

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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JULIA ROSSI, <i>et al.</i> ,)	
)	Case No.: 1:20-cv-5090
Plaintiffs,)	
)	Hon. Andrea R. Wood, presiding
v.)	Hon. Magistrate Heather K. McShain
)	
CLAIRE’S STORES, INC., <i>et al.</i> ,)	
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Defendants.)	
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**DECLARATION OF BRADLEY K. KING IN SUPPORT OF PLAINTIFFS’
UNOPPOSED MOTION FOR ATTORNEYS’ FEES, COSTS, AND SERVICE AWARDS**

I, Bradley K. King, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney duly admitted to practice law in California, New York, New Jersey, and the District of Columbia. I am admitted to practice in this District Court and represent Plaintiff Julia Rossi in this action against Defendants Claire’s Stores, Inc., Claire’s Boutiques, Inc., and CBI Distributing Corp. (collectively, “Defendants”). I am a partner at Ahdoot & Wolfson, PC (“AW”) and Co-Lead Settlement Class Counsel appointed by the Court in the above-captioned case. I submit this declaration in support of Plaintiffs’ Unopposed Motion for Attorneys’ Fees, Costs, and Service Awards (the “Motion”), filed concurrently herewith. The facts herein stated are true of my own personal knowledge, or I am informed and believe them to be true, and if called to testify to such facts, I could and would do so competently.

2. AW has served as class counsel in class action cases throughout the county, including numerous multidistrict litigations, and has recovered hundreds of millions of dollars on

behalf of consumers and aggrieved parties. Our firm's *curriculum vitae* is attached hereto as **Exhibit A**.

3. Prior to the filings of the Complaints in this matter, all Plaintiffs' firms conducted substantial pre-filing investigation into the alleged wrongful conduct of Defendants, which included interviews with affected data breach victims, consultation with experts, and factual online and technological investigation. Further, Plaintiffs' counsel opted to work collaboratively and to further the claims of the plaintiff class affected by Defendants' data breach.

4. From the onset of this litigation, Settlement Class Counsel engaged proactively and efficiently with Defense Counsel, swiftly commencing resolution discussions in the interests of providing relief to the class as expeditiously as possible.

5. Through months of discussions and negotiations, bolstered by their fervent and thorough investigations of the Data Breach, Settlement Class Counsel reached an agreement with Defense Counsel to engage in mediation. As part of this agreement, Settlement Class Counsel negotiated a stipulated protective order and a joint motion to stay the litigation pending the parties' mediation, conserving judicial resources and minimizing expenditures for any future resolution. Defendants provided informal discovery that Settlement Class Counsel evaluated to value the class claims and the viability of potential defenses.

6. Ultimately, on March 23, 2021, the parties participated in a mediation with the assistance of the experienced mediator, Bennett G. Picker, Esq. After a full-day session of hard fought, arm's-length negotiations, the parties reached a settlement in principle.

7. After reaching a settlement in principle, the parties then began memorializing the full Settlement, which generated numerous additional rounds of comprehensive, arm's-length negotiations. The parties extensively negotiated each aspect of the Settlement Agreement itself, as

well as the specific language of the various forms of Settlement Notice. With regard to the provision of credit monitoring and identity theft protection independent of any settlement claims process, the parties had significant, substantive discussions that expanded on their initial mediation agreement in principle and employed creative, efficient methods to provide this benefit to the Settlement Class.

8. Settlement Class Counsel, in numerous rounds of negotiation with Defense Counsel, also further refined the Notice Program and each document comprising the Settlement Notice and ensure the information disseminated to Settlement Class Members was clear and concise.

9. In connection with the submission of the Motion, I compiled and reviewed the billing records for work performed by AW. From case inception through August 10, 2022, and as set forth in more detail in the table below, my firm has expended 191.5 hours prosecuting this matter for a total lodestar of \$125,250. The fees expended were performed by the following AW professionals:

Professional	Title	Billing Rate	Time (0.1 hour)	Lodestar
Tina Wolfson	Partner	\$950/hour	9.4	\$8,930.00
Henry Kelston	Partner	\$900/hour	0.9	\$810.00
Bradley King	Partner	\$750/hour	119.1	\$89,325.00
Deborah De Villa	Associate	\$550/hour	12.8	\$7,040.00
Chloe DeOnna	Associate	\$450/hour	34.1	\$15,345.00
Samantha Benson	Paralegal	\$250/hour	1.3	\$325.00
Windy Loritsch	Paralegal	\$250/hour	13.9	\$3,475.00
		TOTALS:	191.5	\$125,250.00

10. In addition, AW expended \$4,060.61 in expenses associated with mediation fees, expert fees, online research, copying, and postage. The following is a detailed list of the expenses AW has incurred to date:

Expense Description	Amount
Mediation Fees	\$2,906.25
Expert Fees	\$1,000.00
Copying and Postage	\$125.96
Electronic Research Fees (Westlaw/Lexis/PACER)	\$28.40
TOTAL:	\$4,060.61

11. Throughout this litigation and Settlement negotiations, AW maintained contemporaneous time records that reflect the time spent working on the instant action. I believe that my firm's rates are fully commensurate with the hourly rates of other nationally prominent firms performing similar work for both plaintiffs and defendants. After considering all of these data points, I have determined that the rates are reasonable for each of the AW professionals who worked on this matter.

12. Because of the importance of recovery of attorney fee awards in contingency cases to a plaintiffs' class action practice firm such as AW, we keep current on federal and state law developments on the subject of attorneys' fees. Accordingly, AW is familiar with the prevailing market rates for leading attorneys in trial court, complex, and class action litigation of important issues. AW periodically establishes hourly rates for the firm's billing personnel. AW establishes the rates based on prevailing market rates for attorneys and law firms in the Los Angeles area that have attorneys and staff of comparable skill, experience, and qualifications. AW obtains information concerning market rates from other attorneys in the area that have similar experience

doing similar work, from information that occasionally appears in the local press and national bar publications, and in orders awarding attorneys' fees in similar cases.

13. The bulk of AW's practice is contingent, and many of my firm's cases have been large and substantial in settlements or verdicts. In contingent risk cases, my firm and other firms doing this type of work frequently advance tens or hundreds of thousands of dollars in expenses and costs and defer all payment of our fees for several years, with no guarantee that any of the fees we incurred or costs we advanced would ever be recovered.

14. Courts have awarded AW attorneys' fees at rates that are comparable to the rates applicable to this matter. *See, e.g., Eck, et al. v. City of Los Angeles*, No. BC577028 (Cal. Super. Ct. Feb. 2018) (\$295 million finally approved settlement where the Court awarded Class Counsel's full request of approximately \$15 million based on percentage of the fund method and commensurate hourly rates); *In re Zoom Video Commc'ns, Inc. Privacy Litig.*, No. 3:20-cv-02155-LB (N.D. Cal. Apr. 21, 2022) (Dkt. 249; \$85 million minimum value finally approved settlement where the Court awarded Class Counsel's full request of approximately \$21 million based on percentage of the fund method and commensurate hourly rates); *Lavinsky v. City of Los Angeles*, No. BC542245 (Cal. Super Ct. Oct. 2019) (\$51 million minimum value finally approved settlement where the Court awarded Class Counsel's full request of approximately \$8 million based on percentage of the fund method and commensurate hourly rates); *Pantelyat v. Bank of America*, No. 1:16-cv-08964-AJN (S.D.N.Y. Jan. 31, 2019) (Dkt. 116; \$22 million finally approved settlement where the Court awarded Class Counsel's full request of \$5.5 million based on percentage of the fund method and commensurate hourly rates); *Williamson, et al. vs. McAfee, Inc.*, Case No. 5:14-cv-00158-EJD (N.D. Cal. Feb. 15, 2017) (Dkt. 118; \$85 Million settlement in deceptive auto renewal case); *Smith v. Floor & Decor Outlets of Am., Inc.*, Case No. 1:15-cv-04316-ELR, (N.D.

Ga. Jan. 10, 2017) (Dkt. No. 69; \$14.5 Million product liability settlement re: laminate flooring); *Chimeno-Buzzi v. Hollister Co.*, Case No. 1:14-cv-23120-MGC (S.D. Fla. April 11, 2016) (Dkt. No. 155; \$10 Million TCPA Settlement).

15. The rates charged by AW are reasonable and well within the range of rates charged by comparably qualifying attorneys for comparably complex work. Comparable hourly rates have been found reasonable in numerous cases. Moreover, the rates requested by AW are in line with the non-contingent market rates charged by attorneys of reasonably comparable experience, skill, and reputation for reasonably comparable services and supported by surveys of legal rates.

16. Settlement Class Counsel have represented Plaintiffs and the Class on a purely contingent basis, assuming the significant risk that they would not be compensated for time and out of pocket expenses put into this litigation. This risk of nonpayment incentivized all Settlement Class Counsel to work efficiently, to prevent duplication of effort, and to advance expenses responsibly. AW had to forego the representation of other clients and pursuit of other cases to prosecute this litigation. I believe that AW and the other Settlement Class Counsel assumed significant risk of nonpayment in initiating and dedicating hundreds of attorney hours in this case given the legal issues involved and uncertain outcome. Despite these risks, AW, along with the other Settlement Class Counsel, was able to successfully resolve this case through a Settlement that confers substantial monetary and injunctive relief to Settlement Class Members despite litigating against a corporate Defendant employing top-tier counsel from a national law firm.

17. AW will expend additional attorney time required through final approval and administration of the Settlement, should it be approved by the Court. Settlement Class Counsel must prepare for and attend the final fairness hearing, continue to communicate with Plaintiffs and Settlement Class Members, and otherwise supervise the administration of the Settlement.

18. As of the date of this filing, I am informed and believe via consultation with the Settlement Administrator, RG2 Claims Administration LLC, that no Settlement Class Members have objected to the Settlement and only one Settlement Class Member has requested exclusion from the Settlement.

19. Representative Plaintiff Julia Rossi demonstrated a willingness to participate and undertake responsibilities and risks attendant with bringing a representative action. She aided in the investigation of the claims, consulted with counsel, reviewed draft pleadings, participated in informal discovery, and contributed to settlement efforts. In addition to lending her name to this class action, and thus subjecting herself to significant public attention, Ms. Rossi was actively engaged throughout this litigation and settlement negotiations. Among other things, she (1) provided information, including the applicable information related to how the Data Breach affected her, to AW for preparing the complaints and other filings; (2) reviewed pleadings and filings; (3) communicated on a regular basis with AW to stay apprised of the progress of the litigation and settlement negotiations; and (4) reviewed and approved the Settlement Agreement.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11th day of August, 2022.



Bradley K. King

EXHIBIT A



Ahdoot & Wolfson, PC (“AW”) is a nationally recognized law firm founded in 1998 that specializes in class action litigation, with a focus on privacy cases, unfair and anticompetitive business practices, consumer fraud, employee rights, defective products, antitrust, civil rights, and taxpayer rights and unfair practices by municipalities. The attorneys at AW are experienced litigators who have often been appointed by state and federal courts as lead class counsel, including in multidistrict litigation. In over two decades of its successful existence, AW has vindicated the rights of millions of class members in protracted, complex litigation, conferring billions of dollars to the victims, and affecting real change in corporate behavior.

Privacy Class Actions

AW has been prosecuting cutting edge data cases on behalf of consumers since the late 1990s. AW was among the first group of attorneys who successfully advocated for the privacy rights of millions of consumers against major financial institutions based on the unlawful compilation and sale of detailed personal financial data to third-party telemarketers without the consumers’ consent. While such practices later became the subject of Gramm-Leach-Bliley Act regulation, at the time AW was prosecuting these cases before the Hon. Richard R. Kramer, (Ret.) in the complex department of San Francisco Superior Court, such practices were novel and hidden from public scrutiny. AW’s work shed light on how corporations and institutions collect, store, and monetize mass data, leading to governmental regulation. AW has been at the forefront of data-related litigation since then.

As co-lead counsel in the *Experian Data Breach Litigation*, No. 8:15-cv-01592-AG-DFM (C D. Cal.) (Hon. Andrew J. Guilford), which affected nearly 15 million class members, AW achieved a settlement conservatively valued at over \$150 million. Experian also provided robust injunctive relief. Judge Guilford praised counsel’s efforts and efficiency in achieving the settlement, commenting “You folks have truly done a great job, both sides. I commend you.”

As co-lead counsel in the *Zoom Video Communications, Inc. Privacy Litigation*, No. 5:20-cv-02155 (N.D. Cal.) (Hon. Laurel Beeler), a nationwide class action alleging privacy violations from the collection of personal information through third-party software development kits and failure to provide end to end encryption, AW achieved an \$85 million nationwide class settlement that also included robust injunctive relief overhauling Zoom’s data collection and security practices.

As an invaluable member of a five-firm Plaintiffs' Steering Committee ("PSC") in the *Premera Blue Cross Customer Data Sec. Breach Litigation*, No. 3:15-cv-02633-SI (D. Or.) (Hon. Michael H. Simon), arising from a data breach disclosing the sensitive personal and medical information of 11 million Premera Blue Cross members, AW was instrumental in litigating the case through class certification and achieving a nationwide class settlement valued at \$74 million.

Similarly, in the *U.S. Office of Personnel Management Data Security Breach Litigation*, No. 1:15-mc-1394-ABJ (D.D.C.) (Hon. Amy Berman Jackson), AW, as a member of the PSC, briefed and argued, in part, the granted motions to dismiss based on standing, briefed in part the successful appeal to the D.C. Circuit, and had an important role in a preliminarily approved settlement providing for a \$63 million settlement fund.

In *The Home Depot, Inc., Customer Data Sec. Breach Litigation*, No. 1:14-md-02583-TWT (N D. Ga.) (Hon. Thomas W. Thrash Jr.), AW served on the consumer PSC and was instrumental in achieving a \$29 million settlement fund and robust injunctive relief for the consumer class.

AW also currently serves on the PSC in *Am. Med. Collection Agency, Inc., Customer Data Sec. Breach Litigation*, No. 2:19-md-2904-MCA-MAH (D.N.J.) (Hon. Madeline Cox Arleo), a class action arising out of a medical data breach that disclosed the personal and financial information of over 20 million patients, as well as many other data breach class actions.

AW's efforts have shaped data privacy law precedent. As lead counsel in *Remijas v. Neiman Marcus Group, LLC*, No. 14-cv-1735 (N D. Ill.) (Hon. Sharon Johnson Coleman), AW's attorneys successfully appealed the trial court's order granting a motion to dismiss based on lack of Article III standing. The Seventh Circuit's groundbreaking opinion, now cited in every privacy case standing brief, was the first appellate decision to consider the issue of Article III standing in data breach cases in light of the Supreme Court's decision in *Clapper v. Amnesty International USA*, 568 U.S. 398 (2013) and concluded that data breach victims have standing to pursue claims based on the increased risk of identity theft and fraud, even before that theft or fraud materializes in out-of-pocket damages. *Remijas v. Neiman Marcus Group, LLC*, 794 F.3d 688 (7th Cir. 2015) (reversed and remanded).

AW is also serving as plaintiffs' counsel in consumer privacy rights cases involving the right to control the collection and use of biometric information, successfully opposing dispositive motions based on Article III standing and achieving settlements with a total value of over \$100 million. *See, e.g., Rivera v. Google LLC*, No. 19-CH-00990 (Ill. Cir. Ct.) (Hon. Anna M. Loftus); *Miracle-Pond v. Shutterfly, Inc.*, No. 19-CH-07050 (Ill. Cir. Ct.) (Hon. Raymond W. Mitchell); *Acaley v. Vimeo, Inc.*, No. 19-CH-10873 (Ill. Cir. Ct.) (Hon. Clare J. Quish).

Results

AW has achieved excellent results as lead counsel in numerous complex class actions.

In *Eck v. City of Los Angeles*, No. BC577028 (Cal. Super. Ct.) (Hon. Ann I. Jones), AW achieved a \$295 million class settlement in a case alleging that an 8% surcharge on Los Angeles electricity rates

was an illegal tax. Final settlement approval was affirmed on appeal in October 2019.

In *Alvarez v. Sirius XM Radio Inc.*, No. 2:18-cv-08605-JVS-SS (C.D. Cal.) (Hon. James V. Selna), a breach of contract class action alleging that defendant did not honor its lifetime subscriptions, AW achieved a nationwide class action settlement conservatively valued at approximately \$420 million. The settlement extended the promised lifetime subscription for the lifetime of class members who have active accounts and provided the opportunity for class members with closed accounts to reactivate their accounts and enjoy a true lifetime subscription or recover \$100. The district court had granted the motion to compel arbitration on an individual basis, and AW appealed. AW reached the final deal points of the nationwide class action settlement minutes prior to oral argument in the Ninth Circuit.

As a member of the Plaintiffs' Executive Committee in the *Apple Inc. Device Performance Litigation*, No. 5:18-md-2827-EJD (N.D. Cal.) (Hon. Edward J. Davila), AW helped achieve a nationwide settlement of \$310 million minimum and \$500 million maximum. The case arose from Apple's alleged practice of deploying software updates to iPhones that deliberately degraded the devices' performance and battery life.

In *Kirby v. McAfee, Inc.*, No. 5:14-cv-02475-EJD (N.D. Cal.) (Hon. Edward J. Davila), a case arising from McAfee's auto renewal and discount practices, AW and co-counsel achieved a settlement that made \$80 million available to the class and required McAfee to notify customers regarding auto-renewals at an undiscounted subscription price and change its policy regarding the past pricing it lists as a reference to any current discount.

In *Lavinsky v. City of Los Angeles*, No. BC542245 (Cal. Super. Ct.) (Hon. Ann I. Jones), a class action alleging the city unlawfully overcharged residents for utility taxes, AW certified the plaintiff class in litigation and then achieved a \$51 million class settlement.

As co-lead counsel in *Berman v. General Motors, LLC*, No. 2:18-cv-14371-RLR (S D. Fla.) (Hon. Robin L. Rosenberg) (vehicle oil consumption defect class action), AW achieved a \$40 million settlement.

Current Noteworthy Leadership Roles

AW was selected to serve as interim co-lead class counsel in the *StubHub Refund Litigation*, No. 4:20-md-02951-HSG (N.D. Cal.) (Hon. Haywood S. Gilliam, Jr.). This consolidated multidistrict litigation alleges that StubHub retroactively changed its policies for refunds for cancelled or rescheduled events as a result of the Covid-19 pandemic and refused to offer refunds despite promising consumers 100% of their money back if events are cancelled.

AW was appointed, after competing applications, to serve as interim co-lead class counsel in the *Ring LLC Privacy Litigation*, No. 2:19-cv-10899-MWF-RAO (C.D. Cal.) (Hon. Michael W. Fitzgerald), a consolidated class action arising from Ring's failure to implement necessary measures to secure the privacy of Ring user accounts and home-security devices, and failure to protect its customers from hackers despite being on notice of the inadequacies of its cybersecurity.

In *Clark v. American Honda Motor Co., Inc.*, No. 2:20-cv-03147-AB-MRW (C.D. Cal.) (Hon. André Birotte Jr.), AW serves as co-lead counsel in a class action arising from unintended and uncontrolled deceleration in certain Acura vehicles.

In the *Kind LLC “Healthy And All Natural” Litigation*, No. 1:15-md-02645-NRB (S.D.N.Y.) (Hon. Naomi Reice Buchwald), AW was selected as interim co-lead class counsel after competing applications. AW certified three separate classes of New York, California, and Florida consumers who purchased Kind LLC’s products in a false labeling food MDL.

AW was appointed to serve as co-lead interim class counsel in the *Google Location History Litigation*, No. 5:18-cv-05062-EJD (N.D. Cal.) (Hon. Edward J. Davila), a consumer class action arising out of Google’s allegedly unlawful collection and use of mobile device location information on all Android and iPhone devices.

AW serves on the Plaintiffs’ Executive Committees in *Allergan Biocell Textured Breast Implant Products Liability Litigation*, No. 2:19-md-02921-BRM-JAD (D.N.J.) (Hon. Brian R. Martinotti), a class action alleging textured breast implants caused a rare type of lymphoma and in *ZF-TRW Airbag Control Units Products Liability Litigation*, No. 2:19-ml-02905-JAK-FFM (C.D. Cal.) (Hon. John A. Kronstadt), a class action alleging a dangerous defect in car airbag component units.

As part of the leadership team in *Novoa v. The Geo Group, Inc.*, No. 5:17-cv-02514-JGB-SHK (C.D. Cal.) (Hon. Jesus G. Bernal), AW certified a class of immigration detainees challenging private prison’s alleged forced labor practices.

In the *Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010-PKC (S.D. N.Y.) (Hon. P. Kevin Castel), a class action alleging monopolization of the digital advertising market, AW is serving as court appointed co-lead counsel on behalf of the advertiser class.

In the *Dental Supplies Antitrust Litigation*, No. 1:16-cv-00696-BMC-GRB (E.D.N.Y.) (Hon. Brian M. Cogan), a class action alleging an anticompetitive conspiracy among three dominant dental supply companies in the United States, AW served on the plaintiffs’ counsel team that brought in an \$80 million cash settlement for the benefit of a class of approximately 200,000 dental practitioners, clinics, and laboratories.

In *Klein v. Meta Platforms, Inc.*, No. 3:20-cv-08570-JD (N.D. Cal.) (Hon. James Donato), AW is serving on the Executive Committee for the digital advertiser plaintiff class in a class action alleging that Meta (formerly Facebook) engaged in anticompetitive conduct to stifle and/or acquire competition to inflate the cost of digital advertising on its social media platform. Many of the plaintiffs’ claims recently survived a motion to dismiss and are in the process of amending their complaint.

In *Robinson v. Jackson Hewitt, Inc.*, No. 2:19-cv-09066-JXN-ESK (D.N.J.) (Hon. Julien Xavier Neals), a class action alleging that a standardized “no-poach” agreement among Jackson Hewitt and its franchisees limited mobility and compensation prospects for the tax preparer employees, AW is

asserting claims on behalf of consumers under both federal antitrust and California employment laws.

Attorney Profiles

Tina Wolfson graduated Harvard Law School *cum laude* in 1994. Ms. Wolfson began her civil litigation career at the Los Angeles office of Morrison & Foerster, LLP, where she defended major corporations in complex actions and represented indigent individuals in immigration and deportation trials as part of the firm's *pro bono* practice. She then gained further invaluable litigation and trial experience at a boutique firm, focusing on representing plaintiffs on a contingency basis in civil rights and employee rights cases. Since co-founding AW in 1998, Ms. Wolfson has led numerous class actions to successful results. Ms. Wolfson is a member of the California, New York and District of Columbia Bars.

Recognized for her deep class action experience, Ms. Wolfson frequently lectures on numerous class action topics across the country. She is a guest lecturer on class actions at the University of California at Irvine Law School. Her recent notable speaking engagements include:

- Class Action Mastery Forum at the University Of San Diego School of Law (Consumer Class Actions Roundtable) March 2020, featuring Hon. Lucy H. Koh, Hon. Edward M. Chen, and Hon. Fernando M. Olguin.
- Class Action Mastery Forum at the University Of San Diego School of Law (Data Breach/Privacy Class Action Panel) January 16, 2019.
- Association of Business Trial Lawyers: "Navigating Class Action Settlement Negotiations and Court Approval: A Discussion with the Experts," Los Angeles May 2017, featuring Hon. Philip S. Gutierrez and Hon. Jay C. Gandhi.
- CalBar Privacy Panel: "Privacy Law Symposium: Insider Views on Emerging Trends in Privacy Law Litigation and Enforcement Actions in California," Los Angeles Mar. 2017 (Moderator), featuring Hon. Kim Dunning.
- American Conference Institute: "2nd Cross-Industry and Interdisciplinary Summit on Defending and Managing Complex Class Actions," April 2016, New York: Class Action Mock Settlement Exercise featuring the Hon. Anthony J. Mohr.
- Federal Bar Association: N.D. Cal. Chapter "2016 Class Action Symposium," San Francisco Dec. 2016 (Co-Chair), featuring Hon. Joseph F. Anderson, Jr. and Hon. Susan Y. Illston.
- Federal Bar Association: "The Future of Class Actions: Cutting Edge Topics in Class Action Litigation," San Francisco Nov. 2015 (Co-Chair & Faculty), featuring Hon. Jon S. Tigar and Hon. Laurel Beeler.

Ms. Wolfson currently serves as a Ninth Circuit Lawyer Representative for the Central District of California, as Vice President of the Federal Litigation Section of the Federal Bar Association, as a member of the American Business Trial Lawyer Association, as a participant at the

Duke Law School Conferences and the Institute for the Advancement of the American Legal System, and on the Board of Public Justice.

Henry J. Kelston, a partner at AW, graduated from New York University School of Law in 1978 and is a member of the New York and Connecticut Bars. Mr. Kelston has litigated a broad array of class actions for more than two decades, including actions challenging improperly charged bank fees, unauthorized collection of biometric data, and unlawful no-poach agreements among employers. He has been on the front lines in major data breach cases against companies such as Yahoo! and Facebook, and he has represented consumers in class actions challenging food labeling practices, including the use of “natural” claims on products containing GMOs. His work in *In re Conagra Foods, Inc.*, contributed to a groundbreaking decision by the Ninth Circuit Court of Appeals, significantly strengthening the rights of consumers to bring class actions. Mr. Kelston is also a frequent speaker and CLE presenter on electronic discovery, and a member of The Sedona Conference® Working Group 1 on Electronic Document Retention and Production.

Bradley K. King is a partner at AW and a member of the State Bars of California, New Jersey, New York, and the District of Columbia. He graduated from Pepperdine University School of Law in 2010, where he served as Associate Editor of the Pepperdine Law Review. He worked as a law clerk for the California Office of the Attorney General, Correctional Law Section in Los Angeles and was a certified law clerk for the Ventura County District Attorney’s Office. Mr. King began his legal career at a boutique civil rights law firm, gaining litigation experience in a wide variety of practice areas, including employment law, civil rights, police misconduct, municipal contracts, criminal defense, and premises liability cases. During his career at AW, Mr. King has focused on consumer class actions, and privacy class actions in particular. He has served as appointed interim lead counsel and has extensive experience litigating consolidated and MDL class actions with AW, including numerous large data breach cases that have resulted in nationwide class settlements.

Deborah De Villa is an associate attorney at AW and a member of the State Bars of New York and California. She graduated from Pepperdine University School of Law in 2016, where she earned the CALI Excellence for the Future Award in immigration law, business planning and commercial law. During law school, Ms. De Villa completed internships at the Los Angeles District Attorney’s Office, Hardcore Gangs Unit, and at the Supreme Court of the Philippines, Office of the Court Administrator. Born in the Philippines, Ms. De Villa moved to Florida at the age of sixteen to attend IMG Golf Academy as a full-time student-athlete. Ms. De Villa earned a scholarship to play NCAA Division 1 college golf at Texas Tech University, where she graduated *magna cum laude* with a Bachelor of Arts in Psychology and a minor in Legal Studies. Ms. De Villa has gained substantial experience litigating class actions with AW and focuses her practice on consumer protection and privacy class actions.

Chloe DeOnna is an associate attorney at AW and is admitted to practice in Pennsylvania. Before joining AW, Ms. DeOnna worked with several prominent Philadelphia firms, gaining experience in high-profile sex-trafficking litigation, pharmaceutical products liability, and medical malpractice. Ms. DeOnna completed her undergraduate degree at Penn State University, where she earned two majors and two minors. During her time at Penn State, she worked as an EMT on the University Ambulance Service and studied abroad at the Università Mediterranea in southern Italy. Upon receipt of a full scholarship, Ms. DeOnna attended Drexel University Law School where she served as a Dean Scholar for Legislation and Regulation and the President of the Women in Law Society.