

EXHIBIT G

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7 *Counsel for Lead Plaintiff Andrey Slomnitsky*
 8 *and Liaison Counsel for the Class*

9
 10 UNITED STATES DISTRICT COURT
 11 DISTRICT OF NEVADA

12 In re ALLIED NEVADA GOLD CORP.,)
 13 SECURITIES LITIGATION)

Case No. 3:14-cv-00175-LRH-WGC

CLASS ACTION

14 This Document Relates To:)

15 ALL ACTIONS.)

**DECLARATION OF JOSEPH RUSSELLO
 FILED ON BEHALF OF ROBBINS
 GELLER RUDMAN & DOWD LLP IN
 SUPPORT OF AWARD OF ATTORNEYS'
 FEES AND EXPENSES**

1 I, JOSEPH RUSSELLO, am an attorney duly licensed to practice law in the State
2 of New York and am admitted *pro hac vice* in this Court, and I declare under penalty of
3 perjury, pursuant to 28 U.S.C. §1746, as follows:

4 1. I am a member of the firm of Robbins Geller Rudman & Dowd LLP
5 (“Robbins Geller” or the “Firm”), additional counsel for Lead Plaintiff Andrey Slomnitsky
6 (“Lead Plaintiff”) and the proposed Class.¹ I was actively involved in all material aspects of
7 the prosecution and resolution of this action (the “Action”) and have personal knowledge of
8 the matters set forth herein. I respectfully submit this declaration in support of the Settlement
9 and Robbins Geller’s application for an award of attorneys’ fees and expense/charges
10 (“expenses”) in connection with services rendered in the Action.

11 2. The requested attorneys’ fees and expenses are reasonable and were necessary
12 for the successful prosecution of this Action, particularly because Lead Plaintiff’s counsel
13 prosecuted this Action on a contingent basis with no guarantee of compensation or
14 reimbursement if such efforts were unsuccessful. Specifically, the Firm’s request for
15 attorneys’ fees is reasonable in light of: (i) the Firm’s significant contributions of time and
16 labor, (ii) the quality of the representation, and (iii) the risks, magnitude, and complexities
17 involved in prosecuting the Action.

18 3. In addition, the Firm’s expenses reflect routine and typical expenditures
19 incurred in the course of litigation, such as the costs of travel, investigation, document
20 duplication, transcript fees, expert fees, consultant fees, mediation fees, and expedited mail
21 delivery. The Firm took steps to minimize these expenses whenever practicable without
22 jeopardizing the vigorous and efficient prosecution of Lead Plaintiff’s claims.

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24
25
26 _____
27 ¹ Capitalized terms not defined herein have the same meaning given to them in the
28 Stipulation of Settlement (ECF No. 199) (the “Stipulation”).

1 **I. The Firm’s Fee Request is Reasonable in Light of the Significant Time and**
2 **Labor Contributed, the Quality of the Representation, and the Risks,**
3 **Magnitude, and Complexity of the Action**

4 **B. The Firm Contributed Significant Time and Labor to Prosecuting the**
5 **Action**

6 4. The Settlement, which provides \$14,000,000 in cash for the benefit of the
7 Class, is a notable achievement derived from the substantial efforts of both Lead Counsel
8 and the Firm. Largely under Lead Counsel’s supervision and at its direction, the Firm
9 expended considerable resources that were critical to this favorable result, including, but not
10 limited to, the following:

11 (a) The Firm dedicated its extensive resources – including a team of
12 attorneys, forensic accountants, investigators, and staff members – to lead the factual
13 investigation of the Action, having substantially assisted in drafting both the Consolidated
14 Amended Complaint for Violations of the Federal Securities Laws, filed May 1, 2015 (the
15 “Amended Complaint”) and the Second Consolidated Amended Complaint for Violations of
16 the Federal Securities Laws, filed November 3, 2016 (the “Second Amended Complaint”).
17 For example, attorneys and other members of the Firm’s team identified, reviewed and
18 analyzed media reports, conference calls, Securities and Exchange Commission (“SEC”)
19 filings, analyst reports, as well as other articles and public sources, regarding Allied Nevada
20 and the gold industry, generally. In-house forensic accountants at the Firm also assisted the
21 lawyers in analyzing financial information from the Company’s SEC filings and other
22 sources and evaluating the impact of particular events and news on the Company’s financial
23 and operational condition. These efforts formed the cornerstone of the various iterations of
24 the complaint, including both the Amended Complaint and the Second Amended Complaint.

25 (b) The Firm also utilized its in-house investigative team, under the
26 direction of and in consultation with Firm attorneys, to identify and contact over 100 former
27 employees of the Company. Firm investigators and attorneys engaged in discussions with
28 certain of these former employees concerning their firsthand knowledge and awareness of

1 operational problems at Allied Nevada before, during, and after the Class Period, which
2 supported the allegations in the Amended Complaint. Ultimately, as a result of these efforts,
3 Lead Plaintiff detailed the accounts of five former employees, who had occupied various
4 employment positions at Allied Nevada, which supported allegations that the Company was
5 experiencing significant operational problems at the Lewis leach pad no later than March
6 2013, which, in turn, constrained the Company's operating cash flow and resulted in the
7 suspension of plans to expand the Hycroft Mine.

8 (c) The Firm also drafted and submitted a freedom of information request
9 on the Bureau of Mining Regulation & Reclamation for the Nevada Division of
10 Environmental Protection, and engaged in continued discussions with personnel there over
11 several weeks, which resulted in the production of relevant documents regarding certain
12 operational plans for the Hycroft Mine, including the extensive drilling program. These
13 documents not only addressed the scope of Allied Nevada's Hycroft Mine expansion project,
14 but they also revealed key information regarding the timing of plans to investigate the cause
15 of operational problems at the Hycroft Mine and to remediate such issues, as appropriate.

16 (d) In addition to the Firm's contributions to the factual investigation, the
17 Firm drafted significant portions of the Amended Complaint, at the direction of and in
18 consultation with Lead Counsel. Given the Firm's involvement in spearheading the factual
19 investigation and developing the accounts of various former employees with relevant
20 information on the problems affecting Allied Nevada during the Class Period, attorneys at the
21 Firm drafted the sections of the Amended Complaint detailing the accounts of the former
22 employees, as well as sections detailing facts on the background of heap leaching, the
23 Company's business, and industry customs. The Firm also added detail regarding the extent
24 of the Company's operational problems during the Class Period, and to Lead Plaintiff's
25 scienter allegations. Finally, around this time, when Allied Nevada filed for bankruptcy, the
26 Firm conducted research on the effect that the bankruptcy would have on Lead Plaintiff's
27 securities law claims, in order to ensure that Lead Plaintiff and the Class's claims would
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1 remain viable and protected. As explained herein and in Lead Counsel’s submission, the
2 Firm, together with Lead Counsel, engaged and consulted with outside bankruptcy counsel,
3 assisted in preparing Lead Plaintiff’s bankruptcy claim form, analyzed the impact of the
4 bankruptcy on the claims asserted in this Action, assisted in preparing an agreement to
5 protect relevant materials within Allied Nevada’s possession for the duration and aftermath
6 of the bankruptcy, and evaluated the prospect of continuing the Action against the individual
7 defendants.

8 (e) While assisting in drafting the Amended Complaint, the Firm
9 conducted research regarding potential consultants who could assist in explaining the
10 complexities of gold mining, and specifically, the heap leaching process, as applied to the
11 claims at issue. The Firm’s research led to the retention of Tuncel M. Yegulalp, a seasoned
12 expert on various forms of mining and Professor of Mining Engineering, Emeritus, at
13 Columbia University’s School of Engineering and Applied Science, to serve as a non-
14 testifying consultant. Professor Yegulalp assisted Lead Counsel and the Firm in developing
15 the allegations and claims for the Amended Complaint, and ultimately assisted counsel in
16 developing discovery strategy.

17 (f) In assisting in responding to Defendants’ motion to dismiss the
18 Amended Complaint, the Firm, at the direction of Lead Counsel, conducted legal research
19 and drafted significant portions of Lead Plaintiff’s opposition brief. These areas of legal
20 research and drafting covered scienter, falsity, puffery, loss causation, and claims made
21 under Item 303 of SEC Regulation S-K (“Item 303”). The Firm also assisted Lead Counsel
22 in preparing for oral argument, including, at their request, preparing charts of former
23 employee accounts and conducting legal research in light of arguments Defendants made in
24 the motion to dismiss opening and reply briefs.

25 (g) Following the Court’s dismissal of the Amended Complaint, the Firm,
26 at Lead Counsel’s direction, continued its factual investigation, which resulted in the
27 inclusion of the accounts of 10 additional former employees in the Second Amended
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1 Complaint. These former employees, again, occupied a wide range of positions. Generally,
2 they personally observed problems at the Lewis leach pad during the Class Period and
3 reported that serious operating difficulties were occurring early on in the Class Period, which
4 triggered substantial remediation costs and reduced the amount of gold and silver recovered
5 from the Mine. Other former employees recounted the Company's push for increased
6 revenues by accelerating the mining rate, which caused the ore to be improperly treated for
7 leaching. The former employees also provided further confirmation that cost increases and
8 reduced revenues resulting from problems at the Lewis leach pad constrained the Company's
9 operating cash flow, which resulted in, among other things, the suspension of expansion
10 plans at the Hycroft Mine. These accounts strengthened the allegations of the Amended
11 Complaint.

12 (h) For the Second Amended Complaint, the Firm, at Lead Counsel's
13 direction, assisted in drafting sections concerning falsity, Defendants' potential motive to
14 commit securities fraud, the allegedly false and misleading statements regarding the
15 secondary stock offering in May 2013, and how certain statements – such as the March 25
16 and 27, 2013 statements – ostensibly violated Defendants' disclosure obligations under Item
17 303. The Firm also worked with Lead Counsel in researching, drafting, and revising
18 significant portions of Lead Plaintiff's opposition to Defendants' motion to dismiss the
19 Second Amended Complaint.

20 (i) Following dismissal of the Second Amended Complaint, the Firm
21 assisted Lead Counsel in drafting the opening and reply briefs in support of Lead Plaintiff's
22 appeal to the Ninth Circuit Court of Appeals, as well as the brief in response to Defendants'
23 subsequent petition for rehearing after the Ninth Circuit reversed the dismissal. The Firm
24 utilized its dedicated team of appellate lawyers, and enlisted the assistance of an appellate
25 partner in San Francisco, Joseph Daley, to provide expertise and advise on appellate strategy
26 and, specifically, the issue of scienter, falsity, and loss causation in the Ninth Circuit. The
27 Firm also assisted in Lead Counsel's oral argument preparation, and, given my extensive
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1 background and involvement in this case, I accompanied Lead Counsel to the argument
2 before the Ninth Circuit.

3 (j) Once the Action progressed to discovery, the Firm assisted Lead
4 Counsel in the initial stages of discovery planning and negotiation. For example, attorneys at
5 the Firm drafted Lead Plaintiff's Initial Disclosure Statement Pursuant to Fed. R. Civ. P.
6 26(a), served on May 8, 2019. In preparing the Initial Disclosure Statement, Firm attorneys
7 and investigators again conducted research and evaluated information on numerous current
8 and former officers, directors, employees, experts, consultants, and independent contractors
9 of Allied Nevada, who worked or consulted on the Hycroft Mine or otherwise might
10 reasonably possess relevant information. The Firm also took the lead in drafting and
11 negotiating the Fed. R. Civ. P. 26(f) Report, filed with the Court on May 22, 2019, as well as
12 the Form of Production Agreement and the Confidentiality Agreement and Stipulated
13 Protective Order, both filed on July 18, 2019. All three documents went through several
14 drafts, as the parties exchanged their respective positions on the relevant terms, and the Firm
15 carried out Lead Counsel's instructions during this process.

16 (k) The Firm also assisted Lead Counsel in drafting discovery requests
17 and responses. Firm attorneys conferred with defense counsel, as appropriate and at Lead
18 Counsel's instruction, in discussing particular objections to production on both sides. One
19 topic that required special attention was whether the individual defendants had custody and
20 control over Allied Nevada's or Hycroft Mine's documents. Other issues and disputes arose
21 with Defendants during the course of discovery that required similar attention, and the Firm
22 handled certain of these matters at Lead Counsel's direction.

23 (l) Additionally, the Firm analyzed organizational charts and other
24 sources of information and identified potential custodians for Defendants' production, as
25 well as assisted Lead Counsel in preparing correspondence to Defendants outlining the scope
26 of discovery and the reasons why particular custodians were appropriate and necessary for
27 discovery. Likewise, the Firm assisted Lead Counsel in developing potential search terms
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1 for Defendants to use to identify relevant electronically-stored documents and information
2 for production. The Firm also provided support to Lead Counsel in preparing for
3 conferences with defense counsel and in processing and evaluating discovery material
4 produced.

5 (m) As discovery continued, the Firm provided litigation support and
6 assistance to Lead Counsel. When Defendants noticed the depositions of fourteen
7 individuals they believed were referenced in the Second Amended Complaint as anonymous
8 former employees, the Firm performed substantial work in preparing Lead Plaintiff's
9 emergency request for a protective order. These efforts ultimately culminated in a favorable
10 ruling by Magistrate Judge William G. Cobb regarding the scope, sequencing, and timing of
11 discovery concerning these individuals.

12 (n) To further Lead Plaintiff's efforts to obtain relevant non-party
13 discovery, the Firm also assisted in preparing fourteen subpoenas to entities and individuals
14 who provided consulting and other services to Allied Nevada with respect to the Hycroft
15 Mine, including Carl Prescio, EKS&H LLP, EM Strategies, Fluor Corporation,
16 HomeCrafters, Ltd., Hycroft, Jacobs Engineering Group, Kappes, Cassidy & Associates,
17 M3 Engineering, Metal Mining Consultants, Michael Freehan, Moelis & Company, SRK
18 Consulting Inc., and Terry Palmer. Attorneys and in-house investigators at the Firm
19 researched and identified these non-parties by reviewing the scope of work performed by
20 third-party consultants for Allied Nevada during the Class Period and their roles in the
21 Company's operations. The subpoenas targeted varied types of information based on the
22 third parties' connections to and work for the Company.

23 (o) As part of Lead Plaintiff's third-party discovery efforts, the Firm
24 engaged in conferences with many of the subpoenaed third-parties. These efforts resulted in
25 significant document productions from Moelis, SRK, EM Strategies, Fluor, HomeCrafters,
26 Kappes, M3 Engineering, and Metal Mining, totaling over 60,000 documents comprised of
27 over 350,000 pages. The bulk of these documents came from: M3 Engineering, which
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1 served as the engineering, procurement, and construction management contractor for Allied
2 Nevada's Hycroft mine expansion project; Fluor, which rendered engineering services in
3 connection with Allied Nevada's Hycroft mine expansion project; and HomeCrafters, which
4 spearheaded construction of the housing development for Allied Nevada workers at the
5 Hycroft mine.

6 (p) In connection with electronic discovery, the Firm deployed an in-
7 house team of information technology professionals to process and load the documents into
8 segregated databases for use on the document review platform Relativity, which permitted
9 attorneys to access the databases and review the materials. This work involved bates
10 stamping electronic materials, converting the files into a usable format, running quality
11 control checks, resolving production issues, and consulting with attorneys on production
12 protocols and processes. The Firm ultimately processed and hosted thousands of documents
13 produced and received in discovery.

14 (q) Finally, in connection with the October 10, 2019 mediation of this
15 matter, the Firm assisted Lead Counsel in preparing the mediation statement, attended the
16 mediation and reviewed materials produced in discovery to marshal factual support for
17 particular arguments and otherwise assist in evaluating the merits of particular aspects of the
18 case. The Firm also consulted with non-testifying financial consultants at particular times
19 during the course of this litigation to assist Lead Counsel in evaluating the potential damages
20 recoverable in the Action should it proceed to trial, as well as any potential settlement value.
21 These efforts also assisted in the mediation and, ultimately, in achieving, at Lead Counsel's
22 direction, a favorable settlement for the Class in what was undeniably a challenging
23 securities class action.

24 **B. The Quality of Representation**

25 5. Robbins Geller has substantial experience representing investors in securities
26 fraud cases, including in this District. In fact, Robbins Geller initiated and prosecuted as co-
27 lead counsel a securities class action that resulted in what was then – and possibly still is –
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1 the largest securities class action recovery in the history of this District: *In re MGM Mirage*
2 *Securities Litigation*, No. 2:09-cv-01558-GMN-VCF. After nearly six years of hard-fought
3 litigation, the settlement there – \$75 million in cash for shareholders – exceeded the
4 aggregate amount of the next three largest securities class action recoveries in this District
5 *combined*. As described above, the Firm brought this substantial experience to bear here,
6 working efficiently and diligently under Lead Counsel’s direction to obtain a favorable result
7 for the Class in a difficult case.

8 **C. The Risk, Magnitude, and Complexity of the Action**

9 6. In addition to contributing significant resources to the efficient prosecution of
10 the Action, the Firm’s expense request is also appropriate in light of the substantial risk of
11 nonpayment borne by the Firm.

12 7. This case involved complex claims under §§10(b) and 20(a) of the Securities
13 Exchange Act of 1934 (“Exchange Act”), and Rule 10b-5 promulgated thereunder, 17 C.F.R.
14 §240.10b-5. Specifically, Lead Plaintiff alleges that Defendants knew or recklessly
15 disregarded that the Lewis leach pad was beset with operating and production deficiencies,
16 which caused production costs to skyrocket during the Class Period and diverted resources
17 from other areas of the Company’s operations. Lead Plaintiff also alleged that Defendants
18 knew or recklessly disregarded that these problems would dramatically affect the Company’s
19 ability to recover gold and constrain its cash flow to fund operations, and, further, that
20 Defendants concealed the existence and extent of these issues during the Class Period.

21 8. In response, Defendants, represented by experienced counsel, strenuously
22 argued that these allegations were patently insufficient to support a sufficiently strong (or
23 any) inference of scienter, and, further, that the representations identified during the Class
24 Period were not false or misleading when made – affirmatively or by omission – or
25 otherwise actionable. They also argued that the former employee accounts were insufficient
26 to establish knowledge or recklessness on the part of the individual defendants, and that loss
27 causation was lacking because the price of gold, not the revelation of adverse developments
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1 that required disclosure, caused the Company's stock price to decline. The Court ultimately
2 dismissed this action twice, stating that the Amended Complaint and Second Amended
3 Complaint both failed to state a claim.

4 9. The Firm's work was performed on a wholly contingent basis for over six
5 years. As a result, the Firm has advanced and incurred substantial, yet reasonable, litigation
6 expenses. Not only must contingent litigation firms pay regular overhead, but they must also
7 advance the expenses of the litigation, with no guarantee of reimbursement, and the Firm did
8 so here. In light of the Firm's efforts in the face of these risks and at Lead Counsel's
9 direction, I respectfully submit that the Firm's fee request is reasonable and warrants
10 approval.

11 **II. The Fees and Expenses Requested**

12 10. The information in this declaration regarding the Firm's time and expenses is
13 taken from time and expense reports and supporting documentation prepared and/or
14 maintained by the Firm in the ordinary course of business. I am the partner who oversaw
15 and conducted the day-to day management and litigation of this Action. In preparing this
16 declaration, I reviewed these reports (and backup documentation, where necessary or
17 appropriate) to confirm the accuracy of the entries, as well as the reasonableness and
18 necessity of the time and expenses committed to the Action. As a result of this review,
19 reductions and adjustments were made to both time and expenses in the exercise of billing
20 judgment. Based on this review and the adjustments made, I believe that the time reflected
21 in the Firm's lodestar calculation and the expenses for which payment is sought herein are
22 reasonable and were necessary for the effective and efficient prosecution and resolution of
23 the Action. In addition, I believe that these expenses are all of a type that would normally be
24 charged to a fee-paying client in the private legal marketplace.

25 11. After the reductions referred to above, the number of hours spent on the
26 Action by the Firm is 2,906.55. A breakdown of the lodestar is provided in the attached
27 Exhibit 1. The lodestar amount for attorney/paraprofessional time based on the Firm's
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1 current rates is \$1,971,752.75. The hourly rates shown in Exhibit 1 are the usual and
2 customary rates set by the Firm for each individual. Paralegal time is grouped together
3 because no single paralegal contributed a significant amount of time to this engagement.
4 Specifically, aggregate paralegal time reflects work performed by eight paralegals, each of
5 whom billed fewer than five hours. Time relating to the fee and expense application has
6 been excluded.

7 12. The Firm seeks payment of \$47,777.14 in expenses in connection with the
8 prosecution of the Action. Those expenses are summarized by category in the attached
9 Exhibit 2.

10 13. The following is additional information regarding certain of these expenses:

11 (a) Filing, Witness, and Other Fees: \$899.00. These expenses were paid
12 to the Court for filing fees and to attorney service firms who served process of the complaint
13 or subpoenas. The vendors who were paid for these services are set forth in the attached
14 Exhibit 3.

15 (b) Business Wire: \$978.00. This expense was necessary under the
16 Private Securities Litigation Reform Act of 1995's "early notice" requirements, which
17 provides, among other things, that "[n]ot later than 20 days after the date on which the
18 complaint is filed, the plaintiff or plaintiffs shall cause to be published, in a widely circulated
19 national business-oriented publication or wire service, a notice advising members of the
20 purported plaintiff class – (I) of the pendency of the action, the claims asserted therein, and
21 the purported class period; and (II) that, not later than 60 days after the date on which the
22 notice is published, any member of the purported class may move the court to serve as lead
23 plaintiff of the purported class." *See* 15 U.S.C. §78u-4(a)(3)(A)(i).

24 (c) Transportation, Hotels, and Meals: \$4,920.86. In connection with the
25 prosecution of this case, the Firm has paid for travel expenses to, among other things, attend
26 the appeal hearing before the Ninth Circuit, attend the 26(f) Conference, and attend the
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1 mediation in New York City. The date, destination and purpose of each trip are set forth in
2 the attached Exhibit 4.

3 (d) Court Hearing Transcript: \$185.30. These expenses relate to
4 obtaining the transcript of the 10/02/19 hearing regarding CW depositions. The vendor who
5 was paid for this transcript is listed in the attached Exhibit 5.

6 (e) Consultants: \$6,967.10.

7 (i) ValueScope, Inc. (“ValueScope”): \$2,529.60. ValueScope, a
8 valuation and economic consulting firm with expertise in identifying and calculating
9 economic damages, assisted Lead Counsel in assessing loss causation and damages issues
10 for, and during, the mediation.

11 (ii) Allihies Engineering, Inc. (“Allihies”): \$3,250.00. Allihies
12 provides engineering services and designs and develops utilization for machines, materials,
13 instruments, structures, processes, and systems. Dr. Corby G. Anderson, Allihies’ principle,
14 is a professionally registered engineer with 40 years of experience in process, chemical and
15 metallurgical engineering, engineering services, engineering design, management and
16 industrial plant operations. Allihies was retained to serve as Lead Plaintiff’s expert as the
17 case proceeded into discovery, in order to assist Lead Counsel and the Firm in understanding
18 the technical nature of Allied Nevada’s mining process and the Hycroft Mine expansion
19 project.

20 (iii) Tuncel M. Yegulalp: \$1,187.50. Mr. Yegulalp is a Professor
21 of Mining, Emeritus, in the Department of Earth & Environmental Engineering at the Henry
22 Krumb School of Mines at Columbia University. Mr. Yegulalp provided consulting services
23 to Lead Counsel and the Firm on various mining topics during the drafting of the Amended
24 Complaint.

25 (f) Photocopies: \$27.65. In connection with this case, the Firm made 106
26 black and white copies. Robbins Geller requests \$0.15 per copy for a total of \$15.90. Each
27 time an in-house copy machine is used, our billing system requires that a case or
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1 administrative billing code be entered and that is how the number of in-house copies were
2 identified as related to the Action. The Firm also paid \$11.75 to local counsel for their copy
3 charges relating to the Complaint .

4 (g) Online Legal and Financial Research: \$6,082.86. This category
5 includes vendors such as LexisNexis Products, PACER, Thomson Financial and Westlaw.
6 These resources were used to obtain access to SEC filings, factual databases, legal research
7 and for cite-checking of briefs. This expense represents the costs incurred by Robbins Geller
8 for use of these services in connection with this Action. The charges for these vendors vary
9 depending upon the type of services requested. For example, Robbins Geller has flat-rate
10 contracts with some of these providers for use of their services. When Robbins Geller
11 utilizes online services provided by a vendor with a flat-rate contract, access to the service is
12 by a billing code entered for the specific case being litigated. At the end of each billing
13 period in which such service is used, Robbins Geller's costs for such services are allocated to
14 specific cases based on the percentage of use in connection with that specific case in the
15 billing period. As a result of the contracts negotiated by Robbins Geller with certain
16 providers, the Class enjoys substantial savings in comparison with the "market-rate" for a la
17 carte use of such services which some law firms pass on to their clients. For example, the
18 "market rate" charged to others by LexisNexis for the types of services used by Robbins
19 Geller is more expensive than the rates negotiated by Robbins Geller.

20 (h) eDiscovery Database Hosting: \$21,819.90. Robbins Geller requests
21 this amount for hosting eDiscovery related to this Action. Robbins Geller has installed top
22 tier software, infrastructure and security. The platform implemented, Relativity, is offered
23 by over 120 vendors and is currently being used by 198 law firms of the AmLaw200. Over
24 30 servers are dedicated to Robbins Geller's Relativity hosting environment with all data
25 stored in a secure SSAE 16 Type II data center with automatic replication to a datacenter
26 located in a different geographic location. By hosting in-house, Robbins Geller is able to
27 charge a reduced, all-in rate that includes many services which are often charged as extra
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1 fees when hosted by a third party vendor. Robbins Geller's hosting fee includes user logins,
2 processing, deduplication, OCRing, TIFFing, bates stamping, exports, productions and
3 archiving – all at no additional cost. Unlimited structured and conceptual analytics (*i.e.*,
4 email threading, inclusive detection, near-dupe detection, language identification, concept
5 searching, assisted review, clustering, and more) is also included. Robbins Geller is able to
6 provide these services for a rate that is typically much lower than outsourcing to a third party
7 vendor. Utilizing a secure, advanced platform in-house has allowed Robbins Geller to
8 prosecute actions more efficiently and has reduced the time and expense associated with
9 maintaining and searching electronic discovery databases. Similar to third-party vendors,
10 Robbins Geller uses a tiered rate system to calculate hosting charges. The amount requested
11 reflects charges for the hosting of over 66,500 documents, including over 365,000 pages
12 produced by Defendants, Lead Plaintiff, and non-parties in this action.

13 (i) Mediation Fees (Jed Melnick, Esq.): \$5,525.00. The Parties engaged
14 Jed Melnick, Esq., a nationally recognized mediator, to provide mediation services for the
15 October 10, 2019 mediation, which took place in New York City. Mr. Melnick and/or his
16 staff engaged in telephone conferences and communications with the Parties' counsel, both
17 together and separately, concerning, inter alia: (i) the logistics and scheduling of the
18 mediation; (ii) the process by which the parties intended to submit mediation statements and
19 evidence for use at the mediation; and (iii) damages figures, calculations and methodologies.
20 Mr. Melnick spent time reviewing and analyzing the mediation statements, and with the
21 assistance of his staff, prepared detailed questions to the parties, tailored to the facts of this
22 case, for use at the mediation. Mr. Melnick also prepared for and attended the all-day
23 mediation session in New York City, and assisted and engaged in communications with the
24 parties' counsel. Mr. Melnick's contributions to the mediation assisted the parties in
25 reaching an agreement-in-principle to settle the matter and assisted in facilitating
26 negotiations concerning the terms of the settlement.

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EXHIBIT 1

EXHIBIT 1

In re Allied Nevada Gold Corp., Securities Litigation, No. 3:14-cv-00175-LRH-WGC
 Robbins Geller Rudman & Dowd LLP
 Inception through June 11, 2020

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Alba, Mario	(P)	22.75	870	19,792.50
Daley, Joseph D.	(P)	126.05	970	122,268.50
Gusikoff Stewart, Ellen A.	(P)	24.50	1,080	26,460.00
Rudman, Samuel H.	(P)	37.25	1,325	49,356.25
Russello, Joseph F.	(P)	1,254.30	880	1,103,784.00
Delaney, Sarah E.	(A)	86.15	250	21,537.50
Geddish, William J.	(A)	340.70	610	207,827.00
Malina, Avital O.	(A)	289.50	610	176,595.00
Nematzadeh, Justin S.	(A)	82.75	475	39,306.25
Labouriau, Gabriela N.	(SA)	23.90	425	10,157.50
Aronica, R. Steven	(FA)	44.50	750	33,375.00
Barhoum, Anthony J.	(EA)	15.65	430	6,729.50
Topp, Jennifer M.	(EA)	12.25	335	4,103.75
Diamond, Vicki M.	(I)	384.35	290	111,461.50
Peitler, Steven J.	(I)	28.00	290	8,120.00
Lee, Alexander J.	(LS)	36.00	220	7,920.00
Paralegals		64.45	275-350	19,688.50
Shareholder Relations		33.50	95-100	3,270.00
TOTAL		2,906.55		\$ 1,971,752.75

(P) Partner
 (A) Associate
 (SA) Staff Attorney
 (FA) Forensic Accountant
 (EA) Economic Analyst
 (I) Investigator
 (LS) Litigation Support

EXHIBIT 2

EXHIBIT 2

In re Allied Nevada Gold Corp., Securities Litigation, No. 3:14-cv-00175-LRH-WGC
 Robbins Geller Rudman & Dowd LLP
 Inception through June 30, 2020

CATEGORY		AMOUNT
Filing, Witness and Other Fees		\$ 899.00
Business Wire		978.00
Transportation, Hotels & Meals		4,920.86
Telephone		28.26
Postage		34.11
Messenger, Overnight Delivery		309.10
Court Hearing Transcript		185.30
Consultants		6,967.10
Allihies Engineering Inc.	\$ 3,250.00	
ValueScope, Inc.	2,529.60	
Tuncel M. Yegulalp	1,187.50	
Photocopies		27.65
Outside	\$ 11.75	
In-House Black and White (106 copies at \$0.15 per page)	15.90	
Online Legal and Financial Research		6,082.86
eDiscovery Database Hosting		21,819.90
Mediation Fees (JAMS, Inc.)		5,525.00
TOTAL		\$ 47,777.14

EXHIBIT 3

EXHIBIT 3

In re Allied Nevada Gold Corp., Securities Litigation, No. 3:14-cv-00175-LRH-WGC
Robbins Geller Rudman & Dowd LLP

Filing, Witness and Other Fees: \$899.00

<i>DATE</i>	<i>VENDOR</i>	<i>PURPOSE</i>
04/04/14	Clerk of the Court	Certificate of Good Standing for M. Alba, Jr.
04/04/14	Clerk, Appellate Division	Certificate of Good Standing for S. Rudman
09/30/15	The O'Mara Law Firm, P.C.	04/03/14 Filing fee 04/04/14 Service of Process: Allen Investigations 05/22/14 <i>Pro Hac Vice</i> for S. Rudman 05/22/14 <i>Pro Hac Vice</i> for M. Alba, Jr.
04/12/19	Clerk of the Court	Certificate of Good Standing for W. Geddish Certificate of Good Standing for D. Rosenfeld
04/29/19	Clerk, U.S. District Court	Certificate of Good Standing for J. Russello

EXHIBIT 4

EXHIBIT 4

In re Allied Nevada Gold Corp., Securities Litigation, No. 3:14-cv-00175-LRH-WGC
Robbins Geller Rudman & Dowd LLP

Transportation, Hotels & Meals: \$4,920.86

<i>NAME</i>	<i>DATE</i>	<i>DESTINATION</i>	<i>PURPOSE</i>
Russello, Joseph	11/14/18- 11/15/18	San Francisco, CA	Prepare for and attend oral argument on appeal
Russello, Joseph	07/02/19- 07/05/19	Reno, NV	Prepare for and attend hearing on joint report and discovery schedule
Geddish, William	10/10/19	New York, NY	Prepare for and attend mediation
Rudman, Samuel	10/10/19	New York, NY	Prepare for and attend mediation
Russello, Joseph	10/10/19	New York, NY	Prepare for and attend mediation

EXHIBIT 5

EXHIBIT 5

In re Allied Nevada Gold Corp., Securities Litigation, No. 3:14-cv-00175-LRH-WGC
Robbins Geller Rudman & Dowd LLP

Court Hearing Transcript: \$185.30

<i>DATE</i>	<i>VENDOR</i>	<i>PURPOSE</i>
10/08/19	Exceptional Reporting Services, Inc.	Deposit for Transcript of 10/02/19 hearing with court regarding CW depositions
10/11/19	Exceptional Reporting Services, Inc.	Balance paid for Transcript of 10/02/19 hearing with court regarding CW depositions

EXHIBIT 6

FIRM RESUME

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INTRODUCTION

Robbins Geller Rudman & Dowd LLP (“Robbins Geller” or the “Firm”) is a 200-lawyer firm with offices in Boca Raton, Chicago, Manhattan, Melville, Nashville, San Diego, San Francisco, Philadelphia, and Washington, D.C. (www.rgrdlaw.com). The Firm is actively engaged in complex litigation, emphasizing securities, consumer, antitrust, insurance, healthcare, human rights, and employment discrimination class actions. The Firm’s unparalleled experience and capabilities in these fields are based upon the talents of its attorneys, who have successfully prosecuted thousands of class action lawsuits and numerous individual cases, recovering billions of dollars.

This successful track record stems from our experienced attorneys, including many who came to the Firm from federal or state law enforcement agencies. The Firm also includes several dozen former federal and state judicial clerks.

The Firm is committed to practicing law with the highest level of integrity in an ethical and professional manner. We are a diverse firm with lawyers and staff from all walks of life. Our lawyers and other employees are hired and promoted based on the quality of their work and their ability to treat others with respect and dignity.

We strive to be good corporate citizens and work with a sense of global responsibility. Contributing to our communities and environment is important to us. We often take cases on a *pro bono* basis and are committed to the rights of workers, and to the extent possible, we contract with union vendors. We care about civil rights, workers’ rights and treatment, workplace safety, and environmental protection. Indeed, while we have built a reputation as the finest securities and consumer class action law firm in the nation, our lawyers have also worked tirelessly in less high-profile, but no less important, cases involving human rights and other social issues.

PRACTICE AREAS AND SERVICES

Securities Fraud

As recent corporate scandals demonstrate clearly, it has become all too common for companies and their executives – often with the help of their advisors, such as bankers, lawyers, and accountants – to manipulate the market price of their securities by misleading the public about the company’s financial condition or prospects for the future. This misleading information has the effect of artificially inflating the price of the company’s securities above their true value. When the underlying truth is eventually revealed, the prices of these securities plummet, harming those innocent investors who relied upon the company’s misrepresentations.

Robbins Geller is the leader in the fight to protect investors from corporate securities fraud. We utilize a wide range of federal and state laws to provide investors with remedies, either by bringing a class action on behalf of all affected investors or, where appropriate, by bringing individual cases.

The Firm’s reputation for excellence has been repeatedly noted by courts and has resulted in the appointment of Firm attorneys to lead roles in hundreds of complex class-action securities and other cases. In the securities area alone, the Firm’s attorneys have been responsible for a number of outstanding recoveries on behalf of investors. Currently, Robbins Geller attorneys are lead or named counsel in hundreds of securities class action or large institutional-investor cases. Some notable current and past cases include:

- ♦ *In re Enron Corp. Sec. Litig.*, No. H-01-3624 (S.D. Tex.). Robbins Geller attorneys and lead plaintiff The Regents of the University of California aggressively pursued numerous defendants, including many of Wall Street’s biggest banks, and successfully obtained settlements in excess of **\$7.2 billion** for the benefit of investors. *This is the largest securities class action recovery in history.*
- ♦ *Jaffe v. Household Int’l, Inc.*, No. 02-C-05893 (N.D. Ill.). As sole lead counsel, Robbins Geller obtained a record-breaking settlement of **\$1.575 billion** after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a securities fraud verdict in favor of the class. In 2015, the Seventh Circuit Court of Appeals upheld the jury’s verdict that defendants made false or misleading statements of material fact about the company’s business practices and financial results, but remanded the case for a new trial on the issue of whether the individual defendants “made” certain false statements, whether those false statements caused plaintiffs’ losses, and the amount of damages. The parties reached an agreement to settle the case just hours before the retrial was scheduled to begin on June 6, 2016. *The \$1.575 billion settlement, approved in October 2016, is the largest ever following a securities fraud class action trial, the largest securities fraud settlement in the Seventh Circuit and the seventh-largest settlement ever in a post-PSLRA securities fraud case.* According to published reports, the case was just the seventh securities fraud case tried to a verdict since the passage of the PSLRA.

- ♦ *In re Valeant Pharm. Int'l, Inc. Sec. Litig.*, No. 3:15-cv-07658 (D.N.J.). As sole lead counsel, Robbins Geller attorneys obtained preliminary approval of a \$1.2 billion settlement in the securities case that *Vanity Fair* reported as “the corporate scandal of its era” that had raised “fundamental questions about the functioning of our health-care system, the nature of modern markets, and the slippery slope of ethical rationalizations.” The settlement resolves claims that defendants made false and misleading statements regarding Valeant’s business and financial performance during the class period, attributing Valeant’s dramatic growth in revenues and profitability to “innovative new marketing approaches” as part of a business model that was low risk and “durable and sustainable.” Pending court approval, *Valeant* is the largest securities class action settlement against a pharmaceutical manufacturer and the ninth largest ever.
- ♦ *In re Am. Realty Capital Props., Inc. Litig.*, No. 1:15-mc-00040 (S.D.N.Y.). As sole lead counsel, Robbins Geller attorneys zealously litigated the case arising out of ARCP’s manipulative accounting practices and obtained a \$1.025 billion settlement. For five years, the litigation team prosecuted nine different claims for violations of the Securities Exchange Act of 1934 and the Securities Act of 1933, involving seven different stock or debt offerings and two mergers. The recovery represents the highest percentage of damages of any major PSLRA case prior to trial and includes the largest personal contributions by individual defendants in history.
- ♦ *In re UnitedHealth Grp. Inc. PSLRA Litig.*, No. 06-CV-1691 (D. Minn.). Robbins Geller represented the California Public Employees’ Retirement System (“CalPERS”) and demonstrated its willingness to vigorously advocate for its institutional clients, even under the most difficult circumstances. The Firm obtained an \$895 million recovery on behalf of UnitedHealth shareholders, and former CEO William A. McGuire paid \$30 million and returned stock options representing more than three million shares to the shareholders, bringing the total recovery for the class to over \$925 million, the largest stock option backdating recovery ever, and *a recovery that is more than four times larger than the next largest options backdating recovery*. Moreover, Robbins Geller obtained unprecedented corporate governance reforms, including election of a shareholder-nominated member to the company’s board of directors, a mandatory holding period for shares acquired by executives via option exercise, and executive compensation reforms that tie pay to performance.
- ♦ *Alaska Elec. Pension Fund v. CitiGroup, Inc. (In re WorldCom Sec. Litig.)*, No. 03 Civ. 8269 (S.D.N.Y.). Robbins Geller attorneys represented more than 50 private and public institutions that opted out of the class action case and sued WorldCom’s bankers, officers and directors, and auditors in courts around the country for losses related to WorldCom bond offerings from 1998 to 2001. The Firm’s attorneys recovered more than \$650 million for their clients, substantially more than they would have recovered as part of the class.
- ♦ *Luther v. Countrywide Fin. Corp.*, No. 12-cv-05125 (C.D. Cal.). Robbins Geller attorneys secured a \$500 million settlement for institutional and individual investors in what is the largest RMBS purchaser class action settlement in history, and one of the largest class action securities settlements of all time. The unprecedented settlement resolves claims against Countrywide and Wall Street banks that issued the securities. The action was the first securities class action case filed against originators and Wall Street banks as a result of the credit crisis. As co-lead counsel Robbins Geller forged through six years of hard-fought litigation, oftentimes litigating issues of first impression, in order to secure the landmark settlement for its clients and the class.
- ♦ *In re Wachovia Preferred Sec. & Bond/Notes Litig.*, No. 09-cv-06351 (S.D.N.Y.). On behalf of investors in bonds and preferred securities issued between 2006 and 2008, Robbins Geller and co-

counsel obtained a significant settlement with Wachovia successor Wells Fargo & Company and Wachovia auditor KPMG LLP. *The total settlement – \$627 million – is one of the largest credit-crisis settlements involving Securities Act claims and one of the 20 largest securities class action recoveries in history.* The settlement is also one of the biggest securities class action recoveries arising from the credit crisis. The lawsuit focused on Wachovia’s exposure to “pick-a-pay” loans, which the bank’s offering materials said were of “pristine credit quality,” but which were actually allegedly made to subprime borrowers, and which ultimately massively impaired the bank’s mortgage portfolio. Robbins Geller served as co-lead counsel representing the City of Livonia Employees’ Retirement System, Hawaii Sheet Metal Workers Pension Fund, and the investor class.

- ♦ *In re Cardinal Health, Inc. Sec. Litig.*, No. C2-04-575 (S.D. Ohio). As sole lead counsel representing Cardinal Health shareholders, Robbins Geller obtained a recovery of \$600 million for investors on behalf of the lead plaintiffs, Amalgamated Bank, the New Mexico State Investment Council, and the California Ironworkers Field Trust Fund. At the time, the \$600 million settlement was the tenth-largest settlement in the history of securities fraud litigation and is the largest-ever recovery in a securities fraud action in the Sixth Circuit.
- ♦ *AOL Time Warner Cases I & II*, JCCP Nos. 4322 & 4325 (Cal. Super. Ct., Los Angeles Cty.). Robbins Geller represented The Regents of the University of California, six Ohio state pension funds, Rabo Bank (NL), the Scottish Widows Investment Partnership, several Australian public and private funds, insurance companies, and numerous additional institutional investors, both domestic and international, in state and federal court opt-out litigation stemming from Time Warner’s disastrous 2001 merger with Internet high flier America Online. After almost four years of litigation involving extensive discovery, the Firm secured combined settlements for its opt-out clients totaling over \$629 million just weeks before The Regents’ case pending in California state court was scheduled to go to trial. The Regents’ gross recovery of \$246 million is the largest individual opt-out securities recovery in history.
- ♦ *In re HealthSouth Corp. Sec. Litig.*, No. CV-03-BE-1500-S (N.D. Ala.). As court-appointed co-lead counsel, Robbins Geller attorneys obtained a combined recovery of \$671 million from HealthSouth, its auditor Ernst & Young, and its investment banker, UBS, for the benefit of stockholder plaintiffs. The settlement against HealthSouth represents one of the larger settlements in securities class action history and is considered among the top 15 settlements achieved after passage of the PSLRA. Likewise, the settlement against Ernst & Young is one of the largest securities class action settlements entered into by an accounting firm since the passage of the PSLRA.
- ♦ *Jones v. Pfizer Inc.*, No. 1:10-cv-03864 (S.D.N.Y.). Lead plaintiff Stichting Philips Pensioenfonds obtained a \$400 million settlement on behalf of class members who purchased Pfizer common stock during the January 19, 2006 to January 23, 2009 class period. The settlement against Pfizer resolves accusations that it misled investors about an alleged off-label drug marketing scheme. As sole lead counsel, Robbins Geller attorneys helped achieve this exceptional result after five years of hard-fought litigation against the toughest and the brightest members of the securities defense bar by litigating this case all the way to trial.
- ♦ *In re Dynege Inc. Sec. Litig.*, No. H-02-1571 (S.D. Tex.). As sole lead counsel representing The Regents of the University of California and the class of Dynege investors, Robbins Geller attorneys obtained a combined settlement of \$474 million from Dynege, Citigroup, Inc., and Arthur Andersen LLP for their involvement in a clandestine financing scheme known as Project Alpha. Most notably, the settlement agreement provides that Dynege will appoint two board members to be nominated by The Regents, which Robbins Geller and The Regents believe will benefit all of Dynege’s stockholders.

- ♦ *In re Qwest Commc'ns Int'l, Inc. Sec. Litig.*, No. 01-cv-1451 (D. Colo.). In July 2001, the Firm filed the initial complaint in this action on behalf of its clients, long before any investigation into Qwest's financial statements was initiated by the SEC or Department of Justice. After five years of litigation, lead plaintiffs entered into a settlement with Qwest and certain individual defendants that provided a \$400 million recovery for the class and created a mechanism that allowed the vast majority of class members to share in an additional \$250 million recovered by the SEC. In 2008, Robbins Geller attorneys recovered an additional \$45 million for the class in a settlement with defendants Joseph P. Nacchio and Robert S. Woodruff, the CEO and CFO, respectively, of Qwest during large portions of the class period.
- ♦ *Fort Worth Emps.' Ret. Fund v. J.P. Morgan Chase & Co.*, No. 1:09-cv-03701 (S.D.N.Y.). Robbins Geller attorneys served as lead counsel for a class of investors and obtained court approval of a \$388 million recovery in nine 2007 residential mortgage-backed securities offerings issued by J.P. Morgan. The settlement represents, on a percentage basis, the largest recovery ever achieved in an MBS purchaser class action. The result was achieved after more than five years of hard-fought litigation and an extensive investigation.
- ♦ *Smilovits v. First Solar, Inc.*, No. 2:12-cv-00555 (D. Ariz.). As sole lead counsel, Robbins Geller obtained a \$350 million settlement in *Smilovits v. First Solar, Inc.* The settlement, which was reached after a long legal battle and on the day before jury selection, resolves claims that First Solar violated §§10(b) and 20(a) of the Securities Exchange Act of 1934 and SEC Rule 10b-5. The settlement is the fifth-largest PSLRA settlement ever recovered in the Ninth Circuit.
- ♦ *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.*, No. 1:08-cv-10783 (S.D.N.Y.). As sole lead counsel, Robbins Geller obtained a \$272 million settlement on behalf of Goldman Sachs' shareholders. The settlement concludes one of the last remaining mortgage-backed securities purchaser class actions arising out of the global financial crisis. The remarkable result was achieved following seven years of extensive litigation. After the claims were dismissed in 2010, Robbins Geller secured a landmark victory from the Second Circuit Court of Appeals that clarified the scope of permissible class actions asserting claims under the Securities Act of 1933 on behalf of MBS investors. Specifically, the Second Circuit's decision rejected the concept of "tranche" standing and concluded that a lead plaintiff in an MBS class action has class standing to pursue claims on behalf of purchasers of other securities that were issued from the same registration statement and backed by pools of mortgages originated by the same lenders who had originated mortgages backing the lead plaintiff's securities.
- ♦ *Schuh v. HCA Holdings, Inc.*, No. 3:11-cv-01033 (M.D. Tenn.). As sole lead counsel, Robbins Geller obtained a groundbreaking \$215 million settlement for former HCA Holdings, Inc. shareholders – the largest securities class action recovery ever in Tennessee. Reached shortly before trial was scheduled to commence, the settlement resolves claims that the Registration Statement and Prospectus HCA filed in connection with the company's massive \$4.3 billion 2011 IPO contained material misstatements and omissions. The recovery achieved represents more than 30% of the aggregate classwide damages, far exceeding the typical recovery in a securities class action.
- ♦ *In re AT&T Corp. Sec. Litig.*, MDL No. 1399 (D.N.J.). Robbins Geller attorneys served as lead counsel for a class of investors that purchased AT&T common stock. The case charged defendants AT&T and its former Chairman and CEO, C. Michael Armstrong, with violations of the federal securities laws in connection with AT&T's April 2000 initial public offering of its wireless tracking stock, one of the largest IPOs in American history. After two weeks of trial, and on the eve of scheduled testimony by Armstrong and infamous telecom analyst Jack Grubman, defendants agreed to settle the case for \$100 million.

- ♦ *Silverman v. Motorola, Inc.*, No. 1:07-cv-04507 (N.D. Ill.). The Firm served as lead counsel on behalf of a class of investors in Motorola, Inc., ultimately recovering \$200 million for investors just two months before the case was set for trial. This outstanding result was obtained despite the lack of an SEC investigation or any financial restatement.
- ♦ *City of Pontiac Gen. Emps.' Ret. Sys. v. Wal-Mart Stores, Inc.*, No. 5:12-cv-05162 (W.D. Ark.). Robbins Geller attorneys and lead plaintiff City of Pontiac General Employees' Retirement System achieved a \$160 million settlement in a securities class action case arising from allegations published by *The New York Times* in an article released on April 21, 2012 describing an alleged bribery scheme that occurred in Mexico. The case charged that Wal-Mart portrayed itself to investors as a model corporate citizen that had proactively uncovered potential corruption and promptly reported it to law enforcement, when in truth, a former in-house lawyer had blown the whistle on Wal-Mart's corruption years earlier, and Wal-Mart concealed the allegations from law enforcement by refusing its own in-house and outside counsel's calls for an independent investigation. Robbins Geller "achieved an exceptional [s]ettlement with skill, perseverance, and diligent advocacy," said Judge Hickey when granting final approval.
- ♦ *Bennett v. Sprint Nextel Corp.*, No. 2:09-cv-02122 (D. Kan.). As co-lead counsel, Robbins Geller obtained a \$131 million recovery for a class of Sprint investors. The settlement, secured after five years of hard-fought litigation, resolved claims that former Sprint executives misled investors concerning the success of Sprint's ill-advised merger with Nextel and the deteriorating credit quality of Sprint's customer base, artificially inflating the value of Sprint's securities.
- ♦ *In re LendingClub Sec. Litig.*, No. 3:16-cv-02627 (N.D. Cal.). Robbins Geller attorneys obtained a \$125 million settlement for the court-appointed lead plaintiff Water and Power Employees' Retirement, Disability and Death Plan of the City of Los Angeles and the class. The settlement resolved allegations that LendingClub promised investors an opportunity to get in on the ground floor of a revolutionary lending market fueled by the highest standards of honesty and integrity. The settlement ranks among the top ten largest securities recoveries ever in the Northern District of California.
- ♦ *Knurr v. Orbital ATK, Inc.*, No. 1:16-cv-01031 (E.D. Va.). In the *Orbital* securities class action, Robbins Geller obtained court approval of a \$108 million recovery for the class. The Firm succeeded in overcoming two successive motions to dismiss the case, and during discovery were required to file ten motions to compel, all of which were either negotiated to a resolution or granted in large part, which resulted in the production of critical evidence in support of plaintiffs' claims. Believed to be the fourth-largest securities class action settlement in the history of the Eastern District of Virginia, the settlement provides a recovery for investors that is more than ten times larger than the reported median recovery of estimated damages for all securities class action settlements in 2018.
- ♦ *Hsu v. Puma Biotechnology*, No. SACV15-0865 (C.D. Cal.). After a two-week jury trial, Robbins Geller attorneys won a complete plaintiffs' verdict against both defendants on both claims, with the jury finding that Puma Biotechnology, Inc. and its CEO, Alan H. Auerbach, committed securities fraud. The Puma case is only the fifteenth securities class action case tried to a verdict since the Private Securities Litigation Reform Act was enacted in 1995.
- ♦ *Marcus v. J.C. Penney Co., Inc.*, No. 13-cv-00736 (E.D. Tex.). Robbins Geller attorneys obtained a \$97.5 million recovery on behalf of J.C. Penney shareholders. The result resolves claims that J.C. Penney and certain officers and directors made misstatements and/or omissions regarding the company's financial position that resulted in artificially inflated stock prices. Specifically, defendants failed to disclose and/or misrepresented adverse facts, including that J.C. Penney

would have insufficient liquidity to get through year-end and would require additional funds to make it through the holiday season, and that the company was concealing its need for liquidity so as not to add to its vendors' concerns.

- ♦ *Chicago Laborers Pension Fund v. Alibaba Grp. Holding Ltd.*, No. CIV535692 (Cal. Super. Ct., San Mateo Cty.). Robbins Geller attorneys and co-counsel obtained a \$75 million settlement in the Alibaba Group Holding Limited securities class action, resolving investors' claims that Alibaba violated the Securities Act of 1933 in connection with its September 2014 initial public offering. Chicago Laborers Pension Fund served as a plaintiff in the action.
- ♦ *Luna v. Marvell Tech. Grp., Ltd.*, No. 3:15-cv-05447 (N.D. Cal.). In the *Marvell* litigation, Robbins Geller attorneys represented the Plumbers and Pipefitters National Pension Fund and obtained a \$72.5 million settlement. The case involved claims that Marvell reported revenue and earnings during the class period that were misleading as a result of undisclosed pull-in and concession sales. The settlement represents approximately 24% to 50% of the best estimate of classwide damages suffered by investors who purchased shares during the February 19, 2015 through December 7, 2015 class period.
- ♦ *Garden City Emps.' Ret. Sys. v. Psychiatric Sols., Inc.*, No. 3:09-cv-00882 (M.D. Tenn.). In the *Psychiatric Solutions* case, Robbins Geller represented lead plaintiff and class representative Central States, Southeast and Southwest Areas Pension Fund in litigation spanning more than four years. Psychiatric Solutions and its top executives were accused of insufficiently staffing their in-patient hospitals, downplaying the significance of regulatory investigations and manipulating their malpractice reserves. Just days before trial was set to commence, attorneys from Robbins Geller achieved a \$65 million settlement that was the fourth-largest securities recovery ever in the district and one of the largest in a decade.
- ♦ *Plumbers & Pipefitters Nat'l Pension Fund v. Burns*, No. 3:05-cv-07393 (N.D. Ohio). After 11 years of hard-fought litigation, Robbins Geller attorneys secured a \$64 million recovery for shareholders in a case that accused the former heads of Dana Corp. of securities fraud for trumpeting the auto parts maker's condition while it actually spiraled toward bankruptcy. The Firm's Appellate Practice Group successfully appealed to the Sixth Circuit Court of Appeals twice, reversing the district court's dismissal of the action.
- ♦ *In re BHP Billiton Ltd. Sec. Litig.*, No. 1:16-cv-01445 (S.D.N.Y.). As lead counsel, Robbins Geller obtained a \$50 million class action settlement against BHP, a Australian-based mining company that was accused of failing to disclose significant safety problems at the Fundão iron-ore dam, in Brazil. The Firm achieved this result for lead plaintiffs City of Birmingham Retirement and Relief System and City of Birmingham Firemen's and Policemen's Supplemental Pension System, on behalf of purchasers of the American Depositary Shares ("ADRs") of defendants BHP Billiton Limited and BHP Billiton Plc (together, "BHP") from September 25, 2014 to November 30, 2015.
- ♦ *In re St. Jude Med., Inc. Sec. Litig.*, No. 0:10-cv-00851 (D. Minn.). After four and a half years of litigation and mere weeks before the jury selection, Robbins Geller obtained a \$50 million settlement on behalf of investors in medical device company St. Jude Medical. The settlement resolves accusations that St. Jude Medical misled investors by utilizing heavily discounted end-of-quarter bulk sales to meet quarterly expectations, which created a false picture of demand by increasing customer inventory due of St. Jude Medical devices. The complaint alleged that the risk of St. Jude Medical's reliance on such bulk sales manifested when it failed to meet its forecast guidance for the third quarter of 2009, which the company had reaffirmed only weeks earlier.

Robbins Geller's securities practice is also strengthened by the existence of a strong appellate department, whose collective work has established numerous legal precedents. The securities practice also utilizes an extensive group of in-house economic and damage analysts, investigators, and forensic accountants to aid in the prosecution of complex securities issues.

ATTORNEY BIOGRAPHIES

Mario Alba Jr. | Partner

Mario Alba is a partner in the Firm's Melville office. He is a member of the Firm's Institutional Outreach Team, which provides advice to the Firm's institutional clients, including numerous public pension systems and Taft-Hartley funds throughout the United States, and consults with them on issues relating to corporate fraud in the U.S. securities markets, as well as corporate governance issues and shareholder litigation. Some of Alba's institutional clients are currently involved in securities cases involving: BRF S.A.; Ryanair Holdings PLC; HCP, Inc.; Iconix Brand Group; Advisory Board Company; Endo International PLC; Impax Laboratories, Inc.; Super Micro Computer, Inc.; Skechers USA, Inc.; and Hertz Global Holdings, Inc. Alba's institutional clients are also involved in certain antitrust actions, namely: *In re National Prescription Opiate Litigation*, *In re Epipen (Epinephrine Injection, USP) Marketing, Sales Practices and Antitrust Litigation*, and *Forth v. Walgreen Co.* Alba has served as lead counsel in numerous cases and is responsible for initiating, investigating, researching, and filing securities and consumer fraud class actions. He has recovered millions of dollars in numerous actions, including cases against BHP Billiton Limited (\$50 million), NBTY, Inc. (\$16 million), OSI Pharmaceuticals (\$9 million), and PXRe Group, Ltd. (\$5.9 million). Alba has lectured at numerous institutional investor conferences throughout the United States on various shareholder issues, including at the Illinois Public Pension Fund Association, the New York State Teamsters Conference, the American Alliance Conference, and the TEXPERS/IPPPA Joint Conference at the New York Stock Exchange, among others.

Education

B.S., St. John's University, 1999; J.D., Hofstra University School of Law, 2002

Honors / Awards

Rising Star, *Super Lawyers Magazine*, 2012-2013, 2016-2017; B.S., Dean's List, St. John's University, 1999; Selected as participant in Hofstra Moot Court Seminar, Hofstra University School of Law

Joseph D. Daley | Partner

Joseph Daley is a partner in the Firm's San Diego office, serves on the Firm's Securities Hiring Committee, and is a member of the Firm's Appellate Practice Group. Precedents include: *City of Birmingham Ret. & Relief Sys. v. Davis*, F. App'x , 2020 WL 1189621 (2d Cir. 2020); *City of Providence v. Bats Glob. Mkts., Inc.*, 878 F.3d 36 (2d Cir. 2017); *DeJulius v. New Eng. Health Care Emps. Pension Fund*, 429 F.3d 935 (10th Cir. 2005); *Frank v. Dana Corp. ("Dana I")*, 547 F.3d 564 (6th Cir. 2008); *Frank v. Dana Corp. ("Dana II")*, 646 F.3d 954 (6th Cir. 2011); *Freidus v. Barclays Bank Plc*, 734 F.3d 132 (2d Cir. 2013); *In re HealthSouth Corp. Sec. Litig.*, 334 F. App'x 248 (11th Cir. 2009); *In re Merck & Co. Sec., Derivative & ERISA Litig.*, 493 F.3d 393 (3d Cir. 2007); *In re Quality Sys., Inc. Sec. Litig.*, 865 F.3d 1130 (9th Cir. 2017); *In re Qwest Commc'ns Int'l*, 450 F.3d 1179 (10th Cir. 2006); *Luther v. Countrywide Home Loans Servicing LP*, 533 F.3d 1031 (9th Cir. 2008); *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.*, 693 F.3d 145 (2d Cir. 2012); *Rosenbloom v. Pyott ("Allergan")*, 765 F.3d 1137 (9th Cir. 2014); *Silverman v. Motorola Solutions, Inc.*, 739 F.3d 956 (7th Cir. 2013); *Siracusano v. Matrixx Initiatives, Inc.*, 585 F.3d 1167 (9th Cir. 2009), *aff'd*, 563 U.S. 27 (2011); and *Southland Sec. Corp. v. INSpire Ins. Solutions Inc.*, 365 F.3d 353 (5th Cir. 2004). Daley is admitted to practice before the U.S. Supreme Court, as well as before 12 U.S. Courts of Appeals around the nation.

Education

B.S., Jacksonville University, 1981; J.D., University of San Diego School of Law, 1996

Honors / Awards

Super Lawyer, *Super Lawyers Magazine*, 2011-2012, 2014-2018; Appellate Moot Court Board, Order of the Barristers, University of San Diego School of Law; Best Advocate Award (Traynore Constitutional Law Moot Court Competition), First Place and Best Briefs (Alumni Torts Moot Court Competition and USD Jessup International Law Moot Court Competition)

Ellen Gusikoff Stewart | Partner

Ellen Stewart is a partner in the Firm's San Diego office, and is a member of the Firm's Summer Associate Hiring Committee. She currently practices in the Firm's settlement department, negotiating and documenting complex securities, merger, ERISA, and derivative action settlements. Notable settlements include: *KBC Asset Management v. 3D Systems Corp.* (D.S.C. 2018) (\$50 million); *Luna v. Marvell Tech. Grp.* (N.D. Cal. 2018) (\$72.5 million); *Garden City Emps.' Ret. Sys. v. Psychiatric Solutions, Inc.* (M.D. Tenn. 2015) (\$65 million); and *City of Sterling Heights Gen. Emps.' Ret. Sys v. Hospira, Inc.* (N.D. Ill. 2014) (\$60 million).

Stewart has served on the Federal Bar Association Ad Hoc Committee for the revisions to the Settlement Guidelines for the Northern District of California and was a contributor to the Guidelines and Best Practices – Implementing 2018 Amendments to Rule 23 Class Action Settlement Provisions manual of the Bolch Judicial Institute at the Duke University School of Law.

Education

B.A., Muhlenberg College, 1986; J.D., Case Western Reserve University, 1989

Honors / Awards

Rated Distinguished by Martindale-Hubbell

Samuel H. Rudman | Partner

Sam Rudman is a founding member of the Firm, a member of the Firm's Executive and Management Committees, and manages the Firm's New York offices. His 26-year securities practice focuses on recognizing and investigating securities fraud, and initiating securities and shareholder class actions to vindicate shareholder rights and recover shareholder losses. A former attorney with the SEC, Rudman has recovered hundreds of millions of dollars for shareholders, including a \$200 million recovery in *Motorola*, a \$129 million recovery in *Doral Financial*, an \$85 million recovery in *Blackstone*, a \$74 million recovery in *First BanCorp*, a \$65 million recovery in *Forest Labs*, a \$50 million recovery in *TD Banknorth*, a \$48 million recovery in *CVS Caremark*, and a \$34.5 million recovery in *L-3 Communications Holdings*.

Education

B.A., Binghamton University, 1989; J.D., Brooklyn Law School, 1992

Honors / Awards

Plaintiffs' Lawyer Trailblazer, *The National Law Journal*, 2020; Leading Lawyer in America, *Lawdragon*, 2016-2020; National Practice Area Star, *Benchmark Litigation*, 2019-2020; Local Litigation Star, *Benchmark Litigation*, 2013-2020; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019; Recommended Lawyer, *The Legal 500*, 2018-2019; Leading Lawyer, *Chambers USA*, 2014-2019; Litigation Star, *Benchmark Litigation*, 2013, 2017-2019; Super Lawyer, *Super Lawyers Magazine*, 2007-2019; Dean's Merit Scholar, Brooklyn Law School; Moot Court Honor Society, Brooklyn Law School; Member, *Brooklyn Journal of International Law*, Brooklyn Law School

Joseph Russello | Partner

Joseph Russello is a partner in the Firm's Melville office. He principally prosecutes violations of the federal securities laws and breaches of fiduciary duty on behalf of individual and institutional investors. During his tenure at the Firm, Russello has achieved significant results in complex and challenging cases.

Currently, Russello is leading the Firm's efforts in litigating securities claims against several companies in the Commercial Division of the New York State Supreme Court, New York County, in the wake of the U.S. Supreme Court's decision in *Cyan, Inc. v. Beaver Cty. Emps.' Ret. Fund*, _ U.S. __, 138 S. Ct. 1061 (2018), which confirmed that state courts have concurrent jurisdiction of claims under the Securities Act of 1933. He is also prosecuting federal securities fraud cases against Telefonaktiebolaget LM Ericsson (known as Ericsson) and former executives and directors of Allied Nevada Gold Corporation, the latter of which was the subject of a favorable decision from the Ninth Circuit Court of Appeals reversing dismissal and reinstating the claims in their entirety (*In re Allied Nev. Gold Corp. Sec. Litig.*, 743 F. App'x 887 (9th Cir. 2018) (summary order)).

Recently, Russello led the team responsible for recovering \$50 million in litigation against BHP Billiton, an Australian-based mining company accused of failing to disclose significant safety problems at the Fundão iron-ore dam, in Brazil. Together with Brazilian mining company Vale S.A., BHP owned Samarco Mineração S.A., which operated the mining complex at which the Fundão dam was located. On November 5, 2015, the dam collapsed and unleashed a torrent of mining waste, resulting in the death of 19 people, the destruction of the town of Bento Rodrigues, and the decimation of the surrounding environment. Even today, this event is regarded as the worst environmental disaster in Brazil's history. Russello and a team from Robbins Geller represented two institutional investors and an individual in defeating BHP's motion to dismiss (*In re BHP Billiton Ltd. Sec. Litig.*, 276 F. Supp. 3d 65 (S.D.N.Y. 2017)), and prosecuted and ultimately resolved the case on behalf of two sets of purchasers of American Depositary Shares (ADSs) trading on the New York Stock Exchange.

Education

B.A., Gettysburg College, 1998; J.D., Hofstra University School of Law, 2001

Honors / Awards

Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019; Super Lawyer, *Super Lawyers Magazine*, 2014-2019; *Law360* Securities Editorial Advisory Board, 2017

Sarah E. Delaney | Associate

Sarah Delaney is an associate in the Firm's Melville office, where her practice focuses on complex securities litigation.

Delaney graduated from The Pennsylvania State University with a Bachelor of Arts degree in Psychology. She earned a Juris Doctor degree from Fordham University School of Law, where she was a member of the *Fordham Urban Law Journal* and worked in the Securities Litigation and Arbitration Clinic. During law school, she interned at the New Jersey Attorney General's Office and the United States Attorney's Office for the Eastern District of New York. Delaney was also a summer associate at the Firm and returned upon graduation from law school.

Education

B.A., The Pennsylvania State University, 2016; J.D., Fordham University School of Law, 2019

William J. Geddish | Associate

William Geddish is an associate in the Firm's Melville office, where his practice focuses on complex securities litigation. Before joining the Firm, he was an associate in the New York office of a large international law firm, where his practice focused on complex commercial litigation.

Since joining the Firm, Geddish has played a significant role in the following litigations: *In re Barrick Gold Sec. Litig.* (\$140 million recovery); *Landmen Partners, Inc. v. The Blackstone Grp., L.P.* (\$85 million recovery); *City of Austin Police Ret. Sys. v. Kinross Gold Corp.* (\$33 million recovery); *City of Roseville Emps' Ret. Sys. v. EnergySolutions, Inc.* (\$26 million recovery); *Beaver County Emps' Ret. Fund v. Tile Shop Holdings, Inc.* (\$9.5 million recovery); and *Barbara Marciano v. Schell & Kampeter, Inc.* (\$2 million recovery).

Education

B.A., Sacred Heart University, 2006, J.D., Hofstra University School of Law, 2009

Honors / Awards

Rising Star, *Super Lawyers Magazine*, 2013-2019; J.D., *Magna Cum Laude*, Hofstra University School of Law, 2009; Gina Maria Escarce Memorial Award, Hofstra University School of Law

Avital O. Malina | Associate

Avital Malina is an associate in the Firm's Melville office, where her practice focuses on complex securities litigation.

Malina has been recognized as a Rising Star by *Super Lawyers Magazine* for the New York Metro area for the past five consecutive years. Before joining the Firm, she was an associate in the New York office of a large international law firm, where her practice focused on complex commercial litigations.

Education

B.A., Barnard College, 2005, J.D., Fordham University School of Law, 2009

Honors / Awards

Rising Star, *Super Lawyers Magazine*, 2015-2019; B.A., *Magna Cum Laude*, Barnard College, 2005

Justin Solomon Nematzadeh | Associate

Justin Solomon Nematzadeh is an associate in the Firm's Melville office. His practice focuses on complex securities, antitrust, breach of fiduciary duty, and shareholder derivative litigation. Prior to joining Robbins Geller, Nematzadeh practiced in the New York office of Gibson, Dunn & Crutcher LLP. His practice there involved federal and state complex litigation and internal and regulatory investigations, focusing on securities and antitrust litigation. Additionally, for his work in representing lead plaintiffs in *Toney-Dick v. Doar*, he was awarded a 2013 Pro Bono Publico award from The Legal Aid Society.

Nematzadeh earned his J.D. degree, *cum laude*, from Fordham University School of Law. During law school, he served as a member of the *Fordham Urban Law Journal* and as a business editor of the Fordham Dispute Resolution Society. Additionally, he served as a judicial intern to the Honorable Stuart M. Bernstein of the United States Bankruptcy Court for the Southern District of New York. He earned his B.B.A. degree, with distinction, from the University of Michigan Stephen M. Ross School of Business, with an emphasis in finance and corporate strategy. During business school, he was awarded a University of Michigan Alumnae Council MBNA Scholarship.

Nematzadeh is the co-author of the Delaware Business Court Insider article entitled "Lead Plaintiffs' Shareholdings Draw Chancery Review." Additionally, he has contributed to chapters in the American Bar Association's Antitrust Law Developments, chapters in Matthew Bender's Antitrust Laws and Trade Regulation, and Professor Deborah W. Denno's chapter entitled "When Willie Francis Died: The "Disturbing" Story Behind One of the Eighth Amendment's Most Enduring Standards of Risk" in John H. Blume and Jordan M. Steiker's book entitled Death Penalty Stories.

Education

B.B.A., University of Michigan Stephen M. Ross School of Business, 2005; J.D., Fordham University School of Law, 2008

Honors / Awards

Pro Bono Publico award, The Legal Aid Society, 2013; J.D., *Cum Laude*, Fordham University School of Law, 2008; B.B.A., *With Distinction*, University of Michigan Stephen M. Ross School of Business, 2005