and I. Blumberg re filing of documents with the bankruptcy court (0.2); correspond with Archbell, Kroll re DTC eligibility issues (0.1); correspond with M. Dwelle re 10-K/A requests (0.2); correspond with O. Rahnama 1145 question (0.2); correspond with O. Rahnama and B. Huang re same (0.1); correspond with N. Warier of PJT re sales process presentation (0.1); correspond with J Hotes re escrow agreement (0.1); correspond with library re Revlon's SEC reporting history (0.1); correspond with Kroll and M. Dwelle re DTC eligibility matters (0.2).	4.50
Hotes, John R	Corp	Associate	03/29/23	709	Revise registration rights agreement.	0.40
Liu, Ai Na	Othr	Paragl	03/30/23	709	Research exchange act for K. Subramanian.	0.70
Hossain, Julia	Rstr	Paralegal	03/30/23	709	Prepare notice of revised equity rights (0.6); incorporate edits into notice of revised ERO procedures (1.0); file ERO notice and coordinate service (0.4).	2.00
Scherr, Rebekah	Corp	Associate	03/30/23	709	Correspond with M. Kelly re competition filings analysis.	0.30
Kennedy, John C	Corp	Partner	03/30/23	709	Conference with Dwelle, PW team re securities workstreams on emergence checklist (0.5); teleconference with K. Subramanian re same (0.3).	0.80
McLaughlin, Daniel	Othr	Paragl	03/30/23	709	Research re rights offerings for B. Huang.	0.70
Dwelle, Matthew E	Corp	Associate	03/30/23	709	Teleconference with J. Kennedy and PW securities team re securities emergence workstreams (0.5); update securities items on emergence checklist (1.4).	1.90
Heasley, Julia	Rstr	Associate	03/30/23	709	Prepare executed versions of backstop amendment agreements (0.2); prepare notice of revised ROP and subscription form (0.7).	0.90
Huang, Brian	Corp	Associate	03/30/23	709	Research re Section 1145 exemption from registration (0.7); teleconference with Dwelle, PW team re securities emergence filings (0.5); update emergence checklist with deregistration items (0.7); correspond with Subramanian, PW team re Section 1145 research (0.3); draft 8-K for the confirmation of the Plan (1.7); correspond with Ferrari, PW, Alvarez and PJT teams re exit financing (0.3).	4.20

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Name	Dept	Title	Date	Task	Description	Hours
Hotes, John R	Corp	Associate	03/30/23	709	Revise checklist regarding status of documentation required for emergence.	0.60
Subramanian, Keerthika	Corp	Counsel	03/30/23	709	Review and analyze research re 1145 (0.4); correspond with B. Huang re same (0.1); correspond with G. Marchesini (DPW) and T. Weiner (AST) re warrant agreement (0.2); correspond with M. Dwelle re securities items on emergence checklist (0.3); correspond with Kroll re DTC eligibility issues (0.1); correspond with O. Rahnama re 1145 research (0.2); correspond with A. McGinnis re Revlon entity issuing securities (0.2); revised securities items on emergence checklist (0.5); correspond with M. Dwelle re same (0.1); teleconference with J. Kennedy, PW team re emergence action items for securities (0.5); correspond with J. Kennedy re Form 15 obligations for Revlon (0.1); conduct initial review of item 1.03 8-K (0.2); correspond with B. Huang re same (0.1); correspond with Library re Revlon's SEC filing history (0.2); review checklist containing updates from J. Kennedy (0.2); correspond with B. Huang re same (0.1); teleconference with T. Archbell (Kroll), Kroll team re DTC eligibility matters (0.5); correspond with same re same (0.4); correspond with E. Quinones re forward looking statements in communications re plan confirmation (0.1); correspond with A. McGinnis re DTC questions re warrants (0.1); correspond with E. Quinones re deregistration process (0.1); correspond with E. Quinones and A. Alvarez re 10-K/A (0.1); correspond with I. Blumberg re terminations of S-8 filings (0.1); review revised draft of item 1.03 8-K (0.3); correspond with B. Huang re the same (0.1); correspond with L. Luo re timing of confirmation (0.1); correspond with E. Quinones re communications process for plan confirmation (1.1); correspond with A. McGinnis re backstop agreement and equity rights offering questions (0.1).	6.60

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Name	Dept	Title	Date	Task	Description	Hours
Rahnama, Omid	Rstr	Associate	03/30/23	709	Review and revise draft rights offering procedures and subscription form (0.7); correspond with D. Keeton and R. Britton re same (0.3); correspond with E. Quinones and A. Antonio re KYC matters in connection with escrow agreement (0.2); correspond with A. Kidd, Company, Kroll, Akin, DPW, Proskauer, and BR re revised rights offering procedures (0.7); correspond with A. Kidd (Revlon) and R. Britton re backstop transfers (0.4); correspond with K. Subramanian re rights offering matters (0.2); teleconference with C. Katzaounis re rights offering matters (0.3); correspond with J. Galaz re rights offering documents (0.2); correspond with Stewart (DPW) re rights offering matters (0.4); correspond with F. Zepeda (A&M) re rights offering and backstop matters (0.1); correspond with K. Rothenberg (Alston) re rights offering matters (0.2); prepare filing version of revised rights offering procedures and subscription form (0.5)	4.20
Liu, Ai Na	Othr	Paralgl	03/31/23	709	Research precedent disclosures for B. Huang and PW securities team.	0.70
Dwelle, Matthew E	Corp	Associate	03/31/23	709	Correspond with Revlon, EDGAR team, J. Kennedy, PW team re emergence checklist items and next steps.	2.10
Rahnama, Omid	Rstr	Associate	03/31/23	709	Correspond with R. Chiappatta (Alston) re backstop trades.	0.20
Rahnama, Omid	Rstr	Associate	03/31/23	709	Correspond with R. Britton re rights offering matters (0.2); review rights offering procedures re same (0.4); correspond with D. Keeton, R. Britton, and R. Stewart (DPW) re backstop commitment agreement (0.3); review backstop commitment agreement re same (0.4); correspond with L. Marcus (Brown Rudnick) re backstop and rights offering matters (0.2); correspond with N. Scully (Kroll) re rights offering (0.2).	1.70
Huang, Brian	Corp	Associate	03/31/23	709	Research 8-Ks filed upon emergence from Ch. 11 (0.4); revise draft 8-K re confirmation of plan (1.7); correspond with Archbell, PW, Kroll and A&M teams re amount of shares issued upon emergence from Ch. 11 (0.3); correspond with Blumberg, PW team re 8-K in connection with Third A&R Plan (0.2).	2.60
Kennedy, John C	Corp	Partner	03/31/23	709	Correspond with K. Subramanian, PW team re financing developments (0.7); comment on draft 8-K (0.3); correspond with J. Hotes and PW team re 8-K issues (0.2).	1.20
Hotes, John R	Corp	Associate	03/31/23	709	Revise cleansing materials (0.8); draft Form 8-K regarding filing of cleansing materials (0.7); draft Form 8-K regarding disclosure of amended Plan (0.5).	2.00

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Name	Dept	Title	Date	Task	Description	Hours
Subramanian, Keerthika	Corp	Counsel	03/31/23	709	Correspond with A. Eaton re potential MNPI and cleansing obligations (0.1); correspond with B. Huang re emergence 8-K precedents (0.1); correspond with Kroll re share numbers necessary for 8-K (0.1); correspond with R. Britton re cleansing (0.1); correspond with J. Kennedy and team re cleansing-related changes to 8-K disclosure (0.1); correspond with A&M, PJT and J. Hotes re cleansing deck (0.4); review cleansing deck (0.5); correspond with J. Hotes re same (0.1); correspond with Kroll re DTC eligibility (0.1); correspond with PW team re 8-K obligations associated with Third Amended Plan (1.2); correspond with M. Dwelle re warrant agreement (0.1); comment on cleansing 8-K (0.2); correspond with J. Hotes and team re same (0.1); review item 1.03 8-K (0.3); correspond with B. Huang and team re same (0.1); review amended Plan 8-K (0.2); correspond with B. Huang and team re same (0.1); correspond with J. Kennedy re 8-K draft distribution (0.1).	4.00
Huang, Brian	Corp	Associate	04/01/23	709	Research Form 15 requirements for voluntary filers (1.9); correspond with PJT and A&M teams re shares being issued upon emergence (0.2); correspond with PW team re confirmation of Plan 8-K (0.4); revise 8-K re confirmation of Plan (1.5).	4.00
Dwelle, Matthew E	Corp	Associate	04/01/23	709	Revise emergence checklist for securities items (0.2); correspond with K. Subramanian re same (0.1).	0.30
Kennedy, John C	Corp	Partner	04/01/23	709	Review and comment on draft 8-Ks.	0.60
Subramanian, Keerthika	Corp	Counsel	04/01/23	709	Correspond with J. Kennedy, C. Kaoutzanis, J. Hotes, B. Huang and M. Dwelle re non-gaap metrics in cleansing 8-K (0.1); correspond with R. Britton, PW bankruptcy re consolidation of various 8-K (0.1); correspond with I. Blumberg re prior 8-Ks disclosing amendments to the Plan (0.2); correspond with J. Hotes re same (0.1); correspond with B. Huang re 8-K process, research re RCPC requirements, and OTC references in 8-K (0.3); correspond with I. Blumberg, PW bankruptcy team and PW securities team re PW bankruptcy team's comments to the 8-K (0.2).	1.00
Blumberg, Irene	Rstr	Associate	04/01/23	709	Correspond with K. Subramanian re cleansing.	0.20
Kennedy, John C	Corp	Partner	04/02/23	709	Review draft 8-Ks (0.2); correspond with K. Subramanian, PW team re same (0.2).	0.40

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Name	Dept	Title	Date	Task	Description	Hours
Huang, Brian	Corp	Associate	04/02/23	709	Teleconference with K. Subramanian re filing 8-Ks in connection with confirmation of the Plan (0.3); correspond with PW team re approach to filing 8-Ks for confirmation of Plan and cleansing (0.8); circulate draft 8-Ks with working groups including Revlon team (0.5); revise 8-K regarding filing the Third A&R Plan (0.7); revise 8-K regarding confirmation of Plan to consolidate with cleansing and Third A&R Plan 8-Ks (0.4); coordinating with printer to process 8-Ks (0.3); review 8-K proofs received from printer (0.4).	3.40
Dwelle, Matthew E	Corp	Associate	04/02/23	709	Update securities items on emergence checklist (0.2); correspond with K. Subramanian re same (0.1).	0.30
Kaoutzanis, Christodoulos	Corp	Partner	04/02/23	709	Review and analyze draft 8-Ks.	0.50
Subramanian, Keerthika	Corp	Counsel	04/02/23	709	Review revised version of item 1.03 8-K (0.3); correspond with B. Huang re same (0.2); teleconference with B. Huang re same (0.3); review further revised draft of 8-K (0.1); correspond with B. Huang re same (0.1); correspond with PW bankruptcy time re timing of cleansing obligation (0.1); correspond with PW team, Revlon and advisors (PJT/A&M) re strategy and timing for 8-K (1.1).	2.20
Hotes, John R	Corp	Associate	04/02/23	709	Draft Form 8-K re cleansing materials.	1.00
Kennedy, John C	Corp	Partner	04/03/23	709	Correspond with K. Subramanian, M. Dwelle, PW team re 8-K filings.	0.60
Huang, Brian	Corp	Associate	04/03/23	709	Revise 8-K for confirmation of the Plan (1.8); correspond with AST team re outstanding shares for 8-K (0.2); correspond with PW, DPW, Akin and BR teams re 8-K filing (1.6); comment on emergence checklist (0.2); teleconference with J. Hotes, E. Quinones (Revlon) re securities emergence requirements (0.5); teleconference with J. Hotes, AST, DPW, BR and Akin teams on DTC and emergence requirements (0.5); correspond with PW Securities team to discuss filing 8-K process (0.3); coordinate with Broadridge printer team on 8-K filing (0.6); review and analyze proofs of the 8-K (0.6).	6.30
Rahnama, Omid	Rstr	Associate	04/03/23	709	Correspond with H. Zhang (DPW), DPW re backstop transfers (0.2); correspond with R. Chiappetta (Alston) re RSA joinder (0.1); correspond with K. Rothenberg (Alston) rights offering and designation mechanics (0.1); teleconference with K. Rothenberg (Alston) re same (0.2); correspond with F. Sena (Cowan) re backstop transfers (0.1); correspond with A. Amedurri (Akin) and D. Keeton re rights offering designation and funding mechanics (0.6).	1.30

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Name	Dept	Title	Date	Task	Description	Hours
Dwelle, Matthew E	Corp	Associate	04/03/23	709	Teleconference with J. Hotes, E. Quinones (Revlon) re emergence-related items (0.5); teleconference with J. Hotes, DPW, Akin, PW securities teams re emergence checklist (0.5); update securities items on emergence checklist (1.0); proof consolidated 8-K and coordinate with printer re: same (1.5); correspond with K. Subramanian, PW team re same (0.5).	4.00
Page, Alana	Rstr	Associate	04/03/23	709	Correspond with R. Britton re press release and 8-K (0.1); correspond with K. Subramanian re same (0.2).	0.30
Subramanian, Keerthika	Corp	Counsel	04/03/23	709	Correspond with B. Huang re share numbers for item 1.03 8-K (0.1); correspond with B. Huang re status of DPW comments to item 1.03 8-K (0.1); correspond with M. Dwelle re emergence checklist updates (0.1); correspond with PW bankruptcy team and PW securities team re rescheduling group call (0.1); correspond with E. Quinones of Revlon re internal communications re plan confirmation (0.1); review consolidated 8-K (0.2); correspond with PW securities team re the same (0.1); correspond with B. Huang re transfer agent share numbers for item 1.03 8-K (0.1); correspond with B. Huang re DPW comments to 8-K (0.1); correspond with C. Kaoutzanis re share numbers for item 1.03 8-K (0.1); correspond with PW bankruptcy team re proposed internal communications (0.1); correspond with transfer agent re share numbers as of March 1, 2023 for item 1.03 8-K (0.1); correspond with J. Hotes re cleansing materials (0.1); correspond with A&M re DPW comments to item 1.03 8-K (0.2); correspond with A. Nintzel (Revlon) re internal communications (0.1); correspond with E. Ross (PJT) re cleansing materials (0.1); teleconference with same re cleansing materials (0.2); correspond with Revlon and PW bankruptcy team re communications plan (3.1); correspond with Revlon and advisors re changes to cleansing materials (1.1); teleconference with A&M re item 1.03 8-K (0.2); correspond with B. Huang re same (0.1); review further revised 8-K (0.3); correspond with B. Huang re same (0.1); correspond with A. McGinnis re Bruno's (0.1); teleconference with E. Quinones (Revlon), J. Hotes re financing disclosures in 8-K (0.5).	7.50
Hotes, John R	Corp	Associate	04/03/23	709	Draft Form 8-K regarding confirmation of Plan (1.3); conference with E. Quinones (Revlon), M. Dwelle, PW team re securities documentation required for emergence (0.5); conference with B. Huang, DPW, Akin, BR, AST re status of emergence documentation (0.5).	2.30
Heasley, Julia	Rstr	Associate	03/03/23	710	Teleconference with various creditors re bankruptcy process inquiries.	0.50

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Name	Dept	Title	Date	Task	Description	Hours
Blumberg, Irene	Rstr	Associate	03/06/23	710	Correspond with T. Behnke, Kroll re stakeholder inquiry (0.2); respond to same (0.1).	0.30
Blumberg, Irene	Rstr	Associate	03/07/23	710	Correspond with R. Britton, A. Page re BCG meetings.	0.20
Blumberg, Irene	Rstr	Associate	03/07/23	710	Correspond with J. Heasley re stakeholder outreach (0.2); review and analyze draft responses to same (0.3).	0.50
Page, Alana	Rstr	Associate	03/07/23	710	Respond to creditor voting inquiry.	0.30
Heasley, Julia	Rstr	Associate	03/08/23	710	Teleconference with creditors re inquiries.	0.30
Heasley, Julia	Rstr	Associate	03/09/23	710	Teleconference with various creditors re inquiries re voting and claims.	0.10
Blumberg, Irene	Rstr	Associate	03/09/23	710	Correspond with J. Heasley re responses to stakeholder outreach (0.2); correspond with T. Behnke, Kroll re same (0.2); correspond with O. Rahnama re NDAs (0.1); correspond with stakeholder re ballots (0.2).	0.70
Clareman, William	Lit	Partner	03/09/23	710	Correspond with E. Sasso re plan research.	0.30
Heasley, Julia	Rstr	Associate	03/10/23	710	Correspond with I. Blumberg re NDA for creditor.	0.10
Blumberg, Irene	Rstr	Associate	03/13/23	710	Correspond with M. Sidorenkov re cleansing (0.3); correspond with stakeholder re inquiry (0.3); correspond with noteholder re inquiry (0.2).	0.80
Britton, Robert	Rstr	Partner	03/13/23	710	Correspond with A. Page re BCG.	0.20
Heasley, Julia	Rstr	Associate	03/13/23	710	Teleconference with creditors re inquiries voting inquiries.	0.10
Heasley, Julia	Rstr	Associate	03/14/23	710	Teleconference with creditors re bankruptcy inquiries.	0.80
Page, Alana	Rstr	Associate	03/14/23	710	Respond to creditor inquiries re voting and confirmation.	0.30
Blumberg, Irene	Rstr	Associate	03/14/23	710	Correspond with stakeholder re inquiry (0.2); correspond with Kroll, B. Silverberg re bulk voting (0.3).	0.50
Heasley, Julia	Rstr	Associate	03/15/23	710	Teleconference with creditors re chapter 11 process inquiries (0.4); teleconference with A. Page and creditor re same (0.2).	0.60
Page, Alana	Rstr	Associate	03/15/23	710	Respond to creditor inquiries re voting, claims, and general bankruptcy questions.	0.50
Basta, Paul M.	Rstr	Partner	03/15/23	710	Conference with M. Bernstein and E. Arbeter re Revlon.	1.00
Blumberg, Irene	Rstr	Associate	03/16/23	710	Review and analyze NDA (0.4); correspond with R. Britton re same (0.1); correspond with A. Kidd (Revlon) re same (0.2).	0.70
Britton, Robert	Rstr	Partner	03/18/23	710	Conference with S. Massman (DPW), L. Luo re hair straightening issues (0.3); correspond with L. Luo re same (0.5); conference with S. Esserman re same (0.4); correspond with S. Esserman re same (0.5).	1.70

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Name	Dept	Title	Date	Task	Description	Hours
Heasley, Julia	Rstr	Associate	03/21/23	710	Teleconference with various creditors re various inquiries (0.6); correspond with creditor re follow-up information (0.1); draft proposed response to creditor inquiry (0.1).	0.80
Blumberg, Irene	Rstr	Associate	03/22/23	710	Correspond with J. Heasley re various stakeholder inquiries (0.3); review and analyze same (0.5).	0.80
Heasley, Julia	Rstr	Associate	03/22/23	710	Correspond with S. Perry, Kroll team re creditor inquiry (0.1); teleconference with creditor re same (0.3).	0.40
Page, Alana	Rstr	Associate	03/22/23	710	Correspond with stakeholders re claims and voting questions (0.3); correspond with R. Britton re same (0.1).	0.40
Carey, Peter	Lit	Counsel	03/27/23	710	Draft recommended approach for governmental engagement.	0.30
Mohan, Bharath	Corp	Associate	11/03/22	711	Review and revise exit financing NDAs.	0.70
Angelopoulos, Marina	Ent	Paralegal	03/01/23	711	Update IP tracker chart (2.3); conference with J. Braibanti re same (0.4).	2.70
Page, Alana	Rstr	Associate	03/01/23	711	Revise stipulation to modify final DIP order (0.9); correspond with D. Kratzer, DPW, BR teams re same (0.3); teleconference with D. Kratzer re same (0.2); prepare filing version of same (0.2); coordinate filing of same (0.1).	1.70
Heasley, Julia	Rstr	Associate	03/01/23	711	Correspond with S. Massman, DPW team re compiled BCA.	0.10
Glazeski, Jacob	ECP	Counsel	03/01/23	711	Correspond with R. Aizen re credit agreement comments (0.2); review and analyze exit loan credit agreement (0.3); prepare comments re same (0.2); correspond with PW finance team re same (0.2); review and analyze additional comments for credit agreement (0.3); correspond with Canadian counsel re same (0.2).	1.40
Bolin, Brian	Rstr	Partner	03/01/23	711	Review and analyze updated exit financing proposals (0.3); Zoom meeting with E. Ross, PJT team re same (0.5).	0.80
Daniele, Salvatore	Corp	Associate	03/01/23	711	Teleconference with M. Ferrari and PW associates re matter status and workstreams (0.5); teleconference with D. Epstein, PW team, B. Tsepellman, and DPW team re term loan checklist (0.5); review and analyze DACAs (0.4); draft legal opinion and backup certificate (0.6).	2.00
Britton, Robert	Rstr	Partner	03/01/23	711	Correspond with A. Page re DIP stipulation.	0.50
Toossi, Gabriella	Corp	Counsel	03/01/23	711	Review and revise SOFR provisions in exit credit agreement.	0.80

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Name	Dept	Title	Date	Task	Description	Hours
de la Bastide, Thomas V	Corp	Partner	03/01/23	711	Conduct work on exit financing term loan facility (2.0); teleconference with S. Massman, DPW team re term loan exit checklist (0.5); correspond with client and PJT re ABL exit facilities final term (0.2); conference with E. Ross, PJT team, client re same (0.7); review and analyze term sheets and commitment papers for exit ABL facilities (0.5); correspond with D. Epstein re EBITDA and FCCR definitions (0.4); review and analyze same (0.3).	4.60
Blain, Hunter	Corp	Associate	03/01/23	711	Teleconference with M. Ferrari, PW associate team re matter status and workstreams (0.5); prepare for meeting with DPW team re credit agreement (0.1); teleconference with D. Epstein, PW team, DPW team re term loan checklist (0.5); correspond with R. de la Bastide re same (0.1).	1.20
Meredith-Goujon, Claudine K	Corp	Partner	03/01/23	711	Partially attend teleconference with D. Epstein, PW and DPW teams re exit financing issues.	0.30
Epstein, David	Corp	Counsel	03/01/23	711	Teleconference with S. Daniele, PW team, DPW team re exit term loan closing checklist and mechanics (0.5); teleconference with M. Ferrari, PW team, DPW team re term loan checklist (0.5); teleconference with E. Ross, PJT re exit financing (0.4); review and analyze questions re new inventory program (0.2); review and revise financial definitions for exit ABL (0.4); review and prepare markup and grid of exit term loan credit agreement (3.8).	5.80
Keeton, Douglas	Rstr	Associate	03/01/23	711	Teleconference with T. Archbell, Kroll and DPW teams re rights offering mechanics.	0.50
Blumberg, Irene	Rstr	Associate	03/01/23	711	Draft responses to Moody's inquiries (0.4); correspond with E. Ross re same (0.1); correspond with A. Gerber re same (0.2).	0.70
Ferrari, Marta	Corp	Associate	03/01/23	711	Teleconference with E. Rocher, PW team re exit financing workstreams (0.5); teleconference with D. Epstein, DPW team, PW team re same (0.5); teleconference with E. Ross, PJT team re same (1.2); correspond with UK financing team, US financing team, specialists teams and lender's counsel concerning exit facilities (1.9); review and revise draft schedules to Credit Agreement (0.8).	4.90
Kavarsky, Gary	Corp	Associate	03/01/23	711	Review, revise schedules to exit facility documents.	3.00
Rocher, Evan	Corp	Associate	03/01/23	711	Conference with M. Ferrari, financing team re exit financing next steps (0.5); correspond with C. Langan (PJT) re NRL issues for exit financing (0.4); review, analyze issues related to English law debenture release (0.7).	1.60

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Name	Dept	Title	Date	Task	Description	Hours
Braibanti, Jill	LEGL	Associate	03/01/23	711	Correspond with C. Meredith-Goujon and J. Heasley re emergence plan and IP matters (0.1); review and analyze emergence checklist (0.5); review and analyze materials from C. Langan and D. Epstein re exit loan grids (0.3); conference with M. Angelopoulos re IP foreign lien chart (0.4); correspond with M. Angelopoulos re same (0.2); teleconference with E. Rocher and PW team re exit financing (0.5); review and analyze DIP IP lien documentation (1.3); correspond with S. Lefland at DPW re recording bankruptcy order in IP offices (0.1); correspond with L. Cen re APA (0.1).	3.50
Rwambuza, Joseph	Corp	Paralegal	03/02/23	711	Review and analyze comments to the UCC Termination Statements (0.4); prepare revised drafts of certain UCC Termination Statements (0.6).	1.00
Britton, Robert	Rstr	Partner	03/02/23	711	Review and analyze research re finance issues in connection with confirmation (0.5); correspond with I. Blumberg re confirmation and exit (0.4).	0.90
Meredith-Goujon, Claudine K	Corp	Partner	03/02/23	711	Correspond with I. Blumberg and PW team re BrandCo unwinding (0.3); review and analyze IP reporting to DIP BrandCo and DIP ABL lenders (0.1); review and analyze UK counsel summary of release of UK and IP liens in connection with exit financing (0.2).	0.60
Toossi, Gabriella	Corp	Counsel	03/02/23	711	Review and analyze SOFR provisions in exit facility.	0.30
Epstein, David	Corp	Counsel	03/02/23	711	Teleconference with T. de la Bastide, PW finance team re exit facilities (0.6); teleconference with R. Holo, PW Tax re tax issues in exit facilities (0.2); prepare summary of teleconference (0.3); correspond with UK counsel re exit facilities (0.3); review and analyze issues re new inventory program (0.7); review and analyze exit ABL loan terms (1.1).	3.20
Blain, Hunter	Corp	Associate	03/02/23	711	Prepare for meeting with PW tax team re foreign pledges (0.1); teleconference with R. Holo, PW tax re same (0.2); review and analyze UK collateral documents (0.3); teleconference with M. Ferrari re same (0.2).	0.80
de la Bastide, Thomas V	Corp	Partner	03/02/23	711	Conference with M. Ferrari, PW team re exit ABL terms, commitment paper drafts (0.8); teleconference with D. Epstein, PW team re exit financing (0.6); correspond with E. Ross, PJT and company re final exit ABL mandates and terms (0.3); conference with E. Ross (PJT), PJT team, client re same (0.4).	2.10
McGinnis, Anne	Tax	Counsel	03/02/23	711	Correspond with Ferrari, PW team re take back debt (0.2); correspond with same re exit planning (0.4).	0.60
Heasley, Julia	Rstr	Associate	03/02/23	711	Compile exit debt commitment letter.	0.30
Bolin, Brian	Rstr	Partner	03/02/23	711	Teleconference with T. de la Bastide, PW exit financing team, KPMG re exit financing (1.0); review and comment on ABL proposal grid (0.7).	1.70

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Name	Dept	Title	Date	Task	Description	Hours
Daniele, Salvatore	Corp	Associate	03/02/23	711	Draft legal opinions re exit financing (1.5); correspond with M. Ferrari, PW team, N. Warier, PJT team, L. Doughty and Walkers team, K. Moffat, Osler team, M. Kvarda, and Alvarez and Marsal team re exit financing (0.3); draft solvency certificate (0.3); teleconference with R. Holo and PW team re tax issues for exit financing (0.2); review and analyze files re organizational documents (0.6); review and analyze ABL grid and financial definitions (0.5).	3.40
Braibanti, Jill	LEGL	Associate	03/02/23	711	Finalize deliverables for DIP monthly IP reporting (2.7); correspond with PW reprographics, mailroom to coordinate delivery of DIP IP reporting (0.5); correspond with DIP lender notice addresses to send copies of DIP IP reporting (0.3); correspond with L. Shea (Revlon) re trademark docket (0.1); correspond with D. Rabinowitz and C. Meredith-Goujon re coordination on BrandCo IP unwind workstream (0.1); correspond with D. Walsh re BrandCo IP unwind status (0.1); correspond with S. Rosenthal (Revlon) re DIP IP reporting delivery (0.1); correspond with D. Rabinowitz re Brandco IP unwind workstream (0.3); correspond with C. Meredith-Goujon re same (0.4); correspond with C. Meredith-Goujon re same (0.4); correspond with C. Langan re exit loan grids (0.3).	5.30
Ferrari, Marta	Corp	Associate	03/02/23	711	Review and revise borrowing base calculation proposals and exit financing grids (1.3); teleconference with H. Blain re UK collateral documents (0.2); review and revise draft list of payoff documents and exit financing documents for foreign jurisdictions (1.2); teleconference with R. Holo, PW team re tax issues for exit financing (0.2); teleconference with T. de la Bastide, PW exit finance team re exit ABL (0.8); teleconference with E. Ross, PJT team re exit financing (1.6); review and analyze exit financing documents (1.4); review and revise payoff documentation (2.3).	9.00
Rahnama, Omid	Rstr	Associate	03/02/23	711	Correspond with D. Keeton and M. Ferrari re exit financing (0.2); correspond with J. Heasley re debt commitment letter (0.2); correspond with A. Page and D. Keeton re debt commitment letter notice (0.3); correspond with D. Keeton and A. Feld (Akin) re same (0.4).	1.10
Epstein, David	Corp	Counsel	03/03/23	711	Prepare markup of term loan exit facility credit agreement (1.9); review and prepare markups of exit ABL (0.5); review and prepare markups of FILO commitment letter (0.8); review and prepare markups of term sheets (0.5)	3.70
Blain, Hunter	Corp	Associate	03/03/23	711	Review and analyze prior debt documents re UK entity.	0.80

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Name	Dept	Title	Date	Task	Description	Hours
Meredith-Goujon, Claudine K	Corp	Partner	03/03/23	711	Conference with R. Holo re IP issues in exit strategy (0.3); review and analyze issues re same (0.2).	0.50
Toossi, Gabriella	Corp	Counsel	03/03/23	711	Review and analyze SOFR provisions in exit facility (1.7); correspond with D. Epstein re same (0.3).	2.00
Glazeski, Jacob	ECP	Counsel	03/03/23	711	Correspond with M. Ferrari, PW finance team re comments for credit agreement.	0.40
de la Bastide, Thomas V	Corp	Partner	03/03/23	711	Correspond with E. Ross, PJT, company re ABL final terms and commitments (0.4); correspond with D. Epstein, PW team on exit facility issues and commitment paper drafts (0.4).	0.80
Daniele, Salvatore	Corp	Associate	03/03/23	711	Correspond with M. Ferrari re FABTL (0.1); review and analyze files re sub-agent contacts and documents (0.4).	0.50
Braibanti, Jill	LEGL	Associate	03/03/23	711	Correspond with D. Rabinowitz re Brandco IP unwind workstream (0.1); review and analyze Revlon's worldwide IP dockets (0.7); correspond with S. Rosenthal (Revlon) re IP dockets (0.1); review and revise draft annual IP reports for DIP financing (0.8); confirm and update tracker re DIP monthly IP reports received (0.1); correspond with N. Cooper re exit financing release details (0.1).	1.90
Ferrari, Marta	Corp	Associate	03/03/23	711	Teleconference with Freshfields R. Aizen, re UK pension plans (1.1); review and revise draft commitment papers for exit Foreign ATBL facility (2.2); correspond with foreign counsel, R. Holo, PW tax team re exit financing (2.5).	5.80
Blumberg, Irene	Rstr	Associate	03/03/23	711	Correspond with A. Gerber re Moody's inquiries (0.2); correspond with R. Britton re same (0.2); revise answers to Moody's inquiries (0.2); correspond with E. Ross re same (0.1).	0.70
Meredith-Goujon, Claudine K	Corp	Partner	03/04/23	711	Analyze options to "unwind" BrandCo structure.	0.80
Holo, Robert	Tax	Partner	03/04/23	711	Correspond with Carey, PW re Brandco IP restructuring (0.1); review and analyze D. Walsh's structure options re same (0.2).	0.30
Keeton, Douglas	Rstr	Associate	03/05/23	711	Correspond with A. Awrabi (A&M), A&M team re excess liquidity calculations.	0.60
Braibanti, Jill	LEGL	Associate	03/05/23	711	Review and analyze IP dockets from Revlon for perfection certificate.	1.20
Blain, Hunter	Corp	Associate	03/06/23	711	Review and analyze documents re deed of release and related payoff.	0.30
Heasley, Julia	Rstr	Associate	03/06/23	711	Correspond with O. Rahnama and DPW re debt commitment letter.	0.20
de la Bastide, Thomas V	Corp	Partner	03/06/23	711	Meet with D. Epstein, Company, A&M, PJT re exit facility terms, ratings and status (0.7); review and analyze Moody's ratings (0.5); review and comment on commitment papers for ABL and FABTL (2.5).	3.70

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Name	Dept	Title	Date	Task	Description	Hours
Epstein, David	Corp	Counsel	03/06/23	711	Teleconference with T. de la Bastide, Revlon, PJT, A&M re exit facility process (0.7); prepare markup of term loan exit facility (2.0); review and provide comments on exit facility commitment papers (1.7); correspond with T. de la Bastide re lender register (0.2).	4.60
Meredith-Goujon, Claudine K	Corp	Partner	03/06/23	711	Teleconference with S. Rosenthal (Revlon), Revlon team, PW team re distribution of products in EMEA (0.4); conference with S. Rosenthal re same (0.1); correspond with D. Epstein re same (0.1).	0.60
Rahnama, Omid	Rstr	Associate	03/06/23	711	Revise draft posting memos to 2016 and BrandCo lenders (0.9); draft correspondence to lenders' counsel re same (0.5); correspond with D. Keeton re same (0.3); review and analyze Company's diligence materials (1.8).	3.50
Bolin, Brian	Rstr	Partner	03/06/23	711	Partially attend conference with Epstein, PW team, Revlon management team re exit financing.	0.50
Rocher, Evan	Corp	Associate	03/06/23	711	Conference with D. Walsh, Revlon team, PW team re exit financing covenants (0.4); correspond with D. Epstein, D. Shiffman (A&M) re same (1.0); correspond with counsel for agents (C. LoTempio, Seward and Kissel, C. Tseng, Latham, V. Indelicato, Proskauer, M. Sedrish, Paul Hastings) re exit financing matters (2.3).	3.70
Keeton, Douglas	Rstr	Associate	03/06/23	711	Correspond with Stewart, Davis Polk regarding rights offering timing (0.2); correspond with Sidorenkov, A&M regarding excess liquidity calculations (0.2); review and revise updated rights offering calendar (0.4); review and revise rights offering procedures and related forms (1.3).	2.10
Ferrari, Marta	Corp	Associate	03/06/23	711	Conference with Mates, PJT concerning ABL/FILO and FABTL proposals (0.5); correspond with Fischer, DPW and Freshfields teams re same (1.4); revise draft commitment papers (2.2); conference with Ross, Revlon and PJT concerning exit facilities (0.5); draft commitment letters and term sheets for ABTL Facility (4.6); correspond with McGinnis, PW Tax team re financing tax issues (0.8); draft fee letters (1.0).	11.00
Braibanti, Jill	LEGL	Associate	03/06/23	711	Revise annual IP reports for DIP financing (0.4); correspond with C. Meredith-Goujon and J. Maccio re annual IP reports for DIP financing (0.5); correspond with C. Meredith-Goujon, E. Rocher and M. Ferrari re IP financing workstreams (0.5); correspond with S. Rosenthal re annual IP report drafts (0.4); draft sections of intercompany IP license (0.7); review and analyze materials re final ABL grid (0.2).	2.70
Blain, Hunter	Corp	Associate	03/07/23	711	Correspond with Cayman counsel re opinion documents (0.2); review and analyze same (0.1).	0.30

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Name	Dept	Title	Date	Task	Description	Hours
Epstein, David	Corp	Counsel	03/07/23	711	Review and revise exit facility commitment letters and grids (4.7); prepare markup of exit term loan credit agreement (1.2).	5.90
Meredith-Goujon, Claudine K	Corp	Partner	03/07/23	711	Correspond with A. McGinnis, PW team, KPMG re IP rationalization (0.3); review and analyze Revlon deck re same (1.0).	1.30
Meredith-Goujon, Claudine K	Corp	Partner	03/07/23	711	Correspond with J. Braibanti re annual IP report to lenders.	0.10
Rahnama, Omid	Rstr	Associate	03/07/23	711	Review and revise draft posting memos to lenders re revised rights offering and related dates (0.7); correspond with lenders' counsel (DPW, LW, PH, Akin) re same (0.2); correspond with D. Keeton and J. Weichselbaum (LW) re same (0.2).	1.10
Bolin, Brian	Rstr	Partner	03/07/23	711	Review and comment on draft commitment papers for exit financing.	8.10
Daniele, Salvatore	Corp	Associate	03/07/23	711	Correspond with M. Ferrari and E. Rocher re local counsel opinions and matter workstreams.	0.30
de la Bastide, Thomas V	Corp	Partner	03/07/23	711	Review and comment on exit facility documents (1.3); review and comment on commitment papers (0.5); review and comment on term sheets (0.7).	2.50
Ferrari, Marta	Corp	Associate	03/07/23	711	Conference with Ross, PJT concerning ABL/FILO and FABTL proposals (0.7); correspond with Fischer, DPW, Proskauer, Osler and Freshfields teams concerning exit financing (0.8); revise draft commitment papers (6.1); correspond with McGinnis, PW Tax team re exit financing (1.0); revise draft Fee Letters (1.9).	10.50
Braibanti, Jill	LEGL	Associate	03/07/23	711	Correspond with S. Rosenthal, L. Shea and D. Dougherty (Revlon) re draft annual IP reports for DIP financing (0.5); correspond with C. Meredith-Goujon re revising annual IP reports (0.3); revise annual IP reports per Revlon's comments (0.4); review and analyze BrandCo structure and related DIP financing documents (0.6); revise shell IP schedules for perfection certificate (0.5).	2.30
Rocher, Evan	Corp	Associate	03/07/23	711	Correspond with T. De La Bastide, PW Financing team re ABL proposals and next steps (1.1); correspond with C. Langan (PJT) re same (0.2); correspond with M. Volin (Proskauer) and E. Vonnegut, DPW team re milestone extensions (0.5); review and analyze exit KYC requirements (0.8).	2.60
de la Bastide, Thomas V	Corp	Partner	03/08/23	711	Teleconference with Mates, A&M, Company, PJT re covenants for exit facilities (0.9); review and comment on exit facility terms grids, commitment papers and term sheets and takeback credit agreement (3.0); correspond with D. Epstein, B. Bolin, M. Ferrari re comments to exit documents (0.7).	4.60

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Name	Dept	Title	Date	Task	Description	Hours
Blain, Hunter	Corp	Associate	03/08/23	711	Meet with S. Daniele, PW associate team re exit financing (0.5); correspond with E. Rocher, PW team re same (0.2); correspond with foreign counsel re KYC or other documentary requirements (0.3); prepare for checklist teleconference (0.2); attend conference with B. Bolin, DPW re emergence checklist (0.4); review and revise term loan credit agreement (0.5); correspond with E. Rocher, PW team re same (0.1).	2.20
Bolin, Brian	Rstr	Partner	03/08/23	711	Conference with Mates, PJT and management re exit financing (0.9); conference with Fischer, DPW re exit financing closing checklist (0.4); review and comment on exit financing proposals (0.3).	1.60
Ferrari, Marta	Corp	Associate	03/08/23	711	Correspond with Fischer, DPW and Freshfields teams concerning exit financing (1.6); revise draft commitment papers (7.1); conference with T. de la Bastide, PJT team and Revlon concerning covenants to be included in exit Term Loan, ABL and Foreign ABTL Facilities (0.9).	9.60
Daniele, Salvatore	Corp	Associate	03/08/23	711	Conference with H. Blain, and Paul Weiss team re exit financing workstreams (0.5); correspond with M. Ferrari and Paul Weiss team re local counsel opinions (0.4); review and analyze prior local counsel opinions (0.5); review and analyze files re local counsel contacts (0.3); correspond with D. Epstein and Paul Weiss team re term loan documentation (0.3); teleconference with C. Fischer and Davis Polk team re same (0.2); revise secretary's certificate, resolutions, and legal opinions to reflect updated facility information (0.7).	2.90
Meredith-Goujon, Claudine K	Corp	Partner	03/08/23	711	Teleconference with Revlon tax (D. Walsh), Revlon IP (S. Rosenthal), KPMG (R. Lawrence), and J. Braibanti re BrandCo unwind (1.2); prepare for same (0.4); correspond with A. McGinnis re same (0.1).	1.70
Eaton, Alice	Rstr	Partner	03/08/23	711	Correspond D. Epstein re exit financing status.	0.50
Epstein, David	Corp	Counsel	03/08/23	711	Teleconference with Fischer, DPW financing team re exit facility closing checklist (0.6); teleconference with Sidorenkov, A&M and PJT teams re exit 1L TL covenants (0.8); review and comment on exit facility term sheets (2.2); review and comment on exit facility grids (1.5).	5.10
Kavarsky, Gary	Corp	Associate	03/08/23	711	Review and analyze schedules (0.2); correspond with Company, Epstein, PW team re same (0.2); review, revise draft intercreditor agreement (2.3); teleconference with Fischer, DPW, PW re exit facility closing checklist (0.4); correspond with Epstein, PW team re exit financing (0.3).	3.40

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Name	Dept	Title	Date	Task	Description	Hours
Rocher, Evan	Corp	Associate	03/08/23	711	Teleconference with B. Bolin, PW team, C. Fischer, DPW team re exit financing (0.4); correspond with M. Sedrish (PH) re possessory collateral (0.3); correspond with counsel to DIP notice parties (K. Simon, Latham, J. Savin, Akin, B. Masumoto, (UST)) re DIP milestone extension (0.9).	1.60
Braibanti, Jill	LEGL	Associate	03/08/23	711	Review and analyze issues list for exit financing (0.2); correspond with L. Cen re same (0.1); correspond with J. Heasley re emergence checklist (0.1); review and analyze emergence checklist (0.3); revise IP intercompany license draft (2.3); correspond with D. Epstein re final FABTL grid (0.1); correspond with S. Rosenthal re IP issues for LLC conversion (0.1).	3.20
Blumberg, Irene	Rstr	Associate	03/08/23	711	Correspond with R. Britton re milestone extension (0.1); correspond with A. Page re same (0.2); correspond with K. Subramanian re same (0.1).	0.40
de la Bastide, Thomas V	Corp	Partner	03/09/23	711	Meet with B. Bolin, PW team re exit financing closing checklist (1.0); review and comment on PJT grids, covenants and commitment papers for exit financing (1.5); review and analyze markup of exit term loan (0.7).	3.20
Blain, Hunter	Corp	Associate	03/09/23	711	Conference with B. Bolin, PW team re financing workstreams.	1.00
Bolin, Brian	Rstr	Partner	03/09/23	711	Conference with E. Rocher, PW exit financing team re works in process (1.0); review and comment on draft commitment papers (1.0).	2.00
Ferrari, Marta	Corp	Associate	03/09/23	711	Review and revise ABL/FILO and FABTL proposals (2.5); correspond with C. Fischer, DPW, Proskauer, Osler and Freshfields teams concerning exit financing (1.4); revise draft ABL/FILO commitment papers (4.9); correspond with McGinnis, PW Tax team re financing issues (0.6).	9.40
Braibanti, Jill	LEGL	Associate	03/09/23	711	Review and analyze IP workstreams status and updated tracker (0.6); review and revise trademark docket for IP perfection certificate (2.0); review and analyze foreign IP release requirements in connection with Ch. 11 exit and new credit facilities (1.6); teleconference with C. Meredith-Goujon IP workstreams (0.4); correspond with C. Meredith-Goujon, E. Rocher and M. Ferrari re IP licensing matters for the new financings (0.3); correspond with L. Shea (Revlon) re finalizing annual IP report for DIP financing (0.1); correspond with C. Meredith-Goujon re IP remediation requirements (0.1).	5.10
Epstein, David	Corp	Counsel	03/09/23	711	Partially attend conference with M. Ferrari, PW team re exit financing (0.2); review and comment on term sheets and commitment letters (1.7); review and comment on financing grids (1.7); draft exit term loan credit agreement (0.4).	4.00

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Name	Dept	Title	Date	Task	Description	Hours
Kavarsky, Gary	Corp	Associate	03/09/23	711	Meet with B. Bolin, PW exit finance team re exit financing (1.0); revise schedules (0.4); revise perfection certificate (0.3); review and analyze company data re same (0.7).	2.40
Rocher, Evan	Corp	Associate	03/09/23	711	Coordinate review of possessory collateral (0.3); correspond with A. Page re finance comments to Plan (0.4); conference with B. Bolin, finance team re next steps on exit financing (1.0); correspond with K. Frankenberger (Revlon), S. Daniele re local counsel issues (0.5).	2.20
Daniele, Salvatore	Corp	Associate	03/09/23	711	Revise legal opinions and resolutions re M. Ferrari comments (1.2); meet with B. Bolin and PW team re workstreams (1.0).	2.20
Meredith-Goujon, Claudine K	Corp	Partner	03/09/23	711	Review and analyze KPMG questions re IP remediation deck (0.2); draft response to same (0.1); correspond with R. Holo re same (0.1).	0.40
Meredith-Goujon, Claudine K	Corp	Partner	03/09/23	711	Review and analyze emergence checklist re exit financing issues (0.2); correspond with A. McGinnis re same (0.1); correspond with E. Rocher re same (0.1).	0.40
Meredith-Goujon, Claudine K	Corp	Partner	03/09/23	711	Teleconference with J. Braibanti re IP issues for emergence.	0.40
Epstein, David	Corp	Counsel	03/10/23	711	Correspond with Blumberg, PW team re emergence checklist (0.5); review and analyze ABL EBITDA definition (0.4); prepare issues list re same (0.4); review and analyze structuring questions (0.7); prepare summary of intercompany transaction covenants (2.8).	4.80
Braibanti, Jill	LEGL	Associate	03/10/23	711	Correspond with C. Meredith-Goujon and J. Heasley re IP items on emergence checklist (0.2); correspond with S. Lefland (DPW) re recordation of bankruptcy order for documenting lien releases in US/Canada (0.1); correspond with M. Ferrari re IP schedules status (0.1); review and analyze UK/EU/WIPO 2020 lien records (0.5); draft summary of same for Freshfields (0.4); review and analyze other non-US IP lien records from 2020 (0.2); correspond with N. Cooper (Freshfields) and C. Meredith-Goujon re releasing UK/EU 2020 lien records (0.2); revise intercompany IP license draft (0.7); update IP workstreams tracker (0.2); correspond with D. Epstein, A. McGinnis re entity conversions (0.5).	3.10
Ferrari, Marta	Corp	Associate	03/10/23	711	Review and revise ABL/FILO and FABTL proposals (3.2); correspond with DPW, Proskauer, Osler and Freshfields teams re exit financing (0.6); revise draft FABTL commitment papers (4.7).	8.50
Daniele, Salvatore	Corp	Associate	03/10/23	711	Revise draft legal opinions.	0.70
Britton, Robert	Rstr	Partner	03/10/23	711	Correspond with O. Rahnama re collateral issues.	0.20
Bolin, Brian	Rstr	Partner	03/10/23	711	Draft exit term loan credit agreement.	2.10

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Name	Dept	Title	Date	Task	Description	Hours
Meredith-Goujon, Claudine K	Corp	Partner	03/10/23	711	Review and analyze IP pre-emergence steps (0.6); correspond with J. Braibanti and PW financing team re same (0.2); review and analyze files re UK and EU lien recordings on BrandCo marks (0.3); correspond with J. Braibanti re next steps for release of same (0.4).	1.50
Blain, Hunter	Corp	Associate	03/10/23	711	Review and revise FABTL Schedules.	1.70
de la Bastide, Thomas V	Corp	Partner	03/10/23	711	Review and analyze tax transactions compliance summary (1.0); correspond with Company, PJT, A&M re exit facility covenants (0.4); review and analyze same (0.6); draft summary of reporting obligations (0.4).	2.40
Meredith-Goujon, Claudine K	Corp	Partner	03/11/23	711	Correspond with D. Epstein re IP comments to term credit agreement (0.2); review and analyze summary of IP covenants in chart to client (0.1).	0.30
Ferrari, Marta	Corp	Associate	03/11/23	711	Revise draft exit financing commitment papers.	2.10
Braibanti, Jill	LEGL	Associate	03/11/23	711	Revise intercompany IP license draft (1.1); correspond with D. Epstein and C. Meredith-Goujon re exit term loan IP questions (0.5).	1.60
Epstein, David	Corp	Counsel	03/11/23	711	Draft term loan credit agreement (4.2); review and analyze covenant grid (0.5).	4.70
Rwambuya, Joseph	Corp	Paralegal	03/11/23	711	Analyze collateral held by Jefferies (2.1); summarize same (0.9).	3.00
Toossi, Gabriella	Corp	Counsel	03/11/23	711	Correspond with D. Epstein re SOFR provisions in exit facility.	0.30
Eaton, Alice	Rstr	Partner	03/11/23	711	Correspond with D. Epstein re exit financing status.	0.30
Bolin, Brian	Rstr	Partner	03/11/23	711	Revise draft exit term loan credit agreement.	7.60
de la Bastide, Thomas V	Corp	Partner	03/11/23	711	Review and analyze markup of term loan exit facility (1.0); correspond with R. Holo PW team on restructuring structures and compliance issues (0.8).	1.80
Bolin, Brian	Rstr	Partner	03/12/23	711	Review and analyze PJT materials re status of exit financing process.	0.40
Ferrari, Marta	Corp	Associate	03/12/23	711	Revise draft ABL/FILO commitment papers (2.4); correspond with Paul Hastings team re possessory collateral (0.4).	2.80
Meredith-Goujon, Claudine K	Corp	Partner	03/12/23	711	Correspond with N. Cooper (Freshfields) re UK/EU IP lien releases (0.1); correspond with S. Rosenthal (Revlon) re coordinating local IP counsels for releases of BrandCo liens (0.5); correspond with J. Braibanti re same (0.1); correspond with J. Braibanti re intercompany IP license agreement (0.1).	0.80
Braibanti, Jill	LEGL	Associate	03/12/23	711	Revise intercompany IP license draft (0.8); correspond with C. Meredith-Goujon re intercompany IP license draft (0.2); correspond with D. Rabinowitz re scheduling Brandco IP unwind teleconference (0.1).	1.10
Epstein, David	Corp	Counsel	03/12/23	711	Review and analyze questions re term loan credit agreement, financing board presentation, and entity rationalization transactions.	1.20

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Name	Dept	Title	Date	Task	Description	Hours
Rwambuya, Joseph	Corp	Paralegal	03/12/23	711	Analyze collateral held by Jefferies (1.4); prepare chart detailing status of outstanding stock certificates and pledged notes (1.6).	3.00
Blumberg, Irene	Rstr	Associate	03/12/23	711	Correspond with A. Page re notice of presentment of Final DIP Order.	0.10
Bolin, Brian	Rstr	Partner	03/13/23	711	Review and analyze summary of intercompany transaction covenants (0.2); videoconference with D. Walsh (Revlon) and KPMG team re intercompany transaction covenants (1.1); videoconference with Revlon management, A&M team and PJT team re exit facility covenants (1.4); correspond with D. Epstein re same (0.1).	2.80
Ferrari, Marta	Corp	Associate	03/13/23	711	Review and revise draft Engagement Letter and Fee Letter for Term Loan Facility (9.3); correspond with Freshfields team concerning foreign deliverables (0.6); correspond with Revlon team, PJT, A&M, PW tax and bankruptcy teams concerning exit term loan covenants (0.3).	10.20
Rocher, Evan	Corp	Associate	03/13/23	711	Correspond with D. Epstein, PW team re potential local counsel for exit financing opinions.	0.30
Daniele, Salvatore	Corp	Associate	03/13/23	711	Teleconference with M. Ferrari and PW team re exit financing status and work stream organization.	0.60
Britton, Robert	Rstr	Partner	03/13/23	711	Correspond with I. Blumberg re stipulation issues (0.2); correspond with A. Page re same (0.2).	0.40
Kavarsky, Gary	Corp	Associate	03/13/23	711	Confer with D. Epstein, Revlon and PW teams re exit credit agreements (1.0); correspond with S. Daniele, PW finance team re same (0.4).	1.40
Epstein, David	Corp	Counsel	03/13/23	711	Confer with G. Kavarsky, Revlon, A&M, and PJT teams re negative covenants (1.1); draft exit term loan credit agreement (0.8) review and analyze term sheets for ABL and FABTL (0.6); review and analyze emergence steps plan (0.6); review and comment on Jefferies engagement and fee letters (0.5).	3.60
Braibanti, Jill	LEGL	Associate	03/13/23	711	Review and analyze trademark docket and revise for IP perfection certificate (2.6); correspond with L. Gellman (CMS) re UK/EU lien releases (0.3); correspond with C. Blumenthal (Isler Pedrazzini) re WIPO lien releases (0.2); correspond with R. Waters (POF) re Australian lien releases (0.4); correspond with A. Kim (Kim & Chang re S. Korean lien releases (0.4); correspond with C. Meredith-Goujon re foreign lien release workstream coordination (0.5); review and analyze Revlon steps plan (0.2); correspond with A. McGinnis re steps plan (0.1); correspond with E. Rocher and C. Meredith-Goujon re annual IP report delivery (0.2); correspond with G. Fragosso re annual IP reports (0.1); correspond with M. Ferrari re updated lien grid (0.1).	5.10

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Name	Dept	Title	Date	Task	Description	Hours
Meredith-Goujon, Claudine K	Corp	Partner	03/13/23	711	Review and analyze draft KPMG restructure deck for IP implications (0.2); correspond with J. Braibanti re same (0.1); correspond with J. Braibanti re annual report of IP under DIP facilities (0.1); correspond with J. Braibanti and foreign counsel re release of lien on non-US IP (0.3).	0.70
de la Bastide, Thomas V	Corp	Partner	03/13/23	711	Teleconference with client, A&M, PJT re negative covenant package for exit financing (1.5); review and comment on revised term loan agreement, ABL and FABTL term sheets (1.0).	2.50
Blain, Hunter	Corp	Associate	03/14/23	711	Conference with M. Ferrari and PW exit finance team re finance workstreams (0.5); correspond with E. Rocher, same re same (0.2).	0.70
Rocher, Evan	Corp	Associate	03/14/23	711	Correspond with A. Page re status of exit financing plan supplement.	0.10
Ferrari, Marta	Corp	Associate	03/14/23	711	Correspond with J. Braibanti, PW IP team re internal re-organization (0.5); revise draft commitment papers (0.5); teleconference with S. Daniele, PW exit finance associates re works in process (0.5); correspond with Freshfields team re foreign deliverables (0.4); teleconference with Revlon team, PJT, A&M, PW tax and bankruptcy teams re exit term loan affirmative covenants (0.9); review and analyze terms of Credit Facilities (4.1); prepare summary grid of key affirmative covenants (8.2).	15.10
Rwambuza, Joseph	Corp	Paralegal	03/14/23	711	Review and analyze stock certificates from Jeffries (0.3); organize same (0.2); review agreements for form of termination (1.0).	1.50
Braibanti, Jill	LEGL	Associate	03/14/23	711	Review and revise trademark docket for IP perfection certificate (2.8); correspond with C. Meredith-Goujon re finalizing trademark section of perfection certificate (0.8); correspond with C. Meredith-Goujon and M. Ferrari re FABTL IP agreements and approach under new FABTL facility (0.5); correspond with A. Kim (Kim & Chang) re documents needed for S. Korean lien releases (0.2); review and analyze S. Korean lien release documentation (0.2); correspond with R. Waters (POF) re Australian lien release workstream (0.1); correspond with A. Maynes (KWM) re Australian lien release workstream (0.6); correspond with S. Lefland (DPW) re IP language in confirmation order (0.2); correspond with C. Meredith-Goujon re foreign lien releases (0.2); correspond with D. Epstein re plan supplement and financing covenants (0.1).	5.70
Bolin, Brian	Rstr	Partner	03/14/23	711	Conference with T. de la Bastide, management and A&M re affirmative covenants (1.2); correspond with PJT team re exit financing issues (0.1); review and comment on draft Jefferies engagement letter (0.3); review and analyze markups of exit financing documents (0.4).	2.00

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Name	Dept	Title	Date	Task	Description	Hours
Epstein, David	Corp	Counsel	03/14/23	711	Correspond with C. Meredith-Goujon, PW IP re licensing agreements (0.4); teleconference with G. Kavarsky, Revlon, PJT, and A&M teams re exit financing (1.2); draft ABL, FABTL term sheets, and exit term loan credit agreement (2.4).	4.00
Meredith-Goujon, Claudine K	Corp	Partner	03/14/23	711	Correspond with foreign counsel re BrandCo lien releases for Australia (0.1); correspond with same for Korea (0.2); correspond with J. Braibanti re same (0.1); review and analyze draft perfection schedule of IP (0.2); correspond with A. McGinnis and PW team re IP issues re KPMG proposed steps plan for emergence (0.2); correspond with M. Ferrari, D. Epstein, and J. Braibanti re IP documents for FABTL (0.5).	1.30
Kavarsky, Gary	Corp	Associate	03/14/23	711	Review and analyze possessory collateral (3.1); draft summary re same (0.3); review and analyze schedules re same (0.7); teleconference with D. Epstein, PW team, PJT, A&M, Revlon re exit financing (1.2).	5.30
de la Bastide, Thomas V	Corp	Partner	03/14/23	711	Teleconference with B. Bolin, client, A&M and PJT re affirmative covenants and financial covenants for exit facilities (1.2); correspond with M. Ferrari, PW finance team re filing of exit term sheets and credit agreements with court (0.4); review and comment on revised term loan agreement and ABL and FABTL term sheets (2.6).	4.20
Daniele, Salvatore	Corp	Associate	03/14/23	711	Conference with M. Ferrari and Paul Weiss team re finance workstreams (0.5); correspond with M. Ferrari and Paul Weiss team, E. Quinones (Revlon), Revlon team, and P. William re local counsel opinions and workstreams (0.6); review and analyze flagged governing documents (0.7); teleconference with M. Ferrari and Paul Weiss IP team re IP collateral matters (0.3); review and analyze closing checklist re updated matter status (0.4).	2.50
Daniele, Salvatore	Corp	Associate	03/15/23	711	Manage DACA termination files (0.2); correspond with M. Ferrari and PW team re workstreams (0.2).	0.40
Epstein, David	Corp	Counsel	03/15/23	711	Review and analyze FABTL term sheet (0.4); review and comment on fee letters (1.2).	1.60
Blumberg, Irene	Rstr	Associate	03/15/23	711	Correspond with M. Ferrari re exit term sheets (0.3); correspond with H. Zhang (DPW), DPW re same (0.2).	0.50
Maccio, John	Corp	Associate	03/15/23	711	Correspond with J. Braibanti re annual IP reporting.	0.30
de la Bastide, Thomas V	Corp	Partner	03/15/23	711	Review and revise term loan, ABL commitment papers, and FABTL commitment papers for filing (2.0); review and revise tax restructuring plan (1.2); correspond with B. Bolin, PW finance and restructuring teams. and PJT re exit financing (0.8).	4.00

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Name	Dept	Title	Date	Task	Description	Hours
Meredith-Goujon, Claudine K	Corp	Partner	03/15/23	711	Review and analyze J. Braibanti's summary of IP chain of title questions for perfection certificate (0.3); review and analyze IP questions from DPW team re proposed rejected IP agreements (0.1); correspond with PW bankruptcy team re same (0.2); correspond with S. Massman (DPW), DPW team re same (0.2); correspond with D. Shiffman (A&M) re list of rejected contracts (0.1).	0.90
Braibanti, Jill	LEGL	Associate	03/15/23	711	Review and analyze patent docket (1.9); revise same to include IP perfection certificate (0.4); correspond with C. Meredith-Goujon re open questions re finalizing trademark and patent dockets (0.6); correspond with C. Langan (PJT) re FABTL term sheets (0.2); correspond with E. Rocher re transaction steps for plan supplement (0.2).	3.30
Bolin, Brian	Rstr	Partner	03/15/23	711	Review and analyze updated commitment paper drafts (0.2); review and comment on Blue Torch fee letter (0.4); correspond with PJT team re exit financing (0.2).	0.80
Ferrari, Marta	Corp	Associate	03/15/23	711	Draft Blue Torch FABTL Fee Letter (3.2); reviewed and revise draft commitment papers for exit facilities (5.4); correspond with Freshfields team re foreign deliverables (0.8); review and revise draft PJT proposals (1.5); revise draft Fee Letters (1.3); correspond with DPW, PH and PR teams re same (0.2).	12.40
de la Bastide, Thomas V	Corp	Partner	03/16/23	711	Conference with M. Ferrari, PW finance and bankruptcy teams re exit facility and Plan supplement filings (1.8); correspond with D. Epstein, PW finance team re same (0.2); review and revise term sheets for exit facilities and exit term loan (2.0); correspond with PJT, Company, and KPMG re various tax reorganization steps for exit (0.6); conference with C. Langan (PJT), PJT team re same (0.2).	4.80
Epstein, David	Corp	Counsel	03/16/23	711	Teleconference with S. Daniele, PW finance re exit financing workstreams (0.8); finalize financing agreements for filing (2.5); review and analyze FABTL issues list (0.4).	3.70
Blain, Hunter	Corp	Associate	03/16/23	711	Review and analyze UK Debentures (0.5); review and analyze UK resolutions (0.2); correspond with N. Cooper (Freshfields) re same (0.1); teleconference with D. Epstein, PW finance team re exit financing workstreams (0.8); correspond with various counsel re payoff documentation (0.2); correspond with PW team re same (0.2); correspond with M. Ferrari and Freshfields re UK and FABTL issues (0.6).	2.60

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Name	Dept	Title	Date	Task	Description	Hours
Meredith-Goujon, Claudine K	Corp	Partner	03/16/23	711	Review and analyze revised draft of credit agreement from DPW team (0.7); correspond with B. Bolin re same (0.3); review and analyze UK debenture (0.3); correspond with N. Cooper (Freshfields) re IP charges in UK (0.2); prepare for correspond with A. McGinnis, Revlon, PW, and KPMG teams re IP remediation and BrandCo unwind (1.2); correspond with J. Braibanti re same (0.2); correspond with A. McGinnis re same (0.1).	3.00
Bolin, Brian	Rstr	Partner	03/16/23	711	Review and analyze Blue Torch markup of term sheet (0.3); review and analyze DPW markup of credit agreement (0.9); conference with D. Epstein, PW exit financing team re exit financing workstreams (0.8); review and analyze finance issues on emergence checklist (0.1); correspond with C. Meredith-Goujon re IP lien releases (0.8); teleconference with J. Costello (PJT) re Blue Torch agreement (0.2).	3.10
Kavarsky, Gary	Corp	Associate	03/16/23	711	Teleconference with D. Epstein, PW team re exit finance workstreams (0.8); review and analyze possessory collateral (1.4); correspond with agent counsel re same (0.3); revise intercreditor agreement (1.5).	4.00
Daniele, Salvatore	Corp	Associate	03/16/23	711	Conference with D. Epstein and PW team re work streams and matter status.	0.80
Braibanti, Jill	LEGL	Associate	03/16/23	711	Correspond with N. Cooper re EA UK Limited entity and scope of review needed on IP liens (0.2); teleconference with D. Walsh (Revlon) and PW teams re entity conversion planning and related issues (1.1); correspond with C. Meredith-Goujon re IP workstreams for entity conversion planning (0.2); revise emergence checklist for IP items (0.9); review and analyze DPW comments to exit term credit agreement re IP matters (0.3); correspond with C. Blumenthal re WIPO lien releases (0.1); correspond with L. Gellman re UK, EU lien releases (0.1); correspond with C. Meredith-Goujon and B. Bolin re IP treatment in exit term facility draft (0.3); correspond with B. Mohan and C. Meredith-Goujon re diligence contracts for emergence restructuring (0.4); coordinate review and analysis of Revlon fragrance licenses (1.0); review and analyze same for conversion and emergence issues (2.1); correspond with J. Heasley re data room access for contract review project (0.2); correspond with A. Drawbridge (KWM) re Australian IP lien releases (0.1); correspond with C. Meredith-Goujon re foreign IP release status and EA UK debentures (0.2); review and analyze EA UK debentures re IP (0.4); correspond with A. Page re plan supplement filing (0.2); review and analyze trademark docket (1.0); draft summary of open questions (0.3).	9.10

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Name	Dept	Title	Date	Task	Description	Hours
Ferrari, Marta	Corp	Associate	03/16/23	711	Review and revise draft commitment papers for exit facilities (2.4); correspond with PW team re same (0.2); conference with T. de la Bastide, PW team re same (1.8); correspond with Freshfields team concerning foreign deliverables (0.6); review and revise draft PJT proposals (3.9); correspond with PW team, PJT re same (1.3).	10.20
Daniele, Salvatore	Corp	Associate	03/17/23	711	Correspond with I. Blumberg and PW team re bond discharge and local counsel opinions.	0.20
Braibanti, Jill	LEGL	Associate	03/17/23	711	Teleconference with C. Fischer (DPW) and financing teams re exit credit agreement markup (0.5); correspond with C. Blumenthal re WIPO lien release (0.1); correspond with C. Meredith-Goujon re WIPO lien release (0.1); teleconference with C. Meredith-Goujon re review of IP workstreams and contract diligence (0.7); correspond with M. Ferrari re exit ABL and FABTL credit agreement drafts (0.2); correspond with K. Moffatt (Osler) re CIPO lien releases for pre-petition facilities (0.1); correspond with S. Rosenthal re contracts diligence and WIPO lien release (0.1); update IP workstream tracker (0.2).	2.00
Kavarsky, Gary	Corp	Associate	03/17/23	711	Teleconference with D. Epstein, PW finance team re credit agreements (0.7); correspond with A. McGinnis, PW team re financing concerns and tax matters (0.6); revise schedules (0.2); revise perfection certificate (0.2).	1.70
Ferrari, Marta	Corp	Associate	03/17/23	711	Review and revise draft commitment papers for exit facilities (7.1); correspond with C. Fischer, DPW, PH, Proskauer teams re same (1.6); conference with E. Ross, PJT, A&M, DPW, Revlon teams re same (0.9); correspond with A. McGinnis, PW tax and ERISA teams concerning exit credit agreements (1.1).	10.70
Meredith-Goujon, Claudine K	Corp	Partner	03/17/23	711	Partially attend teleconference with B. Bolin, DPW, and PW Team re credit agreement draft (0.5); prepare for same (0.2); review and revise IP provisions of term credit agreement (1.0).	1.70
Epstein, David	Corp	Counsel	03/17/23	711	Teleconference with B. Bolin, PW team re exit term loan credit agreement (0.7); conference with same, DPW re same (0.8); correspond with same re same (0.9); draft FABTL credit agreement (0.8); draft exit term loan credit agreement (1.2).	4.40
de la Bastide, Thomas V	Corp	Partner	03/17/23	711	Teleconference with B. Bolin, PW, DPW re exit term loan agreement issues (0.8); correspond with same re same (0.2); teleconference with D. Epstein, PW finance team on exit ABL and FABTL (0.7); teleconference with S. Mates (PJT), Company, PJT, A&M re FABTL issues and European reorganization issues (1.5).	3.20

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Name	Dept	Title	Date	Task	Description	Hours
Bolin, Brian	Rstr	Partner	03/17/23	711	Teleconference with D. Epstein, PW team re term loan covenants (0.7); correspond with D. Epstein re same (0.1); conference with T. de la Bastide, PW, DPW re exit term loan credit agreement (0.8); correspond with T. de la Bastide, D. Epstein, and M. Ferrari re same (0.3).	1.90
Glazeski, Jacob	ECP	Counsel	03/17/23	711	Review and analyze revised credit agreement (0.4); correspond with Ferrari, PW finance team re same (0.2).	0.60
Blain, Hunter	Corp	Associate	03/17/23	711	Conference with B. Bolin, PW, DPW teams re term loan covenants (0.7); correspond with same re same (0.1).	0.80
Epstein, David	Corp	Counsel	03/18/23	711	Review and analyze FABTL term sheet.	0.20
Bolin, Brian	Rstr	Partner	03/18/23	711	Review and analyze IP team comments to exit term loan.	0.30
Meredith-Goujon, Claudine K	Corp	Partner	03/18/23	711	Analyze issues based on international TM perfection filings (0.2); correspond with D. Shiffman (A&M) re same (0.1); revise draft of form intercompany license agreement for BrandCo entity licenses to RCPC (0.6).	0.90
Ferrari, Marta	Corp	Associate	03/18/23	711	Analyze drafts of FABTL commitment papers (1.0); prepare issues list of same (0.8); correspond with M. Kvarda, A&M, PJT and Revlon teams re same (0.3).	2.10
Epstein, David	Corp	Counsel	03/19/23	711	Correspond with C. Meredith-Goujon re FABTL credit agreement.	0.10
de la Bastide, Thomas V	Corp	Partner	03/19/23	711	Correspond with S. Mates (PJT), PJT re FABTL issues list (0.3); review and analyze issues list (0.4).	0.70
Meredith-Goujon, Claudine K	Corp	Partner	03/19/23	711	Correspond with J. Braibanti re IP issues under draft FABTL (0.2); review and analyze IP comments to ABL and FABTL (0.3).	0.50
Braibanti, Jill	LEGL	Associate	03/19/23	711	Correspond with C. Meredith-Goujon re IP provisions of FABTL credit agreement (0.4); review and analyze FABTL re IP matters (0.2); correspond with M. Ferrari re FABTL credit agreement markup (0.2); draft FABTL and ABL credit agreement comments (0.7); correspond with L. Gellman (CMS) re WIPO lien releases (0.1).	1.60
Glazeski, Jacob	ECP	Counsel	03/20/23	711	Review and revise draft ABL credit agreements (1.5); correspond with R. Aizen re same (0.2); correspond with Ferrari, PW finance team re same and next steps (0.6).	2.30
Epstein, David	Corp	Counsel	03/20/23	711	Review and analyze FABTL term sheet (0.3); prepare markup re same (0.2); teleconference with T. de la Bastide, Revlon, PJT, and A&M teams re entity rationalization (0.7); review and analyze finance issues re emergence checklist (0.5); draft exit term loan credit agreement (3.8).	5.50

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Name	Dept	Title	Date	Task	Description	Hours
de la Bastide, Thomas V	Corp	Partner	03/20/23	711	Review and comment on revised FABTL term sheet with PwC finance team (1.0); review and analyze revised exit term loan agreement (1.2); conference with D. Epstein, PJT, PW, and A&M teams re tax restructuring issues with FABTL (0.7).	2.90
Blain, Hunter	Corp	Associate	03/20/23	711	Correspond with N. Bakke re opinion and other outstanding UK issues.	0.20
Meredith-Goujon, Claudine K	Corp	Partner	03/20/23	711	Review and analyze proposed asset sale covenants in exit term loan.	0.20
Ferrari, Marta	Corp	Associate	03/20/23	711	Review and revise draft commitment papers for exit facilities (4.3); correspond with Freshfields team concerning foreign deliverables (0.5); conference with C. Fischer, DPW and PJT teams re exit facilities (1.1); correspond with C. Fischer, DPW, PH and Proskauer teams re same (1.4); correspond with A. McGinnis, PW tax concerning tax reorganization (0.8).	8.10
Braibanti, Jill	LEGL	Associate	03/20/23	711	Correspond with K. Moffatt re CIPO lien releases (0.1); correspond with L. Gellman re WIPO lien releases (0.1); revise intercompany license agreement (0.8); draft royalty comparison chart (0.7); review and analyze IP issues in KPMG structuring deck (0.2).	1.90
Rwambuza, Joseph	Corp	Paralegal	03/20/23	711	Review and analyze records for receipts, copies of specific stock certificates and promissory notes (1.7); provide copies of the receipts located to G. Kavarsky (0.3).	2.00
Bolin, Brian	Rstr	Partner	03/20/23	711	Conference with M. Kvarda (A&M), PJT, and A&M re exit facilities (0.7); review and comment on draft exit term loan credit agreement (2.0); correspond with T. de la Bastide re same (0.2).	2.90
Kavarsky, Gary	Corp	Associate	03/20/23	711	Teleconference with D. Epstein, PW team and PJT re exit facilities (0.7); revise perfection certificate (0.4); review and analyze company information re same (0.5).	1.60
Blain, Hunter	Corp	Associate	03/21/23	711	Correspond with D. Epstein re payoff letters.	0.10
Daniele, Salvatore	Corp	Associate	03/21/23	711	Correspond with D. Epstein and Paul Weiss team re local counsel opinions.	0.30
de la Bastide, Thomas V	Corp	Partner	03/21/23	711	Correspond with E. Ross, PJT, client, and A&M teams re proposed bond deal (0.4); conference with same re same (0.4); review and comment on revised ABL and FABTL commitment papers (1.0); review and analyze revised exit term loan agreement (0.5); correspond with K&S re FABTL issues (0.4).	2.70
Epstein, David	Corp	Counsel	03/21/23	711	Conference with B. Bolin, K&S re FABTL financing (0.4); review and analyze letter of intent (0.5); draft exit term loan credit agreement (2.9); review and analyze proposals for potential bond issuance (0.5); review and analyze FABTL commitment papers (1.1)	5.40

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Kavarsky, Gary	Corp	Associate	03/21/23	711	Review and analyze possessory collateral (1.2); correspond with agent counsel re same (0.4); teleconference with B. Bolin, K&S, and PW team re commitment (0.4).	2.00
Meredith-Goujon, Claudine K	Corp	Partner	03/21/23	711	Review and analyze A&M summary of net sales by brand.	0.20
Bolin, Brian	Rstr	Partner	03/21/23	711	Review and comment on draft Blue Torch term sheet (0.6); attend Zoom meeting with D. Epstein, King & Spalding re financing proposal (0.4); correspond with R. Britton re same (0.1); teleconference with M. Ferrari re same (0.3); correspond with T. de la Bastide, D. Epstein, and M. Ferrari re finance works in process (0.3).	1.70
Ferrari, Marta	Corp	Associate	03/21/23	711	Review and revise draft commitment papers for exit Foreign ABTL facility (6.9); teleconference with B. Bolin re same (0.3); correspond with Freshfields team concerning foreign deliverables (0.6); conference with E. Ross, Revlon and PJT teams concerning FABTL terms (0.9); correspond with C. Fischer, DPW, PH and Proskauer teams re exit financing (1.4).	10.10
Blain, Hunter	Corp	Associate	03/22/23	711	Review and analyze payoff letter (0.2); teleconference with G. Kavarsky, PW team re current status and next steps (0.5); correspond with C. Fischer, DPW team re checklist (0.5); correspond with foreign counsel re opinions and other foreign issues (0.3).	1.50
de la Bastide, Thomas V	Corp	Partner	03/22/23	711	Review and analyze potential new bond deal (1.5); review and analyze ABL loan documents and commitment papers (2.5); review and analyze FABTL commitment papers (1.2).	5.20
Kennedy, John C	Corp	Partner	03/22/23	711	Teleconference with A. Eaton, PW team re debt offering (0.8); correspond with Subramanian, PW team re UW spread question (0.4); correspond with same re 144A secured debt precedents (0.7).	1.90
Braibanti, Jill	LEGL	Associate	03/22/23	711	Correspond with S. Rosenthal re DIP reporting (0.1); correspond with G. Fragosso (A&M) re foreign perfection proposal (0.2); review and analyze draft net sales chart (0.3); correspond with C. Meredith-Goujon re A&M draft net sales chart (0.4); teleconference with C. Meredith-Goujon re IP perfection chart (0.3); draft comments to net sales chart (0.7).	2.00
Epstein, David	Corp	Counsel	03/22/23	711	Conference with A. Eaton, PW team, Revlon and advisors re potential bond deal (0.8); teleconference with G. Kavarsky, DPW and PW teams re exit financing (0.8); review and comment on PJT bond deck (1.0); review and analyze letter of intent (0.4); review and revise opinion (0.8); review and analyze exit financing commitment papers (2.2).	6.00

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Basta, Paul M.	Rstr	Partner	03/22/23	711	Attend video conference with A. Eaton regarding bond alternative structure (0.8); correspond with same, PJT re same (0.2).	1.00
Ferrari, Marta	Corp	Associate	03/22/23	711	Review and revise draft commitment papers for exit facilities (1.7); correspond with Freshfields team concerning foreign deliverables (0.6); conference with A. Eaton, PW team concerning potential bond deal (0.8); correspond with C. Fischer, DPW, PH and Proskauer teams re exit financing (1.4); correspond with J. Braibranti, PW IP team and California local counsel re IP issues for exit financing (0.4); draft exit ABL/FILO Credit Agreement (6.3).	11.20
Eaton, Alice	Rstr	Partner	03/22/23	711	Analyze issues re bond offering (0.5); teleconference with P. Basta, S. Zelin re same (0.8); teleconference with B. Bolin re same (0.2).	1.50
Maccio, John	Corp	Associate	03/22/23	711	Correspond with PW IP team and Revlon re quarterly IP reporting.	0.20
Meredith-Goujon, Claudine K	Corp	Partner	03/22/23	711	Correspond with J. Braibanti re IP perfection issues (0.5); teleconference with J. Braibanti re same (0.3); teleconference with A. Awrabi (A&M) and G. Fragosso (A&M) re net sales by country for IP lien perfection under Exit Term (0.3).	1.10
Angelopoulos, Marina	Ent	Paralegal	03/22/23	711	Update IP filing tracker.	2.00
Kavarsky, Gary	Corp	Associate	03/22/23	711	Teleconference with A. Eaton, PW, PJT, and company re financing options (0.8); teleconference with H. Blain, PW finance re exit facilities workstreams (0.5); teleconference with E. Rocher, DPW and PW teams re exit term loan (0.8); review and analyze changes to perfection certificate (0.6).	2.70
Rocher, Evan	Corp	Associate	03/22/23	711	Conference with G. Kavarsky, PW finance team re exit financing (0.5); teleconference with G, Kavarsky, PW finance team, C. Fischer, DPW team re exit financing (0.8); review and analyze KYC issues re exit financing (0.6).	1.90
Daniele, Salvatore	Corp	Associate	03/22/23	711	Teleconference with G. Kavarsky and PW team re term loan work streams (0.5); partially attend teleconference with G. Kavarsky, PW team and B. Tsepelman re term loan (0.5); correspond with M. Ferrari and PW team re local counsel opinions (0.2); review and analyze docket re financing professionals (0.1); revise legal opinions re M. Ferrari comments (0.9).	2.20
Bolin, Brian	Rstr	Partner	03/22/23	711	Conference with A. Eaton, PW, PJT, and A&M teams re potential bond deal (0.8); teleconference with A. Eaton re same (0.2); correspond with M. Ferrari re LOI (0.4).	1.40
Kecton, Douglas	Rstr	Associate	03/22/23	711	Teleconference with G. Kavarsky and PW team re exit financing (0.5); partially attend teleconference with D. Epstein, PW team and DPW team re same (0.5).	1.00

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Maccio, John	Corp	Associate	03/23/23	711	Correspond with J. Braibanti, PW IP team, and Revlon re formula ownership disclosure.	0.30
Meredith-Goujon, Claudine K	Corp	Partner	03/23/23	711	Review and analyze charts for proposed perfection of lien on non-US IP (0.2); perform initial review of Term Security Agreement (0.2); teleconference with J. Braibanti re IP issues for emergence (0.4); correspond with PW tax re IP questions (0.2); review and analyze conversion deck (0.4).	1.40
Blain, Hunter	Corp	Associate	03/23/23	711	Conference with M. Ferrari, PW team re finance works in process (0.5); teleconference with T. de la Bastide, DPW and PW finance team re term sheet (0.8); prepare for same (0.2); correspond with local counsel re current status of documents (0.2).	1.70
de la Bastide, Thomas V	Corp	Partner	03/23/23	711	Teleconference with D. Epstein, PW team PJT, Revlon, A&M re bond offering (0.8); prepare for same (0.2); teleconference with B. Bolin, PW team re Blue Torch LOI (0.5); correspond with B. Bolin, PW restructuring re bond offering expense and timing (0.5); conference with D. Epstein, DPW re term loan exit comments (0.8); review and analyze exit term loan credit agreement (0.7); teleconference with K&S, Blue Torch on FABTL issues list (0.6); correspond with S. Zelin, PJT team re proposal on bond offering sources and uses and expenses (0.8).	4.90
Rocher, Evan	Corp	Associate	03/23/23	711	Correspond with D. Rabinowitz re tax issues related to exit financing.	0.30
Kavarsky, Gary	Corp	Associate	03/23/23	711	Teleconference with D. Epstein, PW team DPW team re exit term loan.	0.80
Kennedy, John C	Corp	Partner	03/23/23	711	Review and analyze PJT slides re exit financing (0.5); correspond with Mates, PJT re same (0.4); correspond with A. Eaton re bond deal (0.3); teleconference with Ferrari, PW team re debt offering (1.1); correspond with Ross, PJT re pro forma financials (0.5); meet with Subramanian, PW team re bond deal (0.4).	3.20
Bolin, Brian	Rstr	Partner	03/23/23	711	Review and comment on draft Blue Torch LOI (0.3); teleconference with T. de la Bastide, PW team re same (0.5); meeting with management, A&M, and PJT teams re potential bond deal (0.8); attend conference with D. Keeton, PW team re exit financing (0.5); teleconference with D. Epstein, PW team DPW team re exit term loan credit agreement (0.8); teleconference with King & Spalding re Blue Torch term sheet (0.5); teleconference with M. Kvarda (A&M) re same (0.4); review and comment on PJT deck (0.4); correspond with P. Basta and A. Eaton re same (0.1).	4.30

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Name	Dept	Title	Date	Task	Description	Hours
Epstein, David	Corp	Counsel	03/23/23	711	Teleconference with T. de la Bastide, PW team, Revlon and advisors re ABL financing (0.8); conference with D. Keeton, PW team re exit financing (0.5); teleconference with B. Bolin, PW team, DPW team re exit term loan (0.8); teleconference with K&S, Blue Torch, M. Ferrari, PW team re FABTL term sheet (0.6); review and analyze exit facility documents and issues lists (1.6); review and analyze LER issues (0.7); review and comment on PJT financing decks (0.6).	5.60
Daniele, Salvatore	Corp	Associate	03/23/23	711	Conference with M. Ferrari, PW team re work streams and exit financing status (0.5); partially attend teleconference with D. Epstein, PW team, B. Tsepelman and DPW team re term loan (0.5); correspond with J. McCullough and G. Peck re local counsel opinions (0.5); review and analyze finance issues on closing checklist (0.1).	1.60
Eaton, Alice	Rstr	Partner	03/23/23	711	Teleconference with Bolin, PW team re Blue Torch LOI (0.5); teleconference with M. Kvarda re disclosure and bond requirements (0.5).	1.00
Keeton, Douglas	Rstr	Associate	03/23/23	711	Conference with D. Epstein, PW team re exit financing.	0.80
Braibanti, Jill	LEGL	Associate	03/23/23	711	Revise comments to A&M net sales chart (0.4); correspond with G. Fragosso and C. Meredith-Goujon re net sales chart comments (0.6); correspond with K. Tompsett (CMS) re EU, UK, WIPO lien releases (0.3); review and analyze updated emergence checklist (0.1); correspond with D. Rabinowitz re KPMG tax planning decks (0.2); correspond with C. Meredith-Goujon and A. McGinnis re entity conversion timing (0.2); draft omnibus termination agreement for contribution agreements (1.4); correspond with C. Meredith-Goujon re draft termination agreement (0.1); review and analyze exit term GCA (0.3).	3.60
Kaoutzanis, Christodoulos	Corp	Partner	03/23/23	711	Review and analyze PJT deck on exit financing (0.4); conduct legal research re pro formas (0.8); teleconference with M, Kvarda, A. Eaton re bond requirements (0.5); conference with Kennedy, PW team re bond offering (0.4); review of reporting requirements re same (0.3).	2.40
Ferrari, Marta	Corp	Associate	03/23/23	711	Review and revise draft commitment papers for exit facilities (3.7); review and revise letter of intent for FABTL (2.7); teleconference with Kennedy, PW team re debt offering (1.1); correspond with Freshfields team concerning foreign deliverables (0.2); teleconference with D. Epstein, PW team, K&S, Blue Torch, re FABTL term sheet (0.6); teleconference with C. Langan (PJT) re same (0.5); teleconference with SLR and Midcap teams concerning ABL/FILO facilities (0.7); correspond with DPW, PH and PR teams re same (1.4).	10.90

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Name	Dept	Title	Date	Task	Description	Hours
Angelopoulos, Marina	Ent	Paralegal	03/24/23	711	Update IP filing tracker.	3.00
Rwambuaya, Joseph	Corp	Paralegal	03/24/23	711	Prepare chart detailing the UCC, tax, and judgment lien search jurisdictions for the various Revlon entities.	0.50
Meredith-Goujon, Claudine K	Corp	Partner	03/24/23	711	Review and analyze IP comments to Security Agreement (0.3); review and analyze A&M proposals re perfection of lien on international IP under Exit Term Loan (0.4); correspond with J. Braibanti and A&M team re same (0.3); correspond with S. Rosenthal (Revlon) re proposed territories (0.1).	1.10
Eaton, Alice	Rstr	Partner	03/24/23	711	Partially attend teleconference with J. Kennedy, PW team re bond offering (0.3); review and analyze materials from PJT re same (0.2); teleconference with Vonnegut, BrandCo advisors re bond deal (0.3).	0.80
de la Bastide, Thomas V	Corp	Partner	03/24/23	711	Teleconference with J. Kennedy, Centerview, PJT and DPW teams re exit financing and potential bond deal (1.0); review and comment on PJT bond offering summary materials (0.8); review and analyze issues list and revised commitment papers on FABTL (1.5); review and analyze steps for tax rationalization (1.0); correspond with PW tax and finance teams re finance issues re same (0.5).	4.80
Keeton, Douglas	Rstr	Associate	03/24/23	711	Correspond with Archbell (Kroll) regarding backstop agreement and class 4 elections.	0.20
Braibanti, Jill	LEGL	Associate	03/24/23	711	Correspond with S. Rosenthal (Revlon) re formula compilation for post-emergence (0.1); revise IP contract summary chart (0.4); correspond with C. Meredith-Goujon re IP workstreams (1.1); draft comments to exit term GCA (0.7); correspond with D. Epstein and S. Rosenthal (Revlon) re exit term GCA (0.2); review and analyze draft confirmation order re release of lien language (0.2).	2.70
Kaoutzanis, Christodoulos	Corp	Partner	03/24/23	711	Teleconference with J. Kennedy, PW, DPW, Centerview, PJT teams re potential bond deal (1.0); correspond with D. Epstein, client, PJT teams bond reporting covenant (0.2)	1.20
Ferrari, Marta	Corp	Associate	03/24/23	711	Review and revise draft commitment papers for exit facilities (3.5); correspond with Freshfields team concerning foreign deliverables (0.2); teleconference with J. Kennedy, PW, DPW, A&M, Revlon, CVP and PJT teams concerning potential bond deal (1.0); review and revise security agreements (2.6); review and revise exhibits to Credit Agreements for exit facilities (1.9); finalize LOI for FABTL (0.9).	10.10
Daniele, Salvatore	Corp	Associate	03/24/23	711	Review files re additional DACAs and mortgages	0.60
Bolin, Brian	Rstr	Partner	03/24/23	711	Review and comment on draft PJT deck (0.3); conference with J. Kennedy, PJT, DPW, Centerview re potential bond deal (1.0); review and analyze summary of issues from D. Epstein (0.1).	1.40

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Name	Dept	Title	Date	Task	Description	Hours
Blain, Hunter	Corp	Associate	03/24/23	711	Correspond with foreign counsel re TL/ABL counterparts (0.2); teleconference with J. Weichselbaum (LW) re payoff documentation (0.1); review and analyze TL guarantee and collateral agreement (0.6).	0.90
Kavarsky, Gary	Corp	Associate	03/24/23	711	Teleconference with M. Ferrari, PW, DPW, Centerview, and PJT teams re potential financing bond deal (1.0); review and revise debt documents (0.7).	1.70
Epstein, David	Corp	Counsel	03/24/23	711	Draft FABTL credit agreement (3.9); teleconference with T. de la Bastide, Revlon, and BrandCo lender advisors re potential bond deal (1.0); review and analyze credit agreement reporting requirements (0.3); correspond with T. de la Bastide re minimum liquidity (0.5); correspond with C. Meredith-Goujon re intercompany transactions (1.3); review and analyze FABTL commitment papers (1.0); draft issues list re same (0.2); review and comment on PJT exit facility decks (0.7).	8.90
Kennedy, John C	Corp	Partner	03/24/23	711	Teleconference with Ferrari, PW, DPW, PJT, Centerview teams re potential debt offering.	1.00
Meredith-Goujon, Claudine K	Corp	Partner	03/25/23	711	Review and comment on draft termination of IP contribution agreements from BrandCo transaction (0.3); review and comment on draft bankruptcy confirmation order re IP concerns (0.2).	0.50
de la Bastide, Thomas V	Corp	Partner	03/25/23	711	Correspond with A. McGinnis re financing issues in tax restructuring steps plan (0.5); review and analyze same (0.3); correspond with DPW, CV re exit financing structure (0.4).	1.20
Epstein, David	Corp	Counsel	03/25/23	711	Teleconference with M. Ferrari, Revlon, PJT, and A&M re commitment papers for exit facilities (1.1); review and analyze outstanding financing items (1.4).	2.50
Braibanti, Jill	LEGL	Associate	03/25/23	711	Review and analyze materials from M. Ferrari re FABTL term sheet (0.1); review and analyze comments to confirmation order (0.1); review and analyze comments to omnibus termination agreement for contribution agreements (0.2); revise IP lien release and closing checklist for new credit facilities (0.4).	0.80
Basta, Paul M.	Rstr	Partner	03/25/23	711	Teleconference with D. Epstein, Revlon, PJT, and A&M teams re commitment papers for exit financing (1.1); correspond with D. Epstein, PW team re same (0.4).	1.50
Ferrari, Marta	Corp	Associate	03/25/23	711	Teleconference with D. Epstein, PJT, A&M and Revlon teams concerning Exit FABTL and Term Loan Facilities (1.1); review and revise commitment papers and Term Loan Credit Agreement (0.6).	1.70
Meredith-Goujon, Claudine K	Corp	Partner	03/26/23	711	Correspond with J. Braibanti re IP issues in proposed steps plan.	0.30

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Name	Dept	Title	Date	Task	Description	Hours
de la Bastide, Thomas V	Corp	Partner	03/26/23	711	Review and analyze revised exit ABL commitment papers from Proskauer (0.8); correspond with D. Epstein, PW finance and tax teams re tax restructuring steps approvals (0.4).	1.20
Blain, Hunter	Corp	Associate	03/26/23	711	Revise guarantee and collateral agreement per IP comments.	0.10
Epstein, David	Corp	Counsel	03/26/23	711	Review and analyze ABL papers.	0.50
Braibanti, Jill	LEGL	Associate	03/26/23	711	Correspond with C. Meredith-Goujon re IP issues in alternative transaction steps (0.3); review and analyze transaction steps deck re IP implications for Bruno's (0.3); review and revise exit ABL term sheet and commitment re IP considerations (0.2); update IP lien release checklist (0.3).	1.10
Ferrari, Marta	Corp	Associate	03/26/23	711	Review and analyze Proskauer's draft of the ABL Commitment Papers and prepared issues list (1.8); draft ABL Credit Agreement (3.4).	5.20
de la Bastide, Thomas V	Corp	Partner	03/27/23	711	Teleconference with A. Eaton, DPW, PJT, and A&M re exit financing structure (1.0); prepare for same (0.5); review and comment on ABL issues list (0.8); conference with J. Kennedy, PW team, client re exit financing issues list (1.2); correspond with PW team re bond deal structure and tax reorganization issues (0.9).	4.40
Rocher, Evan	Corp	Associate	03/27/23	711	Review and analyze signatory issues re exit financing (2.1); draft summary of same (0.9); correspond with G. Kavarsky re same (0.2).	3.20
Meredith-Goujon, Claudine K	Corp	Partner	03/27/23	711	Correspond with S. Rosenthal (Revlon) re sublicensing BrandCo IP (0.2); correspond with J. Braibanti, PW team re notices to IP licensors (0.2); correspond with D. Epstein, PW finance team re open IP issues in ABL and FILO (0.3).	0.70
Eaton, Alice	Rstr	Partner	03/27/23	711	Teleconference with Caruso, A&M re exit financing process (0.4); review and analyze materials from PJT re same (0.4); teleconference with Mates, PJT re same (0.3); teleconference with T. de la Bastide, Vonnegut, BrandCo advisors, PJT and A&M re exit financing process (1.0); correspond with B. Bolin re next steps with exit financing (0.2).	2.30
Bolin, Brian	Rstr	Partner	03/27/23	711	Review and comment on financing issues in draft confirmation order (0.4); correspond with A. McGinnis re same (0.2).	0.60
Maccio, John	Corp	Associate	03/27/23	711	Correspond with J. Braibanti PW IP team and Revlon re quarterly formula reporting obligations.	0.20

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Name	Dept	Title	Date	Task	Description	Hours
Epstein, David	Corp	Counsel	03/27/23	711	Correspond with T. de la Bastide, BrandCo advisors re exit financing (0.5); teleconference with T. de la Bastide, PW team, client team re exit financing issues list (1.2); review and analyze financing issues in confirmation order (0.8); revise commitment papers (3.3); prepare summary of reporting requirements (0.5); review and analyze intercreditor agreement (1.0); prepare markup of same (1.2).	8.50
Kavarsky, Gary	Corp	Associate	03/27/23	711	Teleconference with J. Kennedy, PW team, client team re exit financing issues (1.0); prepare for same (0.5); revise perfection certificate (0.3); revise schedules to credit agreements (1.0); revise intercreditor agreement (0.5); review and analyze credit documents (0.8); correspond with E. Rocher, PW team, company re document signature parties (0.3).	4.40
Braibanti, Jill	LEGL	Associate	03/27/23	711	Correspond with K. Tompsett (CMS) re UK/EU lien releases (0.2); review and analyze UK/EU/WIPO lien release chart (0.3); correspond with S. Rosenthal (Revlon) re exit term GCA (0.1); correspond with same re monthly/quarterly DIP reporting (0.3); correspond with M. Ferrari and PW finance team re exit term GCA and credit agreement IP comments (0.3); correspond with I. Blumberg re IP license diligence and licensor notices (0.5); review and analyze BrandCo 2020 intercompany license re query from S. Rosenthal (Revlon) (0.3); correspond with C. Meredith-Goujon re same (0.2); correspond with Z. Gold (A&M) re contracts for additional diligence in connection with exit structuring (0.2); review and analyze materials from D. Epstein and C. Killea (Proskauer) re exit financing status (0.2).	2.60
Daniele, Salvatore	Corp	Associate	03/27/23	711	Correspond with M. Ferrari re DACA terminations (0.2); secretary's cert (0.8); review term loan exhibits (1.1)	2.10
Basta, Paul M.	Rstr	Partner	03/27/23	711	Teleconference with J. Kennedy, PW team, client team re exit financing issues (1.0); partially attend teleconference with T. de la Bastide, DPW, CVP, A&M, Revlon and PJT teams re exit financing structure (0.5).	1.50
Kennedy, John C	Corp	Partner	03/27/23	711	Teleconference with T. de la Bastide, PW team, client re exit financing issues (1.2); prepare for same (0.5); correspond with Eaton, PW team re same (0.4).	2.10
Kaoutzanis, Christodoulos	Corp	Partner	03/27/23	711	Partially attend teleconference with J. Kennedy, PW team, client team re exit financing issues.	0.70

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Name	Dept	Title	Date	Task	Description	Hours
Ferrari, Marta	Corp	Associate	03/27/23	711	Review and revise draft commitment papers for exit facilities (4.2); prepare issues lists re same (2.3); correspond with Freshfields team concerning foreign deliverables (0.4); teleconference with T. de la Bastide, DPW, CVP, A&M, Revlon and PJT teams re exit financing (1.0); correspond with D. Epstein, DPW, PH and PR teams re same (0.2); review and analyze LER decks (1.8); review and analyze bankruptcy filings re exit financing issues (2.2).	12.10
Keeton, Douglas	Rstr	Associate	03/28/23	711	Correspond with A&M team re rights offering issues (0.3); teleconference with T. Archbell (Kroll) Kroll and PW teams re rights offering issues (0.5).	0.80
Rocher, Evan	Corp	Associate	03/28/23	711	Correspond with G. Kavarsky re FABTL issues.	0.90
Bolin, Brian	Rstr	Partner	03/28/23	711	Conference with T. de la Bastide, D. Epstein, and M. Ferrari re commitment papers (0.5); review and analyze markups of Blue Torch commitment papers (1.0).	1.50
Kavarsky, Gary	Corp	Associate	03/28/23	711	Telephone conference with Blumberg, PW, DPW, Akin, BR teams re emergence checklist (0.5); revise intercreditor agreement (0.9).	1.40
Braibanti, Jill	LEGL	Associate	03/28/23	711	Correspond with C. Meredith-Goujon re contribution/license agreement termination and bond deal (0.3); review and analyze IP foreign lien release status (0.8); revise IP foreign lien checklist (1.0); correspond with C. Meredith-Goujon re scope of contracts diligence for restructuring plan (0.4); correspond with S. Rosenthal (Revlon) re formula/monthly reporting for DIP (0.3); correspond with A. Page re draft notice of second plan supplement and exhibits (0.2).	3.00
Epstein, David	Corp	Counsel	03/28/23	711	Teleconference with B. Bolin, PW finance team re commitment papers (0.5); teleconference with M. Ferrari, D. Walsh, Revlon and PW tax team re finance planning (0.5); review and comment on intercreditor agreement (1.7); revise commitment papers (2.7).	5.40
de la Bastide, Thomas V	Corp	Partner	03/28/23	711	Review and comment on revised ABL commitment papers (0.5); review and comment on FABTL commitment papers (0.3); review and comment on confirmation order and releases (1.1); conference with D. Epstein and M. Ferrari re commitment papers (0.5).	2.40
Daniele, Salvatore	Corp	Associate	03/28/23	711	Review and analyze draft exhibits to term sheet	0.50
Kaoutzanis, Christodoulos	Corp	Partner	03/28/23	711	Review and analyze registration rights agreement (0.5); correspond with D. Epstein, PW team re potential financing structures for bond offering (0.3).	0.80

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Name	Dept	Title	Date	Task	Description	Hours
Ferrari, Marta	Corp	Associate	03/28/23	711	Draft Credit Agreement (3.8); review and revise draft ancillary documents (2.4); teleconference with T. de la Bastide, PW team re commitment papers (0.5); correspond with Freshfields team concerning foreign deliverables (0.2); teleconference with Blumberg, PW team re emergence checklist (0.5); revise same (0.5).	7.90
Ferrari, Marta	Corp	Associate	03/29/23	711	Draft credit agreement (3.9); review and revise draft ancillary documents and commitment papers for FABTL facility (4.1); correspond with Freshfields team re foreign deliverables (0.4); teleconference with D. Epstein, King & Spalding re Blue Torch letter (0.6); teleconference with S. Daniele, PW team re financing workstreams (0.6); teleconference with D. Epstein, PW, DPW re finance checklist (0.5).	10.10
Kavarsky, Gary	Corp	Associate	03/29/23	711	Teleconference with D. Epstein, PW finance re exit finance checklist (0.5); teleconference with B. Bolin, King & Spalding re Blue Torch proposal (0.6); teleconference with lender counsels re exit facilities (1.2); review and revise security agreements (2.6); correspond with various counsel re same (0.3); correspond with agent counsel re collateral (0.4).	5.60
Braibanti, Jill	LEGL	Associate	03/29/23	711	Review and analyze materials from Deacons re China and Hong Kong lien removal (0.3); correspond with C. Meredith-Goujon re 2020 China pledge recordal and exit financing checklist (0.4); teleconference with D. Epstein, PW finance team and DPW re exit financing (0.5); correspond with D. Epstein re IP items for exit financing checklist (0.1); correspond with D. Dougherty (Revlon) and J. Maccio re formula updates for DIP reporting (0.4); correspond with G. Kavarsky and C. Geils (Paul Hastings) re Jefferies payoff for exit credit facility (0.4); correspond with A. McGinnis and D. Walsh (Revlon) re Bruno's structure (0.1); review and analyze BrandCo 2020 facilities re copyright schedules (0.5); correspond with C. Meredith-Goujon re copyright schedules for new facilities (0.2).	2.90
Keeton, Douglas	Rstr	Associate	03/29/23	711	Correspond with Kroll re treatment of DIP claims and backstop commitments.	0.20
Rocher, Evan	Corp	Associate	03/29/23	711	Teleconference with S. Daniele, PW finance team re exit financing workstreams (0.6); teleconference with D. Epstein, PW finance team, DPW finance team re same (0.5); correspond with P. Fisch, PW RE team re mortgage issues re exit financing (0.4).	1.50
Daniele, Salvatore	Corp	Associate	03/29/23	711	Teleconference with D. Epstein, PW, DPW re financing checklist (0.5); teleconference with M. Ferrari, E. Rocher, PW finance team re exit financing workstreams (0.6); prepare DACA terminations (0.6).	1.70

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Name	Dept	Title	Date	Task	Description	Hours
Bolin, Brian	Rstr	Partner	03/29/23	711	Teleconference with D. Epstein, PW, DPW team re financing checklist (0.5); teleconference with M. Sidorenkov (A&M) re same (0.1); correspond with T. de la Bastide, D. Epstein, and M. Ferrari re commitment papers (0.2); conference with D. Epstein, King & Spalding re Blue Torch proposal (0.6); review and analyze revised draft Midcap commitment papers (0.2); review and comment on draft confirmation order (0.5).	2.10
Maccio, John	Corp	Associate	03/29/23	711	Review and analyze Revlon quarterly formula materials (1.0); draft Revlon Q1 2023 report (2.7); correspond with C. Meredith-Goujon, PW IP team and Revlon re quarterly formula reporting obligations (0.2).	3.90
Epstein, David	Corp	Counsel	03/29/23	711	Teleconference with B. Bolin, PW, DPW re financing checklist (0.5); teleconference with B. Bolin, King & Spalding re Blue Torch proposal (0.6); review and analyze draft confirmation order (0.8); draft commitment papers (5.0); correspond with PW team re questions re same (0.7).	7.60
Meredith-Goujon, Claudine K	Corp	Partner	03/29/23	711	Review and analyze exit financing checklist (0.4); correspond with J. Braibanti re same (0.4).	0.80
de la Bastide, Thomas V	Corp	Partner	03/29/23	711	Review and revise exit financing facilities for FABTL, bond offering and term loan facilities (3.5); review and revise commitment papers for ABL and FABTL exit facilities (1.5).	5.00
Blain, Hunter	Corp	Associate	03/30/23	711	Correspond with G. Kavarsky and foreign counsel re collateral documents (0.3); prepare for meeting with exit finance group re next steps (0.3); conference with B. Bolin, PW exit finance team re finance works in process (0.5); coordinate payoff documentation (0.2).	1.30
Eaton, Alice	Rstr	Partner	03/30/23	711	Teleconference with D. Epstein, PW team, Company, and advisors re exit facilities (0.5); correspond with A. Kidd (Revlon) re same (0.4); correspond with D. Epstein, B. Bolin re finance issues (0.5).	1.40
Daniele, Salvatore	Corp	Associate	03/30/23	711	Conference with D. Epstein and PW team re finance status update (0.5); correspond with same re same (0.3).	0.80
Keeton, Douglas	Rstr	Associate	03/30/23	711	Correspond with Davis Polk team and O. Rahnama re rights offering mechanics.	0.40
Kaoutzanis, Christodoulos	Corp	Partner	03/30/23	711	Review and analyze section 1145 issues.	0.40

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Name	Dept	Title	Date	Task	Description	Hours
Ferrari, Marta	Corp	Associate	03/30/23	711	Draft ABL/FILO Credit Agreement (5.6); review and revise draft ancillary documents and draft schedules (3.2); coordinate diligence process for FABTL facility (1.5); correspond with Freshfields team re foreign deliverables (0.7); teleconference with N. Bakke (Freshfields), Freshfields, DPW, Revlon, A&M and PJT teams (0.4); teleconference with D. Epstein, PW finance team re financing status update (0.5); review and analyze existing share pledge agreements for foreign loan parties (0.8).	12.70
Rocher, Evan	Corp	Associate	03/30/23	711	Review, analyze potential loan parties (1.0); correspond with A. Kidd, E. Quinones (Revlon) re execution of commitment papers and related documents (0.6).	1.60
Kavarsky, Gary	Corp	Associate	03/30/23	711	Conference with D. Epstein, PW finance team re financing status update (0.5); correspond with PW team, lender counsel re emergence (0.7); conference with A. Eaton, PW team, company, A&M, PJT re exit facilities (0.5); review and analyze issues re same (0.5); correspond with PW team re security documents (0.3); review signature packet (0.4).	2.90
Braibanti, Jill	LEGL	Associate	03/30/23	711	Correspond with C. Meredith-Goujon re copyright schedules for new facilities and IP foreign lien checklist (0.2); correspond with L. Cen re Bruno's structure (0.1); review and analyze IP dockets (0.7); draft summary of outstanding questions re same (0.1); correspond with C. Meredith-Goujon re IP docket questions (0.2); review and analyze exit facility terms summary (0.1).	1.40
Maccio, John	Corp	Associate	03/30/23	711	Review and analyze Revlon quarterly formula materials (0.3); draft Revlon Q1 2023 report (0.4).	0.70
Page, Alana	Rstr	Associate	03/30/23	711	Conference with A. Eaton, PW team, PJT team, client re exit facilities.	0.50
Meredith-Goujon, Claudine K	Corp	Partner	03/30/23	711	Correspond with J. Braibanti re IP perfection certificate (0.2); review and analyze materials from PW financing team re FABTL terms (0.3).	0.50
Bolin, Brian	Rstr	Partner	03/30/23	711	Correspond with T. de la Bastide, D. Epstein, and M. Ferrari re exit financing commitments (0.5); conference with D. Epstein, PW exit financing team re financing finance works in process (0.5); conference with E. Ross (PJT), PJT, A&M, and PW teams re legal entity rationalization steps (0.4); review and analyze summary of same (1.0).	2.40

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Name	Dept	Title	Date	Task	Description	Hours
Epstein, David	Corp	Counsel	03/30/23	711	Conference with B. Bolin, PW team re financing status update (0.5); correspond with T. de la Bastide, PW, DPW teams re financing checklist (0.5); teleconference with A. Eaton, Company, and advisors re exit facilities (0.5); review and analyze structuring steps (1.4); review and analyze commitment papers (2.2); prepare issues lists (0.8); review and analyze financing issues in confirmation order (1.4); draft summary of LER steps (2.8).	10.10
de la Bastide, Thomas V	Corp	Partner	03/30/23	711	Revise exit financing commitment for ABL, FILO, FABTL, Term, Bonds and related tax structuring and confirmation order.	8.20
Meredith-Goujon, Claudine K	Corp	Partner	03/31/23	711	Review and analyze Proskauer comments to term sheet for ABL loan and scope of IP collateral.	0.30
Basta, Paul M.	Rstr	Partner	03/31/23	711	Partially attend teleconference with A. Eaton, PW, PJT, Midcap, and SLR re ABL revised terms.	1.20
Kaoutzannis, Christodoulos	Corp	Partner	03/31/23	711	Review and analyze issues related to 8-K.	0.50
Ferrari, Marta	Corp	Associate	03/31/23	711	Review revised draft of US ABL commitment papers (3.2); update issues list re same (4.7); review and analyze issues re Proskauer and MLB teams concerning LER transactions (2.0); teleconference with A. Eaton, PW, Midcap and advisors re revised ABL terms (2.0); teleconference with B. Bolin and PW finance team re same and finance works in process (0.5); teleconference with B. Bolin, Revlon management team re commitment papers (0.5); correspond with PW team re same (0.7).	13.60
Rocher, Evan	Corp	Associate	03/31/23	711	Correspond with B. Bolin, A. Eaton re exit financing process NRLs.	0.60
Keeton, Douglas	Rstr	Associate	03/31/23	711	Correspond with A. McGinnis, PW tax team re terms of exit financing.	0.10
Kavarsky, Gary	Corp	Associate	03/31/23	711	Teleconference with A. Eaton, PW, PJT, Midcap, and SLR re ABL revised terms (2.0); teleconference with B. Bolin, management team re commitment papers (0.5); review prepetition and dip documents re signature parties and guarantors (1.5); review and comment on perfection certificate (0.5); correspond with J. Braibanti, PW team re security documents (0.3).	4.80

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Braibanti, Jill	LEGL	Associate	03/31/23	711	Correspond with S. Rosenthal (Revlon), D. Dougherty (Revlon), and C Meredith-Goujon re IP schedules for exit financing (0.4); review and analyze materials from J. Heasley re revised steps memo and plan supplement (0.1); review and analyze materials from D. Epstein re financing status (0.1); correspond with A. McGinnis re updated Bruno's steps deck (0.1); correspond with M. Sedrish (Paul Hastings) re Jefferies IP payoff documents (0.2); correspond with D. Dougherty (Revlon) re Hair Hub formulas for DIP reporting (0.1); review and analyze materials from M. Ferrari and PW finance re MidCap terms (0.2).	1.20
Bolin, Brian	Rstr	Partner	03/31/23	711	Review and comment on Proskauer draft of commitment papers (1.3); conference with A. Eaton, PW, Midcap, and SLR re revised ABL terms (2.0); conference with T. de la Bastide, D. Epstein, and M. Ferrari re same and finance works in process (0.5); correspond with D. Epstein, Centerview and DPW re financing options (0.3); conference with M. Sidorenkov (A&M), PJT, A&M, and PW teams re same (0.6); review and comment on financing issues in draft confirmation order (0.3); conference with D. Epstein, management team re commitment papers (0.5); correspond with Proskauer team re same (0.1); correspond with S. Mates (PJT), PJT, A&M, and PW teams re same (0.3); correspond with T. de la Bastide, D. Epstein, and M. Ferrari re same (0.3).	6.20
Eaton, Alice	Rstr	Partner	03/31/23	711	Teleconference with B. Bolin, PW, PJT, Midcap and SLR team re revised ABL terms (2.0); correspond with B. Bolin re same (0.4); teleconference with E. Ross (PJT) re same (0.4); teleconference with A. Kidd (Revlon) re Midcap terms (0.3); teleconference with E. Vonnegut (DPW), BrandCo advisors re financing next steps (0.5); correspond with A&M, PJT, and R. Britton re same (0.3); correspond with E. Vonnegut (DPW), BrandCo lenders re next steps and financing term sheet (0.4); teleconference with D. Perelman (Revlon) and A. Kidd (Revlon) re financing update (0.5); correspond with E. Ross, PJT re same (0.2); correspond with D. Epstein, PW and PJT teams re commitment letter negotiations (0.6).	5.60
Maccio, John	Corp	Associate	03/31/23	711	Correspond with PW IP team and Revlon re quarterly formula reporting obligations.	0.20

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Name	Dept	Title	Date	Task	Description	Hours
Epstein, David	Corp	Counsel	03/31/23	711	Teleconference with A. Eaton, PW, PJT, Midcap, and SLR re ABL revised terms (2.0); review and analyze same (1.0); teleconference with B. Bolin, PW finance team re same and finance works in process (0.5); teleconference with B. Bolin, management team re commitment papers (0.5); correspond with A. Kidd (Revlon), Company re same (0.5); review and analyze steps deck (0.8); review and analyze commitment papers (3.0); draft issues list (1.4).	9.70
Page, Alana	Rstr	Associate	03/31/23	711	Conference with B. Bolin, PW team, client team re exit financing update (0.5); correspond with same re same (0.6).	1.10
Blain, Hunter	Corp	Associate	03/31/23	711	Correspond with local counsel re current status and next steps (0.1); teleconference with M. Sedrish (PH), Paul Hastings team re payoff and termination documents (0.1).	0.20
de la Bastide, Thomas V	Corp	Partner	03/31/23	711	Review tax restructuring and Bruno's transaction steps and issues (1.8); conference with A. Eaton, PW, Midcap, and SLR on issues on ABL commitments (2.0); teleconference with B. Bolin, management team re commitment papers (0.5); correspond with Revlon, PJT, A&M on FABTL and ABL commitment papers and issues (1.0); review confirmation order (1.5); correspond with B. Bolin, PW finance and restructuring teams re filing of confirmation order and exit facilities (1.2); correspond with DPW, CVP re structure of exit financing and closing liquidity (0.8).	8.80
Britton, Robert	Rstr	Partner	03/31/23	711	Conference with Kidd (Revlon) re financing issues (0.9); conference with Perelman (Revlon) re same (0.5); conference with Zelin (PJT) re same (0.6); correspond with Eaton re same (0.3); correspond with Basta re same (0.3); analyze same (0.4).	3.00
Meredith-Goujon, Claudine K	Corp	Partner	04/01/23	711	Review release of BrandCo liens in PRC (0.2); email Deacons (PRC IP counsel) (0.1); correspond with J. Braibanti re IP checklist for emergence (0.2).	0.50
Kavarsky, Gary	Corp	Associate	04/01/23	711	Teleconference with T. de la Bastide, PJT team re exit financing terms and alternate financings.	1.00
de la Bastide, Thomas V	Corp	Partner	04/01/23	711	Teleconference with D. Epstein, advisors, Company re commitment papers issues (1.5); correspond with same re same (0.5); review and revise commitment papers for FABTL, ABL and FILO (2.2); correspond with PW team re exit facilities (0.8); conference with G. Kavarsky, S. Mates (PJT), PJT team re summary of exit financing terms for DPW and CVP and potential alternate financings (1.0); correspond with same, PW team re same (0.2).	6.20

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Epstein, David	Corp	Counsel	04/01/23	711	Draft FABTL (2.1); review and analyze ABL commitment papers (1.3); conference with T. de la Bastide, Company, and advisors re commitment papers (1.5); teleconference with V. Indelicato re LER transaction (0.4).	5.30
Rocher, Evan	Corp	Associate	04/01/23	711	Correspond with P. Fisch re exit financing mortgage workstream.	0.20
Kaoutzanis, Christodoulos	Corp	Partner	04/01/23	711	Review and analyze draft 8-Ks (0.7); correspond with J. Hotes, PW team re same (0.3).	1.00
Ferrari, Marta	Corp	Associate	04/01/23	711	Teleconference with T. de la Bastide, PJT, A&M, CVP, DPW, and other advisors re commitment paper issues (1.5); prepare for same (0.6); revise draft commitment papers for US exit facilities and FABTL (4.6).	6.70
Eaton, Alice	Rstr	Partner	04/01/23	711	Review and analyze correspondence re exit financing negotiations.	0.40
Bolin, Brian	Rstr	Partner	04/01/23	711	Teleconference with T. de la Bastide, Company, advisors re commitment papers (1.5); review and comment on Blue Torch commitment papers (1.3); review and comment on Midcap commitment papers (1.2); correspond with A. Eaton re same (0.4).	4.40
Braibanti, Jill	LEGL	Associate	04/01/23	711	Review correspondence with B. Bolin, exit finance team re exit finance status and liquidity scenarios (0.7); review correspondence with V. Yim (Deacons) and S. Rosenthal re Chinese IP lien releases (0.2); review and analyze C. Meredith Goujon comments on IP foreign lien checklist (0.4); correspond re IP workstreams with C. Meredith-Goujon (0.1); review updated ABL and FABTL commitment papers (0.2).	1.60
Epstein, David	Corp	Counsel	04/02/23	711	Conference with B. Bolin, Revlon, and advisors re financing options (0.5); review and analyze grids and term sheets (1.2).	1.70
de la Bastide, Thomas V	Corp	Partner	04/02/23	711	Conference call with S. Mates (PJT), PJT, client, A&M re alternative ABL and FABTL financings and summary of terms for Brandco lenders (1.2); review and comment on revised ABL and FABTL commitment papers (1.2); correspond with PJT re bank ABL proposals (1.0).	3.40
Ferrari, Marta	Corp	Associate	04/02/23	711	Revise draft commitment papers for exit FABTL facility (3.8); correspond with D. Epstein, CVP, A&M and PW finance teams re calculation of Borrowing Base in exit facilities (0.4); correspond with D. Keeton, PW restructuring team re MAE definition (0.7); correspond with local counsel, N. Cooper, and Freshfields team re FABTL (0.3); correspond with Elise Quinones concerning FABTL diligence questions (0.9).	6.10

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Kavarsky, Gary	Corp	Associate	04/02/23	711	Review, revise security documents (4.1); revise schedules re same (0.5).	4.60
Bolin, Brian	Rstr	Partner	04/02/23	711	Conference with D. Epstein, Company, and advisors re financing options (0.5); correspond with T. de la Bastide, D. Epstein, and M. Ferrari re same (0.3).	0.80
Braibanti, Jill	LEGL	Associate	04/02/23	711	Review correspondence with D. Epstein and PW finance team re revised exit financing commitment papers (0.5); review and analyze revised commitment papers (0.1); correspond with C. Meredith-Goujon re IP docket coordination (0.3).	0.90
Meredith-Goujon, Claudine K	Corp	Partner	04/03/23	711	Teleconference with J. Braibanti re open IP issues in exit financing (0.5); review and analyze correspondence from PW team re exit finance negotiations (0.3).	0.80
Blain, Hunter	Corp	Associate	04/03/23	711	Correspond with E. Rocher, PW team re lien searches and payoff documentation.	0.30
Rocher, Evan	Corp	Associate	04/03/23	711	Correspond with P. Kaminski (Proskauer), Proskauer team, C. Fischer (DPW), DPW team re exit financing diligence (0.3); review and analyze issues related to potential loan parties (0.4); review and analyze FABTL considerations (0.7); correspond with H. Blain re payoff documentation (0.2).	1.60
Braibanti, Jill	LEGL	Associate	04/03/23	711	Teleconference with C. Meredith-Goujon re IP workstreams for emergence (0.5); review and analyze correspondence with D. Epstein re exit facility proposals (0.7); review draft DIP reporting and IP docket open questions (0.8); review contribution and intercompany licenses re terminations/amendments (0.6); update IP workstream tracker (0.3); review formula update tracker from J. Maccio (0.5); correspond with J. Maccio re formula updates (0.1); update IP docket (0.5).	4.00
Bolin, Brian	Rstr	Partner	04/03/23	711	Correspond with T. de la Bastide, D. Epstein, and M. Ferrari re exit financing updates (0.5); comment on Blue Torch commitment papers (0.8); conference with Centerview, B. Bolin re exit financing status (0.3).	1.60
Maccio, John	Corp	Associate	04/03/23	711	Review quarterly formula materials (1.6); draft Q1 2023 Formula updates report (1.0).	2.60
de la Bastide, Thomas V	Corp	Partner	04/03/23	711	Teleconference with D. Epstein, PW, Centerview re exit financing status (0.3); conference with S. Mates (PJT), PJT, A&M, CVP re alternate financing structure for FILO and FABTL (0.9); review and revise FABTL commitment papers (1.6).	2.80
Epstein, David	Corp	Counsel	04/03/23	711	Teleconference with B. Bolin, CVP, and Revlon advisors re exit financing (0.3); review FABTL commitment papers (0.5); prepare issues list re same (0.3); review and analyze exit financing proposals (2.2).	3.30

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Name	Dept	Title	Date	Task	Description	Hours
Eaton, Alice	Rstr	Partner	04/03/23	711	Correspond with D. Epstein re exit financing negotiations.	0.60
Daniele, Salvatore	Corp	Associate	04/03/23	711	Correspond with J. Burne re local counsel opinion (0.1); review files re documents needed for local counsel opinions (0.5).	0.60
Kavarsky, Gary	Corp	Associate	04/03/23	711	Review, revise guaranty and collateral agreements (2.7); revise credit agreement schedules (1.0); correspond with M. Ferrari re same (0.3).	4.00
Ferrari, Marta	Corp	Associate	04/03/23	711	Teleconference with N. Cooper (Freshfields) re local counsel requests for FABTL, exit Term Loan and exit US ABL Facilities (1.1); prepare closing checklist (3.3); review and analyze debt documents re same (1.3); revise draft commitment papers for US ABL (2.7).	8.40
Keeton, Douglas	Rstr	Associate	04/03/23	711	Review and revise escrow agreement (0.5); correspond with O. Rahnama, PW team re same (0.1); review and revise non-reliance letter for ABL (0.8); teleconference with T. de la Bastide, PW, Centerview re exit financing status (0.3); correspond with same re same (0.1).	1.80
Hellebrekers, Robin	ECP	Associate	03/01/23	712	Draft and revise employee arrangements (0.6); conference with A. Ritschard and R. Aizen re same (0.5).	1.10
Luo, Lara	Rstr	Associate	03/01/23	712	Conference with G. Reed, A&M re non-qualified pension distributions (0.6); analyze issues re same (0.7).	1.30
Luo, Lara	Rstr	Associate	03/01/23	712	Correspond with Edwards re qualified pensioner distributions.	0.10
Ritschard, Alexandra	ECP	Associate	03/01/23	712	Revise CIC definition excerpt.	0.50
Ritschard, Alexandra	ECP	Associate	03/01/23	712	Compile documents re EA and severance calculations (0.2); review and analyze documents re same (0.5).	0.70
Britton, Robert	Rstr	Partner	03/01/23	712	Correspond with A. Libby (DPW) re KERP (0.2); correspond with D. Perelman (Revlon) re same (0.2).	0.40
Aizen, Ron	ECP	Counsel	03/01/23	712	Confer with G. Reed and PW team re nonqualified benefits (0.5); confer with A. Kidd and PW team re compensation documents (0.3); prepare employment agreement (0.4); prepare ECIP (0.9); review and analyze Osler comments to credit agreement (0.1).	2.20
Aizen, Ron	ECP	Counsel	03/02/23	712	Correspond with A. Kidd re severance (0.2); prepare ECIP (1.8).	2.00
Glazeski, Jacob	ECP	Counsel	03/02/23	712	Review and analyze additional factual confirmations re benefit plans (0.4); correspond with PW finance team re same (0.1).	0.50
Hellebrekers, Robin	ECP	Associate	03/03/23	712	Correspond with R. Aizen, PW team re incentive plans (0.3); review and analyze ECIP (0.7).	1.00

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Page, Alana	Rstr	Associate	03/03/23	712	Review and analyze employee communications materials re solicitation (0.2); correspond with S. Harnett re same (0.2).	0.40
Akard, Cynthia	ECP	Counsel	03/03/23	712	Review and analyze executive compensation disclosure issues.	0.30
Luo, Lara	Rstr	Associate	03/03/23	712	Correspond with R. Britton re pension issues (0.2); conference with A. Kidd re KERP (0.1); correspond with same, R. Britton, PW team re same (0.3); correspond with A. Goldin, A&M, DPW, BR, UST re severance payments (0.1).	0.70
Aizen, Ron	ECP	Counsel	03/03/23	712	Prepare ECIP (1.8); teleconference with M. Ferrari, Freshfields team re UK pension (1.1); correspond with L. Luo re KERP (0.1).	3.00
Heasley, Julia	Rstr	Associate	03/03/23	712	Correspond with L. Luo and I. Blumberg re Elizabeth Arden employee payment.	0.10
Hellebrekers, Robin	ECP	Associate	03/06/23	712	Correspond with R. Aizen re ECIP (0.3); correspond with R. Aizen, PW team re global bonus program (0.4); draft and revise ECIP documents (0.9).	1.60
Aizen, Ron	ECP	Counsel	03/06/23	712	Confer with Hellebrekers, PW and Revlon teams re compensation plans (2.0); correspond with C. Akard re 10-K (0.1); correspond with S. Howe re 401(k) (0.2).	2.30
Luo, Lara	Rstr	Associate	03/06/23	712	Correspond with R. Aizen re employee programs.	0.20
Akard, Cynthia	ECP	Counsel	03/06/23	712	Review and analyze executive compensation disclosure matters.	0.80
Hellebrekers, Robin	ECP	Associate	03/07/23	712	Draft and revise award letter.	0.40
Luo, Lara	Rstr	Associate	03/07/23	712	Correspond with R. Aizen re post-ED KERP (0.2).	0.20
Aizen, Ron	ECP	Counsel	03/07/23	712	Correspond with Luo, PW team re bonus program (0.3); correspond with Reed, Revlon re 401(k) and excess savings plans (0.2).	0.50
Britton, Robert	Rstr	Partner	03/08/23	712	Partially attend teleconference with R. Aizen, Revlon re compensation issues.	0.50
Aizen, Ron	ECP	Counsel	03/08/23	712	Correspond with Hellebrekers, PW team re bonus program (0.1); conference with R. Britton, Revlon team re severance arrangements (0.7).	0.80
Hellebrekers, Robin	ECP	Associate	03/08/23	712	Correspond with R. Aizen re Global Bonus Program (0.4); draft and revise ECIP (0.4); draft and revise employment agreements (0.2).	1.00
Ritschard, Alexandra	ECP	Associate	03/09/23	712	Review and analyze bonus program decks re policy changes.	0.40
Akard, Cynthia	ECP	Counsel	03/09/23	712	Review and analyze executive compensation disclosure issues.	0.60
Aizen, Ron	ECP	Counsel	03/09/23	712	Correspond with Freshfields team re UK pension (0.1); revise retention plan (0.7); comment on severance plan (0.3); comment on KEIP letter (0.6).	1.70
Britton, Robert	Rstr	Partner	03/09/23	712	Conference with A. Kidd (Revlon) re settlement and compensation issues.	0.90

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Hellebrekers, Robin	ECP	Associate	03/10/23	712	Correspond with R. Aizen, PW team re global bonus plan (0.4); draft and revise employment agreement (0.5); review and analyze KEIP for Revlon questions (0.6); correspond with R. Britton, PW team re KEIP (0.5).	2.00
Aizen, Ron	ECP	Counsel	03/10/23	712	Correspond with G. Reed, A. Eaton and Groom Law re pension matters (0.2); teleconference with G. Reed (Revlon) and E. Bar-Ness (Revlon) re retention program (0.6).	0.80
Luo, Lara	Rstr	Associate	03/10/23	712	Correspond with R. Aizen and PW team re various post-effective date compensation programs.	0.50
Aizen, Ron	ECP	Counsel	03/11/23	712	Correspond with L. Luo re KEIP.	0.10
Hellebrekers, Robin	ECP	Associate	03/13/23	712	Teleconference with R. Aizen re global bonus plan (0.5); teleconference with R. Aizen and L. Luo re KEIP (0.3); draft and revise employment agreements (0.8).	1.60
Ritschard, Alexandra	ECP	Associate	03/13/23	712	Search for material and precedent with market severance practice.	0.10
Aizen, Ron	ECP	Counsel	03/13/23	712	Conference with G. Reed (Revlon), Revlon, Cozen, and PW teams re pensions (1.0); teleconference with L. Luo and R. Hellebrekers re KEIP (0.3); comment on employment agreement (0.2); teleconference with R. Hellebrekers re global bonus plan (0.5).	2.00
Luo, Lara	Rstr	Associate	03/13/23	712	Conference with R. Aizen and R. Hellebrekers re KEIP (0.3); correspond with same re same (0.1).	0.40
Aizen, Ron	ECP	Counsel	03/14/23	712	Comment on ECIP (1.0); comment on 10-K for compensation issues (0.1); conference with R. Hellebrekers, PW team re pensions (0.1); conference with A&M, E. Bar-Ness (Revlon) and G. Reed (Revlon) re KEIP (0.4).	1.60
Luo, Lara	Rstr	Associate	03/14/23	712	Correspond with R. Aizen and PW team re post-ED compensation programs.	0.20
Hellebrekers, Robin	ECP	Associate	03/14/23	712	Correspond with R. Aizen re post-effective plans (0.5); draft and revise related agreements (0.5).	1.00
Britton, Robert	Rstr	Partner	03/14/23	712	Correspond with R. Aizen re compensation issues.	0.20
Aizen, Ron	ECP	Counsel	03/15/23	712	Provide comments re compensation arrangements (0.7); correspond with E. Bar-Ness and G. Reed re KEIP (0.1).	0.80
Hellebrekers, Robin	ECP	Associate	03/15/23	712	Draft employment agreements and severance plans (0.3); revise same (0.4).	0.70
Britton, Robert	Rstr	Partner	03/15/23	712	Correspond with R. Aizen re compensation issues (0.2); correspond with Luo re same (0.1).	0.30
Aizen, Ron	ECP	Counsel	03/16/23	712	Correspond with Freshfields and PW team re UK pension (0.1); comment on severance plans (0.6); teleconference with G. Reed (Revlon), R. Hellebrekers re ECIP (0.8).	1.50

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Name	Dept	Title	Date	Task	Description	Hours
Hellebrekers, Robin	ECP	Associate	03/16/23	712	Correspond with R. Aizen re severance plans (0.4); teleconference with R. Aizen and Company re ECIP (0.8); correspond with R. Aizen re same (0.3); draft and revise severance plans and ECIP (0.6).	2.10
Ritschard, Alexandra	ECP	Associate	03/16/23	712	Review and analyze materials re severance plan.	0.10
Aizen, Ron	ECP	Counsel	03/17/23	712	Correspond with M. Ferrari re UK pension.	0.10
Luo, Lara	Rstr	Associate	03/17/23	712	Correspond with K. Sohr (A&M), DPW, BR, and UST re severance reporting.	0.10
Aizen, Ron	ECP	Counsel	03/19/23	712	Revise ECIP.	1.00
Britton, Robert	Rstr	Partner	03/19/23	712	Correspond with P. Basta re compensation issues.	0.30
Ritschard, Alexandra	ECP	Associate	03/20/23	712	Review and analyze open employment documents (0.7), create list of same (0.4); research most recent materials for same (0.3).	1.40
Hellebrekers, Robin	ECP	Associate	03/20/23	712	Draft and revise retention plans (1.0); correspond with A. Ritschard re outstanding employee matters (0.5).	1.50
Aizen, Ron	ECP	Counsel	03/20/23	712	Correspond with A. Kidd (Revlon) re ECIP.	0.10
Ritschard, Alexandra	ECP	Associate	03/21/23	712	Update post-restructuring employment document status checklist.	0.30
Aizen, Ron	ECP	Counsel	03/21/23	712	Revise ECIP (2.3); conference with R. Hellebreckers re same (0.6); conference with G. Reed re medical plan question (0.5).	3.40
Hellebrekers, Robin	ECP	Associate	03/21/23	712	Conference with R. Aizen re ECIP (0.6); draft and revise ECIP calculations (1.2).	1.80
Aizen, Ron	ECP	Counsel	03/22/23	712	Correspond with G. Reed and R. Hellebreckers re KERP.	0.10
Aizen, Ron	ECP	Counsel	03/23/23	712	Conference with G. Reed (Revlon), Company, and A&M team re ECIP.	0.80
Hellebrekers, Robin	ECP	Associate	03/23/23	712	Draft and revise retention documents (0.3); teleconference with R. Aizen re materials from A&M (0.2); correspond with G. Reed re ECIP (0.2).	0.70
Luo, Lara	Rstr	Associate	03/24/23	712	Correspond with R. Aizen, PW team re post-ED employment issues.	0.10
Aizen, Ron	ECP	Counsel	03/24/23	712	Finalize ECIP drafts.	0.30
Hellebrekers, Robin	ECP	Associate	03/25/23	712	Review and analyze confirmation order re employment matters (0.2); correspond with R. Aizen re same (0.1).	0.30
Aizen, Ron	ECP	Counsel	03/25/23	712	Comment on employment issues in confirmation order.	0.20
Page, Alana	Rstr	Associate	03/26/23	712	Draft summary of ownership change for UK pension regulator.	0.50

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Name	Dept	Title	Date	Task	Description	Hours
Ritschard, Alexandra	ECP	Associate	03/27/23	712	Correspond with R. Hellebrekers (PW ECG) re updates to employment agreement (0.1); teleconference with R. Aizen, PW team, and Revlon team re CEO employment agreement and severance plan (0.7); draft notes for teleconference re employment agreement (0.3); revise employment agreement (1.1).	2.20
Luo, Lara	Rstr	Associate	03/27/23	712	Conference with Reed, Revlon, PW team re pensions (0.5); conference with Massman (DPW) re same (0.2); analyze issues re same (0.5); correspond with Britton re same (0.2).	1.40
Britton, Robert	Rstr	Partner	03/27/23	712	Conference with L. Luo, Reed (Revlon), Bar-Ness (Revlon) re pension issues (0.5); conference with D. Perelman (Revlon) re employment agreement (0.5).	1.00
Aizen, Ron	ECP	Counsel	03/27/23	712	Teleconference with A. Ritschard, PW team, and Revlon team (D. Perelman, A. Kidd, and G. Smith) re CEO employment agreement and severance plan (0.7); review and revise CEO employment agreement (3.7); review and comment on severance plans (1.9).	6.30
Hellebrekers, Robin	ECP	Associate	03/27/23	712	Correspond with R. Aizen re DPW team's comments (0.3); correspond with R. Aizen re DPW comments (0.2); partially attend teleconference with A. Ritschard, PW, Revlon team re employment agreement (0.2).	0.70
Ritschard, Alexandra	ECP	Associate	03/28/23	712	Review and analyze employment agreement markup (0.4); partially attend teleconference with R. Aizen, Company re same (0.3).	0.70
Luo, Lara	Rstr	Associate	03/28/23	712	Correspond with Aizen, PW team re post-ED compensation issues.	0.40
Aizen, Ron	ECP	Counsel	03/28/23	712	Conference with client, A. Ritschard re employment agreement (0.9); revise employment agreement (0.4).	1.30
Luo, Lara	Rstr	Associate	03/29/23	712	Correspond with Edwards re non-qualified pension claims.	0.20
Ritschard, Alexandra	ECP	Associate	03/29/23	712	Revise severance plan.	1.30
Aizen, Ron	ECP	Counsel	03/29/23	712	Correspond with Revlon and DPW teams re severance arrangements (0.2); comment on severance plan (0.6); prepare retention plan (1.5).	2.30
Hellebrekers, Robin	ECP	Associate	03/29/23	712	Correspond with R. Aizen re retention plans.	0.20
Aizen, Ron	ECP	Counsel	03/30/23	712	Conference with D. Walsh (Revlon); Revlon team re retention plan.	0.60
Aizen, Ron	ECP	Counsel	03/31/23	712	Conference with D. Walsh (Revlon), Revlon team re ECIP and severance arrangements (0.6); correspond with Freshfields re UK pension (0.1).	0.70
Aizen, Ron	ECP	Counsel	04/02/23	712	Correspond with R. Hellebrekers, PW, DPW teams re employee agreements.	0.20
Hossain, Julia	Rstr	Paralegal	03/01/23	713	Prepare notice of rejection of HQ lease (0.3); file same (0.2).	0.50

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Name	Dept	Title	Date	Task	Description	Hours
Heasley, Julia	Rstr	Associate	03/01/23	713	Research re post-effective date rejection (0.7); prepare filing version of notice of lease rejection (0.1); correspond with O. Rahnama, R. Britton, paralegals re filing of same (0.3).	1.10
Rahnama, Omid	Rstr	Associate	03/01/23	713	Review and revise draft lease rejection notice (0.3); correspond with K. Frankenberger (Revlon) re same (0.1).	0.40
Heasley, Julia	Rstr	Associate	03/02/23	713	Research and analyze rejection effective date issues (1.0); teleconference with L. Luo and D. Shiffman (A&M) re executory contract review status (0.5); teleconference with I. Blumberg re indemnification issues (0.2); review and analyze contracts re same (1.1); summarize same (0.1); correspond with A. Page re same (0.1).	3.00
Luo, Lara	Rstr	Associate	03/02/23	713	Conference with J. Heasley, D. Shiffman, A&M re executory contracts (0.5); correspond with I. Blumberg, J. Heasley re issues re same (0.3); analyze same (0.3).	1.10
Blumberg, Irene	Rstr	Associate	03/02/23	713	Correspond with L. Luo, A. Page, and J. Heasley re indemnification analysis (0.3); teleconference with J. Heasley re same (0.2); analyze questions re same (0.2).	0.70
Rahnama, Omid	Rstr	Associate	03/03/23	713	Teleconference with H. Kushnick (Greenberg Traurig) re lease matters (0.3); correspond with K. Frankenberger (Revlon), H. Kushnick, and R. Britton re same (0.4).	0.70
Blumberg, Irene	Rstr	Associate	03/03/23	713	Correspond with R. Britton and D. Kratzer re M&F contracts (0.3); review and analyze same (0.2); correspond with D. Shiffman re contracts analysis and rejection damages (0.1); analyze issues re same (0.4).	1.00
Luo, Lara	Rstr	Associate	03/06/23	713	Correspond with J. Heasley re executory contract issues.	0.20
Blumberg, Irene	Rstr	Associate	03/07/23	713	Review and analyze executory contract analysis (0.6); correspond with J. Heasley re same (0.1).	0.70
Heasley, Julia	Rstr	Associate	03/07/23	713	Review and analyze Modi agreements (1.8); summarize conclusions re same (0.9); conference with D. Shiffman (A&M), and Z. Gold (A&M) re executory contract issues (0.6); review and analyze executory contracts for indemnity provisions (0.3).	3.60
Luo, Lara	Rstr	Associate	03/07/23	713	Correspond with J. Heasley, A&M re executory contract issues.	0.10

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Name	Dept	Title	Date	Task	Description	Hours
Heasley, Julia	Rstr	Associate	03/08/23	713	Correspond with I. Blumberg re Modi agreements (0.2); research and analyze rejection issues (0.4); correspond with I. Blumberg re same (0.4); review and analyze Modi agreements (1.0); summarize same (0.5); revise outline per I. Blumberg's comments (0.3); conference with R. Britton re same (0.4); correspond with K. Sohr (A&M) and Elizabeth Arden counsel re unpaid employment contract (0.1); teleconference with D. Shiffman (A&M) re unpaid contract (0.2); correspond with D. Shiffman re executory contracts call (0.1).	3.60
Britton, Robert	Rstr	Partner	03/08/23	713	Meet with J. Heasley re contract rejection issues.	0.40
Mitchell, Sean A.	Rstr	Partner	03/08/23	713	Correspond with Fier, Revlon re indemnity issues (0.4); conference with Britton re same (0.4).	0.80
Blumberg, Irene	Rstr	Associate	03/08/23	713	Review and analyze executory contracts analysis (0.9); correspond with J. Heasley re same (0.2).	1.10
Grant, Natasha	Othr	Paragl	03/09/23	713	Research New York case law re executory contract issue, to assist E. Sasso (1.5); follow-up research re same (0.7).	2.20
Sasso, Emily G	Lit	Associate	03/09/23	713	Conference with R. Britton re rejection issues (0.3); research re rejection of contracts in chapter 11 (2.0); draft memorandum re same (1.2).	3.50
Heasley, Julia	Rstr	Associate	03/09/23	713	Research re executory contract issues (0.9); conference with D. Shiffman (A&M) re executory contract review (0.5); correspond with R. Britton and I. Blumberg re analysis of Modi contracts (0.3); correspond with I. Blumberg and E. Sasso re prior executory contract research (0.2); review and analyze indemnity provisions of Company contracts (0.3).	2.20
Luo, Lara	Rstr	Associate	03/09/23	713	Analyze assumption and rejection issues (0.4); correspond with J. Heasley, PW team re same (0.4).	0.80
Blumberg, Irene	Rstr	Associate	03/09/23	713	Review and revise executory contracts analysis (0.4); correspond with J. Heasley re same (0.2).	0.60
Heasley, Julia	Rstr	Associate	03/10/23	713	Correspond with Blumberg, PW team re list of rejected contracts (0.2); review and analyze indemnity provisions of executory contracts (0.7).	0.90
Blumberg, Irene	Rstr	Associate	03/10/23	713	Correspond with L. Luo, J. Heasley re rejection deadline (0.1); correspond with D. Shiffman re contract rejection exhibit (0.3); review and revise summary of contract rejection process (0.4); correspond with J. Heasley re same (0.1); correspond with R. Britton re rejection list (0.2); correspond with D. Kratzer, A. Page re same (0.3); review and comment on notice (0.2).	1.60
Luo, Lara	Rstr	Associate	03/10/23	713	Correspond with J. Heasley and PW team re assumption and rejection issues.	0.10
Sasso, Emily G	Lit	Associate	03/10/23	713	Research re contract rights in bankruptcy.	4.00
Grant, Natasha	Othr	Paragl	03/10/23	713	Research re New York case law re rejecting contract post-petition.	0.90

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Name	Dept	Title	Date	Task	Description	Hours
Page, Alana	Rstr	Associate	03/10/23	713	Review and analyze bylaws re indemnity provisions (0.3); correspond with R. Britton, D. Kratzer (DPW) re same (0.2).	0.50
Heasley, Julia	Rstr	Associate	03/13/23	713	Revise indemnity provision analysis per I. Blumberg's comments (0.7); correspond with R. Britton, I. Blumberg, L. Luo, A&M re same (0.5).	1.20
Rahnama, Omid	Rstr	Associate	03/13/23	713	Correspond with Y. Cuesta and A. Gerber re commercial contract and collateral access.	0.30
Blumberg, Irene	Rstr	Associate	03/13/23	713	Correspond with L. Luo and PW team re indemnification analysis.	0.40
Sasso, Emily G	Lit	Associate	03/13/23	713	Review and analyze case law re rejection rights (1.8); correspond with R. Britton, PW team re contract research (0.3).	2.10
Heasley, Julia	Rstr	Associate	03/14/23	713	Teleconference with Shiffman, A&M re executory contract issues (0.2); correspond with I. Blumberg, PW, A&M, and DPW teams re same (0.2); correspond with I. Blumberg and PW team re indemnification issues (0.1); revise indemnity tracker (1.2); correspond with I. Blumberg re same (0.1); correspond with L. Luo re same (0.3); perform research re agreements and executory status (0.2); revise indemnity chart (2.4).	4.70
Luo, Lara	Rstr	Associate	03/14/23	713	Analyze executory contract (0.4); correspond with D. Shiffman (A&M) and PW team re same (0.2); correspond with same re executory contract issues (0.4).	1.00
Rahnama, Omid	Rstr	Associate	03/14/23	713	Correspond with D. Harris (Alston) and I. Blumberg re assumption of customer agreement.	0.10
Blumberg, Irene	Rstr	Associate	03/14/23	713	Correspond with D. Shiffman re executory contracts (0.1); correspond with O. Rahnama re same (0.1); review and revise indemnification/contract review (0.6); correspond with J. Heasley re same (0.2).	1.00
Heasley, Julia	Rstr	Associate	03/15/23	713	Analyze contracts for indemnity chart (2.1); correspond with I. Blumberg re same (0.1); review and analyze agreement for ongoing obligations (1.1); correspond with I. Blumberg re same (0.1); teleconference with A. Gerber (Revlon), PW team, Company re indemnity analysis (0.6); analyze license agreements for indemnification issues (0.3); correspond with S. Mitchell, I. Blumberg re same (0.4).	4.70
Braibanti, Jill	LEGL	Associate	03/15/23	713	Review and analyze DPW's list of rejected IP contracts to assist in responding to DPW's requests (0.1); correspond with C. Meredith-Goujon and D. Shiffman (A&M) re DPW's questions re rejected IP contracts (0.4).	0.50

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Name	Dept	Title	Date	Task	Description	Hours
Blumberg, Irene	Rstr	Associate	03/15/23	713	Review and comment on revised indemnity/contract review (1.6); correspond with J. Heasley re same (0.3); correspond with J. Heasley re contract review outstanding research (0.4); review and analyze notes re same (0.5); correspond with D. Shiffman re rejection issues (0.8); correspond with C. Goujon re contract review (0.2).	3.80
Luo, Lara	Rstr	Associate	03/15/23	713	Analyze executory contract re rejection issues (0.7); correspond with D. Shiffman (A&M) re same (0.3).	1.00
Heasley, Julia	Rstr	Associate	03/16/23	713	Research and analyze indemnification obligations re executory contracts (0.3); analyze agreements re same and existing ongoing obligations (1.0); summarize same (0.5); revise same (0.1); correspond with L. Luo, A&M re rejected contracts (0.2); correspond with D. Shiffman (A&M), DPW re updated rejection exhibit (0.3); correspond with W. Walker re contract VDR (0.1); correspond with A. Gerber (Revlon) and S. Fier (Revlon) re BMS agreements (0.1); correspond with PW Doc Services re rejection exhibit (0.1).	2.70
Luo, Lara	Rstr	Associate	03/16/23	713	Correspond with J. Heasley, Kroll, A&M re rejection list issues.	0.50
Blumberg, Irene	Rstr	Associate	03/16/23	713	Correspond with D. Shiffman (A&M) and PW team re executory contract issues (0.5); review and revise indemnification analysis (0.8); correspond with J. Heasley re same (0.3); review and analyze prior work product re change of control issues (0.3); correspond with IP team re same (0.3); correspond with D. Shiffman (A&M) re revised executory contract list (0.5).	2.70
Heasley, Julia	Rstr	Associate	03/17/23	713	Draft indemnity analysis (0.4); analyze issues re same (0.6); correspond with I. Blumberg re same (0.1); revise same (0.6); correspond with I. Blumberg, A. Kidd, Company re UCC contract inquiry (0.1); correspond with C. Meredith-Goujon and PW team re conversion issues (0.2).	2.00
Braibanti, Jill	LEGL	Associate	03/17/23	713	Correspond with I. Blumberg and PW finance, M&A, restructuring re inbound IP license questions (0.4); review and analyze IP contracts (2.0); summarize key provisions of same (1.6); correspond with C. Meredith-Goujon and I. Blumberg re IP contract review (0.9); review and analyze IP license assignment analysis chart (0.2).	5.10
Braibanti, Jill	LEGL	Associate	03/17/23	713	Teleconference with D. Shiffman (A&M) re contracts diligence (0.4); correspond with D. Shiffman (A&M) re IP contracts on rejection schedule (0.1); review and analyze rejection schedule re IP contract review workstream (0.3).	0.80

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Name	Dept	Title	Date	Task	Description	Hours
Blumberg, Irene	Rstr	Associate	03/17/23	713	Correspond with D. Shiffman (A&M) re contract rejection issues (0.6); correspond with counsel to Tinuiti, Inc. re inquiries (0.5); analyze issues re same (0.3); correspond with D. Shiffman (A&M) and IP team re contract analysis (0.5); revise notes re same (0.3); review and analyze revised indemnification analysis (0.5); correspond with J. Heasley re same (0.3); analyze issues re same (1.0); correspond with J. Heasley and D. Shiffman (A&M) re UCC request for contract samples (0.3); analyze issues re same (0.1); correspond with J. Braibanti re IP analysis (0.2).	4.60
Braibanti, Jill	LEGL	Associate	03/18/23	713	Review and analyze IP contracts (3.2); draft summary of analysis (1.5); correspond with C. Meredith-Goujon re intercompany license draft (0.3); review and analyze intercompany license comments (0.2); revise summary re same (0.1).	5.30
Heasley, Julia	Rstr	Associate	03/20/23	713	Correspond with D. Shiffman (A&M) re rejected contract inquiry (0.1); correspond with same and PW team re cure notices (0.2); correspond with D. Kratzer, DPW team re same (0.1); correspond with A. Page re indemnification analysis (0.2); revise same (1.0).	1.60
Page, Alana	Rstr	Associate	03/20/23	713	Review and analyze indemnification provisions in APAs.	1.90
Braibanti, Jill	LEGL	Associate	03/20/23	713	Correspond with D. Shiffman re contract review scope.	0.20
Britton, Robert	Rstr	Partner	03/20/23	713	Correspond with Blumberg re contract review and updates.	0.40
Blumberg, Irene	Rstr	Associate	03/20/23	713	Correspond with M. Nester re Mimran contract (0.2); discuss same with D. Shiffman (0.3); analyze issues re same (0.2); review and analyze cure notice issues (1.1).	1.80
Heasley, Julia	Rstr	Associate	03/21/23	713	Revise indemnification analysis (1.4); correspond with A. Page re same (0.3); teleconference with D. Shiffman (A&M) and I. Blumberg re executory contracts (0.3); prepare cure notices (0.5); correspond with I. Blumberg re sample indemnification provisions (0.1); teleconference with D. Shiffman (A&M) re cure notice inquiry (0.2).	2.80
Luo, Lara	Rstr	Associate	03/21/23	713	Conference with D. Shiffman (A&M) and PW team re executory contracts.	0.30
Page, Alana	Rstr	Associate	03/21/23	713	Review and analyze contracts for rejection (2.2); review and comment on summary of same (0.5).	2.70
Blumberg, Irene	Rstr	Associate	03/21/23	713	Correspond with contract counterparties re cure notices (0.5); correspond with J. Heasley re same (0.2); correspond with O. Rahnema, PW team re chapter 5 waivers (0.3); correspond with Kroll re finalized notices (0.7); attend executory contract call with D. Shiffman, PW team (0.3).	2.00

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Braibanti, Jill	LEGL	Associate	03/21/23	713	Review and analyze IP contracts (6.0); revise summaries re same (3.4).	9.40
Blumberg, Irene	Rstr	Associate	03/21/23	713	Correspond with D. Shiffman re various contract issues.	0.80
Heasley, Julia	Rstr	Associate	03/22/23	713	Correspond with A. Page re indemnification analysis (0.3); review and analyze same (2.0); correspond with D. Shiffman (A&M) and PW team re assumption of contract (0.3); correspond with I. Blumberg, L. Luo and claimants re cure notices and related issues (0.6).	3.20
Luo, Lara	Rstr	Associate	03/22/23	713	Draft revised cure notices (1.0); correspond with R. Britton and A&M re issues with same (0.5).	1.50
Page, Alana	Rstr	Associate	03/22/23	713	Review and analyze APAs for rejection (1.1); correspond with J. Heasley re same (0.3).	1.40
Blumberg, Irene	Rstr	Associate	03/22/23	713	Correspond with D. Shiffman re assumption/rejection issues (1.4); analyze issues re same (1.6); correspond with J. Heasley re same (0.3); correspond with H. Alli Balogun, Kroll re cure notices (0.5).	3.80
Braibanti, Jill	LEGL	Associate	03/22/23	713	Review and analyze additional IP contracts (3.7); update summary re same (0.8); review and analyze C. Meredith-Goujon's comments to IP contract summary chart (0.4); revise same (0.2).	5.10
Heasley, Julia	Rstr	Associate	03/23/23	713	Correspond with D. Shiffman re cure notices (0.1); correspond with D. Shiffman (A&M), I. Blumberg, and L. Luo re executory contract issues (0.2); review and analyze indemnity provisions of executory agreements (0.4); revise analysis re same (0.8); conference with R. Britton, PW team re contract review and analysis (0.5).	2.00
Luo, Lara	Rstr	Associate	03/23/23	713	Correspond with D. Shiffman, Kroll team, and counterparties re cure notice issues (0.6); make revisions to revised cure notices (0.7).	1.30
Britton, Robert	Rstr	Partner	03/23/23	713	Conference with J. Heasley, PW team re contract review and analysis (0.5); analyze same (0.3).	0.80
Blumberg, Irene	Rstr	Associate	03/23/23	713	Correspond with J. Heasley re CVS agreements (0.2); analyze summary of same (0.2); analyze issues re entity conversions (1.3); analyze issues re cure objections (1.5); correspond with D. Shiffman re same (0.5); review IP license summary and analysis (0.8); correspond with J. Braibanti, J. Heasley re same (0.6); correspond with stakeholders re cure notices (0.5).	5.60
Page, Alana	Rstr	Associate	03/23/23	713	Conference with R. Britton and PW team re contract rejection issues (0.5); correspond with J. Heasley re same (0.3).	0.80
Braibanti, Jill	LEGL	Associate	03/23/23	713	Correspond with I. Blumberg re IP contract summary chart.	0.50

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Heasley, Julia	Rstr	Associate	03/24/23	713	Correspond with I. Blumberg, PW team, A&M team, and parties re cure notices (0.4); prepare same (0.6); correspond with I. Blumberg, PW team, and Revlon team re coordinating indemnification analysis teleconference (0.1); teleconference with I. Blumberg, PW team, Revlon legal team re same (0.5); draft tracker re cure notice statuses (0.9); correspond with I. Blumberg and A. Page re indemnification analysis (0.2); draft summary for Revlon re same (0.2); conduct research re lease provisions (0.3).	3.20
Britton, Robert	Rstr	Partner	03/24/23	713	Conference with A. Kidd (Revlon), I. Blumberg, PW team, Revlon legal team re indemnification issues (0.5); review research re same (0.1).	0.60
Blumberg, Irene	Rstr	Associate	03/24/23	713	Analyze assumption/cure issues (1.1); correspond with D. Shiffman re same (0.6); correspond with J. Heasley re same (0.2); correspond with J. Braibanti, J. Heasley re license review (0.4); analyze issues re same (1.2); teleconference with R. Britton, PW team, A. Kidd, Revlon legal re indemnification analysis (0.5); correspond with R. Britton re outstanding assumption issues (0.6); correspond with J. Heasley re bullets for entity conversion deck (0.5).	5.10
Page, Alana	Rstr	Associate	03/24/23	713	Conference with I. Blumberg, A. Kidd, PW, and Revlon teams re analysis of contracts for rejection.	0.50
Luo, Lara	Rstr	Associate	03/24/23	713	Analyze cure issues.	0.30
Heasley, Julia	Rstr	Associate	03/25/23	713	Draft list of rejected contracts (0.5); review and analyze executory agreements (2.7).	3.20
Blumberg, Irene	Rstr	Associate	03/25/23	713	Revise notes from teleconference with Company re indemnification analysis (0.4); correspond with J. Heasley re same (0.2).	0.60
Heasley, Julia	Rstr	Associate	03/26/23	713	Review and analyze executory agreements (3.1); summarize same for A. Page (0.2); teleconference with A. Page re same (0.4); draft list of contracts' statuses (0.3).	4.00
Page, Alana	Rstr	Associate	03/26/23	713	Correspond with Z. Gold (A&M) and K. Frankenberger (Revlon) re guaranty of lease (0.2); review and analyze potential contracts for rejection (1.7); revise summary of same (0.5); teleconference with J. Heasley re executory agreements (0.4).	2.80

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Heasley, Julia	Rstr	Associate	03/27/23	713	Teleconference with A. Page re executory agreements (0.3); correspond with A. Page and PW team re same (0.1); revise overview of executory Agreements (1.0); draft correspondence for W. Clareman's review and analysis re same (0.2); review and analyze executory agreements (0.1); correspond with I. Blumberg and A. Page re same (0.2); revise cure notice tracker (1.4); correspond with I. Blumberg and PW team re same (0.4); review and analyze waste disposal agreement (0.2); analyze lease provisions re indemnification obligations (1.8); correspond with L. Luo re same (0.2).	5.90
Blumberg, Irene	Rstr	Associate	03/27/23	713	Correspond with A. Page re APA analysis (0.5); correspond with J. Heasley re same (0.3); correspond with D. Shiffman re cure/assumption issues (0.7); analyze same (1.5); correspond with Kroll, C. Goujon, PW team re license analysis (0.4); correspond with objectors re cure amounts and related issues (1.1); teleconference with J. Frumkin re cure objection (0.3); review and comment on APA analysis (1.5); correspond with A. Page, J. Heasley re same (0.3).	6.60
Luo, Lara	Rstr	Associate	03/27/23	713	Analyze cure issues (0.4); correspond with Page, PW team re language resolving same (0.3); correspond with Heasley re outstanding executory contract issues (0.2); analyze research re same (0.4).	1.30
Britton, Robert	Rstr	Partner	03/27/23	713	Analyze cure objections (0.8); conference with I. Blumberg re same (0.2).	1.00
Page, Alana	Rstr	Associate	03/27/23	713	Revise summary of executory agreements (2.4); teleconference with J. Heasley re same (0.3); review and analyze cure objections (0.4); review and analyze suggested confirmation order language re cure issues (0.3); correspond with H. Zhang, DPW, BR, and Akin teams re same (0.2); review and analyze SAP cure claim amount (0.2); analyze contract rejection issues (0.7).	4.50
Heasley, Julia	Rstr	Associate	03/28/23	713	Teleconference with I. Blumberg, PW, and A&M teams re executory contract statuses (0.5); revise cure notice tracker (0.7); correspond with A. Page re extensions of cure objection deadline (0.2); draft summary re executory contract agreements for client (0.4); conference with K. Ammari and A. Page re same (0.2); revise counterparties' identities for rejection list (0.8); correspond with A. Page re follow up to same (0.2); correspond with I. Blumberg and A. Page re same (0.3); correspond with R. Britton, I. Blumberg, and A&M team re notice of rejection (0.6).	3.90
Britton, Robert	Rstr	Partner	03/28/23	713	Correspond with L. Luo re indemnification issues.	0.30

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Date: 04/28/2023

Name	Dept	Title	Date	Task	Description	Hours
Page, Alana	Rstr	Associate	03/28/23	713	Review and comment on summary of contracts for potential rejection prepared by J. Heasley (0.1); conference with K. Ammari and J. Heasley re indemnification analysis (0.2).	0.30
Ammari, Kamil R.	Lit	Associate	03/28/23	713	Review and analyze purchase contracts (0.8); teleconference with A. Page and J. Heasley re same (0.2).	1.00
Luo, Lara	Rstr	Associate	03/28/23	713	Conference with Blumberg, Shiffman re executory contracts (0.5); analyze issues re same (0.1).	0.60
Blumberg, Irene	Rstr	Associate	03/28/23	713	Analyze issues re assumption/cure amounts (2.4); conference with L. Luo, J. Heasley, D. Shiffman re same (0.5); correspond with J. Heasley re same (0.5).	3.40
Ammari, Kamil R.	Lit	Associate	03/29/23	713	Correspond with R. Britton re contract analysis.	0.10
Heasley, Julia	Rstr	Associate	03/29/23	713	Correspond with A. Page and PW team re executory contracts indemnification analysis (0.4); coordinate teleconference re same (0.1); correspond with D. Shiffman (A&M) re cure notice (0.1).	0.60
Blumberg, Irene	Rstr	Associate	03/29/23	713	Analyze assumption and cure issues (1.8); teleconference with D. Shiffman re same (0.7); teleconference with D. Shiffman, Company re rejected contracts (1.0); review and revise APA analysis (0.6); correspond with J. Heasley re same (0.3); conference with R. Britton re same (0.5); summarize proposed outreach re remaining cure objections (0.5); correspond with R. Britton re same (0.2); analyze landlord objection (0.3); correspond with R. Britton, client re same (0.4).	6.30
Blumberg, Irene	Rstr	Associate	03/30/23	713	Teleconference with QAD counsel re assumption/cure issues (0.5); teleconference with Salesforce counsel re same (0.5); teleconference with Target counsel re same (0.4); teleconference with ARI counsel re same (0.5); teleconference with Mimran counsel re rejection issues (0.5); revise objection tracker (1.3); review and analyze remaining cure/assumption issues (1.4); correspond with D. Shiffman re same (0.6).	5.70
Heasley, Julia	Rstr	Associate	03/30/23	713	Teleconference with A. Page, PW team, and Revlon team re executory agreements and indemnification analysis (0.4); correspond with D. Shiffman (A&M) and PW team re same (0.1).	0.50
Page, Alana	Rstr	Associate	03/30/23	713	Conference with J. Heasley, PW team, and Revlon team re contract rejection issues (0.4); correspond with same re same (0.1).	0.50
Heasley, Julia	Rstr	Associate	03/31/23	713	Review and analyze executory agreement (0.8); correspond with R. Britton re same (0.2); correspond with Z. Gold re executory contracts (0.1).	1.10
Blumberg, Irene	Rstr	Associate	03/31/23	713	Correspond with cure objecting parties re assumption issues (1.1); correspond with D. Shiffman re revised schedule of rejected contracts (0.6); analyze issues re same (0.4); correspond with J. Heasley re same (0.5).	2.60

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Name	Dept	Title	Date	Task	Description	Hours
Cen, Leo	Corp	Associate	03/31/23	713	Review and analyze Revlon contracts to populate summary chart.	1.30
Blumberg, Irene	Rstr	Associate	04/01/23	713	Correspond with J. Heasley re rejection notice (0.2); review same (0.1).	0.30
Heasley, Julia	Rstr	Associate	04/01/23	713	Revise notice of rejected contract (0.2); correspond with D. Shiffman and Z. Gold (A&M) re rejected contracts (0.2)	0.40
Heasley, Julia	Rstr	Associate	04/03/23	713	Teleconference with Z. Gold re potential executory contract (0.1); correspond with I. Blumberg re same (0.1); review and analyze agreement (1.5); calculate deadline for filing proofs of claim for rejection damages (0.4).	2.10
Blumberg, Irene	Rstr	Associate	04/03/23	713	Correspond with objecting party re cure issue (0.3); revise tracker re outstanding issues (0.5); correspond with Target counsel re proposed order (0.1).	0.90
Hossain, Julia	Rstr	Paralegal	03/01/23	714	File A&M staffing report (0.3); prepare filing version of PwC declaration (0.2); file PwC declaration (0.3); file KPMG notice (0.3); coordinate service of declaration, staffing report, and KPMG notice (0.4).	1.50
Harnett, Sarah	Rstr	Counsel	03/01/23	714	Correspond with V. Robinson re finalizing A&M monthly staffing report for filing.	0.10
Page, Alana	Rstr	Associate	03/01/23	714	Revise PWC supplemental declaration (0.5); prepare filing version of same (0.2); teleconference with T. Cody (PWC) re same (0.2); prepare notice of additional KPMG engagement letters for filing (0.2); coordinate filing of PWC declaration and KPMG notice (0.2).	1.30
Robinson, Vida	Rstr	Associate	03/01/23	714	Create filing version of A&M monthly staffing report (0.3); coordinate filing of same (0.1).	0.40
Page, Alana	Rstr	Associate	03/02/23	714	Correspond with C. Campbell (KPMG) re KPMG interim application.	0.30
Heasley, Julia	Rstr	Associate	03/02/23	714	Correspond with R. Britton, L. Luo, and ordinary course professional firm re OCP declaration (0.4); correspond with ordinary course professional firm re invoice inquiry (0.1).	0.50
Baham, Sam	Rstr	Associate	03/03/23	714	Correspond with Molo team and Freshfields team re interim fee applications.	0.20
Blumberg, Irene	Rstr	Associate	03/03/23	714	Correspond with A. Page re professional fees.	0.20
Robinson, Vida	Rstr	Associate	03/03/23	714	Correspond with Kaplan Rice, PJT, and PwC teams re interim fee applications.	0.50

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Date: 04/28/2023

Name	Dept	Title	Date	Task	Description	Hours
Page, Alana	Rstr	Associate	03/03/23	714	Correspond with J. Heasley re Deloitte interim fee applications (0.2); correspond with M. Rothchild (Deloitte) re final fee applications (0.2); teleconference with J. Galaz (A&M) re same (0.2); teleconference with J. Galaz re professional fee escrow account (0.3); correspond with R. Britton re same (0.2); correspond with G. Brunswick (Kroll) re same (0.2); teleconference with same re same (0.3); prepare summary of steps to open professional fee escrow with Kroll (0.2).	1.80
Heasley, Julia	Rstr	Associate	03/03/23	714	Correspond with professionals re interim fee application deadline and review.	0.20
Harnett, Sarah	Rstr	Counsel	03/03/23	714	Correspond with A. Page re Deloitte fee inquiries.	0.10
Heasley, Julia	Rstr	Associate	03/06/23	714	Correspond with L. Luo re ordinary course professional firm declaration (0.3); correspond with OCP firm re inquiry about pre-petition invoices (0.1).	0.40
Page, Alana	Rstr	Associate	03/06/23	714	Teleconference with J. Galaz (A&M) re pro fee escrow account.	0.30
Heasley, Julia	Rstr	Associate	03/07/23	714	Correspond with OCP firm re declaration status.	0.10
Hossain, Julia	Rstr	Paralegal	03/07/23	714	Prepare CNO for January monthly fee statements of PW and Deloitte LLP.	0.50
Heasley, Julia	Rstr	Associate	03/08/23	714	Correspond with professionals re submission of LEDES data in connection with interim fee applications.	0.10
Page, Alana	Rstr	Associate	03/08/23	714	Correspond with V. Hua (Kaplan) re interim fee applications (0.2); prepare CNO for Deloitte and PW fee statements (0.3); correspond with L. Sandlar (Petrillo) re interim fee applications (0.2).	0.70
Robinson, Vida	Rstr	Associate	03/08/23	714	Correspond with other professionals re interim fee applications (0.2); review and analyze Kaplan Rice monthly fee application (0.4); review and analyze Kaplan Rice interim fee application (0.9).	1.50
Baham, Sam	Rstr	Associate	03/08/23	714	Review and analyze Molo second interim fee application (1.1); correspond with R. Yeh re same (0.1).	1.20
Blumberg, Irene	Rstr	Associate	03/09/23	714	Correspond with D. Lewis, D. Shiffman re invoice system.	0.20
Luo, Lara	Rstr	Associate	03/09/23	714	Correspond with J. Heasley, OCP, Company re OCP declaration.	0.10
Baham, Sam	Rstr	Associate	03/09/23	714	Review and analyze Molo interim fee application.	0.70
Heasley, Julia	Rstr	Associate	03/10/23	714	Correspond with M. Holker-Smith (Revlon), A. Camber (A&M), and A&M team re OCP declaration status and invoice issues (0.4); correspond with Holland & Knight re same (0.2); review and analyze declaration (0.2); correspond with R. Britton, I. Blumberg, and J. Hossain re filing of same (0.1).	0.90
Luo, Lara	Rstr	Associate	03/10/23	714	Correspond with R. Britton, Revlon and OCP re OCP issues.	0.20

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Date: 04/28/2023

Name	Dept	Title	Date	Task	Description	Hours
Robinson, Vida	Rstr	Associate	03/10/23	714	Correspond with Kaplan Rice re interim fee app.	0.10
Blumberg, Irene	Rstr	Associate	03/10/23	714	Correspond with J. Heasley re OCP declaration (0.2); correspond with J. Galaz, E. Rocher re fee inquiry (0.2); correspond with S. Harnett, S. Fier re Longacre retention (0.2).	0.60
Baham, Sam	Rstr	Associate	03/10/23	714	Review and analyze KPMG monthly fee statement (1.9); correspond with S. Harnett re same (0.1).	2.00
Page, Alana	Rstr	Associate	03/12/23	714	Review and comment on Kaplan Rice interim fee application.	0.30
Heasley, Julia	Rstr	Associate	03/13/23	714	Prepare filing version of monthly OCP flash report (0.3); correspond with R. Britton, I. Blumberg re same (0.2); correspond with M. Ferrari and PW finance team re OCP declaration (0.3); analyze issues re same (0.3); correspond with OCP firm re status of declaration (0.2); review and comment on Deloitte Tax supplemental declaration (0.3); correspond with S. Harnett, A. Page re same (0.1); review and analyze Deloitte Canada second interim fee application (0.2).	1.90
Robinson, Vida	Rstr	Associate	03/13/23	714	Correspond with Kaplan Rice re February monthly fee statement (0.2); correspond with A. Page re Kaplan Rice interim fee application (0.3).	0.50
Hossain, Julia	Rstr	Paralegal	03/13/23	714	Prepare draft of CNO for A&M and PJT monthly fee statements (0.6); file KPMG fee statement (0.3); coordinate service of same (0.3); file OCP supplement (0.2); coordinate service of same (0.1).	1.50
Blumberg, Irene	Rstr	Associate	03/13/23	714	Correspond with J. Heasley re OCP reporting.	0.20
Page, Alana	Rstr	Associate	03/13/23	714	Correspond with S. Levitt (A&M) re Molo, Freshfields, and Kaplan Rice fees (0.4); correspond with S. Weiner (Kroll) re interim fee applications (0.2).	0.60
Baham, Sam	Rstr	Associate	03/13/23	714	Correspond with S. Harnett, PW team, KPMG team re KPMG fee statement (0.3); correspond with S. Harnett, PW team, Molo team re interim fee application (0.2).	0.50
Harnett, Sarah	Rstr	Counsel	03/13/23	714	Review and analyze Kroll, KPMG and ML fee applications (0.4); correspond with V. Robinson, PW and Company re same (0.2).	0.60
Heasley, Julia	Rstr	Associate	03/14/23	714	Correspond with professionals re interim fee applications (0.1); correspond with A. Page re same (0.1); review and analyze Deloitte Tax fee statement (0.3).	0.50
Hossain, Julia	Rstr	Paralegal	03/14/23	714	Correspond with ordinary course professional counsel re submitted OCP declarations (0.2); update OCP tracker (0.1); prepare draft of second fee application notice (0.3).	0.60

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Date: 04/28/2023

Name	Dept	Title	Date	Task	Description	Hours
Page, Alana	Rstr	Associate	03/14/23	714	Correspond with S. Levitt (A&M) re professional fee payments (0.2); correspond with V. Hua (Kaplan) re fee statement (0.2); coordinate review of professional fee applications (0.3); correspond with A. Kidd (Revlon) re Molo fees (0.2).	0.90
Harnett, Sarah	Rstr	Counsel	03/14/23	714	Correspond with A. Page re fee issues.	0.20
Baham, Sam	Rstr	Associate	03/14/23	714	Review and analyze KPMG interim fee application.	0.50
Robinson, Vida	Rstr	Associate	03/14/23	714	Update interim professional fee tracker (0.1); revise Kaplan Rice interim fee application (0.2); correspond with S. Harnett re same (0.1); review and analyze PwC monthly application (0.7).	1.10
Luo, Lara	Rstr	Associate	03/14/23	714	Conference with Eversheds and Revlon re OCP declaration (0.4); analyze issues re same (0.3).	0.70
Hossain, Julia	Rstr	Paralegal	03/15/23	714	File supplemental declaration (0.3); coordinate service of same (0.1).	0.40
Heasley, Julia	Rstr	Associate	03/15/23	714	Correspond with S. Harnett and OCPs re supplemental declaration and fee statements (0.4); prepare filing version of supplemental declaration (0.2); review and analyze Deloitte Canada's second interim fee application (0.3); correspond with S. Harnett, A. Page re same (0.1); review and analyze Deloitte Tax's monthly invoice (0.4).	1.40
Robinson, Vida	Rstr	Associate	03/15/23	714	Review and analyze PwC's interim fee application (0.9); correspond with S. Harnett re same (0.4); correspond with V. Hua (KR) re interim fee applications (0.3); create filing version of PwC monthly fee application (0.3); correspond with S. Harnett re same (0.1).	2.00
Page, Alana	Rstr	Associate	03/15/23	714	Correspond with J. Heasley and PW team re professional interim fee applications (0.3); review and comment on PJT interim fee application (0.5); correspond with S. Harnett re same (0.2); correspond with S. Levitt re KPMG UK invoices (0.2); correspond with S. Harnett re same (0.2); correspond with A. Rich (Freshfields) and professionals re interim application (0.2); review and comment on Freshfields fee application (0.5); review and prepare CNO for monthly fee statements (0.3); teleconference with K. Scott (Ropes) re fee applications (0.2).	2.60
Melvin, Marguerite	Corp	Paralegal	03/15/23	714	Prepare fee analysis chart.	1.50
Baham, Sam	Rstr	Associate	03/15/23	714	Correspond with S. Harnett and A. Page re KPMG interim application.	0.20
Harnett, Sarah	Rstr	Counsel	03/15/23	714	Revise interim fee app for Kroll (0.2); correspond with V. Robinson and Kroll re same (0.2); review and analyze supplemental declaration for Deloitte Tax (0.1); correspond with A. Page re PJT interim fee app and KPMG interim app (0.2).	0.70
Robinson, Vida	Rstr	Associate	03/16/23	714	Revise filing version of PwC monthly fee statement.	0.20

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Name	Dept	Title	Date	Task	Description	Hours
Luskey, Randy	Lit	Partner	03/16/23	714	Correspond with Company and Longacre re amended retention agreement.	0.40
Heasley, Julia	Rstr	Associate	03/16/23	714	Comment on Deloitte Canada's second interim fee application re privilege concerns (0.4); review and analyze Petrillo's second interim fee application (0.4); review and analyze Teneo's second interim fee application (0.4); correspond with S. Harnett, A. Page, and L. Sandlar re same (0.3).	1.50
Blumberg, Irene	Rstr	Associate	03/16/23	714	Review and analyze PJT and KPMG CNO.	0.10
Page, Alana	Rstr	Associate	03/16/23	714	Review and comment on KPMG fee statement CNO (0.2); correspond with V. Robinson and S. Harnett re professional fee statements (0.6); review and comment on Petrillo fee statement (0.3); correspond with R. Yeh (Molo) re interim fee application (0.2); review and comment on A. Gover's fee application (0.4); correspond with L. Sandler (Petrillo) re same (0.2); review and comment on notice of fee applications (0.5); correspond with V. Hua (Kaplan) re interim fee application (0.3).	2.70
Hossain, Julia	Rstr	Paralegal	03/16/23	714	Revise CNO for PJT and KPMG fee statements (0.4); file PJT/KPMG CNO (0.3); file PwC third monthly fee statement (0.3); coordinate service of filed pleadings (0.1).	1.10
Baham, Sam	Rstr	Associate	03/16/23	714	Review and analyze Molo fee statement (0.8); correspond with KPMG re fee statement (0.1).	0.90
Harnett, Sarah	Rstr	Counsel	03/16/23	714	Review and comment on interim fee apps for Deloitte Canada (0.2), review and comment on interim fee apps for PWC (0.2), review and comment on interim fee apps for FF (0.2), review and comment on interim fee apps for Gover (0.2), review and comment on interim fee apps for Petrillo (0.3), review and comment on interim fee apps for Teneo (0.2); correspond with A. Page and PW team re same (0.4).	1.70
Harnett, Sarah	Rstr	Counsel	03/17/23	714	Review and analyze filing versions of interim fee app (0.3) correspond with A. Page and PW team re same (0.2); teleconference with A. Page re Deloitte interim fee application (0.2); review and analyze same (0.3).	1.00
Page, Alana	Rstr	Associate	03/17/23	714	Review and analyze KPMG, PWC, and Deloitte Canada fee applications (0.8); prepare same for filing (0.5); review and comment on PJT fee application (0.5); correspond with J. De Almeida (PJT) re same (0.2); prepare same for filing (0.2); review and comment on Deloitte tax interim fee application (0.6); coordinate filing of same (0.2); correspond with M. Rothchild (Deloitte) re same (0.2); teleconference with S. Harnett re fee applications (0.2); review and comment on omnibus notice of fee applications (0.3); correspond with M. Sawyer (BR), K. Scott (Ropes), A. Rich (Freshfields), and other professionals re fee application filing (0.8).	4.50

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Name	Dept	Title	Date	Task	Description	Hours
Britton, Robert	Rstr	Partner	03/17/23	714	Correspond with J. Hurwitz re fee issues.	0.20
Baham, Sam	Rstr	Associate	03/17/23	714	Review and analyze Molo fee statement (0.3); correspond with A. Page and PW team re same (0.1); correspond with Molo team re interim application and fee statement (0.3).	0.70
Heasley, Julia	Rstr	Associate	03/17/23	714	Correspond with A. Page re Deloitte Canada interim fee application (0.1); review and analyze Deloitte Tax interim invoice for privilege and confidentiality (0.5); correspond with L. Sandlar (PBK), professionals re same (0.1); correspond with I. Blumberg re OCP inquiry about invoice status (0.1).	0.80
Robinson, Vida	Rstr	Associate	03/17/23	714	Compile filing version of PwC interim fee application (0.3); correspond with PwC and PJT teams re monthly apps (0.2); correspond with A. Page re same (0.1).	0.60
Melvin, Marguerite	Corp	Paralegal	03/17/23	714	Review and e-file Deloitte LLP's second interim fee application (0.3); review and e-file PwC's second interim fee application (0.3); coordinate service of same (0.2); review and e-file Deloitte Tax LLP's third monthly fee statement (0.2); coordinate service of same (0.1); respond to service of pleadings inquiry from Kroll (0.1).	1.20
Hossain, Julia	Rstr	Paralegal	03/17/23	714	Update notice for second interim fee applications (1.7); file three interim fee applications (1.0); file omnibus notice for interim fee applications (0.3).	3.00
Heasley, Julia	Rstr	Associate	03/20/23	714	Correspond with Holland & Knight re OCP declaration (0.2); review and analyze Deloitte Canada invoice for privilege and confidentiality (0.6); correspond with S. Harnett, A. Page, PW team re same (0.3); review and analyze Petrillo invoice for privilege and confidentiality (0.3).	1.40
Page, Alana	Rstr	Associate	03/20/23	714	Coordinate sharing of LEDES and spreadsheet data on behalf of various professionals with the US Trustee.	0.50
Hossain, Julia	Rstr	Paralegal	03/20/23	714	File two monthly fee statements for Paul Weiss and Deloitte LLP (0.5); coordinate service of same (0.2).	0.70
Baham, Sam	Rstr	Associate	03/20/23	714	Correspond with R. Yeh re Molo fee statement (0.2); correspond with S. Harnett and PW team re same (0.1).	0.30
Harnett, Sarah	Rstr	Counsel	03/20/23	714	Review and analyze Molo fee statement.	0.30
Luskey, Randy	Lit	Partner	03/20/23	714	Review and analyze materials re Longacre retention.	0.40
Heasley, Julia	Rstr	Associate	03/21/23	714	Review and analyze OCP issue (0.2); correspond with I. Blumberg and L. Luo re same (0.2); review and analyze Gover and Teneo fee invoices for privilege and confidentiality (0.3); correspond with S. Harnett, A. Page, and L. Sandlar (PKB) re same (0.1); correspond with R. Britton re exit financing OCPs (0.1); correspond with S. Daniele re same (0.1).	1.00

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Name	Dept	Title	Date	Task	Description	Hours
Harnett, Sarah	Rstr	Counsel	03/21/23	714	Review and analyze fee applications for Gover, Petrillo, and Teneo.	0.30
Page, Alana	Rstr	Associate	03/21/23	714	Correspond with V. Vlasova (UST) re LEDES/spreadsheet data.	0.20
Blumberg, Irene	Rstr	Associate	03/22/23	714	Correspond with D. Epstein, PW team re OCP for exit financing.	0.20
Heasley, Julia	Rstr	Associate	03/22/23	714	Review and analyze ordinary course professional conflict issues (0.3); correspond with I. Blumberg, L. Luo, and OCP firms re same and declaration comments (0.2); correspond with I. Blumberg and A. Page re Kroll application (0.1).	0.60
Heasley, Julia	Rstr	Associate	03/23/23	714	Correspond with L. Luo re OCP declaration (0.1); correspond with OCP firm and A&M team re invoice status (0.1); review and analyze Kroll fee application (0.1).	0.30
Page, Alana	Rstr	Associate	03/23/23	714	Correspond with M. Cook (Schulte) re CNO for Kroll fee application (0.1); review and analyze proposed order re same (0.2).	0.30
Page, Alana	Rstr	Associate	03/24/23	714	Teleconference with L. Calderone (Chambers) re Kroll final fee order (0.2); revise same (0.3); correspond with M. Cook (Schulte) re same (0.1).	0.60
Hossain, Julia	Rstr	Paralegal	03/24/23	714	Prepare notice for additional KPMG engagement letter.	0.40
Page, Alana	Rstr	Associate	03/27/23	714	Review and revise proposed final Kroll fee order (0.2); circulate same to Chambers (0.1).	0.30
Harnett, Sarah	Rstr	Counsel	03/28/23	714	Review and analyze PJT monthly fee app	0.30
Robinson, Vida	Rstr	Associate	03/28/23	714	Review and analyze PJT fee application (0.5); correspond with PW team and S. Harnett re same (0.1).	0.60
Page, Alana	Rstr	Associate	03/29/23	714	Review and analyze KPMG UK invoice issues.	0.20
Robinson, Vida	Rstr	Associate	03/29/23	714	Create filing version of PJT monthly statement (0.1); coordinate filing of same (0.1).	0.20
Robinson, Vida	Rstr	Associate	03/30/23	714	Review and analyze A&M monthly staffing report.	0.20
Hossain, Julia	Rstr	Paralegal	03/30/23	714	Update and revise KPMG supplemental notice to incorporate additional engagement letter (0.5); incorporate comments into notice of engagement letter (0.3); circulate filing version of same to PW team (0.1); revise KPMG notice (0.1); file notice of additional KPMG engagement (0.2); coordinate service of same (0.1).	1.30
Harnett, Sarah	Rstr	Counsel	03/30/23	714	Review KPMG supplemental declaration.	0.20
Page, Alana	Rstr	Associate	03/30/23	714	Prepare notice of additional KPMG engagement letters (0.2); coordinate filing of same (0.1).	0.30
Heasley, Julia	Rstr	Associate	03/30/23	714	Correspond with L. Luo and OCP firm re status of declaration.	0.10
Harnett, Sarah	Rstr	Counsel	03/31/23	714	Review and analyze A&M monthly staffing plan.	0.20

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Invoice #: 1433832

Matter: 00370 Revlon - Chapter 11 Cases

Date: 04/28/2023

Name	Dept	Title	Date	Task	Description	Hours
Robinson, Vida	Rstr	Associate	03/31/23	714	Correspond with PJT re monthly fee statement (0.1); compile A&M team staffing report (0.3).	0.40
Britton, Robert	Rstr	Partner	04/03/23	714	Correspond with Robinson re staffing report (0.1); review and analyze same (0.2).	0.30
Robinson, Vida	Rstr	Associate	04/03/23	714	Correspond with S. Harnett, R. Britton re A&M monthly staffing report.	0.20
Page, Alana	Rstr	Associate	04/03/23	714	Correspond with J. Galaz (A&M) re professional fee escrow.	0.20
Hossain, Julia	Rstr	Paralegal	04/03/23	714	File A&M fee statement.	0.30
Baham, Sam	Rstr	Associate	03/01/23	715	Review and analyze PW fee statement for privilege concerns (1.0); correspond with Page, PW team re same (0.2).	1.20
Page, Alana	Rstr	Associate	03/01/23	715	Review and analyze PW fee statement for privilege.	0.90
Luo, Lara	Rstr	Associate	03/01/23	715	Review, analyze invoices for privilege, confidentiality.	0.20
Luo, Lara	Rstr	Associate	03/02/23	715	Review, analyze fee statement for privilege, confidentiality.	2.80
Baham, Sam	Rstr	Associate	03/02/23	715	Review and analyze PW fee statement for confidentiality concerns.	1.20
Luo, Lara	Rstr	Associate	03/03/23	715	Review, analyze PW fee statement for privilege, confidentiality.	0.40
Page, Alana	Rstr	Associate	03/03/23	715	Review and comment on second interim fee application (0.6); draft exhibits for fee application (0.5).	1.10
Blumberg, Irene	Rstr	Associate	03/03/23	715	Correspond with A. Page re interim fee application (0.2); review and revise same (1.1).	1.30
Baham, Sam	Rstr	Associate	03/03/23	715	Review and analyze PW fee statement for confidentiality concerns (2.3); correspond with A. Page and PW team re same (0.3).	2.60
Page, Alana	Rstr	Associate	03/04/23	715	Draft second interim fee application.	4.00
Heasley, Julia	Rstr	Associate	03/05/23	715	Review and analyze PW fee statement for privilege and confidentiality.	0.40
Page, Alana	Rstr	Associate	03/05/23	715	Draft second interim fee application.	2.70
Robinson, Vida	Rstr	Associate	03/05/23	715	Review and edit PW interim fee application.	0.80
Luo, Lara	Rstr	Associate	03/05/23	715	Review, analyze PW fee statements for privilege and confidentiality.	0.30
Heasley, Julia	Rstr	Associate	03/06/23	715	Review and analyze PW invoice for privilege and confidentiality.	0.80
Luo, Lara	Rstr	Associate	03/06/23	715	Review and analyze PW invoices for privilege and confidentiality.	0.20
Baham, Sam	Rstr	Associate	03/06/23	715	Review and analyze PW invoice for privilege concerns.	1.60
Page, Alana	Rstr	Associate	03/06/23	715	Draft second interim fee application.	3.40
Robinson, Vida	Rstr	Associate	03/06/23	715	Review and analyze PW invoice for privilege and confidentiality.	0.80

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Name	Dept	Title	Date	Task	Description	Hours
Heasley, Julia	Rstr	Associate	03/07/23	715	Review and analyze PW invoice for privilege and confidentiality.	1.10
Luo, Lara	Rstr	Associate	03/07/23	715	Review, analyze PW invoices re privilege, confidentiality.	0.50
Page, Alana	Rstr	Associate	03/07/23	715	Revise second interim fee application.	1.40
Heasley, Julia	Rstr	Associate	03/08/23	715	Review and analyze PW invoices for privilege and confidentiality.	1.70
Higgins, Matthew M	Lit	Associate	03/08/23	715	Review and analyze PW interim fee application.	0.30
Luo, Lara	Rstr	Associate	03/08/23	715	Review, analyze PW invoices re privilege, confidentiality.	4.80
Baham, Sam	Rstr	Associate	03/08/23	715	Review and analyze PW invoice for privilege concerns (2.0); correspond with A. Page, PW team re same (0.5).	2.50
Robinson, Vida	Rstr	Associate	03/08/23	715	Review and analyze PW invoice for privilege and confidentiality.	1.50
Shack Sackler, Benjamin	Lit	Associate	03/08/23	715	Correspond with A. Page and PW team re litigation time for second fee application (0.2); review and revise litigation time descriptions re second fee application (0.2).	0.40
Page, Alana	Rstr	Associate	03/08/23	715	Review and analyze PW fee statement for confidentiality (2.1); review and revise PW second interim fee application (3.6); prepare budget and staffing plan (0.5).	6.20
Blumberg, Irene	Rstr	Associate	03/08/23	715	Correspond with A. Page re fees.	0.30
Basta, Paul M.	Rstr	Partner	03/08/23	715	Correspond with R. Britton and A. Eaton re Revlon fees.	0.50
Heasley, Julia	Rstr	Associate	03/09/23	715	Review and analyze PW invoice for privilege and confidentiality.	0.60
Rocher, Evan	Corp	Associate	03/09/23	715	Correspond with A. Page re comments to fee application for description of finance tasks.	0.30
Blumberg, Irene	Rstr	Associate	03/09/23	715	Correspond with A. Page re CNO for fee application (0.1); review and analyze interim fee application (0.6); correspond with A. Page re comments to same (0.5).	1.20
Page, Alana	Rstr	Associate	03/09/23	715	Correspond with C. Monte (A&M) and S. Fiszer re PII list (0.3); revise second interim fee application (1.7); coordinate filing of monthly fee statement CNO (0.3); review and analyze PW fee statement for confidentiality (1.6).	3.90
Baham, Sam	Rstr	Associate	03/09/23	715	Review and analyze PW invoice for privilege and confidentiality.	1.00
Robinson, Vida	Rstr	Associate	03/09/23	715	Review and analyze PW invoice for privilege and confidentiality.	2.00
Britton, Robert	Rstr	Partner	03/09/23	715	Review and revise second interim fee application (0.8); review and revise budget (0.4).	1.20
Luo, Lara	Rstr	Associate	03/09/23	715	Review and analyze PW invoices for privilege and confidentiality.	0.10

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Name	Dept	Title	Date	Task	Description	Hours
Baham, Sam	Rstr	Associate	03/10/23	715	Review and analyze PW invoice for privilege issues (1.0); correspond with I. Blumberg, PW team re same (0.2).	1.20
Robinson, Vida	Rstr	Associate	03/10/23	715	Review and analyze PW invoice for privilege and confidentiality.	0.30
Luo, Lara	Rstr	Associate	03/10/23	715	Review and analyze PW invoices for privilege and confidentiality.	2.30
Blumberg, Irene	Rstr	Associate	03/11/23	715	Review and analyze February 1-15 invoice for privilege and confidentiality.	3.80
Baham, Sam	Rstr	Associate	03/11/23	715	Review and analyze PW invoice for privilege concerns.	0.60
Luo, Lara	Rstr	Associate	03/12/23	715	Review and analyze PW invoices for privilege and confidentiality.	1.60
Heasley, Julia	Rstr	Associate	03/12/23	715	Review and analyze PW invoice for privilege and confidentiality concerns.	0.70
Page, Alana	Rstr	Associate	03/12/23	715	Review and analyze PW invoice for privilege.	0.90
Baham, Sam	Rstr	Associate	03/12/23	715	Review and analyze PW invoice for privilege concerns (2.1); correspond with PW billing, PW team re same (0.2).	2.30
Robinson, Vida	Rstr	Associate	03/12/23	715	Review and analyze PW invoice for privilege and confidentiality.	1.40
Heasley, Julia	Rstr	Associate	03/13/23	715	Review and analyze PW invoice for privilege and confidentiality (1.0); correspond with A. Page and paralegals re preparation of February fee statement (0.2).	1.20
Page, Alana	Rstr	Associate	03/13/23	715	Revise second interim fee application.	1.20
Baham, Sam	Rstr	Associate	03/13/23	715	Review and revise PW fee statement for privilege concerns.	1.00
Luo, Lara	Rstr	Associate	03/13/23	715	Review, analyze PW invoices for privilege, confidentiality.	0.50
Britton, Robert	Rstr	Partner	03/14/23	715	Correspond with P. Basta re fee issues.	0.20
Baham, Sam	Rstr	Associate	03/14/23	715	Update fee tracker (0.2); review and revise PW invoice for privilege concerns (0.3).	0.50
Page, Alana	Rstr	Associate	03/14/23	715	Review and revise second PW fee application (0.4); correspond with C. Monte (A&M) re PII list (0.2); correspond with M. Melvin re research for fee application (0.3).	0.90
Baham, Sam	Rstr	Associate	03/15/23	715	Review and revise PW invoice for privilege concerns.	0.70
Blumberg, Irene	Rstr	Associate	03/15/23	715	Review and analyze February proforma for privilege.	3.80
Luo, Lara	Rstr	Associate	03/15/23	715	Review and analyze PW invoices for privilege and confidentiality.	0.40
Eaton, Alice	Rstr	Partner	03/16/23	715	Correspond with R. Britton re fee application (0.2); review and analyze fee application (0.8).	1.00
Baham, Sam	Rstr	Associate	03/16/23	715	Review and analyze PW invoice for privilege concerns.	2.10

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Name	Dept	Title	Date	Task	Description	Hours
Page, Alana	Rstr	Associate	03/16/23	715	Coordinate fee statement preparation (0.3); review and revise PW fee application (0.4).	0.70
Castro-James, Maria	Lit	Staff Attorney	03/17/23	715	Review and analyze March PW invoice for privilege and confidentiality.	3.80
Luo, Lara	Rstr	Associate	03/17/23	715	Review and analyze PW invoices for privilege and confidentiality.	0.30
Heasley, Julia	Rstr	Associate	03/17/23	715	Draft PW monthly fee statement for February (2.2); correspond with A. Page re same (0.1).	2.30
Baham, Sam	Rstr	Associate	03/17/23	715	Review and analyze PW invoice for privilege, confidentiality (1.1); correspond with PW billing department, A. Page re same (0.2).	1.30
Page, Alana	Rstr	Associate	03/17/23	715	Review and revise PW fee application (0.7); prepare filing version of same (0.3); review and analyze filing version of same (0.4); coordinate filing of same (0.1).	1.50
Blumberg, Irene	Rstr	Associate	03/17/23	715	Review and analyze filing version of PW fee application.	0.50
Page, Alana	Rstr	Associate	03/18/23	715	Review and comment on filing version of PW monthly fee statement.	0.20
Heasley, Julia	Rstr	Associate	03/18/23	715	Correspond with R. Britton re PW invoice.	0.10
Heasley, Julia	Rstr	Associate	03/19/23	715	Correspond with A. Eaton, A. Page, and PW team re PW invoice (0.1); correspond with A. Kidd (Revlon) re same (0.1).	0.20
Page, Alana	Rstr	Associate	03/20/23	715	Review and comment on filing version of PW monthly fee statement.	1.10
Luo, Lara	Rstr	Associate	03/20/23	715	Review and analyze PW invoices for privilege and confidentiality.	0.10
Heasley, Julia	Rstr	Associate	03/20/23	715	Prepare filing version of PW invoice (0.2); correspond with R. Britton, I. Blumberg, A. Page re same (0.1).	0.30
Miller, Courtney A. R.	Lit	Staff Attorney	03/20/23	715	Review and analyze March PW invoice for privilege and confidentiality.	4.50
Luo, Lara	Rstr	Associate	03/21/23	715	Review and analyze PW invoices for privilege and confidentiality.	0.20
Miller, Courtney A. R.	Lit	Staff Attorney	03/21/23	715	Review and analyze March PW invoice for privilege and confidentiality.	2.50
Castro-James, Maria	Lit	Staff Attorney	03/21/23	715	Review and analyze PW March invoice for privilege and confidentiality.	4.60
Feher, Melinda	Lit	Staff Attorney	03/21/23	715	Review and analyze PW invoice from March for privilege concerns.	7.00
Luo, Lara	Rstr	Associate	03/22/23	715	Review and analyze PW invoices for privilege and confidentiality.	0.10
Castro-James, Maria	Lit	Staff Attorney	03/22/23	715	Review and analyze PW March invoice for privilege and confidentiality.	3.60
Miller, Courtney A. R.	Lit	Staff Attorney	03/22/23	715	Review and analyze March PW invoice for privilege and confidentiality (3.1); correspond with M. Fehrer re same (0.2).	3.30

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Name	Dept	Title	Date	Task	Description	Hours
Feher, Melinda	Lit	Staff Attorney	03/22/23	715	Review and analyze PW invoice from March for privilege concerns.	7.00
Feher, Melinda	Lit	Staff Attorney	03/23/23	715	Review and analyze PW fee statement from March for privilege concerns.	3.00
Castro-James, Maria	Lit	Staff Attorney	03/23/23	715	Review and analyze PW March invoice for privilege and confidentiality.	4.00
Luo, Lara	Rstr	Associate	03/23/23	715	Review and analyze PW fee statements for privilege and confidentiality.	0.30
Baham, Sam	Rstr	Associate	03/24/23	715	Review and analyze fee statement for expert disbursements (0.1); correspond with P. Paterson re same (0.1).	0.20
Heasley, Julia	Rstr	Associate	03/26/23	715	Review and analyze PW fee statement for privilege and confidentiality.	0.10
Page, Alana	Rstr	Associate	03/26/23	715	Review and analyze PW fee statement for privilege and confidentiality.	0.20
Novod, Claudia	Lit	Staff Attorney	03/27/23	715	Review and analyze PW March fee statement for privilege and confidentiality.	8.10
Feher, Melinda	Lit	Staff Attorney	03/27/23	715	Review and analyze PW fee statement from March for privilege concerns.	4.00
Castro-James, Maria	Lit	Staff Attorney	03/27/23	715	Review and analyze March PW fee statement for privilege and confidentiality (1.7); correspond with C. Novod and C. Miller re fee schedule question (0.1).	1.80
Luo, Lara	Rstr	Associate	03/27/23	715	Review, analyze PW fee statements for privilege, confidentiality.	0.20
Novod, Claudia	Lit	Staff Attorney	03/28/23	715	Review and analyze PW March fee statement for privilege and confidentiality (7.7); teleconference with M. Castro-James re fee schedule (0.3).	8.00
Miller, Courtney A. R.	Lit	Staff Attorney	03/28/23	715	Review and analyze March PW fee statement for privilege and confidentiality.	7.60
Feher, Melinda	Lit	Staff Attorney	03/28/23	715	Review and analyze PW fee statement from March for privilege concerns.	8.50
Castro-James, Maria	Lit	Staff Attorney	03/28/23	715	Review and analyze March PW fee statement for privilege and confidentiality (4.3); teleconference with C. Novod re fee schedule questions (0.3).	4.60
Castro-James, Maria	Lit	Staff Attorney	03/29/23	715	Review and analyze March PW invoice for privilege and confidentiality (3.2); correspond with J. Truman, C. Miller, M. Feher, and C. Novod re fee schedule (0.1).	3.30
Feher, Melinda	Lit	Staff Attorney	03/29/23	715	Review and analyze PW invoice from March for privilege concerns.	3.00
Miller, Courtney A. R.	Lit	Staff Attorney	03/29/23	715	Review and analyze March PW invoice for privilege and confidentiality.	2.60
Heasley, Julia	Rstr	Associate	03/29/23	715	Review and analyze PW invoice for privilege and confidentiality.	1.30
Novod, Claudia	Lit	Staff Attorney	03/29/23	715	Review and analyze PW March invoice for privilege and confidentiality.	2.10

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Name	Dept	Title	Date	Task	Description	Hours
Luo, Lara	Rstr	Associate	03/30/23	715	Review, analyze PW invoices for privilege, confidentiality.	0.20
Luo, Lara	Rstr	Associate	03/31/23	715	Review, analyze PW invoices for privilege, confidentiality.	0.10
Feher, Melinda	Lit	Staff Attorney	03/31/23	715	Review and analyze PW invoice from March for privilege concerns.	6.50
Novod, Claudia	Lit	Staff Attorney	04/03/23	715	Review and analyze PW March invoice for privilege and confidentiality.	8.10
Feher, Melinda	Lit	Staff Attorney	04/03/23	715	Review and analyze PW invoice from March for privilege concerns.	4.50
Luo, Lara	Rstr	Associate	04/03/23	715	Review, analyze PW invoices for privilege, confidentiality.	0.20
Mitchell, Sean A.	Rstr	Partner	03/07/23	716	Attend hearing re hair relaxer bar date.	3.30
Eaton, Alice	Rstr	Partner	03/07/23	716	Partially attend hair straightening bar date hearing.	1.90
Basta, Paul M.	Rstr	Partner	03/07/23	716	Partially attend Revlon hearing on hair relaxer claimant motions.	1.80
Blumberg, Irene	Rstr	Associate	03/07/23	716	Partially attend hearing re bar date motions.	2.50
Luo, Lara	Rstr	Associate	03/07/23	716	Partially attend hearing re bar date.	3.10
Britton, Robert	Rstr	Partner	03/07/23	716	Attend bar date motion hearing.	3.30
Basta, Paul M.	Rstr	Partner	04/03/23	716	Attend Revlon confirmation hearing.	2.00
Britton, Robert	Rstr	Partner	04/03/23	716	Present at confirmation hearing.	2.00
Heasley, Julia	Rstr	Associate	04/03/23	716	Partially attend confirmation hearing.	1.60
Bolin, Brian	Rstr	Partner	04/03/23	716	Partially attend confirmation hearing.	1.00
Eaton, Alice	Rstr	Partner	04/03/23	716	Attend confirmation hearing.	2.00
Paterson, Paul	Lit	Counsel	04/03/23	716	Attend confirmation hearing.	2.00
Blumberg, Irene	Rstr	Associate	04/03/23	716	Attend confirmation hearing.	1.90
Luo, Lara	Rstr	Associate	04/03/23	716	Attend confirmation hearing.	2.10
Page, Alana	Rstr	Associate	04/03/23	716	Attend confirmation hearing.	1.90
Britton, Robert	Rstr	Partner	03/01/23	717	Correspond with L. Luo re Zurich plan discussions.	0.20
Sacksteder, Elizabeth M	Lit	Partner	03/02/23	717	Correspond with A. Eaton re insurance deductible issues (0.1); partially attend teleconference with A. Kidd, Fier, and PW team re insurance issues (0.2).	0.30
Blumberg, Irene	Rstr	Associate	03/02/23	717	Correspond with R. Britton and DPW team re Lockton engagement.	0.20
Robinson, Vida	Rstr	Associate	03/02/23	717	Prepare for call with R. Britton, PW Team, and S. Fier, A. Kidd (Revlon) re insurance issues (0.1); conference with R. Britton, S. Fier, PW team re insurance issues (0.4).	0.50
Britton, Robert	Rstr	Partner	03/02/23	717	Conference with Fier re insurance issues.	0.40
Rahnama, Omid	Rstr	Associate	03/03/23	717	Correspond with S. Fier re insurance matters.	0.20
Sacksteder, Elizabeth M	Lit	Partner	03/06/23	717	Teleconference with C. Sgro and P. Basta re insurance issues (0.5); correspond with S. Mitchell, L. Luo re follow-up with Cohen Ziffer on insurance issues (0.2).	0.70

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Name	Dept	Title	Date	Task	Description	Hours
Britton, Robert	Rstr	Partner	03/06/23	717	Conference with P. Basta re insurance issues.	0.40
Britton, Robert	Rstr	Partner	03/07/23	717	Conference with McKenna, Cohen Ziffer re insurance issues (0.8); conference with E. Sacksteder re same (0.2); correspond with P. Basta re same (0.4); conference with A. Kidd (Revlon) re insurance issues (0.5).	1.90
Sacksteder, Elizabeth M	Lit	Partner	03/07/23	717	Correspond with Sgro re insurance provisions (0.2); teleconference with R. Britton re same (0.2); teleconference with McKenna, MacAndrews team and Cohen & Ziffer re insurance issues (0.5); correspond with Britton and Eaton re next steps (0.1).	1.00
Britton, Robert	Rstr	Partner	03/08/23	717	Conference with Luo, Zurich counsel re insurance issues (0.5); conference with MAFCO counsel re same (0.5); review and analyze insurance policies (0.8).	1.80
Luo, Lara	Rstr	Associate	03/08/23	717	Conference with R. Britton, counsel to Zurich re hair straightening insurance issues (0.5); conference with S. Mitchell, Cohen Ziffer re insurance issues re same (1.5); conference with S. Mitchell re same (0.4); analyze precedent plans re insurance issues (1.5); analyze insurance contracts (0.7); correspond with Raines re same (0.5).	5.10
Basta, Paul M.	Rstr	Partner	03/08/23	717	Conference with Luskey, PW team re MDL (0.6); review and analyze Revlon insurance issues re hair straightening claims (1.4).	2.00
Sacksteder, Elizabeth M	Lit	Partner	03/08/23	717	Teleconference with J. Raines, K. McKenna, S. Mitchell, L. Luo re insurance considerations and strategy.	1.50
Britton, Robert	Rstr	Partner	03/09/23	717	Conference with counsel to CNA re surety issues.	0.50
Mitchell, Sean A.	Rstr	Partner	03/10/23	717	Analyze insurance claims issues (0.4); teleconference with R. Britton, Company re same (0.6).	1.00
Sacksteder, Elizabeth M	Lit	Partner	03/11/23	717	Review and comment on proposed revisions to plan re Hair Straightening Claims and treatment of insurance.	0.50
Eaton, Alice	Rstr	Partner	03/12/23	717	Correspond with O. Rahnama re insurance matters.	0.20
Rahnama, Omid	Rstr	Associate	03/13/23	717	Correspond with L. Luo re insurance matter (0.3); review and analyze insurance order, Zurich binder, and summary chart re same (0.7).	1.00
Britton, Robert	Rstr	Partner	03/15/23	717	Correspond with L. Luo re surety issues.	0.20
Rahnama, Omid	Rstr	Associate	03/17/23	717	Correspond with L. Luo re insurance matters (0.2); review and analyze premium financing agreement (0.1).	0.30
Britton, Robert	Rstr	Partner	03/17/23	717	Correspond with J. Raines (Cohen Ziffer) and K. McKenna (Cohen Ziffer) re CNA.	0.20
Luo, Lara	Rstr	Associate	03/17/23	717	Conference with D. McGehrin, Duane Morris re insurance policies (0.2); correspond with M. Padilla and O. Rahnama re insurance notice (0.3).	0.50

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Britton, Robert	Rstr	Partner	03/18/23	717	Conference with C. Heitzenrater, Duane Morris re insurance plan issues (0.4); correspond with L. Luo re same (0.2).	0.60
Britton, Robert	Rstr	Partner	03/19/23	717	Correspond with P. Basta re insurance issues.	0.10
Sacksteder, Elizabeth M	Lit	Partner	03/19/23	717	Correspond with R. Britton re Zurich settlement.	0.10
Luo, Lara	Rstr	Associate	03/20/23	717	Conference with J. Raines (Cohen Ziffer) and K. McKenna (Cohen Ziffer) re insurance issues.	0.60
Britton, Robert	Rstr	Partner	03/20/23	717	Conference with K. McKenna (Cohen Ziffer) re insurer issues.	0.30
Sacksteder, Elizabeth M	Lit	Partner	03/21/23	717	Correspond with R. Atkins re insurance analysis.	0.10
Rahnama, Omid	Rstr	Associate	03/22/23	717	Correspond with L. Luo and M. Padilla (MAFCO) re insurance matters.	0.10
Britton, Robert	Rstr	Partner	03/22/23	717	Conference with counsel to CNA re surety issues (0.6); correspond with CNA re insurance issues (0.5).	1.10
Luo, Lara	Rstr	Associate	03/23/23	717	Conference with counterparty counsel re premium financing agreement (0.2); conference with Padilla re same (0.1); meet with R. Britton re same (0.3); analyze issues re same (0.3).	0.90
Britton, Robert	Rstr	Partner	03/23/23	717	Conference with A. Kidd re insurance issues and next steps (0.5); analyze insurance issues (0.5); meet with L. Luo re same (0.3).	1.30
Luo, Lara	Rstr	Associate	03/27/23	717	Correspond with Cohen Ziffer re insurance question.	0.10
Britton, Robert	Rstr	Partner	03/27/23	717	Correspond with Duane Morris team re insurance issues (0.6); correspond with L. Luo re same (0.3); correspond with S. Esserman re same (0.4); review and analyze same (0.6).	1.90
Britton, Robert	Rstr	Partner	03/28/23	717	Conference with plaintiffs' counsel re insurance policies (0.5); conference with Duane Morris team re same (0.4).	0.90
Luo, Lara	Rstr	Associate	03/28/23	717	Conference with Raines, McKenna, Revlon re insurance issues (0.9); conference with Raines re same (0.8); analyze same (0.2).	1.90
Britton, Robert	Rstr	Partner	03/29/23	717	Conference with Duane Morris re insurance issues (1.2); conference with S. Massman and DPW team re same (0.9); conference with A. Kidd re same (0.8); conference with plaintiffs' counsel re same (0.8); correspond with L. Luo re same (0.3); teleconference with S. Esserman re same (1.3).	5.30
Blumberg, Irene	Rstr	Associate	03/15/23	718	Correspond with A. Gerber re Canada inquiry (0.2); correspond with Osler team re same (0.1).	0.30
Blumberg, Irene	Rstr	Associate	03/21/23	718	Correspond with L. Luo, Osler re Canadian tax inquiry.	0.20
Carey, Peter	Lit	Counsel	03/29/23	719	Review and analyze background materials for upcoming teleconference with governmental entity.	0.30

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Name	Dept	Title	Date	Task	Description	Hours
Britton, Robert	Rstr	Partner	03/01/23	720	Conference with L. Luo, PW team re emergence checklist (0.4); conference with L. Luo, PW team re emergence (0.4); analyze emergence closing checklist (0.5).	1.30
Page, Alana	Rstr	Associate	03/01/23	720	Conference with L. Luo re confirmation order and brief (0.5); review and analyze confirmation order precedents (0.6).	1.10
Heasley, Julia	Rstr	Associate	03/01/23	720	Revise emergence checklist (0.1); correspond with I. Blumberg re same (0.2); correspond with R. Britton and PW team re same (0.4); correspond with I. Blumberg re same (0.1); revise same (0.8); coordinate meeting re retained causes of action discussion (0.1); correspond with E. Quinones re emergence checklist (0.2); correspond with I. Blumberg, DPW, BR, Akin, and Proskauer teams re same (0.2).	2.10
Luo, Lara	Rstr	Associate	03/01/23	720	Partially attend conference with A. Page, I. Blumberg re confirmation order and brief (0.5); conference with R. Britton, PW team re emergence checklist (0.4).	0.90
Blumberg, Irene	Rstr	Associate	03/01/23	720	Correspond with S. Fier and Revlon legal team re retained causes of action (0.3); review and analyze precedent re same (0.8); conduct research re same (0.5); coordinate client teleconference re same (0.1); correspond with R. Britton and A. Page re confirmation research (0.2); correspond with J. Heasley re emergence checklist (0.2); review and analyze same (0.5); teleconference with D. Kratzer re plan supplement documents (0.3); analyze issues re same (0.5); correspond with D. Kratzer re stipulation (0.2); correspond with A. Page re same (0.2); correspond with Kroll re ballots (0.3); correspond with T. Axelrod re talc trustee (0.1); correspond with L. Luo and J. Heasley re confirmation hearing notice (0.1).	4.30
Harnett, Sarah	Rstr	Counsel	03/02/23	720	Review and analyze proposed employee communications re solicitation and confirmation hearing (0.1); correspond with I. Blumberg, PW, A&M, Revlon re same (0.2).	0.30
Luo, Lara	Rstr	Associate	03/02/23	720	Correspond with I. Blumberg, PW team re plan confirmation research issues.	0.30
Heasley, Julia	Rstr	Associate	03/02/23	720	Teleconference with I. Blumberg, PW, A&M, and Company re retained causes of action schedule for plan supplement (0.5); teleconference with I. Blumberg, PW, and Company re emergence checklist (0.7); teleconference with M. Sawyer (BR) re same (0.1); correspond with DPW, Akin, Proskauer re same (0.1).	1.40

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Name	Dept	Title	Date	Task	Description	Hours
Robinson, Vida	Rstr	Associate	03/02/23	720	Correspond with L. Luo re plan voting research questions (0.4); correspond with S. Mitchell re same (0.3); research re plan voting procedures (3.5); correspond with A. Eaton, PW team re same (0.8).	5.00
Blumberg, Irene	Rstr	Associate	03/02/23	720	Correspond with D. Keeton and PW team re emergence timeline (0.2); teleconference with J. Weichselbaum (Latham) re distributions (0.1); correspond with L. Luo re same (0.1); correspond with J. Heasley re confirmation hearing notice (0.2); correspond with A. Page re professional fee payments under plan (0.3); analyze research re retained causes of action (0.6); correspond with S. Fier and Revlon re same (0.2); teleconference with S. Fier (Revlon), A. Page, PW team re same (0.5); review and analyze securities slides re private company considerations (0.5); correspond with A. Page re solicitation communications (0.2); teleconference with D. Kratzer re emergence and related issues (0.3); teleconference with S. Fier, E. Quinones and PW team re emergence checklist (0.7); prepare for same (0.4).	4.30
Page, Alana	Rstr	Associate	03/02/23	720	Review and analyze plan provisions re payment of professional fees (0.5); summarize same for I. Blumberg (0.3); review and analyze bankruptcy code provisions re administrative claims (0.6); teleconference with I. Blumberg and PW team re indemnification issues (0.4); review and analyze plan provisions re indemnification (0.3); prepare summary of same (0.2); teleconference with S. Fier (Revlon), Revlon team, and PW team re retained causes of action (0.5); teleconference with J. Heasley, E. Quinones (Revlon), Revlon team, and PW team re emergence checklist (0.7).	3.50
Rahnama, Omid	Rstr	Associate	03/02/23	720	Correspond with L. Luo re disclosure statement (0.1); correspond with Chambers and A. Eaton re plan confirmation hearing (0.3).	0.40
Mitchell, Sean A.	Rstr	Partner	03/02/23	720	Teleconference with S. Fier, Revlon client team re claims issues (1.1); teleconference with coverage counsel re same (2.0); teleconference with A. Orchowski (Kroll) re claims issues (0.8).	3.90
Heasley, Julia	Rstr	Associate	03/02/23	720	Correspond with R. Britton re filing of confirmation hearing notice.	0.10
Hossain, Julia	Rstr	Paralegal	03/03/23	720	File confirmation hearing notice.	0.30
Eaton, Alice	Rstr	Partner	03/03/23	720	Teleconference with R. Britton, management re emergence date (0.4); conference with R. Britton re same (0.2); conference with D. Kratzer (DPW), DPW team re same (0.2).	0.80
Page, Alana	Rstr	Associate	03/03/23	720	Teleconference with T. Behnke (A&M), A&M re distribution planning (0.5); summarize payment of professional fees under plan (0.4); review and analyze consent rights under RSA (0.3).	1.20

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Name	Dept	Title	Date	Task	Description	Hours
Blumberg, Irene	Rstr	Associate	03/03/23	720	Correspond with S. Harnett and A. Page re solicitation communications (0.2); review and analyze same (0.1); correspond with M. Sawyer re emergence checklist (0.1); review and revise same (0.5); correspond with R. Britton and DPW team re plan supplement timing (0.2); analyze outstanding plan supplement documents (0.3); revise notes re same (0.5); correspond with K. Subramanian re emergence considerations (0.1); review and analyze precedent for same (0.2).	2.20
Luo, Lara	Rstr	Associate	03/03/23	720	Correspond with V. Carey re plan tax issues (0.2); revise FINRA notice re plan (0.2); revise communications re solicitation (0.5); correspond with A. Page, Revlon re same (0.2).	1.10
Harnett, Sarah	Rstr	Counsel	03/03/23	720	Review and analyze revised employee communications re solicitation.	0.20
Heasley, Julia	Rstr	Associate	03/03/23	720	Correspond with R. Britton re confirmation hearing notice (0.1); correspond with I. Blumberg and claimant re inquiry about solicitation receipt and voting ballot (0.2).	0.30
Britton, Robert	Rstr	Partner	03/03/23	720	Conference with E. Vonnegut (DPW) re status and next steps for confirmation (0.6); conference with A. Eaton re emergence date (0.2); conference with A. Eaton, A. Kidd (Revlon) re same (0.4); review and analyze issues re same (0.1).	1.30
Britton, Robert	Rstr	Partner	03/03/23	720	Correspond with Massman re closing issues.	0.20
Harnett, Sarah	Rstr	Counsel	03/04/23	720	Correspond with A. Page and PW team re revised proposed comments to employees on solicitation.	0.20
Page, Alana	Rstr	Associate	03/05/23	720	Conduct legal research re confirmation brief.	2.30
Luo, Lara	Rstr	Associate	03/06/23	720	Analyze plan issues.	0.70
Eaton, Alice	Rstr	Partner	03/06/23	720	Confer with W. Clareman re confirmation next steps.	0.50
Blumberg, Irene	Rstr	Associate	03/06/23	720	Correspond with K. Subramanian re emergence checklist (0.2); review and revise same (0.5); review and analyze precedent of same (0.5); correspond with R. Aizen re emergence timeline (0.1); correspond with R. Britton, A. Page re milestone extension (0.3); correspond with O. Rahnama re confirmation hearing (0.2); correspond with creditor re ballots (0.2); correspond with S. Perry, Kroll re lender register (0.2); teleconference with D. Walsh, A&M team re retained causes of action (0.3); research re same (0.2).	2.70
Page, Alana	Rstr	Associate	03/06/23	720	Review and analyze RSA consent rights (0.3); correspond with I. Blumberg, E. Rocher re milestone extension (0.4); revise emergence checklist (0.6); correspond with I. Blumberg, PW team, client re same (0.3).	1.60

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Britton, Robert	Rstr	Partner	03/07/23	720	Conference with S. Massman re wind down issues (0.2); correspond with T. Axelrod re same (0.2); correspond with W. Clareman re confirmation (0.5); correspond with S. Mitchell re wind-down issues (0.2).	1.10
Luo, Lara	Rstr	Associate	03/07/23	720	Analyze proposed comments to plan.	0.80
Heasley, Julia	Rstr	Associate	03/07/23	720	Correspond with A. Kidd re emergence checklist (0.2); revise same (0.3).	0.50
Blumberg, Irene	Rstr	Associate	03/07/23	720	Correspond with Orchowski, Kroll re ballot inquiries (0.2); correspond with A. McGinnis re trust agreements (0.2); teleconference with D. Kratzer (DPW) re plan supplement and related issues (0.3); revise notes re same (0.6); review and analyze request for confirmation order language (0.2); correspond with A. Page re same (0.1); correspond with A. Page, PW team re emergence milestone (0.2); review and analyze emergence checklist (0.9); correspond with A. Page, J. Heasley re same (0.2).	2.90
Page, Alana	Rstr	Associate	03/07/23	720	Draft confirmation brief.	0.20
Britton, Robert	Rstr	Partner	03/08/23	720	Correspond with I. Blumberg re closing checklist and next steps (0.5); correspond with C. Meredith-Goujon re same (0.2); revise plan supplement docs (0.6); correspond with A. Page re confirmation documents (0.2).	1.50
Britton, Robert	Rstr	Partner	03/08/23	720	Correspond with I. Blumberg re confirmation and exit issues.	0.20
Luo, Lara	Rstr	Associate	03/08/23	720	Correspond with A. Page re plan comments.	0.20
Heasley, Julia	Rstr	Associate	03/08/23	720	Correspond with I. Blumberg, PW team re emergence checklist (0.4); teleconference with V. Cahill (DPW) re emergence checklist (0.2); draft notice of plan supplement (0.4); correspond with J. Hossain and PW team re same (0.2); draft notice of new warrant agreement (0.4).	1.60
Blumberg, Irene	Rstr	Associate	03/08/23	720	Correspond with A. Libby, DPW re plan supplement documents (0.2); review and revise emergence checklist (0.4); correspond with J. Heasley re same (0.3); teleconference with B. Mohan re emergence issues (0.3); correspond with J. Heasley re plan supplement notice (0.2); correspond with J. Greanias (A&M) re retained causes of action exhibit (0.2); revise same (1.1); correspond with R. Britton re same (0.3); review and analyze GUC Trust Agreement (0.8); correspond with R. Britton, A. McGinnis re same (0.2); correspond with D. Kratzer re plan supplement issues (0.3); analyze same (0.5).	4.80

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Page, Alana	Rstr	Associate	03/08/23	720	Conference with I. Blumberg and L. Luo re confirmation order and brief (0.7); correspond with E. Rocher re milestone extension (0.2); teleconference with K. Zuzolo (Akin) re same (0.2); correspond with D. Kratzer (DPW) re confirmation order comments (0.3); review and analyze confirmation order precedent (0.2).	1.60
Mitchell, Sean A.	Rstr	Partner	03/08/23	720	Conference with Britton, insurers counsel re plan issues and related follow ups (0.5); correspond with same re same (0.9); conference with Behnke, Luo re claims and plan issues (0.4); conference with Luskey, PW team re hair straightening claims and plan issues (0.6); correspond with same re same (0.3); conference with Luo, Cohen Ziffer re insurance and plan issues (1.5); conference with Luo re same (0.4); analyze same (1.1).	5.70
Clareman, William	Lit	Partner	03/08/23	720	Analyze confirmation issues and research.	0.50
Heasley, Julia	Rstr	Associate	03/09/23	720	Correspond with C. Meredith-Goujon, PW, DPW teams re emergence checklist teleconference (0.5); correspond with I. Blumberg and Kroll team re ballot questions (0.1); review and revise notice of new warrant agreement (0.9); correspond with I. Blumberg and PW team re same (0.1); coordinate teleconference re emergence checklist with company and with creditors (0.3); correspond with M. Sidorenkov (A&M) re questions on emergence timeline (0.1); correspond with DPW team and I. Blumberg re filing version of warrant agreement (0.6); revise emergence checklist (0.4).	3.00
Britton, Robert	Rstr	Partner	03/09/23	720	Correspond with J. Heasley re emergence checklist (0.1); correspond with I. Blumberg re plan supplement (0.3).	0.40
Baham, Sam	Rstr	Associate	03/09/23	720	Review and analyze solicitation procedures (0.1); correspond with I. Blumberg re same (0.1).	0.20
Luo, Lara	Rstr	Associate	03/09/23	720	Conference with CNA's counsel re surety bond treatment under the plan (0.1); correspond with I. Blumberg, PW team re plan supplement (0.5); analyze various proposed plan comments (0.6); correspond with R. Britton, PW team re same (0.6); revise notice of warrant agreement (0.4).	2.20
Choi, Jessica I.	Rstr	Associate	03/09/23	720	Revise Plan re hair relaxer claims.	1.80
Page, Alana	Rstr	Associate	03/09/23	720	Review and analyze confirmation order comments from stakeholders (3.3); revise second amended plan (2.6); correspond with I. Blumberg and L. Luo re same (0.5).	6.40
Hossain, Julia	Rstr	Paralegal	03/09/23	720	Prepare and file new warrant agreement (2.0); coordinate service of same (0.2).	2.20

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Blumberg, Irene	Rstr	Associate	03/09/23	720	Correspond with K. Subramanian re emergence checklist (0.2); review and revise emergence checklist (0.4); correspond with E. Rocher re 8k re milestone extension (0.1); review and analyze same (0.1); correspond with T. Behnke re retained causes of action schedule (0.3); correspond with R. Britton re same (0.3); revise same (0.7); correspond with A. Orchowski, Kroll re ballots (0.2); correspond with R. Britton re same (0.2); correspond with J. Heasley re emergence teleconferences (0.3); correspond with E. Sasso, R. Britton re research (0.3); correspond with B. Silverberg re solicitation procedures (0.2); correspond with A. Orchowski, Kroll re same (0.3); analyze issues re bulk voting (0.4); correspond with R. Britton re same (0.3); correspond with S. Fier re retained causes of action (0.2); teleconference with D. Kratzer re plan supplement (0.3); correspond with J. Heasley re same (0.2); correspond with B. Mohan re governance term sheet for plan supplement (0.5); correspond with A. Page re emergence-related director forms (0.2); correspond with R. Britton re emergence checklist and related issues (0.1).	5.80
Mitchell, Sean A.	Rstr	Partner	03/09/23	720	Call with insurers' counsel re plan issues (1.0); review and analyze plan and insurance issues (4.7); teleconference with E. Vonnegut (DPW) and DPW team re plan and claims issues (0.8); correspond with same, PW team re same (0.4).	6.90
Heasley, Julia	Rstr	Associate	03/10/23	720	Revise emergence checklist (0.2); correspond with I. Blumberg re same (0.2); partially attend teleconference with I. Blumberg and PW team re same (0.6); draft plan supplement exhibit pages (2.2); correspond with I. Blumberg re same (0.1); correspond with M. Sawyer (BR), BR, and Akin teams re twice-weekly emergence checklist teleconferences (0.1).	3.40
Huang, Brian	Corp	Associate	03/10/23	720	Partially attend teleconference with I. Blumberg, PW team re emergence checklist.	0.30
Meredith-Goujon, Claudine K	Corp	Partner	03/10/23	720	Teleconference with I. Blumberg, PW team re emergence checklist.	0.60
Mitchell, Sean A.	Rstr	Partner	03/10/23	720	Review and analyze hair relaxer claim issues (0.8); teleconference with counsel to hair relaxer claimants (0.6); draft liquidation protocols (2.0); research and analyze precedent re same (1.2); review and analyze plan comments (1.4).	6.00
Hotes, John R	Corp	Associate	03/10/23	720	Conference with I. Blumberg and PW Bankruptcy department re status of emergence documentation.	0.60
Blain, Hunter	Corp	Associate	03/10/23	720	Teleconference with I. Blumberg, PW team re emergence checklist.	0.60
Daniele, Salvatore	Corp	Associate	03/10/23	720	Teleconference with I. Blumberg, PW team re emergence checklist.	0.60

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Name	Dept	Title	Date	Task	Description	Hours
Braibanti, Jill	LEGL	Associate	03/10/23	720	Teleconference with I. Blumberg, PW team re emergence checklist.	0.60
McGinnis, Anne	Tax	Counsel	03/10/23	720	Teleconference with Blumberg, PW team re emergence checklist.	0.90
Bolin, Brian	Rstr	Partner	03/10/23	720	Teleconference with I. Blumberg, PW team re emergence checklist.	0.60
Ferrari, Marta	Corp	Associate	03/10/23	720	Teleconference with I. Blumberg, PW team re emergence checklist.	0.60
Blumberg, Irene	Rstr	Associate	03/10/23	720	Correspond with K. Subramanian re registration rights agreement for plan supplement (0.2); review and revise emergence checklist (0.5); prepare for team meeting re same (0.2); teleconference with R. Britton, full PW team re same (0.9); analyze issues re bulk ballot (0.5); correspond with Kroll re same (0.3); correspond with R. Britton re same (0.2); correspond with B. Silverberg re same (0.2); correspond with D. Walsh re retained causes of action schedule (0.1); revise same (0.2); correspond with B. Mohan re governance documents for PS filing (0.2); correspond with A. McGinnis re trust agreements (0.1); review and analyze GUC trust agreement (1.1); review and analyze PI trust agreement (0.9); revise retained causes of action schedule (0.2); correspond with R. Britton re same (0.1); review and revise form of PS filing (0.4); correspond with A. Page and J. Heasley re same (0.3); review and analyze trust distribution procedures (0.7); correspond with R. Britton, S. Mitchell re same (0.1).	7.40
Kavarsky, Gary	Corp	Associate	03/10/23	720	Teleconference with I. Blumberg, PW team re emergence.	0.60
Basta, Paul M.	Rstr	Partner	03/10/23	720	Conference with E. Vonnegut (DPW) re status and next steps for confirmation.	0.70
Choi, Jessica I.	Rstr	Associate	03/10/23	720	Revise plan for hair relaxer claim procedures.	1.00
Dwelle, Matthew E	Corp	Associate	03/10/23	720	Teleconference with I. Blumberg, PW team re emergence checklist.	0.60
Page, Alana	Rstr	Associate	03/10/23	720	Draft confirmation brief (5.3); conduct legal research re same (3.7); correspond with I. Blumberg re plan supplement notice (0.3); revise rejection schedule exhibit page for same (0.5); correspond with R. Britton, DPW team re same (0.2); revise confirmation brief (0.9).	10.90
Britton, Robert	Rstr	Partner	03/10/23	720	Conference with I. Blumberg and PW team re emergence checklist (0.9); review and analyze checklist (0.3); correspond with I. Blumberg re rejected contract schedule for plan supplement (0.3).	1.50
Rahnama, Omid	Rstr	Associate	03/10/23	720	Partially attend conference with I. Blumberg, PW team re emergence matters.	0.80
Luo, Lara	Rstr	Associate	03/10/23	720	Correspond with I. Blumberg and PW team re plan supplement.	0.30

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Eaton, Alice	Rstr	Partner	03/10/23	720	Correspond with S. Massman, DPW re plan supplement documents (0.2); correspond with Stark (BR) re plan supplement updates (0.2); review and analyze emergence checklist (0.2); correspond with I. Blumberg re same (0.2).	0.80
Heasley, Julia	Rstr	Associate	03/11/23	720	Revise trust distribution procedures per R. Britton's comments (0.9); correspond with I. Blumberg, A. Page, and PW team re same (0.4); revise same (0.3); revise plan supplement exhibits (0.7); correspond with A. Page re same (0.2); review and revise same (0.7); correspond with I. Blumberg and L. Luo re same (0.2).	3.40
Mitchell, Sean A.	Rstr	Partner	03/11/23	720	Comment on plan supplement trust distribution documents.	2.00
Britton, Robert	Rstr	Partner	03/11/23	720	Review and revise plan supplement documents (0.9); correspond with I. Blumberg re same (0.3); correspond with L. Luo re revised plan (0.4).	1.60
Heasley, Julia	Rstr	Associate	03/12/23	720	Revise trust distribution procedures per R. Britton comments (0.3); correspond with I. Blumberg, PW team re same (0.1); correspond with A. Kidd and Company re same (0.1).	0.50
Page, Alana	Rstr	Associate	03/12/23	720	Draft confirmation order (3.7); review and analyze precedent re same (1.3).	5.00
Luskey, Randy	Lit	Partner	03/12/23	720	Review language in Plan re hair straightener claims.	0.50
Britton, Robert	Rstr	Partner	03/12/23	720	Revise plan (0.6); correspond with L. Luo re same (0.2); conference with S. Mitchell re same (0.3); revise retained causes of action (0.6); correspond with I. Blumberg re same (0.2).	1.90
Sacksteder, Elizabeth M	Lit	Partner	03/12/23	720	Correspond with R. Atkins, R. Luskey, R. Britton, and L. Luo re treatment of Hair Straightening Claims in the revised Plan (0.8); review and analyze relevant caselaw concerning same (1.1).	1.90
Mitchell, Sean A.	Rstr	Partner	03/12/23	720	Review and analyze claims issues in connection with plan (1.3); comment on trust distribution documents (1.0); review and analyze plan and liquidation procedures (1.5).	3.80
Blumberg, Irene	Rstr	Associate	03/12/23	720	Correspond with L. Luo and PW team re plan supplement.	0.40
Heasley, Julia	Rstr	Associate	03/13/23	720	Correspond with I. Blumberg and PW team re emergence checklist teleconference (0.3); revise GUC Trust Agreement (0.9); correspond with I. Blumberg, R. Britton, A. McGinnis re same (0.6); correspond with Massman, DPW, BR teams re same (0.3); revise emergence checklist (0.2); draft response to inquiry about Class 8 recovery (0.2).	2.50

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Page, Alana	Rstr	Associate	03/13/23	720	Correspond with J. Hossain re confirmation declarations (0.3); teleconference with D. Kratzer (DPW) re plan supplement filing (0.2); prepare tracker of plan/confirmation order comments (0.5); revise plan (0.3); draft summary of options for professional fee escrow account (0.5); correspond with R. Caruso and Revlon team re same (0.3); review and comment on confirmation declarations (0.3); review and analyze stakeholder confirmation order comments (1.5); teleconference with D. Kratzer (DPW) re plan supplement (0.4); revise plan supplement notice (0.4); revise confirmation brief (1.8).	6.50
Blumberg, Irene	Rstr	Associate	03/13/23	720	Correspond with A. Page re confirmation order (0.3); research precedent of same re IP releases (0.4); correspond with L. Luo and PW team re plan supplement (1.0); revise notes re status of same (0.8); review and analyze trust documents (1.2); correspond with J. Heasley re same (0.5); correspond with A. McGinnis re same (0.3); correspond with J. Heasley re emergence checklist (0.2); review and revise same (0.5); correspond with L. Luo and PW team re plan (0.2); revise retained COA exhibit (0.2); correspond with R. Britton re same (0.2); correspond with client re same (0.1); correspond with R. Britton and PW team re rejected contracts list (0.5); review and revise confirmation brief (3.6); correspond with A. Page re same (0.3).	10.30
Hossain, Julia	Rstr	Paralegal	03/13/23	720	Prepare shell of A. Eaton declaration (1.2); prepare shell of R. Caruso declaration (1.3); prepare shell of S. Zelin declaration (0.6).	3.10
Luo, Lara	Rstr	Associate	03/13/23	720	Correspond with B. Mohan re new organizational documents (0.1); review and analyze proposed plan and confirmation comments from various parties (0.3); revise same (0.4); correspond with A. Page and PW team re same (0.2); correspond with M. Padilla and Revlon re surety bond plan treatment (0.1); correspond with B. Mohan re emergence (0.3).	1.40
Scherr, Rebekah	Corp	Associate	03/13/23	720	Review and analyze emergence checklist.	0.20
Baham, Sam	Rstr	Associate	03/13/23	720	Correspond with A. Page re settlement standard research.	0.20
Basta, Paul M.	Rstr	Partner	03/13/23	720	Analyze issues in connection with confirmation (0.5); correspond with Britton, PW team, Revlon re same (0.5).	1.00
Mitchell, Sean A.	Rstr	Partner	03/13/23	720	Partially attend teleconference with P. Gross (Lowenstein), PW team re plan and disclosure statement issues (0.2); review and analyze materials re same (0.2).	0.40
Britton, Robert	Rstr	Partner	03/13/23	720	Correspond with A. Page re exit issues.	0.20

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Name	Dept	Title	Date	Task	Description	Hours
Heasley, Julia	Rstr	Associate	03/14/23	720	Correspond with I. Blumberg and Company re settlement trust agreement (0.2); revise settlement TDPs (0.9); correspond with I. Blumberg and PW team re same and GUC Trust Agreement (0.6); revise liquidating trust agreement (0.6); correspond with A. Page re plan provisions (0.1); correspond with same re plan supplement (0.3).	2.70
Blumberg, Irene	Rstr	Associate	03/14/23	720	Correspond with A. Kidd re emergence calendar (0.2); correspond with R. Britton and S. Mitchell re PI settlement trust TDPs (0.5); review and comment on same (1.3); correspond with J. Heasley re same (0.1); review and analyze DPW comments to same (0.5); teleconference with S. Fier (Revlon) and Company re same (0.7); correspond with R. Scherr re HSR filing timing (0.2); correspond with J. Heasley re trust documents (0.5); review and analyze revisions to same (0.5); correspond with M. Ferrari re exit term sheets for PS filing (0.2); correspond with E. Ross (PJT) re same (0.1); review and analyze precedent of same (0.3); revise case notes re emergence/plan supplement (1.1); correspond with A. Page re filing preparations (0.3); oversee distribution of PS documents to client (0.5); correspond with L. Luo re plan changes re indemnification (0.2); review and analyze 8k re plan supplement (0.2); correspond with J. Hotes re same (0.1).	7.50
Page, Alana	Rstr	Associate	03/14/23	720	Coordinate cite check of confirmation brief (0.3); review and revise confirmation brief (3.2); review and analyze DPW comments to amended plan (0.5); correspond with M. Volin (Proskauer), Proskauer team, Akin team, and BR team re amended plan and plan supplement (0.5); correspond with M. Myers (Ballard) and other stakeholders re confirmation order comments (0.5); revise plan supplement notice (0.3); correspond with D. Keeton and PW team re documents for plan supplement filing (0.4); prepare summary of plan supplement filing for Revlon (0.3); correspond with K. Zuzolo, Akin team, BR team, and DPW team re stakeholder confirmation order requests (0.3); review and analyze plan supplement documents for filing (0.3); draft confirmation order (1.9).	8.50
Mitchell, Sean A.	Rstr	Partner	03/14/23	720	Revise plan (1.0); analyze of insurance issues in connection with plan (1.5).	2.50
Eaton, Alice	Rstr	Partner	03/14/23	720	Review and analyze materials re plan insurance revisions (0.3); teleconference with R. Britton re same (0.2); correspond with same, PW team re emergence and exit financing (0.4).	0.90

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Name	Dept	Title	Date	Task	Description	Hours
Britton, Robert	Rstr	Partner	03/14/23	720	Revise plan language (1.8); correspond with L. Luo re same (0.3); conference with Fox Swibel re plan issues (0.3); conference with A. Kidd (Revlon) re same (0.6); conference with A. Eaton re same, insurance issues in connection with plan (0.2); analyze plan supplement issues (0.6); correspond with S. Esserman re plan discovery (0.4); correspond with W. Clareman re same (0.3).	4.50
Luo, Lara	Rstr	Associate	03/14/23	720	Review and analyze revised plan (0.4); review and analyze DPW comments to plan (0.2); revise plan (0.5); analyze plan and confirmation order comments from various parties (1.0); correspond with A. Page and PW team re same (0.6); conference with K. Zuzolo (Akin) re plan changes (0.1).	2.80
Mitchell, Sean A.	Rstr	Partner	03/15/23	720	Teleconference with counsel to hair straightener claimants re plan issues (0.5); teleconference with S. Fier (Revlon) re plan issues (0.5); correspond with R. Britton, PW team re plan and litigation issues (0.4); comment on plan and plan supplement (1.2).	2.60
Blumberg, Irene	Rstr	Associate	03/15/23	720	Correspond with S. Mitchell and J. Heasley re plan supplement documents (0.3); review and analyze revised drafts of trust agreements (1.1); correspond with R. Britton and B. Bolin re confirmation order (0.1); correspond with A. Page and PW team re stakeholder plan question (0.2); correspond with Kroll team re M&F team materials (0.2).	1.90
Britton, Robert	Rstr	Partner	03/15/23	720	Revise plan (1.4); correspond with K. McKenna (Cohen Ziffer) and Cohen team re same (0.3); correspond with L. Luo re same (0.2); revise plan supplement (0.7); correspond with I. Blumberg re same (0.2); conference with E. Vonnegut (DPW) re same (0.3); conference with plaintiffs' counsel re plan (0.6); correspond with A. Eaton re same (0.4); conference with E. Vonnegut (DPW) re same (0.5); conference with A. Kidd (Revlon) re same (0.7); conference with B. Silverberg (BR) re settlement status (0.7).	6.00
Page, Alana	Rstr	Associate	03/15/23	720	Correspond with D. Perelman (Revlon) and Revlon team re plan supplement filing (0.1); revise confirmation order (1.5); prepare tracker of stakeholder confirmation order comments (0.3); review and analyze Plan provisions in response to DPW comments (0.5); correspond with I. Blumberg re same (0.2); review and analyze DPW plan comments (0.3); coordinate review of plan supplement documents (0.5); review and analyze retained causes of action language under plan (0.3); review and comment on plan supplement notice (0.4); correspond with K. Zuzolo (Akin), Proskauer team re plan supplement filing (0.2); teleconference with D. Kratzer (DPW) re same (0.3); revise confirmation brief (3.5).	8.10

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Name	Dept	Title	Date	Task	Description	Hours
Luo, Lara	Rstr	Associate	03/15/23	720	Correspond with J. Heasley, PW team re plan supplement (0.6); analyze issues re same (0.3).	0.90
Higgins, Matthew M	Lit	Associate	03/15/23	720	Review and analyze plan supplement filings.	0.20
Heasley, Julia	Rstr	Associate	03/15/23	720	Correspond with I. Blumberg, DPW, BR, and PW teams re PI settlement fund documents (0.2); revise emergence checklist (0.4); correspond with K. Subramanian re same (0.1); revise notice of plan supplement (0.2); correspond with A. Page, PW team re same (0.1).	1.00
Blumberg, Irene	Rstr	Associate	03/16/23	720	Review and analyze plan supplement filing (4.1); correspond with J. Greanias (A&M) re retained COA exhibit (0.2); correspond with R. Britton and S. Mitchell re TDPs (0.8); analyze and revise same (1.5); review and analyze revised plan (0.2); correspond with A. Page re same (0.3); correspond with B. Mohan and K. Subramanian re SHA (0.2); review and revise emergence checklist (0.9); correspond with J. Heasley re same (0.2); prepare for emergence checklist meeting (0.5); attend same (0.4).	9.30
Hossain, Julia	Rstr	Paralegal	03/16/23	720	Revise confirmation order.	0.50
Eaton, Alice	Rstr	Partner	03/16/23	720	Correspond with R. Britton re status of settlement (0.5); correspond with Blumberg, PW team re plan supplement documents (0.5).	1.00
McGinnis, Anne	Tax	Counsel	03/16/23	720	Teleconference with Blumberg, PW team, Akin, DPW, BR re emergence checklist.	0.40
Lysikatos Carey, Valentine	Tax	Associate	03/16/23	720	Teleconference with Blumberg, PW, DPW, and creditor teams re emergence checklist.	0.40
Daniele, Salvatore	Corp	Associate	03/16/23	720	Partially attend teleconference with I. Blumberg and Paul Weiss team re emergence checklist.	0.30
Epstein, David	Corp	Counsel	03/16/23	720	Teleconference with I. Blumberg, PW, creditor teams re emergence checklist updates.	0.50
Blain, Hunter	Corp	Associate	03/16/23	720	Teleconference with I. Blumberg, PW, creditor teams re emergence checklist.	0.30
Melvin, Marguerite	Corp	Paralegal	03/16/23	720	Review and e-file the Second Amended Joint Plan of Reorganization (0.2); review and e-file the Notice of Filing of Plan Supplement (0.2); coordinate service of each (0.2).	0.60
Mitchell, Sean A.	Rstr	Partner	03/16/23	720	Teleconference with L. Luo, PW, DPW, counsel to hair straightening claimants re plan issues (1.1); teleconference with counsel to Zurich re plan structure (0.4); correspond with R. Britton, PW team re hair straightening plan revisions (1.5); review and analyze various comments and revisions to plan (2.0); review and analyze supplement documents and comments to same (1.0).	6.00

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Name	Dept	Title	Date	Task	Description	Hours
Page, Alana	Rstr	Associate	03/16/23	720	Conference with I. Blumberg, PW, BR, DPW, and Akin teams re emergence checklist (0.5); conference with T. Axelrod (BR), BR team, and PW team re plan supplement (0.5); revise confirmation brief (0.5); correspond with J. Hossain re confirmation order task (0.3); revise plan (0.5); revise plan supplement notice (0.4); revise retained causes of action exhibit (0.3); correspond with D. Kratzer, DPW, BR, Akin, Proskauer, Osler, Ropes, and WLRK teams re amended plan (0.7); correspond with D. Kratzer and DPW team re plan supplement documents (0.3); correspond with D. Perelman (Revlon) and client team re same (0.3); continue to revise plan supplement (1.6); summarize plan supplement filing for client (0.3); coordinate filing of plan supplement (2.1); draft notice of amended plan (0.3).	8.60
Heasley, Julia	Rstr	Associate	03/16/23	720	Correspond with A. Page and A&M team re disclosure statement objections (0.1); correspond with A. Page, J. Hotes, PW team re as-filed DS, Plan, ROP (0.2); revise emergence checklist (0.6); correspond with I. Blumberg, PW team re same (0.5); correspond with V. Cahill (DPW) re same (0.2); partially attend conference with I. Blumberg, PW, DPW, Akin, and BR teams re plan supplement documents (0.3); correspond with A. Page re compiling plan supplement (0.1); coordinate filing version of same (2.7); revise trust distribution procedures (0.3).	5.00
Luo, Lara	Rstr	Associate	03/16/23	720	Conference with S. Esserman, plaintiffs' counsel re potential hair straightening settlement (0.5); conference with J. Raines (Cohen Ziffer) and Cohen team re same (0.5); conference with Fox Swibel re same (0.3); conference with R. Britton, plaintiffs' counsel, Fox Swibel, DPW re same (1.1); revise plan re hair straightening settlement (2.5); conference with R. Britton re same (0.4); analyze issues re same (2.0); correspond with R. Britton, PW team, Akin, DPW, plaintiffs' counsel, Fox Swibel, BR re same (1.7); analyze proposed plan revisions (0.8); correspond with D. Kratzer (DPW), A. Page, PW team re same (0.9); correspond with J. Heasley, PW team, Kroll team re plan supplement (1.1); prepare filing version of plan (0.6).	12.40

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Britton, Robert	Rstr	Partner	03/16/23	720	Revise plan supplement documents (2.1); correspond with I. Blumberg re same (0.4); revise plan (2.9); conference with L. Luo, plaintiffs' counsel, Fox Swibel, and S. Massman (DPW) re same (1.1); confer with P. Basta re same (0.4); conference with A. Kidd (Revlon) re same (0.9); conference with J. Feltman (WLRK) re same (0.5); correspond with Conflicts Committee re same (0.4); correspond with A. Bernikow re same (0.4); conference with L. Luo re same (0.4); conference with I. Blumberg, PW team, BR, DPW re emergence checklist (0.5); coordinate plan supplement filing (0.4).	10.40
Luskey, Randy	Lit	Partner	03/16/23	720	Correspond with R. Britton, PW restructuring team re plan supplement.	0.30
Heasley, Julia	Rstr	Associate	03/17/23	720	Correspond with B. Mohan, I. Blumberg, and PW team re conversion issues (0.5); revise emergence checklist (0.3); correspond with J. Auslander re ballot question (0.1).	0.90
Luo, Lara	Rstr	Associate	03/17/23	720	Analyze and revise proposed confirmation order comments (0.8); correspond with R. Britton, PW team re same (0.4); analyze voting and solicitation issues (0.6); correspond with S. Perry (Kroll), Kroll team re same (0.4).	2.20
Meredith-Goujon, Claudine K	Corp	Partner	03/17/23	720	Teleconference with J. Braibanti re IP work streams for emergence (0.7); analyze IP issues for emergence (0.3); correspond with S. Rosenthal re IP issues for emergence (0.1); teleconference with D. Shiffman (A&M) re contract issues for emergence (0.5).	1.60
Meredith-Goujon, Claudine K	Corp	Partner	03/17/23	720	Correspond with J. Braibanti, PW Team re entity conversion issues (0.5); correspond with J. Braibanti re same (0.2); correspond with I. Blumberg re same (0.2).	0.90
Cen, Leo	Corp	Associate	03/17/23	720	Teleconference with B. Mohan re entity conversion (0.4); conduct research for entity conversion deck (1.2).	1.60
Britton, Robert	Rstr	Partner	03/17/23	720	Conference with S. Esserman re release issues (0.9); conference with I. Blumberg re closing checklist (0.5); review and revise confirmation brief (2.4); correspond with A. Page re same (0.2); correspond with L. Luo re voting issues (0.2).	4.20
Blumberg, Irene	Rstr	Associate	03/17/23	720	Review and analyze confirmation brief (0.6); correspond with A. Page re same (0.3); correspond with D. Kratzer (DPW) re restructuring expenses (0.4); correspond with A. Page and PW team re same (0.2); conference with R. Britton re closing checklist (0.5).	2.00
Mohan, Bharath	Corp	Associate	03/17/23	720	Analyze steps plan (0.5); correspond with I. Blumberg, PW team re same (0.5); conference with L. Cen re entity conversion (0.4); correspond with same re same (0.1).	1.50

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Name	Dept	Title	Date	Task	Description	Hours
Cen, Leo	Corp	Associate	03/18/23	720	Correspond with B. Mohan re entity conversion deck (0.4); review and revise entity conversion deck (2.1); research re same (1.9).	4.40
Mohan, Bharath	Corp	Associate	03/18/23	720	Revise entity conversion deck (1.0); correspond with L. Cen re same (0.1).	1.10
Mitchell, Sean A.	Rstr	Partner	03/18/23	720	Teleconference with C. Heitzenrater re plan issues (0.4); review and analyze plan issues re same (0.4).	0.80
Luo, Lara	Rstr	Associate	03/18/23	720	Conference with Duane Morris, R. Britton re plan revisions (0.4); analyze issues re same (0.1).	0.50
Eaton, Alice	Rstr	Partner	03/18/23	720	Correspond with Blumberg, PW team re emergence and plan supplements.	0.40
Cen, Leo	Corp	Associate	03/19/23	720	Review and revise entity conversion deck (2.1); correspond with B. Mohan re same (1.0); conference with J. Braibanti and B. Mohan re same (0.4).	3.50
Eaton, Alice	Rstr	Partner	03/19/23	720	Teleconference with R. Britton re insurance settlement update (0.5); correspond with same, PW team re emergence status (0.1).	0.60
Britton, Robert	Rstr	Partner	03/19/23	720	Conference with Eaton re insurance plan issues (0.5); correspond with Luo re release issues (0.2); conference with Kidd re same (0.3); conference with Esserman re release issues (0.5); review and revise opt out notice (0.4); correspond with Luo re same (0.4).	2.30
Luo, Lara	Rstr	Associate	03/19/23	720	Draft hair straightening opt out form (1.2); correspond with R. Britton, Kroll team re same (0.4).	1.60
Blumberg, Irene	Rstr	Associate	03/19/23	720	Teleconference with D. Kratzer (DPW) re restructuring expenses.	0.20
Braibanti, Jill	LEGL	Associate	03/19/23	720	Correspond with L. Cen re entity conversion deck (0.3); review and analyze draft entity conversion deck (0.4); teleconference with B. Mohan and L. Cen re entity conversion deck (0.4); review and analyze IP contracts re conversion and emergence issues (2.0); draft summaries re same (2.1).	5.20
Mohan, Bharath	Corp	Associate	03/19/23	720	Revise conversion deck (0.4); meet with L. Cen regarding deck (1.0); meet with same, J. Braibranti re same (0.4).	1.80
Page, Alana	Rstr	Associate	03/20/23	720	Review and revise confirmation brief (3.8); correspond with I. Blumberg, L. Luo re same (0.6); conference with L. Luo, R. Britton re same (0.3); revise confirmation order (1.7); conference with I. Blumberg, PW team re emergence checklist (0.5); conference with I. Blumberg, PW team, S. Massman (DPW), DPW team, BR team, Akin team re emergence checklist (0.5).	7.40

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Name	Dept	Title	Date	Task	Description	Hours
Heasley, Julia	Rstr	Associate	03/20/23	720	Correspond with I. Blumberg re confirmation order and conversion issues (0.1); research re same (1.5); summarize same (0.4); revise emergence checklist (1.4); correspond with K. Subramanian, I. Blumberg, PW team re same (0.3); teleconference with I. Blumberg and PW team re same (0.5); teleconference with I. Blumberg, PW, DPW, Akin, and BR teams re same (0.5).	4.70
Luo, Lara	Rstr	Associate	03/20/23	720	Conference with Sgro (Kroll) re voting questions (0.1); conference with I. Blumberg, PW team re emergence checklist (0.5); conference with I. Blumberg, PW team, BR, Akin, DPW re emergence checklist (0.5); conference with A. Page, R. Britton re confirmation brief (0.3); revise confirmation brief (2.0); revise confirmation order (1.7); analyze comments to same (0.7); correspond with R. Britton, PW team re brief, order (0.5).	6.30
Cen, Leo	Corp	Associate	03/20/23	720	Conference with B. Mohan re entity conversion deck (0.5); conference with Blumberg, PW team, DPW, BR re emergence checklist (0.5); teleconference with B. Mohan re same (0.6); review and revise entity conversion deck (0.8).	2.40
Britton, Robert	Rstr	Partner	03/20/23	720	Conference with I. Blumberg, PW team re emergence checklist (0.5); conference with I. Blumberg, PW team, Akin, BR, DPW re emergence checklist (0.5); correspond with L. Luo re opt outs (0.5); correspond with plaintiffs' counsel re same (0.5); review and analyze noticing issues (0.5); correspond with L. Luo re voting issues (0.2); conference with A. Page, L. Luo re confirmation brief (0.3).	3.00
Basta, Paul M.	Rstr	Partner	03/20/23	720	Review and analyze Revlon emergence issues.	1.00
Eaton, Alice	Rstr	Partner	03/20/23	720	Correspond with R. Britton re confirmation (0.2); review and analyze voting results (0.2); correspond with L. Luo and I. Blumberg re same (0.1).	0.50
Meredith-Goujon, Claudine K	Corp	Partner	03/20/23	720	Partially attend teleconference with I. Blumberg, PW team, creditors re emergence checklist.	0.40
Daniele, Salvatore	Corp	Associate	03/20/23	720	Teleconference with I. Blumberg, PW, creditor teams re emergence checklist (0.5); correspond with I. Blumberg, Paul, Weiss team, B. Tsepelman, and Davis Polk team re same (0.2).	0.70
Mitchell, Sean A.	Rstr	Partner	03/20/23	720	Review and analyze proposed confirmation order language.	0.30
Braibanti, Jill	LEGL	Associate	03/20/23	720	Teleconference with J. Heasley, PW finance and working group re emergence checklist (0.5); prepare for same (0.1).	0.60
Blain, Hunter	Corp	Associate	03/20/23	720	Teleconference with I. Blumberg, PW, creditor teams re next steps for emergence.	0.50

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de la Bastide, Thomas V	Corp	Partner	03/20/23	720	Conference with I. Blumberg, PW bankruptcy team, creditor groups re status of emergence and exit financing.	0.50
Epstein, David	Corp	Counsel	03/20/23	720	Teleconference with I. Blumberg, PW, creditor teams re emergence checklist.	0.50
Bolin, Brian	Rstr	Partner	03/20/23	720	Correspond with I. Blumberg, PW team re emergence checklist (0.4); teleconference with I. Blumberg, PW, creditor groups re same (0.5).	0.90
Mohan, Bharath	Corp	Associate	03/20/23	720	Revise conversion deck (0.6); conference with L. Cen re same (0.5); conference with L. Cen re emergence items (0.6); correspond with same, PW team re same (0.3).	2.00
Keeton, Douglas	Rstr	Associate	03/20/23	720	Attend emergence checklist call with Blumberg, PW and DPW teams.	0.50
Blumberg, Irene	Rstr	Associate	03/20/23	720	Review and comment on confirmation order (3.6); correspond with L. Luo, A. Page re same (0.5); coordinate emergence checklist call (0.2); prepare for same (0.8); revise checklist (0.5); correspond with J. Heasley re same (0.2); conference with J. Heasley, PW team re emergence (0.5); conference with J. Heasley, DPW, Akin, BR teams re same (0.5); revise notes re same (0.4); correspond with A. Page, Kroll re voting report (0.2); review and analyze same (0.4).	7.80
Blumberg, Irene	Rstr	Associate	03/20/23	720	Review and analyze entity conversion/contract analysis deck (0.5); correspond with J. Heasley re same (0.3); review and revise bullets re same (0.5); review and analyze summary re APAs (0.3); correspond with A. Page re same (0.2).	1.80
Braibanti, Jill	LEGL	Associate	03/20/23	720	Correspond with B. Mohan re draft entity conversion deck (0.2); review and analyze IP contracts re conversion and emergence issues (4.0); draft summaries re same (2.7).	6.90
Heasley, Julia	Rstr	Associate	03/21/23	720	Correspond with claimant re inquiry about plan, claim, and notice of rejection (0.1); research re confirmation and contractual provision issues (1.0); correspond with R. Britton, I. Blumberg re same (0.2).	1.30
Britton, Robert	Rstr	Partner	03/21/23	720	Analyze voting results (0.6); correspond with B. Silverberg (BR) re same (0.4); conference with S. Massman (DPW) re same (0.4); correspond with I. Blumberg re closing issues (0.4); correspond with A. Page re plan language (0.3); review and revise same (0.7); analyze noticing issues (0.3); correspond with L. Luo re same (0.2).	3.30
Luo, Lara	Rstr	Associate	03/21/23	720	Revise confirmation order (4.3); review and analyze precedent re same (2.0); correspond with A. Page, PW team re confirmation order and plan comments (1.1); revise and analyze plan comments (0.5).	7.90
Meredith-Goujon, Claudine K	Corp	Partner	03/21/23	720	Correspond with J. Braibanti re conversion issues.	0.10

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Braibanti, Jill	LEGL	Associate	03/21/23	720	Review and analyze updated entity conversion deck (0.3); correspond with I. Blumberg and B. Mohan re statutory conversion slides in entity conversion deck (0.3); correspond with B. Mohan on Florida conversions (0.4).	1.00
Page, Alana	Rstr	Associate	03/21/23	720	Correspond with I. Blumberg and L. Luo re confirmation order (0.2); revise confirmation brief (2.3); review and analyze stakeholder confirmation order language requests (2.2); revise confirmation order comments tracker (0.1); correspond with A. Kidd (Revlon) re stakeholder language for confirmation order (0.3).	5.10
Blumberg, Irene	Rstr	Associate	03/21/23	720	Correspond with A. Page re voting report (0.2); analyze same (0.5); correspond with L. Luo, A. Page re confirmation order (0.4); review and analyze stakeholder requests re confirmation (0.5); correspond with A. Page re same (0.2).	1.80
Basta, Paul M.	Rstr	Partner	03/21/23	720	Prepare for Revlon confirmation hearing.	3.00
Mohan, Bharath	Corp	Associate	03/21/23	720	Teleconference with L. Cen re emergence.	0.80
Cen, Leo	Corp	Associate	03/21/23	720	Review and revise emergence checklist (1.4); teleconference with B. Mohan re emergence (0.8).	2.20
Luo, Lara	Rstr	Associate	03/21/23	720	Conference with D. Keeton, Kroll team re DIP/ERO funding.	0.50
Mohan, Bharath	Corp	Associate	03/21/23	720	Correspond with A. McGinnis re structure (0.3); correspond with J. Braibanti and L. Cen re same (0.2), review and revise illustrative step plan (0.7), revise conversion deck (0.5).	1.70
Ammari, Kamil R.	Lit	Associate	03/22/23	720	Review and analyze objection from Old Dominion Freight Line (0.1); correspond with I. Blumberg and PW team re voting update (0.1).	0.20
Cen, Leo	Corp	Associate	03/22/23	720	Teleconference with B. Mohan re emergence checklist and entity conversion deck (1.5); revise emergence checklist and entity conversion deck (0.8); review and revise issues list (0.1).	2.40
Luo, Lara	Rstr	Associate	03/22/23	720	Conference with CSG re proposed confirmation order language (0.3); conference with J. Raines (Cohen Ziffer) re plan assumption issues (0.3); review and revise proposed confirmation order comments from counterparties (2.1); correspond with A. Page, PW team, various parties in interest re same (1.5); analyze issues re same (0.6); revise confirmation order (2.9); analyze precedent confirmation orders (1.9).	9.60
Britton, Robert	Rstr	Partner	03/22/23	720	Revise confirmation order (1.9); correspond with A. Page re same (0.4); correspond with L. Luo re voting issues (0.5); analyze same (0.4); meet with P. Basta and A. Eaton re confirmation hearing (0.5); analyze confirmation issues (0.3).	4.00

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Name	Dept	Title	Date	Task	Description	Hours
Heasley, Julia	Rstr	Associate	03/22/23	720	Research re plan provision on releases (0.3); correspond with creditor re inquiry re same (0.3); research re effects of confirmation (0.4); correspond with I. Blumberg, PW team re same (0.1); conference with A. Page re confirmation declarations (0.2); draft same (0.9).	2.20
Rahnama, Omid	Rstr	Associate	03/22/23	720	Correspond with chambers re plan confirmation matters (0.2); correspond with I. Blumberg and R. Britton re plan confirmation objection (0.2); conference with counsel to plan objector re same (0.3).	0.70
Basta, Paul M.	Rstr	Partner	03/22/23	720	Prepare for confirmation hearing (1.0); meet with R. Britton re same (0.5).	1.50
Eaton, Alice	Rstr	Partner	03/22/23	720	Review and revise confirmation brief (1.5); meet with P. Basta, R. Britton re confirmation hearing (0.5).	2.00
Mohan, Bharath	Corp	Associate	03/22/23	720	Conference with L. Cen re conversion deck, APA, and other M&A items (1.5); revise same (1.4).	2.90
Heasley, Julia	Rstr	Associate	03/22/23	720	Correspond with R. Britton re conversion summary (0.1); correspond with B. Mohan, C. Len re conversion bullets and emergence checklist (0.4); correspond with I. Blumberg, L. Luo re same (0.1).	0.60
Blumberg, Irene	Rstr	Associate	03/22/23	720	Review and revise entity conversion bullets (0.7); correspond with J. Heasley re same (0.5); correspond with B. Mohan re same (0.2); correspond with C. Goujon re same (0.2).	1.60
Braibanti, Jill	LEGL	Associate	03/22/23	720	Correspond with A. McGinnis re conversions and BrandCo licensing arrangements (0.2); correspond with B. Mohan and I. Blumberg re entity conversion deck revisions (0.2); correspond with A. Page re confirmation order IP language (0.2).	0.60
Meredith-Goujon, Claudine K	Corp	Partner	03/22/23	720	Review and analyze issues related to conversion of certain Revlon entities (0.2); review and analyze conversion analysis under IP licenses and M&A summary of applicable state law (1.1); review and analyze IP issues in revised deck (0.2); correspond with J. Braibanti re same (0.2).	1.70

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Name	Dept	Title	Date	Task	Description	Hours
Page, Alana	Rstr	Associate	03/22/23	720	Correspond with various stakeholders re comments to confirmation order (2.4); correspond with R. Britton, S. Mitchell, and PW team re same (0.2); review and analyze DPW comments to stakeholder confirmation order language (0.5); correspond with P. Gross (Lowenstein) re BMS confirmation order comments (0.2); teleconference with A. Sun (AUSA) re confirmation order language (0.3); teleconference with C. Searcy (Texas AG) re confirmation order language (0.2); conference with J. Heasley re confirmation declarations (0.2); correspond with D. Rosner (Goulston) re landlord confirmation order comments (0.3); review and analyze same (0.4); teleconference with D. Kratzer (DPW) re stakeholder confirmation comments (0.3); revise confirmation order (3.3); correspond with A. Kidd (Revlon) re confirmation order informal comments (0.2).	8.50
Blumberg, Irene	Rstr	Associate	03/22/23	720	Correspond with L. Luo re insider voting (0.3); review and analyze UST plan objections (2.3); correspond with R. Britton, A. McGinnis re intercompany cleanup under plan (0.5).	3.10
Cen, Leo	Corp	Associate	03/23/23	720	Teleconference with B. Mohan re APA, emergence checklist, and entity conversion deck (1.1); teleconference with I. Blumberg, PW team, DPW, BR re emergence checklist (0.3); review and revise APA (0.3); review and revise emergence checklist and entity conversion deck (2.1).	3.80
Luo, Lara	Rstr	Associate	03/23/23	720	Conference with R. Britton and S. Massman re Chubb plan comments (0.5); review and revise proposed plan comments (2.0); review and revise proposed confirmation order comments (1.1); correspond with A. Page, PW team, and counterparties re same (1.0); correspond with R. Britton and PW team re voting tabulation (0.9); analyze issues re same (0.4); revise voting declaration (2.2).	8.10
Heasley, Julia	Rstr	Associate	03/23/23	720	Correspond with A. Page re confirmation declaration (0.2); draft same (1.2); review and analyze same (0.3); revise emergence checklist (1.2); correspond with I. Blumberg, PW team, DPW team, and creditor groups re same (0.1); review and analyze entity conversion tracker (0.4); conduct research re same (0.8); correspond with I. Blumberg re same (0.1); correspond with I. Blumberg and J. Braibanti re same (0.2); conference with I. Blumberg, PW team, DPW team, and creditor groups re emergence checklist (0.5); correspond with K. Subramanian, V. Cahill (DPW), and PW team re coordinating emergence conversion issues teleconferences (0.3); update plan objection tracker (0.1).	5.40

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Name	Dept	Title	Date	Task	Description	Hours
Britton, Robert	Rstr	Partner	03/23/23	720	Review and analyze plan objections (0.8); negotiate plan language with objecting parties (2.8); conference with L. Luo and S. Massman re Chubb plan comments (0.5); correspond with L. Luo re same (0.4); confer with I. Blumberg re same (0.5); revise confirmation order (3.1); correspond with A. Page re same (0.2); review and analyze Kroll declaration (0.5); conference with L. Luo re same (0.4).	9.20
Baham, Sam	Rstr	Associate	03/23/23	720	Correspond with A. Page re indenture trustee's requested plan language.	0.20
Melvin, Marguerite	Corp	Paralegal	03/23/23	720	Review and analyze Initial Voting Declaration (0.3); e-file same (0.3); correspond with A. Page re same (0.3); coordinate service of same (0.1).	1.00
Page, Alana	Rstr	Associate	03/23/23	720	Conference with I. Blumberg, PW, DPW, Akin, and BR teams re emergence checklist (0.5); revise informal comment tracker for confirmation order (0.4); correspond with A. Sun (AUSA), M. Myers (Ballard), and other stakeholders re informal comments to confirmation order (0.3); correspond with landlord re confirmation order language (0.3); coordinate objection deadline extensions (0.4); review and analyze stakeholder informal comments to confirmation order (2.8); draft R. Caruso's declaration (3.7); correspond with K. Zuzolo, Akin, DPW, and BR teams re informal stakeholder comments to confirmation order (0.3); conduct legal research re confirmation declarations (0.5); prepare summary of objections and informal comments for R. Britton and PW team (0.3); review and analyze unsecured notes trustee objection (0.3); correspond with C. Whitmore (Maslon) re same (0.1); review and revise S. Zelin's declaration (0.8); correspond with A. Kidd (Revlon) re stakeholder confirmation order comments (0.2).	10.90
Page, Alana	Rstr	Associate	03/23/23	720	Coordinate filing of voting declaration.	0.40
Basta, Paul M.	Rstr	Partner	03/23/23	720	Teleconference with I. Blumberg, PW team re emergence (0.5); review and analyze emergence documentation (0.1).	0.60
Keeton, Douglas	Rstr	Associate	03/23/23	720	Teleconference with I. Blumberg, PW team re emergence checklist.	0.50

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Name	Dept	Title	Date	Task	Description	Hours
Blumberg, Irene	Rstr	Associate	03/23/23	720	Review and analyze voting report (0.6); correspond with R. Britton, L. Luo re same (0.4); correspond with M. Sidorenkov re same (0.2); correspond with A. Page re confirmation order comments and deadline extensions (0.4); correspond with R. Britton re intercompany emergence issues (0.3); analyze issues re same (0.7); analyze issues re emergence (1.2); review checklist (0.6); correspond with J. Heasley re same (0.3); attend checklist call with J. Heasley, PW, Akin, BR, DPW teams (0.5); revise notes re same (0.2); review and analyze plan/cure objections (1.6); correspond with L. Luo re voting report (0.2).	7.20
Kavarsky, Gary	Corp	Associate	03/23/23	720	Teleconference with I. Blumberg, PW team and stakeholder counsel re emergence (0.5); prepare for same (0.2).	0.70
Braibanti, Jill	LEGL	Associate	03/23/23	720	Teleconference with I. Blumberg, PW, creditor groups re emergence checklist.	0.50
Eaton, Alice	Rstr	Partner	03/23/23	720	Correspond with R. Britton, PW team re confirmation standards.	0.40
Mohan, Bharath	Corp	Associate	03/23/23	720	Conduct legal research for conversion issues (0.9); teleconference with L. Cen re APA, emergence checklist, and entity conversion deck (1.1); teleconference with I. Blumberg, PW team re emergence checklist (0.5); correspond with I. Blumberg re same (0.2); correspond with L. Cen re same (0.4); correspond with S. Stasny regarding M&A updates and workstream status (0.3); review and analyze Array APA (0.1).	3.50
Braibanti, Jill	LEGL	Associate	03/23/23	720	Teleconference with C. Meredith-Goujon re IP workstreams for new credit facilities and conversion deck (0.4); draft comments to entity conversion deck (0.4); update IP contract summary chart (0.4); correspond with B. Mohan re entity conversion deck comments (0.1).	1.30
Heasley, Julia	Rstr	Associate	03/24/23	720	Correspond with V. Cahill (DPW) and PW team re emergence checklist calls (0.2); revise draft confirmation declaration (0.9); correspond with L. Luo re same (0.2); correspond with L. Luo and DPW team re status of objection deadline extensions (0.2); correspond with H. Zhang re DS transcript (0.1).	1.60
Britton, Robert	Rstr	Partner	03/24/23	720	Conference with A. Page, P. Gross (Lowenstein), Lowenstein team re settlement issues (0.5); conference with L. Luo, Duane Morris team re same (0.5); conference with A. Gover re plan confirmation (0.3); revise confirmation order (1.0); conference with L. Luo, A. Page re same (0.5); correspond with I. Blumberg and PW team re creditor input on plan (0.2).	3.00
Britton, Robert	Rstr	Partner	03/24/23	720	Conference with A. Kidd, P. Basta re emergence status and next steps.	0.40

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Name	Dept	Title	Date	Task	Description	Hours
Luo, Lara	Rstr	Associate	03/24/23	720	Conference with R. Britton and Duane Morris team re plan comments (0.5); conference with A. Page and R. Britton re confirmation order (0.5); review and analyze proposed confirmation order comments (1.4); analyze and revise proposed plan comments (1.6); correspond with A. Page and PW team re plan and confirmation order (0.9); revise S. Zelin's declaration (1.1); analyze precedent re same (0.6); correspond with J. Heasley re same (0.3).	6.90
Eaton, Alice	Rstr	Partner	03/24/23	720	Correspond with A. Page and R. Britton re confirmation (0.3); review and analyze confirmation objections (0.5).	0.80
Mohan, Bharath	Corp	Associate	03/24/23	720	Conference with L. Cen re entity conversion deck (1.9); revise conversion deck (0.7).	2.60
Cen, Leo	Corp	Associate	03/24/23	720	Conduct legal research re entity conversion deck (1.5); revise same (0.7); correspond with Mohan, PW team re same (0.8); teleconference with B. Mohan re entity conversion deck (1.9).	4.90
Blumberg, Irene	Rstr	Associate	03/24/23	720	Correspond with A. Page, PW team re confirmation pleadings (1.3); review brief in light of UST objections (1.4); correspond with J. Hurwitz re restructuring expenses (0.2); correspond with J. Heasley, PW team re plan supplement (0.8); review and comment on objections tracker (0.6); correspond with B. Silverberg, Kröll re ballot inquiries (0.5); review and revise Caruso declaration (3.9); correspond with A. Page re same (0.3); teleconference with BMS counsel and R. Britton, PW team re confirmation order comments (0.5); revise notes re same (0.2).	9.70
Page, Alana	Rstr	Associate	03/24/23	720	Correspond with D. Rosner (Goulston) re landlord plan comments (0.2); review and analyze same (0.3); conference with P. Gross (Lowenstein), R. Britton, and PW team re BMS confirmation order comments (0.5); revise informal confirmation order comments tracker (0.3); summarize same for L. Luo and PW team (0.2); correspond with D. Kratzer (DPW) re information confirmation order comments (0.3); review and analyze BMS confirmation order comments (0.3); review and analyze confirmation order comments from various stakeholders (1.5); teleconference with J. Weichselbaum (LW) re voting results (0.2); teleconference with F. Zepeda (A&M) re objections to confirmation (0.3); correspond with A. Kidd re landlord confirmation order language (0.2); coordinate objection deadline extensions (0.6); revise confirmation order (2.5); correspond with B. Silverberg re BMS reservation of rights (0.2); continue to revise confirmation order (0.6); teleconference with R. Britton and L. Luo re confirmation order (0.5); revise R. Caruso's declaration (1.4).	10.10

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Name	Dept	Title	Date	Task	Description	Hours
Basta, Paul M.	Rstr	Partner	03/24/23	720	Teleconference with R. Britton, A. Kidd re emergence status and next steps (0.4); review and analyze emergence checklist (1.6).	2.00
Rahnama, Omid	Rstr	Associate	03/24/23	720	Correspond with L. Calderon (chambers) re plan confirmation hearing (0.1); teleconference with L. Calderon re plan confirmation (0.3).	0.40
Braibanti, Jill	LEGL	Associate	03/24/23	720	Review and analyze revised net sales by brand chart from A&M and related materials from G. Fragosso (A&M) (0.4); correspond with A&M re net sales by brand chart (0.3); correspond with I. Blumberg, J. Heasley and B. Mohan re finalizing entity conversion deck (2.8); review and analyze Kroll's notices list re IP license parties for conversion analysis (0.2); correspond with D. Shiffman (A&M) re additional contracts for conversion issues review (0.1); draft additional comments on entity conversion deck (0.2).	4.00
Heasley, Julia	Rstr	Associate	03/24/23	720	Review and analyze master service list re notice to counterparties for conversion review (0.5); correspond with I. Blumberg and Kroll team re same (0.2); correspond with I. Blumberg, J. Braibanti, and PW team re conversion analysis deck (0.6); review and analyze confirmation language and case law for conversion issues (0.4); draft and revise bullets re same (0.8).	2.50
Meredith-Goujon, Claudine K	Corp	Partner	03/24/23	720	Review and analyze materials for conversion summary (0.6); review and analyze conversion analysis deck (0.4); correspond with client re conversion summary (0.4).	1.40
Meredith-Goujon, Claudine K	Corp	Partner	03/25/23	720	Correspond with D. Walsh (Revlon) and S. Rosenthal (Revlon) re entity conversion analysis.	0.30
Heasley, Julia	Rstr	Associate	03/25/23	720	Conduct research re precedent valuation declarations (0.9); review and analyze same (1.1); correspond with L. Luo re same (0.1); correspond with L. Luo, PW, and PJT teams re same (0.4); draft notice of amended plan supplement (0.8).	3.30
Cen, Leo	Corp	Associate	03/25/23	720	Correspond with Mohan, PW team re emergence issues.	0.10
Luo, Lara	Rstr	Associate	03/25/23	720	Revise S. Zelin's declaration (0.5); analyze precedent re same (0.3); conference with R. Britton re same (0.2); correspond with J. Heasley re same (0.2).	1.20
Blumberg, Irene	Rstr	Associate	03/25/23	720	Review R. Britton comments to Caruso declaration (0.6); correspond with A. Page re same (0.4); review and analyze draft Caruso declaration (1.3); review and analyze draft confirmation brief (3.1); correspond with A. Page re same (0.4); correspond with A. Page re responses to UST objections (0.3).	6.10
Melvin, Marguerite	Corp	Paralegal	03/25/23	720	Obtain, download, save, and circulate the Plan, DS, and Restructuring Steps from two precedent chapter 11 cases to PW bankruptcy team.	1.80

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Name	Dept	Title	Date	Task	Description	Hours
Britton, Robert	Rstr	Partner	03/25/23	720	Revise confirmation order (0.8); revise confirmation declarations (0.9); conference with L. Luo re same (0.2); correspond with I. Blumberg re transaction steps (0.3); revise confirmation brief (0.5).	2.70
Page, Alana	Rstr	Associate	03/25/23	720	Correspond with D. Shiffman (A&M) re landlord guaranty (0.3); correspond with V. Cahill (DPW) re same (0.2); correspond with B. Silverberg, BR team, and Akin team re same (0.2).	0.70
Page, Alana	Rstr	Associate	03/25/23	720	Revise R. Caruso's declaration (2.6); correspond with I. Blumberg and R. Britton re same (0.3); correspond with R. Caruso re same (0.1); correspond with DPW team re confirmation order (0.2); revise confirmation brief (2.8); conduct legal research re same (0.8); review and analyze objections to confirmation (1.0).	7.80
Page, Alana	Rstr	Associate	03/26/23	720	Revise confirmation brief (1.4); conduct legal research re exculpation provisions in precedent plans (0.8); correspond with R. Britton re confirmation brief (0.2); prepare summary of objections for A&M team (0.2).	2.60
Britton, Robert	Rstr	Partner	03/26/23	720	Correspond with S. Massman re voting (0.2); review and analyze revised confirmation brief (0.6); correspond with A. Page re same (0.2).	1.00
Heasley, Julia	Rstr	Associate	03/26/23	720	Draft confirmation objection tracker.	0.20
Luo, Lara	Rstr	Associate	03/26/23	720	Correspond with A. Page and PW team re confirmation issues and workstreams.	0.40
Cen, Leo	Corp	Associate	03/26/23	720	Correspond with Mohan, PW team re emergence.	0.10
Blumberg, Irene	Rstr	Associate	03/26/23	720	Correspond with A. Page re confirmation brief (0.6); correspond with B. Mohan re emergence/plan supplement issues (0.2).	0.80
Mohan, Bharath	Corp	Associate	03/26/23	720	Correspond with I. Blumberg, PW team re emergence items.	0.70
Paterson, Paul	Lit	Counsel	03/27/23	720	Review and comment on draft Zelin declaration (0.7); correspond with Heasley, PW team re same (0.1).	0.80
Heasley, Julia	Rstr	Associate	03/27/23	720	Revise confirmation objections tracker (0.4); draft correspondence to Chambers re extension of deadlines for objections to plan (0.2); correspond with I. Blumberg and PW team re confirmation checklist (0.5); revise S. Zelin's declaration per P. Paterson's comments (0.8); correspond with L. Luo, PW, and PJT teams re same (0.3); review and analyze DPW comments to emergence checklist (0.1); revise same (0.7); draft notice of plan supplement (0.6).	3.60
Britton, Robert	Rstr	Partner	03/27/23	720	Correspond with A. Page re confirmation order (0.4); review and analyze revisions to same (0.7).	1.10
Eaton, Alice	Rstr	Partner	03/27/23	720	Correspond with Page, PW team re confirmation declarations and comments.	0.30

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Name	Dept	Title	Date	Task	Description	Hours
Page, Alana	Rstr	Associate	03/27/23	720	Revise objection/comment tracker (0.4); coordinate plan objection deadline extensions (0.3); distribute confirmation order to Akin and BR teams (0.2); review and analyze confirmation order comments from stakeholders (0.6); review and analyze R. Caruso's comments to declaration (0.5); teleconference with B. Shack Sackler re confirmation brief cite check (0.4); confer with D. Epstein re finance comments to confirmation order (0.2); compile and summarize objections for R. Caruso (0.3); coordinate R. Caruso's hearing preparation meeting (0.2); revise R. Caruso's declaration (1.2); correspond with B. Shack Sackler re confirmation brief (0.1).	4.40
Melvin, Marguerite	Corp	Paralegal	03/27/23	720	Conduct research to locate additional precedent plan supplement re transaction/restructuring steps.	0.50
Ammari, Kamil R.	Lit	Associate	03/27/23	720	Correspond with I. Blumberg and team re additional confirmation brief workstreams.	0.10
Britton, Robert	Rstr	Partner	03/27/23	720	Conference with A. Kidd re status of confirmation and next steps (0.6); correspond with L. Luo re same (0.3).	0.90
Shack Sackler, Benjamin	Lit	Associate	03/27/23	720	Correspond with A. Page and PW team re confirmation brief cite check (0.1); teleconference with A. Page re same (0.4); cite check confirmation brief (2.5).	3.00
Luo, Lara	Rstr	Associate	03/27/23	720	Revise Zelin declaration (0.6); correspond with Heasley re same (0.3); revise plan (1.0); correspond with Page, PW team re same (0.2); correspond with Epstein re plan revisions (0.1); correspond with Britton re same (0.2); analyze and revise proposed confirmation order comments (1.5); correspond with Page, PW team, Revlon, DPW, Akin, BR re same (0.7); correspond with hair straightening plaintiffs, Chubb counsel, DPW re proposed plan revisions (0.6); analyze and revise proposed plan comments (1.1).	6.30
Keeton, Douglas	Rstr	Associate	03/27/23	720	Conference with I. Blumberg, PW, DPW, Akin, and BR teams re emergence checklist.	0.40
Blumberg, Irene	Rstr	Associate	03/27/23	720	Review objection/response tracker to analyze outstanding issues (1.2); correspond with L. Luo, A. Page, J. Heasley re same (0.6); review and analyze outstanding items ahead of confirmation (1.4); correspond with stakeholders re same (0.7); review and comment on revised brief (1.0); correspond with A. Page re same (0.4); coordinate chambers communications (0.5); correspond with A. Page re confirmation documents (0.7); correspond with M. Ferrari re plan supplement filing (0.2); review revised confirmation order (0.5).	7.20

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Name	Dept	Title	Date	Task	Description	Hours
Heasley, Julia	Rstr	Associate	03/28/23	720	Correspond with I. Blumberg and PW team re emergence checklist (0.2); revise same (0.3); correspond with V. Cahill (DPW), PW, DPW, and creditor teams re same (0.1); confer with A. Page re confirmation declarations (0.4); correspond with J. Hossain re confirmation agenda (0.1); correspond with A. Page, PW, and PJT teams re scheduling S. Zelin's hearing preparation (0.1); revise plan supplement (1.1); teleconference with I. Blumberg, PW, and creditor teams re emergence checklist (0.5); correspond with B. Shack Sackler and A. Page re confirmation brief (0.1); correspond with A. Page and PW team re plan supplement and confirmation agenda (0.6); review and analyze precedents re same (0.2).	3.70
Paterson, Paul	Lit	Counsel	03/28/23	720	Review and comment on draft affidavits for confirmation (2.3); correspond with W. Clareman, R. Britton and team re witness preps for confirmation hearing (0.1).	2.40
Blumberg, Irene	Rstr	Associate	03/28/23	720	Correspond with A. Page re confirmation documents (0.6); review and revise emergence checklist (1.2); analyze issues re same (0.6); correspond with A. McGinnis, B. Mohan, D. Epstein re same (0.4); conference with same and PW, DPW, Akin, BR teams re same (0.5); revise emergence coordination notes (0.7); review revised Caruso declaration (0.7); correspond with A. Page re same (0.5); revise objection tracker (0.7); review plan supplement documents (0.6); review notice for same (0.5); correspond with DPW re confirmation press release (0.2); analyze issues re plan supplement filing (1.1); coordinate same (0.8).	9.10
Basta, Paul M.	Rstr	Partner	03/28/23	720	Review and analyze confirmation documents (2.4); correspond with R. Britton re same (0.3).	2.70
Rahnama, Omid	Rstr	Associate	03/28/23	720	Teleconference with A. Stitzer (vendor's counsel) re plan confirmation order (0.1); correspond with A. Stitzer and I. Blumberg re same (0.3); teleconference with B. Englander (vendor's counsel) re plan confirmation matters (0.3).	0.70
Lysikatos Carey, Valentine	Tax	Associate	03/28/23	720	Teleconference with I. Blumberg, PW, creditors team re closing checklist.	0.50
McGinnis, Anne	Tax	Counsel	03/28/23	720	Teleconference with I. Blumberg, PW team re emergence checklist.	0.50
Epstein, David	Corp	Counsel	03/28/23	720	Teleconference with I. Blumberg, PW, creditor groups re emergence checklist.	0.50

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Name	Dept	Title	Date	Task	Description	Hours
Britton, Robert	Rstr	Partner	03/28/23	720	Revise confirmation order (1.1); review and analyze objections to plan and cure (0.6); correspond with R. Caruso (A&M) re confirmation order (0.2); teleconference with I. Blumberg, PW team, Akin, BR, and DPW teams re closing checklist (0.5); revise Kroll team's declaration (0.6); revise R. Caruso's declaration (0.3); revise S. Zelin's declaration (0.2); conference with L. Luo, insurers' counsel, plaintiffs' counsel re plan issues (0.7); review and analyze plan supplement (0.5); correspond with A. Page re plan supplement (0.2); correspond with I. Blumberg re same (0.2).	5.10
Meredith-Goujon, Claudine K	Corp	Partner	03/28/23	720	Partially attend teleconference with I. Blumberg, PW, creditor teams re emergence checklist.	0.20
Shack Sackler, Benjamin	Lit	Associate	03/28/23	720	Cite check confirmation brief (1.4); correspond with A. Page re cite check of confirmation brief (0.3).	1.70
Cen, Leo	Corp	Associate	03/28/23	720	Correspond with Massman, DPW re emergence (0.2); conference with Blumberg, PW team re Revlon emergence checklist (0.5).	0.70
Eaton, Alice	Rstr	Partner	03/28/23	720	Conference with I. Blumberg, PW team, creditors re emergence checklist (0.5); correspond with R. Britton, I. Blumberg re confirmation preparation (0.2).	0.70
Luo, Lara	Rstr	Associate	03/28/23	720	Conference with Britton, plaintiffs' counsel, insurers counsel re plan language (0.7); conference with Blumberg, Akin, BR, DPW re emergence checklist (0.5); revise plan (2.8); analyze issues re same (1.9); correspond with DPW, BR, Akin, plaintiffs counsel, insurers counsel re same (0.9).	6.80

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Name	Dept	Title	Date	Task	Description	Hours
Page, Alana	Rstr	Associate	03/28/23	720	Teleconference with I. Blumberg, PW, DPW, and Akin teams re emergence items (0.5); correspond with W. Clareman re R. Caruso's declaration (0.4); review and analyze comments to same (0.4); review and comment on P. Aronzon's declaration (0.3); review and analyze stakeholder's confirmation order comments (0.5); conduct research re exculpation issues (0.5); correspond with H. Zhang, DPW, Akin, and BR teams re confirmation order (0.3); coordinate extensions of objection deadlines (0.3); review and analyze confirmation comments/objection tracker (0.4); analyze restructuring expenses under plan (0.3); revise R. Caruso's declaration (1.4); correspond with K. Zuzolo, Akin team, and BR team re confirmation brief (0.3); revise confirmation order (0.8); review and comment on notice of plan supplement (0.5); correspond with B. Shack Sackler re confirmation brief (0.2); correspond with R. Britton re confirmation order and outstanding objections (0.2); correspond with B. Mohan re plan supplement filing (0.2); correspond with A. Kidd (Revlon) and R. Britton re same (0.2); compile plan supplement documents (0.4); prepare summary of plan supplement filing for Company (0.2); distribute summary and documents to Company (0.1); review and analyze P. Aronzon's declaration (0.5).	8.90
Braibanti, Jill	LEGL	Associate	03/28/23	720	Teleconference with I. Blumberg, PW, creditor teams re emergence checklist.	0.50
Heasley, Julia	Rstr	Associate	03/29/23	720	Teleconference with A. Page and B. Shack Sackler re UCC member fee research for confirmation brief (0.6); prepare filing version of plan supplement (1.4); correspond with I. Blumberg and PW team re same (0.2); organize filing versions of same (0.8); cite check confirmation brief (1.1); revise S. Zelin's confirmation declaration (0.8); revise emergence checklist (0.5); review and analyze confirmation hearing agenda for inclusion of all pleadings (0.3).	5.70
Shack Sackler, Benjamin	Lit	Associate	03/29/23	720	Conference with A. Page and J. Heasley re UCC fee research for confirmation brief (0.6); research re same (5.8); correspond with A. Page and PW team re confirmation brief cite check and research (0.5); correspond with R. Poston re confirmation brief cite check (0.1); cite check confirmation brief (1.0).	8.00
Poston, RaCia D	Lit	Associate	03/29/23	720	Correspond with B. Shack Sackler re confirmation brief.	0.20

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Name	Dept	Title	Date	Task	Description	Hours
Britton, Robert	Rstr	Partner	03/29/23	720	Conference with L. Luo, PW, DPW, Duane Morris re insurance issues (0.5); conference with S. Massman (DPW) and DPW team re same (0.9); conference with A. Kidd (Revlon) re same (0.8); conference with L. Luo, plaintiffs' counsel re same (0.8); correspond with L. Luo re same (0.3); teleconference with S. Esserman (SBEP) re same (1.3); revise plan language re insurance issues (3.0); correspond with P. Basta re same (0.4); correspond with Cohen Ziffer team re same (0.3).	8.30
Page, Alana	Rstr	Associate	03/29/23	720	Prepare binders of confirmation pleadings (0.5); revise agenda for confirmation hearing (0.6).	1.10
Eaton, Alice	Rstr	Partner	03/29/23	720	Review and analyze confirmation order (1.0); correspond with A. Page, L. Luo and R. Britton re preparation for confirmation (0.4).	1.40
Baham, Sam	Rstr	Associate	03/29/23	720	Correspond with B. Shack Sackler, PW team re research re payment of UCC fees in plan.	0.20
Rahnama, Omid	Rstr	Associate	03/29/23	720	Correspond with I. Blumberg and A Page re confirmation objection (0.1); correspond with Old Dominion counsel re same (0.2); correspond with R. Britton re confirmation order (0.2); review and revise confirmation order in connection with vendor deposits (0.4); correspond with A. Page re confirmation (0.1)	1.00
Page, Alana	Rstr	Associate	03/29/23	720	Conference with B. Shack Sackler, J. Heasley re research for confirmation brief (0.6); correspond with stakeholders re confirmation order (0.7); revise confirmation order comment tracker (0.5); revise confirmation order (0.5); correspond with W. Clareman and PW team re declarations of P. Aronzon and R. Caruso (0.3); prepare combined tracker with cure objections (0.5); review and analyze research prepared by B. Shack Sackler for confirmation brief (0.6); conduct legal research re plan release provisions (3.7); revise plan (0.2); correspond with H. Zhang and DPW team re UST objection to third-party releases (0.2); revise confirmation order (1.8); review and analyze DPW comments to same (0.7); review and analyze US Bank comments to confirmation order (0.3); correspond with H. Zhang and DPW team re same (0.2); review and analyze BMS team's comments to confirmation order (0.3); correspond with M. Volin, Proskauer team, WLRK team, Osler team, and Ropes team re confirmation documents (0.3); revise confirmation order (1.4).	12.80
Luo, Lara	Rstr	Associate	03/29/23	720	Conference with R. Britton, PW, DPW, Duane Morris re Chubb comments to plan (0.5); conference with R. Britton, plaintiffs' counsel re same (0.8); conference with Kidd (Revlon), Britton re same (0.8); revise plan (3.4); analyze issues re same (2.1); revise confirmation order (1.1).	8.70

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Name	Dept	Title	Date	Task	Description	Hours
Hossain, Julia	Rstr	Paralegal	03/29/23	720	File second plan supplement (0.3); coordinate service of same (0.1); file solicitation voting report (0.3).	0.70
Basta, Paul M.	Rstr	Partner	03/29/23	720	Review and analyze plan, confirmation materials in preparation for confirmation hearing.	2.00
Blumberg, Irene	Rstr	Associate	03/29/23	720	Coordinate plan supplement filing (0.9); correspond with A. Page, J. Heasley re binders for chambers (0.5); review same (1.1); correspond with A. Page re confirmation documents (0.8); review and revise objection trackers (1.3); correspond with J. Hotes, PW securities and M&A teams re plan supplement documents (0.9); review DPW comments to confirmation order (1.1); review and analyze revised trust documents (0.9); correspond with A. McGinnis, PW tax team re same (0.2); review and revise confirmation hearing agenda (0.5); correspond with R. Britton re same (0.2).	8.40
Poston, RaCia D	Lit	Associate	03/30/23	720	Review and revise confirmation brief (9.0); correspond with B. Shack Sackler re same (0.3).	9.30
Paterson, Paul	Lit	Counsel	03/30/23	720	Review and analyze P. Aronzon and S. Zelin declarations (1.4); correspond with Blumberg, PW team re same (0.2); correspond with W. Clareman re witness preparation (0.2).	1.80
Cen, Leo	Corp	Associate	03/30/23	720	Conference with Blumberg, PW team, creditors re emergence checklist (0.3); correspond with same re same (0.3).	0.60
Blain, Hunter	Corp	Associate	03/30/23	720	Conference with I. Blumberg, PW, creditor groups re emergence checklist.	0.30
Braibanti, Jill	LEGL	Associate	03/30/23	720	Teleconference with I. Blumberg, PW, creditors teams re emergence checklist (0.3); review and analyze same (0.2).	0.50
Clareman, William	Lit	Partner	03/30/23	720	Review and analyze declarations in support of confirmation (1.0); correspond with P. Paterson re witness preparation for confirmation (0.3).	1.30
Basta, Paul M.	Rstr	Partner	03/30/23	720	Review and analyze issues re timing and confirmation for Revlon (2.2); correspond with A. Eaton, PW team re same (0.8).	3.00
Blumberg, Irene	Rstr	Associate	03/30/23	720	Correspond with A. Page, L. Luo, J. Heasley re confirmation documents (2.1); review revised confirmation brief (2.3); review revised Caruso declaration (1.9); coordinate plan supplement documents (1.4); revise emergence checklist (0.6); correspond with J. Heasley re same (0.4); correspond with PW specialists re checklist call (0.4); teleconference with A. Page, PW, DPW, Akin, BR teams re emergence (0.3); revise objection chart for brief (0.9).	10.30
Lysikatos Carey, Valentine	Tax	Associate	03/30/23	720	Teleconference with I. Blumberg, PW team, creditor groups re closing checklist.	0.30
McGinnis, Anne	Tax	Counsel	03/30/23	720	Teleconference with I. Blumberg, PW team, creditors re closing checklist.	0.30

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Name	Dept	Title	Date	Task	Description	Hours
Dwelle, Matthew E	Corp	Associate	03/30/23	720	Teleconference with Blumberg, Akin, DPW re emergence checklist.	0.50
Huang, Brian	Corp	Associate	03/30/23	720	Teleconference with Blumberg, DPW, BR re emergence checklist status.	0.50
Hotes, John R	Corp	Associate	03/30/23	720	Teleconference with I. Blumberg, PW, DPW, Akin, BR teams re emergence checklist.	0.50
Subramanian, Keerthika	Corp	Counsel	03/30/23	720	Teleconference with I. Blumberg, PW, DPW, Akin and BR teams re emergence checklist.	0.50
Heasley, Julia	Rstr	Associate	03/30/23	720	Coordinate redline for rejected contracts plan supplement exhibit (0.8); teleconference with Z. Gold (A&M) re same (0.2); correspond with I. Blumberg re same (0.2); revise emergence checklist (1.0); correspond with I. Blumberg, B. Mohan, PW team, and creditors re same (0.2); teleconference with same re same (0.3); draft objection chart for confirmation brief (2.8); draft notice of third plan supplement (1.2); correspond with I. Blumberg re previously filed exhibit (0.1); correspond with L. Luo re confirmation workstreams (0.2); correspond with L. Luo, PW team, and Company re exhibits to plan supplement (0.3); cite check confirmation brief (1.1); revise S. Zelin's declaration (0.5); correspond with L. Luo and PW team re same (0.4); review P. Aronzon's declaration (0.6); revise retained causes of action (0.2).	10.10
Page, Alana	Rstr	Associate	03/30/23	720	Conference with I. Blumberg, PW, DPW, BR, and Akin teams re emergence checklist (0.3); review and analyze voting results (0.7); revise R. Caruso's declaration (0.3); correspond with A. Kidd (Revlon) and client team re confirmation pleadings (0.2); complete cite check of confirmation brief (0.7); revise confirmation order (1.2); distribute confirmation documents to Osler team (0.2); teleconference with J. Klein (Petrillo) re P. Aronzon's declaration (0.2); review and comment on same (0.3); review and analyze DPW team's comments on confirmation brief (1.2); revise same (1.8); review and analyze client and stakeholder comments on confirmation brief (0.5); teleconference with H. Klabo (DPW) re brief (0.2); continue to revise R. Caruso's declaration (0.6); review and analyze UST objection to plan (0.3).	8.70
Shack Sackler, Benjamin	Lit	Associate	03/30/23	720	Cite check confirmation brief (5.2); correspond with A. Page and PW team re confirmation brief cite check (0.8).	6.00
Eaton, Alice	Rstr	Partner	03/30/23	720	Review and analyze R. Caruso (A&M), S. Zelin (Revlon) and P. Aronzon declarations.	1.20

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Name	Dept	Title	Date	Task	Description	Hours
Luo, Lara	Rstr	Associate	03/30/23	720	Revise confirmation order (3.2); conference with R. Britton re same (0.3); revise plan (5.0); correspond with Massman, DPW, BR, PW team, hair straightening plaintiffs, insurers counsel, various parties re same, confirmation order (1.5); analyze issues re same (2.6).	12.60
Britton, Robert	Rstr	Partner	03/30/23	720	Conference with Kidd (Revlon) re status of confirmation filings and next steps.	1.10
Britton, Robert	Rstr	Partner	03/30/23	720	Revise plan (1.2); correspond with Massman (DPW) re same (0.5); conference with Vonnegut (DPW) re same (0.3); conference with Luo re same (0.3); correspond with Hair straightening plaintiffs re same (0.4); revise confirmation order (2.1); correspond with Blumberg and Page re same (0.8); revise confirmation declarations (1.1); correspond with Blumberg and Page re same (0.7); analyze confirmation issues re vendor agreement (0.3).	7.70
Heasley, Julia	Rstr	Associate	03/31/23	720	Revise S. Zelin's declaration (0.9); correspond with L. Luo and PW team re same and plan supplement documents (0.6); revise notice of third plan supplement (0.6); circulate documents (0.3); cite check confirmation brief (2.1); revise same re same (1.7); revise retained causes of action and plan supplement documents (1.5); coordinate filings with M. Melvin (0.3); prepare notices for orders (0.7); correspond with R. Britton re tabulation question (0.1); prepare filing version of S. Zelin's declaration (0.3); prepare plan supplement filings (2.5); review and revise same (0.7).	12.30
Paterson, Paul	Lit	Counsel	03/31/23	720	Prepare for P. Aronzon witness preparation (1.6); attend same (0.5); teleconference with W. Clareman re same (0.2).	2.30
Ammari, Kamil R.	Lit	Associate	03/31/23	720	Correspond with P. Paterson and team re confirmation hearing preparation.	0.20
Luo, Lara	Rstr	Associate	03/31/23	720	Revise confirmation order (4.5); revise plan (3.9); conference with R. Britton, Chubb's counsel, Axelrod re same (0.5); correspond with Massman (DPW), DPW, BR, PW team, various parties re same, confirmation order (2.1); coordinate filing of confirmation pleadings (1.9); prepare notices of same (1.2).	14.10
Rahnama, Omid	Rstr	Associate	03/31/23	720	Draft holder NDA in connection with plan confirmation (0.4); correspond with R. Britton and I. Blumberg re same (0.1)	0.50
Shack Sackler, Benjamin	Lit	Associate	03/31/23	720	Review and analyze documents for confirmation hearing witness preparation (1.2); correspond with P. Paterson re documents for confirmation hearing witness preparation (0.3).	1.50
Higgins, Matthew M	Lit	Associate	03/31/23	720	Compile documents for confirmation hearing witness prep for P. Paterson.	0.90

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Name	Dept	Title	Date	Task	Description	Hours
Britton, Robert	Rstr	Partner	03/31/23	720	Revise confirmation order (1.6); revise plan (1.3); revise confirmation declarations (1.4); conference with Vonnegut (DPW), DPW re filing papers (1.4); conference with L. Luo, Axelrod (BR), Brown Rudnick re same (0.5); correspond with hair straightening plaintiffs re same (0.5); teleconference with A. Eaton re updates to declarations and brief (0.4); correspond with Blumberg re filing papers (0.3); correspond with Luo re same (0.5); correspond with Page re same (0.1).	8.00
Page, Alana	Rstr	Associate	03/31/23	720	Revise R. Caruso's declaration (1.8); revise confirmation brief (3.2); correspond with J. Heasley re same (0.2); conference with R. Britton, PW, DPW, Akin, and BR teams re confirmation order comments (0.7); continue to revise R. Caruso's declaration with stakeholder comments (2.1); review and analyze P. Aronzon's declaration (0.5); revise confirmation brief with comments from stakeholders (3.8); correspond with P. Gross (Lowenstein) re confirmation order (0.2); teleconference with H. Klabo (DPW) re confirmation brief (0.2); complete proofread of confirmation brief (0.5); revise table of authorities (0.5); prepare declarations and confirmation brief for filing (1.2); review and analyze notice of plan supplement filing (0.3); oversee filing of confirmation documents (0.8).	16.00
Melvin, Marguerite	Corp	Paralegal	03/31/23	720	Review and e-file Revlon's Third Amended Joint Plan of Reorganization (0.3); review and e-file Debtors' Memorandum of Law In Support of Confirmation of the Third Amended Joint Plan of Reorganization (0.3); review and e-file Declaration of Robert M. Caruso (0.3); review and e-file Declaration of Steven M. Zelin (0.2); review and e-file Notice of Filing Proposed Findings of Fact, Conclusions of Law, and Order Confirming the Third Amended Joint Plan of Reorganization of Revlon, Inc. and Its Debtor Affiliates (0.3); review and e-file Notice of Filing of Third Plan Supplement (0.2); review and e-file Notice of Agenda For Hearing (0.3); coordinate service of each of the filings (0.3); download, save, and circulate a filed copy of pleadings to PW bankruptcy team (0.3).	2.50
Basta, Paul M.	Rstr	Partner	03/31/23	720	Review and analyze draft confirmation brief and proposed order (1.3); prepare for confirmation hearing (0.7).	2.00
Eaton, Alice	Rstr	Partner	03/31/23	720	Review and analyze confirmation declarations and brief (1.2); teleconference with R. Britton re updates to declarations and brief (0.4); review and comment on declarations (0.5); correspond with PW team, R. Britton, L. Luo, I. Blumberg and A. Page re same (0.5).	2.60

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Name	Dept	Title	Date	Task	Description	Hours
Blumberg, Irene	Rstr	Associate	03/31/23	720	Review and revise draft confirmation hearing agenda (0.7); correspond with J. Heasley re same (0.2); revise confirmation brief (1.2); correspond with R. Britton re same (0.5); correspond with A. Page re confirmation documents (1.5); coordinate plan supplement filing (1.1); correspond with A. McGinnis, PW team re same (0.6); analyze outstanding issues re confirmation documents (1.9); correspond with securities team re 8-Ks in connection with confirmation (0.4); review and comment on same (0.5); review and revise objection tracker (1.4); revise coordination notes (1.0); coordinate finalization and filing of confirmation brief, supporting declarations, proposed order, and plan supplement documents (3.1).	14.10
Paterson, Paul	Lit	Counsel	04/01/23	720	Teleconference with Clareman re witness prep for Caruso (0.2); review and analyze docs for same (0.2); review and analyze materials to prepare for Zelin prep (0.5); lead Zelin prep with S. Zelin (PJT) (0.4).	1.30
Melvin, Marguerite	Corp	Paralegal	04/01/23	720	Review and e-file the Debtors' Motion For Entry of an Order Authorizing the Debtors to Exceed the Page Limit For the Debtors' Memorandum of Law in Support of Confirmation (0.3); coordinate service of the same (0.2).	0.50
Eaton, Alice	Rstr	Partner	04/01/23	720	Attend Zelin witness prep with S. Zelin (PJT), P. Paterson (0.4); teleconference with S. Zelin (PJT) re same (0.2); correspond with B. Bolin re same (0.3).	0.90
Heasley, Julia	Rstr	Associate	04/01/23	720	Correspond with R. Britton re voting statistics (0.2); research and organize cited case law in confirmation objection and brief (2.1); draft motion to exceed page limit for confirmation brief (1.4); correspond with R. Britton, L. Luo, PW team re same (0.2); revise confirmation outline (0.6).	4.50
Basta, Paul M.	Rstr	Partner	04/01/23	720	Attend Zelin witness prep with S. Zelin (PJT), P. Paterson (0.4); correspond with same, PW team re same (0.1).	0.50
Blumberg, Irene	Rstr	Associate	04/01/23	720	Correspond with L. Luo, A. Page re outstanding issues (0.2); correspond with R. Britton, PW team, DPW re releases (0.5); correspond with DPW team re press release (0.1); revise confirmation 8k (0.4); correspond with R. Britton, Kroll re opt out data (0.2); review revised confirmation hearing agenda (0.5); review motion to extend page limit (0.3); correspond with L. Luo, team re same (0.2).	2.40
Page, Alana	Rstr	Associate	04/01/23	720	Correspond with I. Blumberg, PW team re motion to exceed page limit (0.5); review and analyze local rules re same (0.3).	0.80

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Name	Dept	Title	Date	Task	Description	Hours
Luo, Lara	Rstr	Associate	04/01/23	720	Conference with Vonnegut (DPW), DPW, PW team re plan objection (0.3); revise motion to exceed page limit for confirmation brief (1.5); correspond with Blumberg, PW team re preparation for confirmation hearing (1.5).	3.30
Britton, Robert	Rstr	Partner	04/01/23	720	Attend Aronzon witness prep conference with Aronzon (Company) (0.6); correspond with Basta re confirmation hearing (0.4); correspond with Blumberg re same (0.3); correspond with Kidd re same (0.7); correspond with Heasley re motion to exceed page limit (0.3); revise same (0.3); review materials in preparation for confirmation hearing (2.5).	5.10
Clareman, William	Lit	Partner	04/01/23	720	Teleconference with P. Paterson re witness prep for Caruso.	0.20
Paterson, Paul	Lit	Counsel	04/02/23	720	Review materials in preparation for Caruso confirmation prep (0.4); attend same with W. Clareman, R. Caruso (A&M) (0.8).	1.20
Luo, Lara	Rstr	Associate	04/02/23	720	Correspond with Britton, PW team re various confirmation issues in preparation for confirmation hearing.	1.00
Britton, Robert	Rstr	Partner	04/02/23	720	Attend Caruso hearing prep conference with Paterson, PW team (0.8); conference with Zelin (PJT) re confirmation hearing (0.2); prepare for confirmation hearing (3.1); correspond with Heasley re confirmation research (0.4); correspond with Luo re same (0.1).	4.60
Heasley, Julia	Rstr	Associate	04/02/23	720	Revise confirmation declaration (0.6); correspond with R. Britton and PW team (0.1); research and analyze Voyager provision re exculpation clause (2.0); correspond with R. Britton, A. Page re same (0.3).	3.00
Basta, Paul M.	Rstr	Partner	04/02/23	720	Attend Caruso witness prep with W. Clareman, Caruso (A&M), and PW team (0.8); correspond with A. Eaton, PW team re same (0.2).	1.00
Cen, Leo	Corp	Associate	04/02/23	720	Correspond with PW team re confirmation workstreams.	0.10
Blumberg, Irene	Rstr	Associate	04/02/23	720	Review confirmation outline for R. Britton (0.5); correspond with J. Heasley re same (0.2); prepare for hearing (2.1); analyze outstanding issues (0.7); correspond with J. Heasley re hearing agenda (0.6).	4.10
Page, Alana	Rstr	Associate	04/02/23	720	Review and analyze materials for confirmation hearing (3.9); prepare binders for confirmation hearing (1.7).	5.60
Eaton, Alice	Rstr	Partner	04/02/23	720	Attend Caruso witness prep with W. Clareman, Caruso (A&M), and PW team re preparation for confirmation testimony (0.8); review and analyze confirmation order changes (0.2); review pleadings in preparation for confirmation hearing (1.0).	2.00

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Name	Dept	Title	Date	Task	Description	Hours
Clareman, William	Lit	Partner	04/02/23	720	Review materials in preparation for Caruso witness prep (0.6); attend witness prep for R. Caruso with R. Caruso (A&M), P. Paterson, PW team (0.8).	1.40
Paterson, Paul	Lit	Counsel	04/03/23	720	Review materials in preparation for confirmation hearing (1.8); correspond with W. Clareman re same (0.3).	2.10
Heasley, Julia	Rstr	Associate	04/03/23	720	Draft revised proposed confirmation order notice.	0.30
Britton, Robert	Rstr	Partner	04/03/23	720	Prepare for confirmation hearing (2.2); correspond with creditors re hearing (0.5); revise confirmation order (0.4); conference with Blumberg re same (0.5); correspond with creditors re trading issues in light of confirmation (0.4); conference with Kidd re confirmation order and next steps (0.4); correspond with Silverberg re confirmation order (0.2).	4.60
Blumberg, Irene	Rstr	Associate	04/03/23	720	Prepare for confirmation hearing (2.0); correspond with A. Page, team re revised confirmation order (0.3); review revised confirmation 8k (0.2); correspond with R. Britton re same (0.3); correspond with A. Page re order issues (0.4).	3.20
Luo, Lara	Rstr	Associate	04/03/23	720	Revise confirmation order (0.5); correspond with Britton, PW team, BR, DPW, Akin re same (0.5); prepare filing of same (0.3); prepare for confirmation hearing (0.8).	2.10
Page, Alana	Rstr	Associate	04/03/23	720	Review and analyze employee communication and press release re confirmation (0.2); correspond with K. Subramanian re same (0.2); correspond with S. Harnett re same (0.1).	0.50
Page, Alana	Rstr	Associate	04/03/23	720	Revise confirmation order (0.2); prepare notice of filing revised confirmation order (0.2); coordinate filing of same (0.1); teleconference with M. Melvin re same (0.1); review and analyze materials for confirmation hearing (0.6); prepare confirmation order and exhibits for submission to Chambers (0.3); share same with Chambers (0.1); teleconference with Chambers re confirmation order (0.1).	1.70
Basta, Paul M.	Rstr	Partner	04/03/23	720	Correspond with A. Eaton, PW team re preparation for confirmation hearing.	0.50
Eaton, Alice	Rstr	Partner	04/03/23	720	Review and analyze correspondence re confirmation order and stay (0.2); review and analyze as-filed order (0.3).	0.50
Eaton, Alice	Rstr	Partner	04/03/23	720	Review and analyze materials in preparation for confirmation hearing.	1.00
de la Bastide, Thomas V	Corp	Partner	04/03/23	720	Review materials in preparation for confirmation hearing.	0.50
Hossain, Julia	Rstr	Paralegal	04/03/23	720	File revised confirmation order.	0.30
Rabinowitz, Danielle	Tax	Associate	03/01/23	722	Correspond with McGinnis, Revlon re withholding issues (0.2); review and analyze tax issues re BrandCo unwind (0.2); review and analyze credit agreement re tax issues (2.1); teleconference with C. Nunez (KPMG) re tax structuring (1.0).	3.50

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Name	Dept	Title	Date	Task	Description	Hours
Lysikatos Carey, Valentine	Tax	Associate	03/01/23	722	Further review and analyze Plan and DS re tax issues (0.2); correspond with Luo, PW team re tax questions (0.1); review and analyze TL credit agreement re tax issues (1.0); correspond with D. Rabinowitz and PW Finance re same (0.6); correspond with DPW Tax and KPMG re structuring questions (0.4).	2.30
Holo, Robert	Tax	Partner	03/01/23	722	Review and analyze KPMG analysis of tax consequences (0.3); correspond with Britton, Luore same (0.1); analyze tax structuring options (0.3); correspond with Britton, PW and Revlon re UK tax implications (0.1); correspond with McGinnis, PW re withholding tax issues (0.1); correspond with Rabinowitz, PW and Revlon re Brandco IP unwind structure (0.1); review and analyze draft emergence checklist (0.2); correspond with McGinnis, PW and KPMG re exit TL CRA and tax analysis of same (0.1); review and analyze KPMG's analysis of tax cost of proposed guarantee structure (0.4); review and analyze draft exit TL CRA (0.2).	1.90
Blumberg, Irene	Rstr	Associate	03/02/23	722	Correspond with A. McGinnis re tax structuring (0.2); correspond with A. Eaton, R. Britton, and PW team re same (0.2); analyze issues re same (0.1).	0.50
Rabinowitz, Danielle	Tax	Associate	03/02/23	722	Correspond with McGinnis re new structure (0.3); correspond with same re BrandCo IP (0.2); correspond with Holo, PW team re UK counsel (0.2); confer with V. Lysikatos re tax issue (0.2); review and analyze materials from R. Holo re tax issue (0.5); conduct research re 245A (3.4); teleconference with R. Holo, PW team and KPMG re structuring (1.0); teleconference with D. Epstein and PW finance team re exit financing tax issues (0.2); correspond with J. Braibanti and I. Blumberg re KPMG deck (0.3); correspond with M. Ferrari, PW team re take-back debt (0.4); teleconference with R. Holo re tax issues in connection with emergence (0.3).	7.00
Holo, Robert	Tax	Partner	03/02/23	722	Review and analyze materials from D. Walsh re intercompany cleanup (0.1); review and analyze materials from Revlon tax re non-US bankruptcy tax issues for the UK (0.2); correspond with Rabinowitz, PW and Freshfields re same (0.1); correspond with Rabinowitz, PW and KPMG re tax analysis of full asset sale (0.1); analyze re tax consequences of same (0.9); teleconference with H. Blain, PW team re financing structure tax issues (0.2); analyze same (1.1); correspond with Rabinowitz, PW and KPMG re Brandco IP restructuring (0.1); review and analyze Revlon's deck re same (0.6); teleconference with Rabinowitz, PW and KPMG re tax consequences of structuring options (1.0); teleconference Rabinowitz, PW tax and financing re financing structure (0.2); teleconference with D. Rabinowitz re tax issues in connection with emergence (0.3).	4.90

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Lysikatos Carey, Valentine	Tax	Associate	03/02/23	722	Review and analyze research re tax questions for term loan credit agreement (0.5); confer with D. Rabinowitz re same (0.2); teleconference with KPMG, R. Holo, and D. Rabinowitz re tax structuring questions (1.0); correspond with KPMG re same (0.3); teleconference with M. Ferrari, PW finance team, R. Holo & D. Rabinowitz re term loan credit agreement (0.2); correspond with same re same (0.2).	2.40
Lysikatos Carey, Valentine	Tax	Associate	03/03/23	722	Teleconference with T. Matlock (DPW Tax), KPMG, R. Holo and D. Rabinowitz re structure questions (0.7); review and analyze Plan and DS re tax issues (2.3); correspond with McGinnis re tax questions re intercompany receivables questions (0.9).	3.90
McGinnis, Anne	Tax	Counsel	03/03/23	722	Correspond with Rabinowitz, PW team re emergence transactions.	1.20
Holo, Robert	Tax	Partner	03/03/23	722	Correspond with McGinnis, PW and Revlon tax re questions about PR tax issues (0.1); teleconference with Rabinowitz, PW, DPW and KPMG re structuring alternatives (0.7); teleconference with C. Meredith-Goujon re exit financing tax issues (0.3); correspond with Carey, PW re intercompany clean up (0.2); review and analyze materials re same (0.2); correspond with McGinnis, PW re Brandco IP unwind (0.4); review and analyze materials from Revlon re same (0.3).	2.20
Luo, Lara	Rstr	Associate	03/03/23	722	Correspond with McRadu, Osler re Canadian tax issues.	0.30
Blumberg, Irene	Rstr	Associate	03/03/23	722	Correspond with D. Rabinowitz re intercompany accounting and related tax issues (0.2); analyze issues re same (0.3); correspond with R. Britton re same (0.2); correspond with D. Rabinowitz re confirmation order (0.1).	0.80
Rahnama, Omid	Rstr	Associate	03/03/23	722	Correspond with D. Rabinowitz and I. Blumberg re Puerto Rico debtor tax matters.	0.20
Rabinowitz, Danielle	Tax	Associate	03/03/23	722	Teleconference with Holo, KPMG and T. Matlock (DPW) re tax structuring (0.7); correspond with D. Walsh re same (0.3); correspond with McGinnis re BrandCo unwind (0.2); correspond with same re intercompany clean up (0.3); review and analyze KPMG decks for credit agreement (1.1).	2.60
Lysikatos Carey, Valentine	Tax	Associate	03/04/23	722	Correspond with R. Holo re BrandCos and tax points.	0.30
McGinnis, Anne	Tax	Counsel	03/06/23	722	Teleconference with Holo, Freshfields team and Company re UK tax law (0.5); review and analyze warrant agreement for tax considerations (0.5); correspond with Matlock, DPW and KPMG teams re exit structure (0.8); review and revise exit facility re tax issues (0.9).	2.70

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Holo, Robert	Tax	Partner	03/06/23	722	Correspond with A. McGinnis re updates on tax analysis (0.3); teleconference with V. Carey, PW, Revlon and Freshfields re UK tax issues and consequences of restructuring (0.5); review and analyze KPMG's 956 analysis (0.2); correspond with Carey, PW and KPMG re same (0.2); correspond with Rabinowitz, PW re legal entity rationalization and credit agreement covenants (0.1); review and analyze materials re same (0.1).	1.40
Lysikatos Carey, Valentine	Tax	Associate	03/06/23	722	Correspond with D. Rabinowitz re credit agreement tax issues (0.3); review and analyze follow up materials re same (0.6); teleconference with R. Holo, PW team, D. Walsh, KPMG and Freshfields Tax re UK tax questions (0.5).	1.40
Blumberg, Irene	Rstr	Associate	03/06/23	722	Teleconference with R. Holo, PW tax re UK issues.	0.50
Rabinowitz, Danielle	Tax	Associate	03/06/23	722	Correspond with Carey, PW team re credit agreement tax issues (0.2); correspond with A. McGinnis re various tax issues (0.2); teleconference with D. Walsh re same (0.5); review and analyze tax issues (0.3); teleconference with K. Baird re UK tax consequences (0.5).	1.70
Holo, Robert	Tax	Partner	03/07/23	722	Partially attend teleconference with McGinnis, PW team re Revlon Brandco IP restructuring (0.5); analyze IP and tax issues (0.6); correspond with Ferrari, PW team re credit agreement and tax entity rationalization issues (0.2); correspond with A. McGinnis re tax structuring issues (0.1).	1.40
Lysikatos Carey, Valentine	Tax	Associate	03/07/23	722	Review and analyze warrant agreement (0.4); correspond with A. McGinnis re same (0.2); partially attend teleconference with J. Braibanti, R. Holo, A. McGinnis and D. Rabinowitz re Brandco Unwind (1.0); teleconference with T. Matlock (DPW Tax) re structure and credit agreement (0.3); correspond with same re same (0.2).	2.10
McGinnis, Anne	Tax	Counsel	03/07/23	722	Teleconference with Rabinowitz, PW team re IP (1.2); revise credit agreement for new money facility tax considerations (0.8).	2.00
Braibanti, Jill	LEGL	Associate	03/07/23	722	Teleconference with D. Rabinowitz and PW tax re Brandco IP unwinding.	1.20
Blumberg, Irene	Rstr	Associate	03/07/23	722	Correspond with A. McGinnis re transaction steps memorandum (0.1); correspond with R. Britton re same (0.1).	0.20
Rabinowitz, Danielle	Tax	Associate	03/07/23	722	Teleconference with Braibanti, PW team re IP unwind (1.2); review and analyze warrant agreement (0.5); draft TSA (0.4).	2.10
Lysikatos Carey, Valentine	Tax	Associate	03/08/23	722	Teleconference with C. Meredith-Goujon, J. Braibanti, PW team, D. Walsh (Revlon Tax), KPMG re Brandco unwind (1.2); review and analyze follow up questions re credit agreement (1.8); correspond with D. Rabinowitz and A. McGinnis re same (0.8); review and analyze GUC Trust agreement (1.3).	5.10

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Name	Dept	Title	Date	Task	Description	Hours
Holo, Robert	Tax	Partner	03/08/23	722	Teleconference with Carey, PW team, Revlon, KPMG re Brandco IP restructuring (1.2); review and analyze Revlon deck re same (0.1); review and analyze A. McGinnis' comments to Exit TL CRA (0.1).	1.40
McGinnis, Anne	Tax	Counsel	03/08/23	722	Analyze financing covenants (3.0); revise exit facility documents (0.8); attend teleconference with Holo, PW team, Revlon, KPMG re Brandco IP restructuring (1.2).	5.00
Britton, Robert	Rstr	Partner	03/08/23	722	Correspond with Holo re tax issues.	0.30
Braibanti, Jill	LEGL	Associate	03/08/23	722	Teleconference with D. Walsh (Revlon), KPMG and C. Meredith-Goujon re Brandco IP unwind options.	1.20
Rabinowitz, Danielle	Tax	Associate	03/08/23	722	Teleconference with D. Walsh (Revlon), PW team re Brandco IP (1.2); review and analyze warrant agreement (0.3); analyze exit TL documents (2.9); revise TSA (1.6).	6.00
Holo, Robert	Tax	Partner	03/09/23	722	Correspond with V. Carey, PW, KPMG re structure issues (0.3); review and analyze proposed structure transactions re same (0.2); correspond with PW, DPW and KPMG teams re choice of emergence structure (0.1); correspond with PW, Revlon, Osler and KPMG teams re Canadian preferred stock (0.1); correspond with A. McGinnis, PW and KPMG re emergence charts (0.1); correspond with D. Walsh (Revlon), PW and KPMG teams re emergence steps (0.1); correspond with A. McGinnis re same (0.1).	1.00
Lysikatos Carey, Valentine	Tax	Associate	03/09/23	722	Review and revise tax aspects of GUC Trust and PI Trust Agreements (5.1); correspond with A. McGinnis re same (1.1).	6.20
McGinnis, Anne	Tax	Counsel	03/09/23	722	Correspond with V. Carey, KPMG and PW teams re emergence structure (1.0); review and analyze same (1.9).	2.90
McLaughlin, Daniel	Othr	Paralgl	03/09/23	722	Research re trust agreements in bankruptcy for V. Lysikatos Carey (0.6); research re description of transaction steps for D. Rabinowitz (0.8).	1.40
Blumberg, Irene	Rstr	Associate	03/09/23	722	Correspond with A. Page re proposed confirmation order language from taxing authority (0.2); review and analyze request from Texas taxing authority (0.1); correspond with A. McGinnis re same (0.1).	0.40
Rabinowitz, Danielle	Tax	Associate	03/09/23	722	Review and analyze narrative steps deck precedents (1.1); draft TSA (3.0).	4.10
Britton, Robert	Rstr	Partner	03/09/23	722	Correspond with A. McGinnis re emergence structure and tax issues.	0.20
McGinnis, Anne	Tax	Counsel	03/10/23	722	Revise transaction steps (3.0); revise credit agreement (1.5).	4.50
Rabinowitz, Danielle	Tax	Associate	03/10/23	722	Correspond with D. Walsh re structuring (0.1); review and revise TSA (1.3); review and analyze precedent transaction steps (1.0); review and analyze checklist (0.3); draft narrative for transaction steps (3.8).	6.50

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Holo, Robert	Tax	Partner	03/10/23	722	Correspond with Carey, PW team and Revlon re intercompany cleanup (0.3); correspond with McGinnis re intercompany payments and tax consequences of same (0.1); review and analyze same (0.1); correspond with Carey, PW team, KPMG and Revlon re emergence structure (0.5); review and analyze KPMG's draft step deck (0.5); correspond with Rabinowitz, PW team re step deck and comments on same (0.2); review and analyze same (0.2).	1.90
Lysikatos Carey, Valentine	Tax	Associate	03/10/23	722	Review and analyze liquidating trust agreements (1.1); correspond with A. McGinnis and D. Rabinowitz re same (0.6); review and analyze restructuring steps deck (1.0); correspond with D. Rabinowitz re same (0.3); teleconference with D. Walsh (Revlon), KPMG re emergence structure (0.3); review and analyze follow-up materials re same (0.5).	3.80
Lysikatos Carey, Valentine	Tax	Associate	03/11/23	722	Review and analyze transaction steps narrative (1.6); correspond with D. Rabinowitz re comments to transaction steps narrative (0.8).	2.40
Holo, Robert	Tax	Partner	03/11/23	722	Correspond with McGinnis, PW team re intercompany cleanup and other tax planning transactions.	0.10
Rabinowitz, Danielle	Tax	Associate	03/11/23	722	Draft transaction steps narrative.	1.60
de la Bastide, Thomas V	Corp	Partner	03/12/23	722	Correspond with D. Epstein, PW team, and Revlon on tax restructuring options and steps.	0.40
Holo, Robert	Tax	Partner	03/12/23	722	Correspond with Ferrari, PW Team, KPMG and Revlon re debt covenants and section 956 issues (0.1); analyze materials re same (0.1).	0.20
Rabinowitz, Danielle	Tax	Associate	03/12/23	722	Draft transaction steps narrative.	1.20
McGinnis, Anne	Tax	Counsel	03/12/23	722	Revise steps plan.	1.00
Lysikatos Carey, Valentine	Tax	Associate	03/13/23	722	Discuss credit agreement open points with D. Rabinowitz (0.3); review and analyze GUC Trust and PI trust markups (2.0); correspond with D. Rabinowitz and A. McGinnis re same (0.6).	2.90
McGinnis, Anne	Tax	Counsel	03/13/23	722	Teleconference with Ferrari, Company re debt covenants (1.1); correspond with same, PW team re same (0.6); revise steps plan (2.1); revise GUC/PI trust docs (3.1).	6.90
Epstein, David	Corp	Counsel	03/13/23	722	Confer with A. McGinnis, Revlon tax group and KPMG team re entity rationalization transactions.	1.10
Rabinowitz, Danielle	Tax	Associate	03/13/23	722	Teleconference with D. Walsh (Revlon) re tax structure (1.0); review and analyze times for schedule (0.1); correspond with V. Lysikatos re steps decks (0.2); review and analyze GUC Trust comments (0.6); draft transaction narrative (2.1).	4.00

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Holo, Robert	Tax	Partner	03/13/23	722	Revise GUC trust documents (0.4); correspond with PW team re same (0.1); revise draft PI settlement trust documents (0.3); correspond with Carey, PW team re same (0.1); review and analyze DPW comments on trust documents (0.3); teleconference with McGinnis, PW (tax and finance), Revlon tax and KPMG re debt covenants and potential transactions (1.0); correspond with same re same (0.2); review and analyze KPMG's revised and updated emergence steps deck (0.3); correspond with McGinnis and DPW re Lenders' decision re structure (0.1).	2.80
Lysikatos Carey, Valentine	Tax	Associate	03/14/23	722	Review and revise structure steps and narrative (4.8); correspond with A. McGinnis, R. Holo & D. Rabinowitz re same (1.6).	6.40
Holo, Robert	Tax	Partner	03/14/23	722	Review and comment on A. McGinnis' drafts of emergence steps narrative (1.5); correspond with A. McGinnis, PW Team and KPMG re same (0.4); review and comment on revised versions of KPMG emergence steps decks (0.8); correspond with McGinnis, PW team, and KPMG re same (0.1); correspond with Carey, PW team, Revlon and KPMG re intercompany clean up and legal rationalization decks (0.1); correspond with McGinnis, PW team re Bruno's structure (0.2); correspond with same and Revlon tax team re emergence date and documentation of same (0.1); review and analyze A. McGinnis' comments and revisions to PI Settlement trust agreement (0.2).	3.40
McGinnis, Anne	Tax	Counsel	03/14/23	722	Revise steps plan and narrative.	6.60
Rabinowitz, Danielle	Tax	Associate	03/14/23	722	Review and revise transaction steps.	3.70
Blumberg, Irene	Rstr	Associate	03/14/23	722	Correspond with B. Pederson (A&M) re tax issue (0.1); correspond with A. McGinnis and PW team re Revlon steps plan (0.4).	0.50
Lysikatos Carey, Valentine	Tax	Associate	03/15/23	722	Review and analyze feedback from Revlon Tax re TSA (0.2); review and analyze comments to warrant agreement (0.3); review and analyze feedback from KPMG re credit agreement (0.4); review and revise transaction steps, narrative (1.6).	2.50
Holo, Robert	Tax	Partner	03/15/23	722	Correspond with McGinnis, PW team re comments and revisions to warrant agreement (0.1); review and analyze same (0.1); correspond with PW and KPMG re emergence steps deck (0.2); review and revise draft decks from PW and KPMG teams re emergence steps and narratives (0.8); correspond with McGinnis, PW and KPMG teams re exit debt issues (0.2); review and analyze materials re same (0.2); review and analyze DPW comments re steps narrative (0.2); correspond with McGinnis, PW, KPMG and DPW teams re same (0.3); review and analyze comments re warrant agreement (0.2).	2.30

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McGinnis, Anne	Tax	Counsel	03/15/23	722	Revise narrative and emergence steps deck (3.0); correspond with Holo, PW team, KPMG re exit structure and debt covenants (0.8).	3.80
Rabinowitz, Danielle	Tax	Associate	03/15/23	722	Teleconference with D. Walsh (Revlon) re Canadian preferred scheduling (0.1); review and analyze transaction steps (1.3).	1.40
Britton, Robert	Rstr	Partner	03/15/23	722	Correspond with A. McGinnis re tax issues.	0.30
Blumberg, Irene	Rstr	Associate	03/15/23	722	Review and analyze filing version of Deloitte tax declaration (0.1); correspond with J. Heasley re same (0.1).	0.20
Blumberg, Irene	Rstr	Associate	03/15/23	722	Correspond with D. Rabinowitz re transaction steps (0.2); review and analyze same (0.5); correspond with D. Kratzer (DPW) re same (0.2); correspond with R. Britton re same (0.2).	1.10
Lysikatos Carey, Valentine	Tax	Associate	03/16/23	722	Teleconference with C. Meredith-Goujon, J. Braibanti, R. Holo, A. McGinnis, D. Rabinowitz, and Company re Brandco IP and emergence structure (0.7); review and revise tax items on emergence checklist (0.2); review and analyze credit agreement and transaction steps (1.4).	2.30
McGinnis, Anne	Tax	Counsel	03/16/23	722	Teleconference with R. Holo, PW, Walsh (Revlon), and Company re emergence structure (0.7); revise credit agreement (0.4); correspond with Rabinowitz, PW team re emergence structure (0.6); analyze same (1.1); review and analyze steps plan (0.2).	3.00
Holo, Robert	Tax	Partner	03/16/23	722	Conference with PW, Revlon and KPMG teams re Brandco IP unwind (0.9); review and revise updated transaction steps presentations from KPMG (0.3); correspond with C. Meredith-Goujon, PW team re Brandco IP unwind and legal entity rationalization structure (0.3).	1.50
Rabinowitz, Danielle	Tax	Associate	03/16/23	722	Teleconference with D. Walsh (Revlon) re Brandco IP restructuring (1.0); correspond with A. McGinnis re status (0.3); correspond with C. Meredith-Goujon, PW team re intellectual property considerations (0.4).	1.70
de la Bastide, Thomas V	Corp	Partner	03/17/23	722	Partially attend teleconference with B. Bolin, PW, KPMG re tax restructuring.	1.00
Blain, Hunter	Corp	Associate	03/17/23	722	Partially attend teleconference with A. McGinnis, PW team re tax issues.	0.30
Bolin, Brian	Rstr	Partner	03/17/23	722	Conference with T. de la Bastide, PW, KPMG and A&M teams re tax structuring.	1.50
McGinnis, Anne	Tax	Counsel	03/17/23	722	Teleconference with T. Matlock (DPW) re Revlon steps plan (1.0); teleconference with B. Bolin, PW team, KPMG, PJT re exit financing tax issues (1.5); correspond with R. Holo re intercompany cleanup (0.6).	3.10
Rabinowitz, Danielle	Tax	Associate	03/17/23	722	Teleconference with A. McGinnis, DPW re steps plan (1.0); correspond with same re same (0.2).	1.20

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Lysikatos Carey, Valentine	Tax	Associate	03/17/23	722	Partially attend teleconference with R. Lawrence (KPMG), B. Bolin, PW team, and PJT team re FABL tax issues (1.2); review and analyze emergence checklist (0.3).	1.50
Holo, Robert	Tax	Partner	03/17/23	722	Correspond with D. Rabinowitz, PW team re Brandco IP steps (0.5); review and analyze materials from KPMG re tax analysis of certain steps (0.5); correspond with A. McGinnis re same (0.2).	1.20
de la Bastide, Thomas V	Corp	Partner	03/18/23	722	Correspond with E. Ross, PJT, A&M, and client re tax restructuring and FABTL restrictions.	0.50
Holo, Robert	Tax	Partner	03/18/23	722	Correspond with D. Epstein re FABTL issues list re tax.	0.10
McGinnis, Anne	Tax	Counsel	03/19/23	722	Correspond with D. Epstein re exit structure.	0.10
de la Bastide, Thomas V	Corp	Partner	03/19/23	722	Review and analyze tax steps plan from KPMG.	0.50
Rabinowitz, Danielle	Tax	Associate	03/19/23	722	Update tax sharing agreement.	1.20
Lysikatos Carey, Valentine	Tax	Associate	03/20/23	722	Teleconference with T. Matlock (DPW Tax) re structure (0.5); teleconference with I. Blumberg, PW team re closing checklist (0.5); teleconference with same, DPW re same (0.5); teleconference with T. Matlock (DPW Tax), KPMG, R. Holo, PW team re tax steps (1.2).	2.70
Holo, Robert	Tax	Partner	03/20/23	722	Correspond with A. McGinnis re FABL, legal entity rationalization, tax modeling and choice of emergence structure (0.1); review and analyze KPMG materials re same (0.3); conference with V. Carey, PW, DPW and KPMG teams re additional lender questions on structure (1.2); review and analyze draft emergence checklist (0.1).	1.70
Rabinowitz, Danielle	Tax	Associate	03/20/23	722	Teleconference with M. Kvarda, PJT, and A&M teams re credit agreement (0.6) teleconference with T. Matlock re emergence structure (0.7); teleconference with I. Blumberg re emergence checklist (0.5); teleconference with I. Blumberg and creditor counsel re emergence checklist (0.5); teleconference with T. Matlock re emergence structure (0.5); update tax sharing agreement (0.7).	3.50
McGinnis, Anne	Tax	Counsel	03/20/23	722	Teleconference with T. Matlock, DPW team re exit structure (1.2); correspond with R. Holo re same, tax issues (1.0); teleconference with I. Blumberg, PW team re emergence checklist (0.5); teleconference with same, DPW, BR teams re same (0.5); review and analyze credit documents (0.7).	3.90
Holo, Robert	Tax	Partner	03/21/23	722	Correspond with A. McGinnis re tax issues (0.1); review and analyze additional KPMG analysis re restructure in place scenario (0.2); correspond with A. McGinnis, PW, DPW and KPMG teams re same and follow-up questions (0.2); review and analyze KPMG's modified Bruno's example (0.1).	0.60

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Rabinowitz, Danielle	Tax	Associate	03/21/23	722	Update tax sharing agreement (3.0); review and analyze credit agreement (2.1).	5.10
McGinnis, Anne	Tax	Counsel	03/21/23	722	Review and revise LER materials.	2.00
Braibanti, Jill	LEGL	Associate	03/21/23	722	Correspond with C. Meredith-Goujon re IP contracts diligence and KPMG tax decks (0.5); review and analyze KPMG tax structure decks (0.5).	1.00
Lysikatos Carey, Valentine	Tax	Associate	03/22/23	722	Review and analyze materials re tax structuring and modeling from T. Matlock (DPW), A. McGinnis, and KPMG (0.8); teleconference with T. Matlock (DPW), KPMG team, R. Holo re same (0.8).	1.60
Holo, Robert	Tax	Partner	03/22/23	722	Conference with V. Carey, PW, DPW, KPMG and Centerview teams re additional structure options and tax analysis of same (0.8); review and analyze additional materials from KPMG re same (0.3); correspond with A. McGinnis re same (0.2); analyze issues re same (0.5); conference with A. McGinnis and KPMG teams re tax analysis and structuring (1.4); correspond with A. McGinnis re same and related timing and restructuring questions (0.2).	3.40
Rabinowitz, Danielle	Tax	Associate	03/22/23	722	Teleconference with T. Matlock (DPW) re emergence structure (0.9); review and analyze checklist (0.9).	1.80
McGinnis, Anne	Tax	Counsel	03/22/23	722	Teleconference with T. Matlock, DPW team re structure (0.8); teleconference with Y. Kukoyi, KPMG team re inter company cleanup (0.5); conference with R. Holo, KPMG re emergence structure (1.4); correspond with R. Holo, PW team re emergence structure and debt covenants (1.0).	3.70
Braibanti, Jill	LEGL	Associate	03/22/23	722	Review and analyze KPMG tax decks.	2.40
McGinnis, Anne	Tax	Counsel	03/23/23	722	Teleconference with I. Blumberg, PW team re emergence checklist (0.5); teleconference with D. Rabinowitz, KPMG re tax structure (0.5); correspond with KPMG and PW teams re intercompany cleanup (1.5); teleconference with R. Holo, PW, DPW, and KPMG teams re tax structuring issues (1.0).	3.50
Rabinowitz, Danielle	Tax	Associate	03/23/23	722	Review and analyze Revlon share transfer questions (1.2); review and analyze credit agreements for tax issues (4.4); teleconference with I. Blumberg, DPW team, and BR team re emergence checklist (0.5); teleconference with A. McGinnis, KPMG re tax structure (0.5).	6.60

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Date: 04/28/2023

Name	Dept	Title	Date	Task	Description	Hours
Holo, Robert	Tax	Partner	03/23/23	722	Correspond with R. Britton and A. McGinnis re MAFCO transfers and Bruno's analysis (0.1); review and analyze KPMG team's summary and analysis of legal entity rationalization (0.3); correspond with A. McGinnis, PW team re tax steps prior to, at, and post- emergence (0.1); correspond with A. McGinnis re same (0.1); correspond with V. Lysikatos-Carey PW team re proposed Mafco transfer (0.1); correspond with A. McGinnis re same (0.1); review and analyze same (0.3); teleconference with A. McGinnis, PW, DPW, and KPMG teams re tax structuring issues (1.0); review and analyze tax chart (0.3); review and analyze additional comments re steps memo (0.1); correspond with PW, KPMG, and DPW teams re preferred equity in Beautyge held by entity (0.1).	2.60
Lysikatos Carey, Valentine	Tax	Associate	03/23/23	722	Review and analyze MAFCO trading question and NOL Order (0.8); review and analyze ABL issues (2.7); review and analyze FABL issues (1.3).	4.80
Rabinowitz, Danielle	Tax	Associate	03/24/23	722	Coordinate schedules for standing tax teleconference (0.1); review and analyze correspondence re transaction steps memo (0.2).	0.30
McGinnis, Anne	Tax	Counsel	03/24/23	722	Correspond with R. Holo, DPW and KPMG teams re emergence restructure (3.7); conference with R. Holo re partial Bruno's structure (0.2); teleconference with C. Nunez (KPMG), R. Holo re emergence structure (0.6); correspond with D. Epstein, PW finance team re debt covenants (0.5); correspond with R. Holo, PW team re conversion steps deck and review of same (1.7).	6.70
Grant, Natasha	Othr	Paralgl	03/24/23	722	Research precedent Restructuring Transactions Memorandum for D. Rabinowitz.	1.20
Holo, Robert	Tax	Partner	03/24/23	722	Correspond with PW, DPW, and KPMG teams re Bruno's structure (0.2); review and analyze same (0.2); correspond with A. McGinnis re pre-emergence and post-emergence restructuring steps (0.3); correspond with A. McGinnis, PW, DPW, and KPMG teams re legal entity rationalization and intercompany unwind steps (0.3); review and analyze materials from KPMG team re LER, intercompany unwinds, and conversion analysis (0.5); correspond with A. McGinnis, PW and KPMG teams re lender constraints on LER (0.2); teleconference with C. Nunez (KPMG) and A. McGinnis re emergence structure (0.6); conference with A. McGinnis re partial Bruno's structure (0.2).	2.50
Lysikatos Carey, Valentine	Tax	Associate	03/24/23	722	Review and analyze follow up correspondence from KPMG team, PW finance team, and A. McGinnis re credit agreements and structure.	0.90
Blumberg, Irene	Rstr	Associate	03/25/23	722	Correspond with M. Melvin re tax precedent.	0.20

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Name	Dept	Title	Date	Task	Description	Hours
McGinnis, Anne	Tax	Counsel	03/25/23	722	Correspond with R. Holo, PW team re inter company cleanup.	1.10
Holo, Robert	Tax	Partner	03/25/23	722	Review and analyze entity conversion deck (0.4); correspond with A. McGinnis, PW team re Bruno's and related tax, bankruptcy, and restructuring issues (0.3).	0.70
Lysikatos Carey, Valentine	Tax	Associate	03/25/23	722	Review and analyze follow up materials from A. McGinnis re intercompany cleanup.	0.30
Meredith-Goujon, Claudine K	Corp	Partner	03/26/23	722	Teleconference with A. McGinnis re steps plan for potential Bruno's transaction (0.4); review and analyze draft KPMG deck re same (0.3).	0.70
Holo, Robert	Tax	Partner	03/26/23	722	Correspond with A. McGinnis, PW team re Bruno's considerations (0.1); review and analyze same (0.2).	0.30
McGinnis, Anne	Tax	Counsel	03/26/23	722	Teleconference with T. Matlock, DPW team re emergence structure (1.0); correspond with R. Holo, PW team re emergence structure (0.6); teleconference with G. Meredith-Goujon re potential Bruno's (0.4).	2.00
Britton, Robert	Rstr	Partner	03/26/23	722	Correspond with A. McGinnis re tax planning.	0.20
McGinnis, Anne	Tax	Counsel	03/27/23	722	Teleconference with R. Holo, KPMG team re Bruno's steps (0.7); correspond with PW team re emergence structure (2.6).	3.30
Lysikatos Carey, Valentine	Tax	Associate	03/27/23	722	Review and analyze precedent documents and structure questions (2.3); review and analyze transaction steps narrative (0.4); correspond with D. Rabinowitz re same (1.2).	3.90
Holo, Robert	Tax	Partner	03/27/23	722	Teleconference with A. McGinnis and KPMG teams re Bruno's and related tax analysis (0.7); correspond with A. McGinnis, PW, KPMG, and Revlon teams re same (0.1); review and analyze revised transaction steps from KPMG team (0.3).	1.10
Rabinowitz, Danielle	Tax	Associate	03/27/23	722	Review and revise narrative for transaction steps.	3.50
Britton, Robert	Rstr	Partner	03/27/23	722	Correspond with R. Holo re tax issues (0.3); analyze same (0.2).	0.50
Lysikatos Carey, Valentine	Tax	Associate	03/28/23	722	Review and analyze precedent documents and structure questions (1.6); teleconference with R. Holo, DPW tax team, B. Sherman (DPW), A. Lele (DPW), PW team re closing items (0.4); teleconference with D. Walsh (Revlon), KPMG team, PW team re structure (0.7); correspond with A. McGinnis re same (0.1); review and analyze LLCA (0.3).	3.10
McGinnis, Anne	Tax	Counsel	03/28/23	722	Teleconference with C. Meredith-Goujon, PW team re Bruno's steps (0.7); correspond with same re same (0.6); teleconference with R. Holo, KPMG, Revlon re Bruno's steps (0.7); review and analyze exit structure (2.7).	4.70

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Name	Dept	Title	Date	Task	Description	Hours
Holo, Robert	Tax	Partner	03/28/23	722	Review and analyze KPMG FABTL borrower considerations deck (0.2); review and revise KPMG Bruno's deck (0.1); correspond with A. McGinnis, PW and KPMG teams re legal entity rationalization steps (0.1); correspond with DPW and Blue Torch teams re same (0.1); correspond with A. McGinnis, PW tax and restructuring teams re Bruno's steps and necessary Revlon review of same (0.1); teleconference with V. Lysikatos Carey, PW team re tax closing items issues (0.4); review and analyze materials re same (0.4); teleconference with A. McGinnis, V. Lysikatos Carey, KPMG, Revlon, PW, and A&M teams re Bruno's and related legal and tax issues (0.7).	2.10
Meredith-Goujon, Claudine K	Corp	Partner	03/28/23	722	Conference with A. McGinnis, PW re Bruno's steps walk through (0.7); correspond with J. Braibanti re same (0.3); correspond with A. McGinnis, Revlon and PW re revised tax deck (0.6).	1.60
Britton, Robert	Rstr	Partner	03/28/23	722	Conference with R. Holo and PW team re Revlon tax closing issues (0.4); correspond with A. Kidd (Revlon) re same (0.2).	0.60
Epstein, David	Corp	Counsel	03/28/23	722	Teleconference with A. McGinnis, PW tax team re Bruno's transaction (0.7); review and analyze same (0.2).	0.90
de la Bastide, Thomas V	Corp	Partner	03/28/23	722	Teleconference with A. McGinnis, PW tax, restructuring and finance teams re Bruno's tax reorganization steps (0.7); review and analyze same (0.6); conference with R. Holo, PW, Company, KPMG re Bruno's structure (0.7).	2.00
Bolin, Brian	Rstr	Partner	03/28/23	722	Partially attend conference with A. McGinnis, PW tax team re Bruno's steps.	0.50
Braibanti, Jill	LEGL	Associate	03/28/23	722	Teleconference with A. McGinnis, C. Meredith-Goujon, PW teams re Bruno's steps and tax planning.	0.70
Ferrari, Marta	Corp	Associate	03/28/23	722	Teleconference with B. Mohan, PW Tax team re potential Bruno Transactions (0.8); teleconference with A. McGinnis, D. Walsh (Revlon), PW team re Tax reorganization and intercompany loans (0.5).	1.30
Mohan, Bharath	Corp	Associate	03/28/23	722	Meet with Hotes, PW team re Bruno transaction.	0.80
Hotes, John R	Corp	Associate	03/28/23	722	Conference with Mohan, PW tax re Bruno transaction.	0.80
Rabinowitz, Danielle	Tax	Associate	03/28/23	722	Teleconference with A. McGinnis re Bruno's steps and tax planning (0.7); draft follow-up points re same (0.3); correspond with V. Lysikatos Carey re same (0.2); revise notes re same (0.2); teleconference with T. Matlock (DPW) re same (0.5); review precedent Bruno's plans and filing documentation re same (2.2).	4.10
Cen, Leo	Corp	Associate	03/28/23	722	Conference with Ferrari, PW tax team re tax reorganization.	0.50

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Name	Dept	Title	Date	Task	Description	Hours
Lysikatos Carey, Valentine	Tax	Associate	03/29/23	722	Review and analyze revised transaction structure from KPMG team (0.3); teleconference with J. Sweet (KS), R. Lawrence (KPMG), PW team re legal entity rationalization and related tax issues (0.5); teleconference with A. McGinnis, T. Matlock (DPW Tax), KPMG, PW team re tax structure (0.8); review and analyze PI and GUC trust agreements (0.9).	2.50
Holo, Robert	Tax	Partner	03/29/23	722	Correspond with A. McGinnis, PW team re legal entity rationalization and related changes to ABL and FABTL commitment papers (0.1); teleconference with V. Lysikatos Carey, PW, KPMG, and KS teams re legal entity rationalization and related tax analysis (0.5); review and analyze KPMG team modeling materials re same (0.3); correspond with D. Rabinowitz, PW and KPMG teams re same (0.2); correspond with PW, Revlon, DPW and KPMG teams re Interco cleanup issues (0.2); teleconference with A. McGinnis, PW, KPMG and DPW teams re emergence structure (0.8).	2.10
McGinnis, Anne	Tax	Counsel	03/29/23	722	Teleconference with V. Lysikatos Carey, T. Matlock (DPW), DPW team re emergence structure (0.8); teleconference with Blue Torch team re debt covenants (0.7); review and analyze exit structure (1.3).	2.80
Rabinowitz, Danielle	Tax	Associate	03/29/23	722	Correspond with R. Holo, PW team re steps plan (0.1); revise steps deck (2.0); review and analyze side letters (2.1).	4.20
McGinnis, Anne	Tax	Counsel	03/30/23	722	Teleconference with V. Lysikatos Carey, PW team, T. Matlock (DPW); Davis Polk team re tax matters (1.2); revise exit decks (5.1).	6.30
Lysikatos Carey, Valentine	Tax	Associate	03/30/23	722	Review and analyze transaction steps memo (0.8); teleconference with T. Matlock (DPW Tax), KPMG team, A. McGinnis, R. Holo, and D. Rabinowitz re structure deck (1.2); review and analyze follow up re transaction steps deck (1.3); review and analyze revised memo (1.1).	4.40
Rabinowitz, Danielle	Tax	Associate	03/30/23	722	Review and analyze transaction steps memo (1.9); teleconference with A. McGinnis, T. Matlock (DPW), PW and DPW teams re structure deck (1.2); revise transaction steps memo (2.9).	6.00
Holo, Robert	Tax	Partner	03/30/23	722	Teleconference with A. McGinnis, PW, DPW and KPMG teams re tax modeling for potential sale (1.0); review and analyze revised transaction steps decks from KPMG (0.3); correspond with PW team re tax, restructuring and financing issues related to structure steps (0.1).	1.40
Lysikatos Carey, Valentine	Tax	Associate	03/31/23	722	Review and analyze follow up questions re intercompany cleanups and transaction steps documents (1.8); review and analyze securities tax question (0.7).	2.50

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Name	Dept	Title	Date	Task	Description	Hours
Meredith-Goujon, Claudine K	Corp	Partner	03/31/23	722	Review and analyze updated tax deck.	0.20
McGinnis, Anne	Tax	Counsel	03/31/23	722	Revise transaction steps memorandum (5.7); teleconference with KPMG team re same (0.6); teleconference with D. Rabinowitz, T. Matlock (DPW) re same, legal entity rationalization (1.0).	7.30
Rabinowitz, Danielle	Tax	Associate	03/31/23	722	Correspond with A. McGinnis, PW team re changes to transaction steps memorandum (0.5); teleconference with A. McGinnis, T. Matlock (DPW) re same, legal entity rationalization (1.0); revise transaction steps memorandum (2.0); research re section 871(m) (3.2).	6.70
Holo, Robert	Tax	Partner	03/31/23	722	Review updated transaction steps deck and memo (0.6); review tax attribute model (0.2); correspond with A. McGinnis, PW re legal entity rationalization, interco clean up, choice of transaction structure (0.6); correspond with A. Kidd (Revlon), PW, KPMG and Revlon re same (0.1); review DPW comments on transaction steps memo (0.5); correspond with A. McGinnis, PW team re same (0.2).	2.20
Lysikatos Carey, Valentine	Tax	Associate	04/01/23	722	Teleconference with R. Holo, PW team, KPMG re legal entity rationalization.	0.30
Holo, Robert	Tax	Partner	04/01/23	722	Teleconference with A. McGinnis, PW team, KPMG re legal entity rationalization, related tax and finance issues (0.3); correspond with D. Epstein re same (0.1).	0.40
McGinnis, Anne	Tax	Counsel	04/01/23	722	Teleconference with R. Holo, PW, KPMG re legal entity rationalization and related issues (0.3); teleconference with ABL counsel re credit agreement (0.5); correspond with D. Epstein re same (0.6).	1.40
McGinnis, Anne	Tax	Counsel	04/02/23	722	Correspond with client and credit team regarding FABL tax review.	0.30
McGinnis, Anne	Tax	Counsel	04/03/23	722	Correspond with R. Holo, P. Karsnitz, PW, KPMG, and DPW re tax structure.	0.60
Holo, Robert	Tax	Partner	04/03/23	722	Correspond with A. McGinnis, PW, KPMG, Revlon and DPW re choice of Bruno's structure (0.1); correspond with D. Epstein, PW team re financing structure and related tax issues (0.1).	0.20
Lysikatos Carey, Valentine	Tax	Associate	04/03/23	722	Correspond with D. Rabinowitz re securities tax question (0.3); review and analyze correspondence re credit agreements and structure (0.6).	0.90
Blumberg, Irene	Rstr	Associate	03/27/23	724	Correspond with B. Masumoto re UST objection.	0.10
Britton, Robert	Rstr	Partner	03/28/23	724	Conference with B. Masumoto (UST), A. Page re UST objection to confirmation.	0.40
Page, Alana	Rstr	Associate	03/28/23	724	Teleconference with R. Britton, PW team, and B. Masumoto re UST confirmation objection (0.4); correspond with R. Britton re same (0.1).	0.50

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Name	Dept	Title	Date	Task	Description	Hours
Rahnama, Omid	Rstr	Associate	03/01/23	727	Correspond with S. Rosenthal (Revlon) re vendor agreement (0.2); review and revise asset purchase agreement re vendor materials (0.8); correspond with R. Britton and J. Heasley re same (0.2); review and analyze revised vendor agreement (0.3); correspond with B. Shelley (Revlon) re same (0.1); review and revise draft vendor trade agreement (0.6); correspond with D. Shiffman re same (0.1); correspond with K. Kimpler and R. Britton re vendor matter (0.3); review and analyze plan re same (0.3).	2.90
Rahnama, Omid	Rstr	Associate	03/08/23	727	Correspond with D. Shiffman (A&M) and B. Mohan re vendor asset purchase agreement (0.3); correspond with vendor re trade agreement (0.1); teleconference with D. Shiffman re vendor issues (0.3).	0.70
Rahnama, Omid	Rstr	Associate	03/09/23	727	Correspond with D. Shiffman (A&M) and B. Mohan re asset purchase agreement for vendor (0.1); review and revise draft vendor trade agreement (0.7); correspond with D. Shiffman (A&M) re same (0.1).	0.90
Rahnama, Omid	Rstr	Associate	03/10/23	727	Review and revise draft vendor trade agreement (0.7); correspond with D. Shiffman (A&M) and vendor's counsel re same (0.1); review and revise draft vendor trade agreement (0.4); correspond with J. Hanson and vendor's counsel re same (0.1); review and analyze vendor agreement (0.4); correspond with R. Britton re vendor agreement analysis (0.3).	2.00
Rahnama, Omid	Rstr	Associate	03/13/23	727	Revise draft trade agreement (0.6); correspond with D. Shiffman (A&M) re same and other vendor matters (0.3); correspond with B. Cornell (Revlon) re vendor matter (0.1).	1.00
Rahnama, Omid	Rstr	Associate	03/14/23	727	Review and analyze vendor agreement, termination notice (0.5); conference with B. Cornell (Revlon) and D. Shiffman (A&M) re vendor matter (0.4); teleconference with D. Shiffman (A&M) re same (0.2).	1.10
Rahnama, Omid	Rstr	Associate	03/15/23	727	Teleconference with D. Shiffman (A&M) re vendor matters (0.3); teleconference with P. Campeau (Revlon) and T. Heinz (Revlon) re vendor matter (0.6); review and analyze vendor agreement (0.3); correspond with B. Shelley (Revlon) re vendor matter (0.1); teleconference with D. Shiffman (A&M) and vendor re vendor matter (0.4); correspond with A. Stitzer re vendor matter (0.2).	1.90
Rahnama, Omid	Rstr	Associate	03/16/23	727	Correspond with D. Shiffman (A&M) re vendor matter (0.3); draft correspondence to vendor re same (0.2); correspond with A. Stitzer (vendor's counsel) re vendor matter (0.1).	0.60
Rahnama, Omid	Rstr	Associate	03/17/23	727	Conference with A. Stitzer (vendor's counsel) re vendor matter (0.4); conference with D. Shiffman re vendor matter (0.2).	0.60

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Date: 04/28/2023

Name	Dept	Title	Date	Task	Description	Hours
Rahnama, Omid	Rstr	Associate	03/20/23	727	Review and analyze comments in connection with vendor agreement (0.4); correspond with vendor and B. Mohan re same (0.1).	0.50
Rahnama, Omid	Rstr	Associate	03/22/23	727	Correspond with I. Blumberg and D. Shiffman re vendor matter (0.4); correspond with B. Mohan and D. Shiffman re vendor agreement (0.2).	0.60
Rahnama, Omid	Rstr	Associate	03/24/23	727	Correspond with R. Spinner re vendor matter.	0.20
Rahnama, Omid	Rstr	Associate	03/27/23	727	Correspond with A Stitzer (vendor's counsel) re plan objection (0.3); correspond with I. Blumberg re same (0.1).	0.40
Rahnama, Omid	Rstr	Associate	03/27/23	727	Correspond with K. Sohr (A&M) and D. Shiffman (A&M) re vendor matters.	0.30
Rahnama, Omid	Rstr	Associate	03/28/23	727	Teleconference with K. Sohr (A&M) re vendor matters (0.2); teleconference with P. Mosley (A&M) re vendor matter (0.4); correspond with D. Shiffman re vendor agreement (0.1).	0.70
Blumberg, Irene	Rstr	Associate	03/29/23	727	Correspond with D. Shiffman, O. Rahnama re critical vendors.	0.20
Rahnama, Omid	Rstr	Associate	03/29/23	727	Correspond with K. Sohr (A&M) re vendor matters (0.2); review and revise draft vendor agreement (0.3); correspond with vendor re same (0.2).	0.70
Rahnama, Omid	Rstr	Associate	03/30/23	727	Correspond with K. Learn (Revlon) and A. Shelby (vendor's counsel) re vendor matter (0.1); correspond with D. Shiffman re vendor agreement and matter (0.2); correspond with B. Englander (vendor's counsel) re same (0.1); correspond with R. Britton re vendor matter (0.3); teleconference with P. Mosely (A&M) re same (0.1); correspond with R. Britton and D. Shiffman (A&M) re vendor matter (0.4).	1.20
Britton, Robert	Rstr	Partner	03/30/23	727	Correspond with Rahnama re vendor issues (0.5); analyze vendor agreement (0.3).	0.80
Rahnama, Omid	Rstr	Associate	03/31/23	727	Correspond with D. Shiffman (A&M) re vendor agreement.	0.20
Rahnama, Omid	Rstr	Associate	04/01/23	727	Draft vendor trade agreement (0.4); correspond with K. Sohr (A&M) re same (0.1).	0.50
TOTAL						3,919.20

Exhibit L

	Firms	Count	Low	25th Percentile	Median	75th Percentile	High
2022							
Partners							
	1) Akin Gump Strauss Hauer & Feld LLP	21	\$1,205	\$1,400	\$1,525	\$1,775	\$1,775
	2) Davis Polk & Wardwell LLP	18	\$1,925	\$1,925	\$1,950	\$1,950	\$1,950
	3) Jones Day	12	\$1,100	\$1,188	\$1,250	\$1,400	\$1,550
	4) Kasowitz Benson Torres LLP	2	\$540	\$705	\$870	\$1,035	\$1,200
	5) Kirkland & Ellis LLP	32	\$1,185	\$1,310	\$1,610	\$1,804	\$1,995
	6) Kramer Levin Naftalis & Frankel LLP	6	\$1,275	\$1,325	\$1,413	\$1,538	\$1,575
	7) Latham & Watkins LLP	11	\$1,265	\$1,315	\$1,505	\$1,875	\$2,075
	8) Morrison & Foerster LLP	4	\$1,075	\$1,113	\$1,250	\$1,394	\$1,450
	9) O'Melveny & Meyers LLP	1	\$1,225	\$1,225	\$1,225	\$1,225	\$1,225
	10) Paul Hastings, LLP	6	\$920	\$1,331	\$1,388	\$1,463	\$1,475
	11) Paul, Weiss, Rifkind, Wharton & Garrison LLP	7	\$1,560	\$1,790	\$1,935	\$2,025	\$2,025
	12) Quinn Emanuel Urquhart & Sullivan, LLP	4	\$1,320	\$1,320	\$1,503	\$1,771	\$2,030
	13) Sidley Austin LLP	12	\$1,225	\$1,269	\$1,338	\$1,400	\$1,550
	14) Skadden, Arps, Slate, Meagher & Flom LLP	24	\$848	\$1,175	\$1,607	\$1,785	\$1,980
	15) Weil, Gotshal & Manges LLP	10	\$1,140	\$1,432	\$1,474	\$1,670	\$1,950
	16) Willkie Farr & Gallagher LLP	11	\$1,275	\$1,325	\$1,650	\$1,800	\$1,900
Of Counsel							
	1) Akin Gump Strauss Hauer & Feld LLP	34	\$670	\$925	\$1,065	\$1,146	\$1,330
	2) Davis Polk & Wardwell LLP	14	\$1,465	\$1,465	\$1,465	\$1,465	\$1,465
	3) Jones Day	4	\$1,025	\$1,044	\$1,088	\$1,144	\$1,200
	4) Kramer Levin Naftalis & Frankel LLP	2	\$1,105	\$1,105	\$1,105	\$1,105	\$1,105
	5) Latham & Watkins LLP	3	\$1,210	\$1,273	\$1,335	\$1,400	\$1,465
	6) Morrison & Foerster LLP	2	\$965	\$968	\$970	\$973	\$975
	7) O'Melveny & Meyers LLP	2	\$685	\$716	\$748	\$779	\$810
	8) Paul, Weiss, Rifkind, Wharton & Garrison LLP	2	\$1,525	\$1,525	\$1,525	\$1,525	\$1,525
	9) Quinn Emanuel Urquhart & Sullivan, LLP	1	\$1,285	\$1,285	\$1,285	\$1,285	\$1,285
	10) Sidley Austin LLP	3	\$1,075	\$1,150	\$1,225	\$1,225	\$1,225
	11) Skadden, Arps, Slate, Meagher & Flom LLP	7	\$857	\$933	\$1,269	\$1,410	\$1,495
	12) Weil, Gotshal & Manges LLP	1	\$978	\$978	\$978	\$978	\$978
	13) Willkie Farr & Gallagher LLP	1	\$1,900	\$1,900	\$1,900	\$1,900	\$1,900
Associates							
	1) Akin Gump Strauss Hauer & Feld LLP	9	\$605	\$670	\$710	\$860	\$965
	2) Davis Polk & Wardwell LLP	66	\$515	\$935	\$1,190	\$1,310	\$1,315
	3) Jones Day	15	\$550	\$625	\$725	\$763	\$1,100
	4) Kasowitz Benson Torres LLP	2	\$625	\$625	\$625	\$625	\$625
	5) Kirkland & Ellis LLP	53	\$503	\$795	\$910	\$1,035	\$1,295
	6) Kramer Levin Naftalis & Frankel LLP	8	\$615	\$715	\$880	\$1,030	\$1,090
	7) Latham & Watkins LLP	22	\$655	\$882	\$990	\$1,115	\$1,165
	8) Morrison & Foerster LLP	5	\$715	\$715	\$755	\$765	\$1,050
	9) O'Melveny & Meyers LLP	1	\$540	\$540	\$540	\$540	\$540
	10) Paul Hastings, LLP	8	\$680	\$891	\$955	\$1,050	\$1,120
	11) Paul, Weiss, Rifkind, Wharton & Garrison LLP	12	\$735	\$998	\$1,173	\$1,228	\$1,525
	12) Sidley Austin LLP	17	\$560	\$775	\$895	\$1,050	\$1,100
	13) Skadden, Arps, Slate, Meagher & Flom LLP	45	\$380	\$628	\$785	\$1,055	\$1,275
	14) Weil, Gotshal & Manges LLP	17	\$536	\$655	\$840	\$1,075	\$1,200
	15) Willkie Farr & Gallagher LLP	12	\$825	\$1,041	\$1,098	\$1,195	\$1,240
Paralegals							
	1) Akin Gump Strauss Hauer & Feld LLP	5	\$265	\$355	\$420	\$420	\$475
	2) Davis Polk & Wardwell LLP	18	\$220	\$368	\$375	\$506	\$935
	3) Jones Day	3	\$350	\$375	\$400	\$413	\$425
	4) Kasowitz Benson Torres LLP	2	\$295	\$308	\$320	\$333	\$345
	5) Kirkland & Ellis LLP	4	\$365	\$365	\$373	\$384	\$395
	6) Kramer Levin Naftalis & Frankel LLP	2	\$400	\$410	\$420	\$430	\$440
	7) Latham & Watkins LLP	3	\$330	\$393	\$455	\$470	\$485
	8) Morrison & Foerster LLP	1	\$445	\$445	\$445	\$445	\$445
	9) Paul, Weiss, Rifkind, Wharton & Garrison LLP	1	\$455	\$455	\$455	\$455	\$455
	10) Quinn Emanuel Urquhart & Sullivan, LLP	1	\$455	\$455	\$455	\$455	\$455
	11) Sidley Austin LLP	11	\$350	\$405	\$425	\$435	\$475
	12) Skadden, Arps, Slate, Meagher & Flom LLP	14	\$246	\$322	\$362	\$495	\$495
	13) Weil, Gotshal & Manges LLP	6	\$234	\$292	\$346	\$383	\$495
	14) Willkie Farr & Gallagher LLP	8	\$280	\$291	\$313	\$356	\$425
Law Clerk							
	1) Akin Gump Strauss Hauer & Feld LLP	1	\$510	\$510	\$510	\$510	\$510
	2) Davis Polk & Wardwell LLP	2	\$535	\$550	\$565	\$580	\$595
Staff Attorney							
	1) Jones Day	1	\$550	\$550	\$550	\$550	\$550
	2) Kirkland & Ellis LLP	1	\$485	\$485	\$485	\$485	\$485
	3) Latham & Watkins LLP	3	\$470	\$470	\$470	\$490	\$510
	4) Skadden, Arps, Slate, Meagher & Flom LLP	3	\$422	\$441	\$460	\$467	\$473

Position	Type	Firms	Count	Low	25th	Median	75th	High
				Rate (%Diff.)	Percentile	Rate (%Diff.)	Percentile	Rate (%Diff.)
All Partners								
		All Firms Sampled	181	\$540 (-14%)	\$1,315 (+44%)	\$1,525 (+53%)	\$1,795 (+60%)	\$2,075 (+54%)
		Labaton Sucharow LLP	23	\$625	\$913	\$1,000	\$1,125	\$1,350
Senior Partners								
		All Firms Sampled	154	\$540 (-36%)	\$1,350 (+46%)	\$1,565 (+57%)	\$1,823 (+58%)	\$2,075 (+54%)
		Labaton Sucharow LLP	21	\$850	\$925	\$1,000	\$1,150	\$1,350
Mid-Level Partners								
		All Firms Sampled	18	\$1,100 (+38%)	\$1,284 (+60%)	\$1,363 (+70%)	\$1,501 (+88%)	\$1,925 (+141%)
		Labaton Sucharow LLP	1	\$800	\$800	\$800	\$800	\$800
Junior Partners								
		All Firms Sampled	9	\$1,075 (+72%)	\$1,235 (+98%)	\$1,275 (+104%)	\$1,275 (+104%)	\$1,925 (+208%)
		Labaton Sucharow LLP	1	\$625	\$625	\$625	\$625	\$625
Of Counsel								
		All Firms Sampled	76	\$670 (+22%)	\$967 (+45%)	\$1,135 (+57%)	\$1,424 (+82%)	\$1,900 (+90%)
		Labaton Sucharow LLP	16	\$550	\$669	\$725	\$781	\$1,000
All Associates								
		All Firms Sampled	292	\$380 (-11%)	\$769 (+71%)	\$935 (+87%)	\$1,165 (+117%)	\$1,525 (+154%)
		Labaton Sucharow LLP	24	\$425	\$450	\$500	\$538	\$600
Senior Associates								
		All Firms Sampled	63	\$553 (+23%)	\$1,038 (+89%)	\$1,165 (+98%)	\$1,280 (+113%)	\$1,525 (+154%)
		Labaton Sucharow LLP	8	\$450	\$550	\$588	\$600	\$600
Mid-Level Associates								
		All Firms Sampled	92	\$503 (+1%)	\$933 (+87%)	\$1,055 (+111%)	\$1,173 (+123%)	\$1,315 (+150%)
		Labaton Sucharow LLP	7	\$500	\$500	\$500	\$525	\$525
Junior Associates								
		All Firms Sampled	137	\$380 (-11%)	\$660 (+47%)	\$795 (+77%)	\$910 (+92%)	\$1,315 (+177%)
		Labaton Sucharow LLP	9	\$425	\$450	\$450	\$475	\$475
Staff Attorneys								
		All Firms Sampled	8	\$422 (+34%)	\$468 (+22%)	\$472 (+16%)	\$491 (+16%)	\$550 (+22%)
		Labaton Sucharow LLP	23	\$315	\$383	\$405	\$425	\$450
Law Clerks								
		All Firms Sampled	3	\$510 (+13%)	\$523 (+16%)	\$535 (+19%)	\$565 (+26%)	\$595 (+32%)
		Labaton Sucharow LLP	1	\$450	\$450	\$450	\$450	\$450
Paralegals								
		All Firms Sampled	79	\$220 (-40%)	\$338 (-10%)	\$380 (+1%)	\$443 (+13%)	\$935 (+115%)
		Labaton Sucharow LLP	14	\$365	\$375	\$375	\$390	\$435

Exhibit M



THE TOP 50 OF 2022

A comprehensive listing of the top 50 plaintiff law firms ranked by the total cash amount of 2022 North American securities class action settlements.

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EXECUTIVE SUMMARY

In this report, ISS SCAS reviews the securities-related settlements of 2022 and ranks the Top 50 plaintiffs' securities firms by aggregate settlement amount achieved for shareholders. For the calendar year 2022, ISS Securities Class Action Services (ISS SCAS) recorded 143 approved securities class action settlements within North America. Collectively, 2022 delivered \$4.87 billion in settlement funds for distribution, an increase of 37.2 percent from the \$3.55 billion recovered in 2021.

The top five recorded North American settlements from 2022 were as follows:

- Twitter, Inc. – \$809,500,000
- Teva Pharmaceutical Industries Ltd. – \$420,000,000
- Luckin Coffee, Inc. – \$175,000,000
- BlackBerry Ltd. – \$165,000,000
- NovaStar Mortgage, Inc. – \$165,000,000

Of the 143 settlements, 141 occurred in the United States, while only two occurred in Canada. The largest Canadian resolution of 2022 was the CAD \$125,000,000 (USD \$97,901,600) [Canadian Imperial Bank of Commerce \(CIBC\)](#) settlement. Of the 141 U.S. settlements, 110 were litigated in federal courts, while 31 were pursued in state courts.

“2022 delivered \$4.87 billion in settlement funds for distribution, an increase of 37.2 percent from the \$3.55 billion recovered in 2021.”

In addition to the 143 settlements noted above, there were an additional six settlements – all litigated in U.S. state courts – that resulted in no settlement fund.¹ These six cases are not included in any of the statistics or charts within this “Top 50” report.

Of the 143 settlements, 18 of these settlements have already disbursed roughly \$523.6 million back to eligible claimants. This relatively modest amount, however, is unsurprising, as disbursements generally take 16-to-18 months, on average, from the claim deadline date to the disbursement date. As previously reported by ISS SCAS, five Claims Administrators managed roughly 90 percent of the cases: A.B. Data, Epiq Global, Gilardi & Co., JND Legal Administration, and Strategic Claims Services.

On average, the litigation life cycle for the 143 settlements with monetary shareholder recoveries was 3.71 years... an increase in time of 12 percent over the 3.31 years average from 2021 settlements. ISS SCAS considers this time period to be from the date of the initially filed complaint through the official settlement date as noted within court documents.

Final settlement approval by the courts was at its lowest in the first quarter of 2022 with a quantity of 32 settlements, while the highest figure occurred in the fourth quarter of 2022 with a high of 41. The second and third quarters of 2022 had totals of 34 and 36, respectively.

¹ These types of non-monetary settlements often times require corporate governance reforms.

In terms of court venue, the highest level of activity during 2022 was the following:

- U.S.D.C. New York (Southern) – 26 settlements valued at \$882,500,000
- Delaware Court of Chancery – 17 settlements valued at \$526,175,000
- U.S.D.C. California (Northern) – 10 settlements valued at \$1,029,250,000
- U.S.D.C. California (Central) – 10 settlements valued at \$295,988,374
- U.S.D.C. New Jersey – 9 settlements valued at \$147,850,000

ISS SCAS’ analysis of all 2022 settlements identified Robbins Geller Rudman & Dowd as the only plaintiff law firm to surpass the \$1 billion threshold, while 13 other firms exceeded the \$100 million mark. In comparison, last year’s “Top 50” Report listed one firm above the \$1 billion mark and only six plaintiff law firms surpassing \$100 million in settlements. In the year prior, 2020, only one plaintiff law firm surpassed the \$1 billion mark and only four law firms surpassed \$100 million in settlements.

Only (one) plaintiff law firm surpass(ed) the \$1 billion threshold, while 13 other firms exceeded the \$100 million mark.

Robbins Geller ranked first among plaintiffs’ firms with \$1,750,080,874 in total settlement funds during 2022. The firm, with nine offices across the U.S., was co-lead counsel in the largest resolution of 2022 – the [\\$809.5 million Twitter](#) settlement. Robbins Geller also represented shareholders in a number of substantial settlements, including Novo Nordisk and Stamps.com at \$100,000,000 each, and Altria Group at \$90,000,000. This is the third year in a row where Robbins Geller surpassed \$1 billion in settlements and secured the largest shareholder settlement of the year – in 2021, it was [Valeant Pharmaceuticals at \\$1.21 billion](#); in 2020, it was [American Realty Capital Properties at \\$1.025 billion](#).

Bernstein Litowitz Berger & Grossmann, with five offices across the U.S., ranked second among plaintiffs’ firms with \$920,650,000 in total settlement funds, including two actions which reached (or exceeded) the \$100 million threshold – Luckin Coffee at \$175,000,000 and Novo Nordisk at \$100,000,000.

Of note, for ten straight years of this report from ISS SCAS, Bernstein Litowitz has finished in the top two, while Robbins Geller has finished in the top three. (In 2018, Pomerantz finished first due to its role as lead counsel in the \$3 billion Petrobras settlement.)

Law firms rounding out the top five rankings in total settlement funds from 2022 include Motley Rice, Bleichmar Fonti & Auld, and Kessler Topaz Meltzer & Check:

- Motley Rice was co-lead counsel in the aforementioned Twitter case
- Bleichmar Fonti & Auld was lead counsel in the second largest resolution of 2022, the \$420 million Teva Pharmaceutical Industries settlement
- Kessler Topaz served as lead counsel (or co-lead counsel) in two significantly sized settlements: Luckin Coffee at \$175 million and Walgreens at \$105 million

The top 50 plaintiffs’ law firms are ranked in this report by the dollar value of final class action settlements in which the law firm was appointed as lead or co-lead counsel. In addition, the report ranks the top ten law firms based upon the number of settlements recorded for the year. Leading this latter category with double-digit quantities were Robbins Geller with 27 settled cases, The Rosen Law Firm

with 19 settled cases, Bernstein Litowitz and Pomerantz with 18 settled cases each, and Labaton Sucharow with 13 settled cases. Notably, in last year’s “Top 50” report, all five of these firms were also in the top ten in terms of the number of settlements secured.

Looking ahead, as of this report’s publication, \$2.1 billion in settlement funds have a court approved settlement date scheduled in 2023 from 48 North American settlements. This includes investor actions against [Dell Technologies \(\\$1 billion\)](#), [McKesson \(\\$141 million\)](#), Newell Brands (\$102.5 million), [Infinity Q \(up to \\$48 million\)](#), Inovio Pharmaceuticals (\$44 million), Grubhub (\$42 million), United States Steel (\$40 million), Credit Suisse Group (\$32.5 million), [Lyft \(\\$25 million\)](#), Yelp (\$22.25 million), and Oracle (\$17.5 million) to name but a few.

Furthermore, approximately two dozen North American investor class actions have announced tentative settlements valued at \$1 billion; these actions await official court approvals. The largest such cases from this group include Wells Fargo (\$300 million), Micro Focus International (\$107.5 million), [Grupo Televisa \(\\$95 million\)](#), and Mohawk Industries (\$60 million).

With all of this continued activity within the securities litigation landscape, members of the financial, legal, and professional services industries can count on ISS Securities Class Action Services to continue to monitor and keep the community up-to-date with regard to class action trends & developments.

#

METHODOLOGY

The ISS Securities Class Action Services Top 50 Report is based upon North American settlement data from its proprietary database, RecoverMax. ISS SCAS tracks, among many other things, U.S. (Federal and State) and Canadian shareholder class actions.

Each plaintiff law firm was contacted by ISS SCAS to verify settlement data pertaining to that firm. This report is specific to North American securities class action cases only and does not include data on ERISA, derivative lawsuits, or antitrust litigation. Canadian settlements were converted into U.S. dollars at the time of the announced settlement. Antitrust litigation and non-north American shareholder class & group actions – which are closely tracked and monitored by ISS SCAS – are not included within this report.

This report reflects only those final settlements that resulted in the creation of a cash settlement fund on behalf of shareholders. Cases which resulted in no settlement fund being created, but instead had only non-financial settlement terms (such as corporate governance changes, changes in the terms of a merger, etc.) are not included. Further information on these types of settlements can be found in the ISS SCAS database, RecoverMax.

This report credits law firms that served as lead or co-lead counsel in a case with the entire settlement fund, regardless of how many other firms served as lead or co-lead counsel in the case. Thus, for a settlement of \$5,000,000 where there were two lead counsel firms, the ISS Securities Class Action Services Top 50 Report credits both law firms with \$5,000,000 – rather than dividing the settlement fund between them. For purposes of this report, law firms are considered as the lead or co-lead counsel if (and only if) they are identified as such in the notice of settlement document distributed to shareholders.

TERMINOLOGY

Total Settlement Amount listed in the “Top 50” is the total cash amount made available to investors for recovery for all final settlements occurring in 2022 in which the law firm served as lead or co-lead counsel, and where a settlement fund was created.

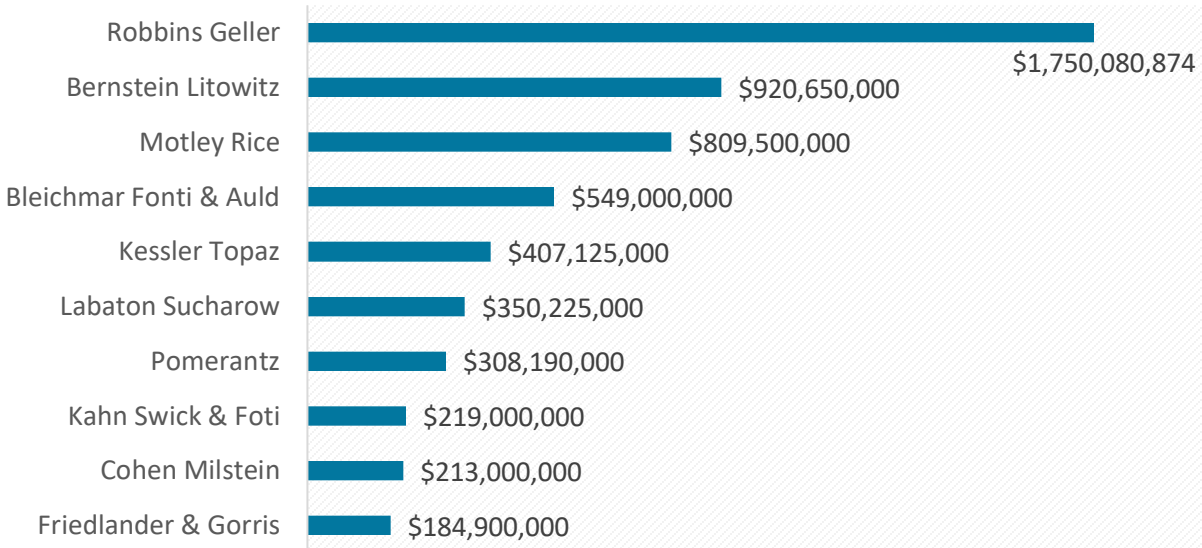
Number of Settlements listed in the “Top 50” represents the total number of final settlements occurring in 2022 in which the law firm served as lead or co-lead counsel, and where a settlement fund was created.

THE TOP 50 OF 2022

RANK	LAW FIRM	TOTAL SETTLEMENT AMOUNT
1	Robbins Geller Rudman & Dowd	\$1,750,080,874
2	Bernstein Litowitz Berger & Grossmann	\$920,650,000
3	Motley Rice	\$809,500,000
4	Bleichmar Fonti & Auld	\$549,000,000
5	Kessler Topaz Meltzer & Check	\$407,125,000
6	Labaton Sucharow	\$350,225,000
7	Pomerantz	\$308,190,000
8	Kahn Swick & Foti	\$219,000,000
9	Cohen Milstein Sellers & Toll	\$213,000,000
10	Friedlander & Gorris	\$184,900,000
11	Saxena White	\$171,650,000
12	Friedman Oster & Tejtel	\$166,500,000
13	Brower Piven	\$165,000,000
14	Andrews & Springer	\$154,000,000
15	Himelfarb Proszanski	\$97,901,600
15	Rochon Genova	\$97,901,600
17	The Rosen Law Firm	\$93,057,500
18	Berger & Montague	\$78,500,000
19	Entwistle & Cappucci	\$73,100,000
20	Levi & Korsinsky	\$69,325,000
21	Barrack Rodos & Bacine	\$65,750,000
22	Bragar Eigel & Squire	\$64,250,000
23	Saxton & Stump	\$63,400,000
24	Chappell Smith & Arden	\$63,000,000
24	Morton & Gettys	\$63,000,000

26	Berman Tabacco	\$53,600,000
27	Glancy Prongay & Murray	\$52,110,000
28	Scott + Scott	\$45,275,000
29	Block & Leviton	\$44,875,000
30	Hagens Berman Sobol Shapiro	\$37,000,000
31	Gordon Ball	\$35,000,000
32	Bottini & Bottini	\$34,250,000
33	Wolf Popper	\$29,025,000
34	Tousley Brain Stephens	\$26,200,000
35	Prickett Jones & Elliott	\$21,625,000
36	Cotchett Pitre & McCarthy	\$19,250,000
37	Bernstein Liebhard	\$19,000,000
38	Miller Shah	\$18,000,000
39	Federman & Sherwood	\$15,100,000
40	Grant & Eisenhofer	\$14,250,000
40	Potter Anderson & Corroon	\$14,250,000
42	Lieff Cabraser Heimann & Bernstein	\$14,100,000
43	Cera	\$13,950,000
44	Kirby McInerney	\$13,500,000
45	Holzer & Holzer	\$12,750,000
46	Monteverde & Associates	\$12,400,000
47	Kaplan Fox & Kilsheimer	\$11,200,000
48	Roche Freedman	\$10,500,000
49	Ademi	\$10,000,000
50	Goren Law	\$9,200,000

TOP 10 FIRMS BY DOLLAR SIZE OF SETTLEMENTS



TOP 10 FIRMS BY NUMBER OF SETTLEMENTS²

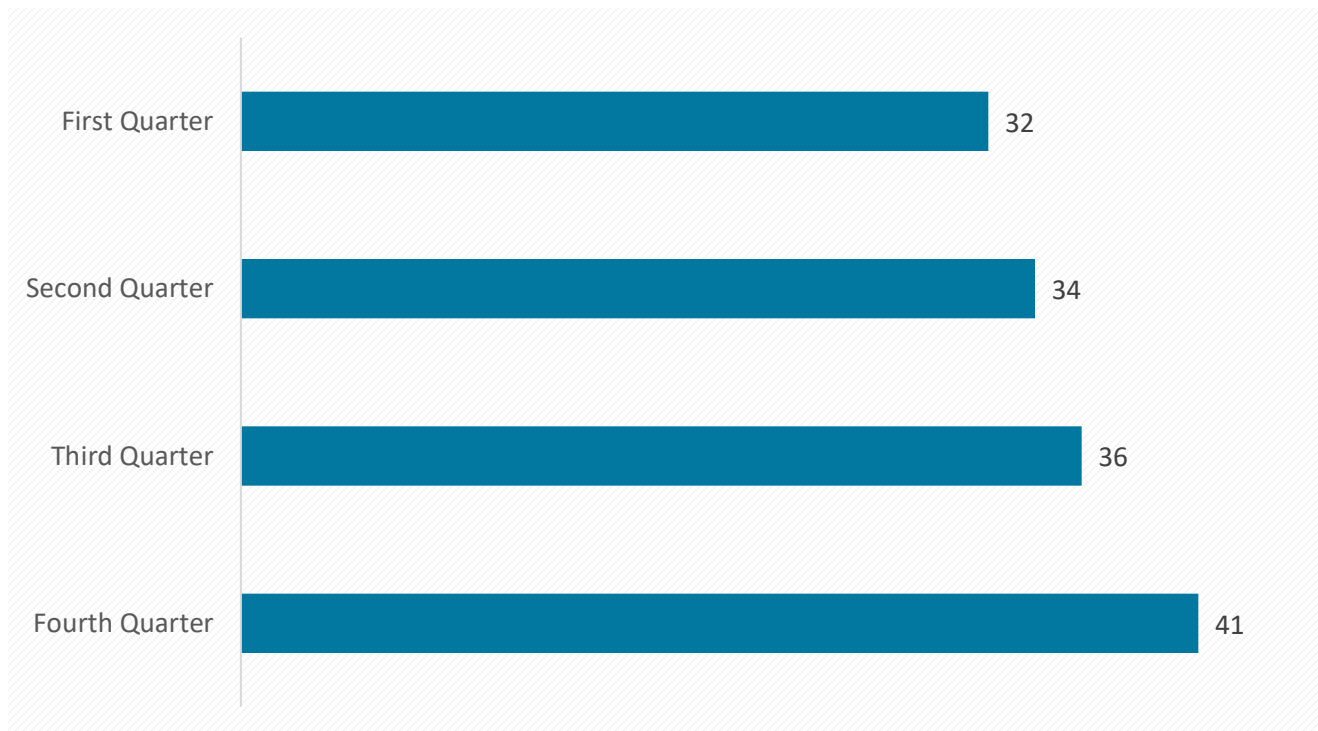
RANK (BY NUMBER OF SETTLEMENTS)	RANK (BY SETTLEMENT AMOUNT)	LAW FIRM	NUMBER OF SETTLEMENTS
1	1	Robbins Geller Rudman & Dowd	27
2	17	The Rosen Law Firm	19
3	2	Bernstein Litowitz Berger & Grossmann	18
3	7	Pomerantz	18
5	6	Labaton Sucharow	13
6	5	Kessler Topaz Meltzer & Check	8
6	20	Levi & Korsinsky	8
8	27	Glancy Prongay & Murray	6
9	11	Saxena White	5
9	12	Friedman Oster & Tejtel	5
9	28	Scott + Scott	5

²The total firms listed exceed ten due to a tie in the rankings.

TOP 10 LAW FIRM RANKINGS – LAST 5 YEARS

	2022	2021	2020	2019	2018
1	Robbins Geller	Robbins Geller	Robbins Geller	Bernstein Litowitz	Pomerantz
2	Bernstein Litowitz	Bernstein Litowitz	Bernstein Litowitz	Robbins Geller	Bernstein Litowitz
3	Motley Rice	Kessler Topaz	Labaton Sucharow	The Rosen Law Firm	Robbins Geller
4	Bleichmar Fonti & Auld	Labaton Sucharow	Kessler Topaz	Entwistle & Cappucci	Kessler Topaz
5	Kesler Topaz	Saxena White	Saxena White	Kessler Topaz	Saxena White
6	Labaton Sucharow	Grant & Eisenhofer	Faguy & Co.	Pomerantz	Glancy Prongay & Murray
7	Pomerantz	Kalloghlian Myers	Siskinds	Cohen Milstein	Scott + Scott
8	Kahn Swick & Foti	Prickett Jones & Elliott	Glancy Prongay & Murray	Labaton Sucharow	Labaton Sucharow
9	Cohen Milstein	Levi & Korsinky	Levi & Korsinky	Glancy Prongay & Murray	Cotchett Pitre & McCarthy
10	Friedlander & Gorris	The Rosen Law Firm	The Rosen Law Firm	Cotchett Pitre & McCarthy	Motley Rice

FINAL SETTLEMENT APPROVALS 2022



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