

EXHIBIT 2

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*Counsel for Lead Plaintiff
Fulton County Employees' Retirement System
[Additional Counsel Appear on Signature Page]*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CITY OF SOUTHFIELD FIRE AND
POLICE RETIREMENT SYSTEM,
Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

HAYWARD HOLDINGS, INC.,
KEVIN HOLLERAN, EIFION
JONES, CCMP CAPITAL
ADVISORS, LP, CCMP CAPITAL
INVESTORS III, L.P., CCMP
CAPITAL INVESTORS III
(EMPLOYEE), L.P., CCMP CAPITAL
ASSOCIATES III, L.P., CCMP
CAPITAL ASSOCIATES III GP,
LLC, CCMP CAPITAL, LP, CCMP
CAPITAL GP, LLC, MSD AQUA
PARTNERS, LLC, MSD PARTNERS,
L.P., MSD PARTNERS (GP), LLC,
MARK MCFADDEN, GREG

Civil Action No. 2:23-cv-04146

Hon. William J. Martini

**DECLARATION OF DARYL F.
SCOTT IN SUPPORT OF
MOTION FOR (1) FINAL
APPROVAL OF SETTLEMENT
(2) AWARD OF ATTORNEYS'
FEES, LITIGATION
EXPENSES, AND LEAD
PLAINTIFF AWARD
PURSUANT TO 15 U.S.C. §78u-
4(a)(7)**

BRENNEMAN, TIMOTHY WALSH,
CHRISTOPHER BERTRAND, and
KEVIN BROWN

Defendants.

I, DARYL F. SCOTT, hereby declare as follows:

1. I am a Partner and the Chief Financial Officer of the law firm of Scott+Scott Attorneys at Law LLP (“Scott+Scott” or the “Firm”). I submit this declaration in support of Plaintiff’s Counsel’s motion for an award of attorneys’ fees in connection with services rendered in the above-captioned action (the “Action”), as well as for payment of expenses incurred by my Firm in connection with the Action.¹ I have personal knowledge of the facts stated in this declaration and, if called upon, could and would testify to these facts.

2. My Firm serves as Lead Counsel and Class Counsel for the Settlement Class in this Action.

3. My Firm was involved in all aspects of the prosecution and resolution of the Action, as set forth in the Declaration of Max R. Schwartz in Support of Motion for (1) Final Approval of Settlement; and (2) Award of Attorneys’ Fees, Litigation Expenses, and Lead Plaintiff award pursuant to 15 U.S.C. §78u-4(a)(7), filed herewith.

¹ All capitalized terms that are not otherwise defined herein shall have the same meanings provided in the Stipulation of Settlement dated January 23, 2026 (“Stipulation” or “Stip.”), filed as ECF No. 128-2.

4. The schedule attached hereto as **Exhibit 1** is a summary indicating the amount of time spent by each Scott+Scott attorney and professional support staff employee involved in this Action who devoted ten (10) or more hours to the Action from its inception through and including April 30, 2026, and the lodestar calculation for those individuals. The lodestar calculation for the individuals in **Exhibit 1** is based on my Firm's current hourly rates, as set forth in paragraph 8 below. For personnel who are no longer employed by my Firm, the lodestar calculation is based on the hourly rates for such personnel in their final year of employment. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by my Firm.

5. Attorneys at Scott+Scott carefully reviewed these time and expense records before preparing this declaration. The purpose of this review was to confirm both the accuracy of the time entries and expenses and the necessity for, and reasonableness of, the time and expenses committed to the litigation. As a result of this review, reductions were made in the exercise of counsel's judgment. In addition, all time expended in preparing this application for fees and expenses has been excluded.

6. Following this review and the adjustments made, I believe that the time reflected in the Firm's lodestar calculation and the expenses for which reimbursement is sought are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation.

7. The hourly rates for the Scott+Scott attorneys and professional support staff employees included in **Exhibit 1** are the same as, or comparable to, the rates submitted by my Firm and accepted by courts for lodestar cross-checks in other securities class action or other complex litigation fee applications.

8. My Firm's rates are set yearly, based on an analysis of billing rates by law firms performing comparable work and that have been approved by courts. Different timekeepers within the same employment category (*e.g.*, partners, associates, paralegals, etc.) may have different rates based on a variety of factors, including years of practice, years at the Firm, year in their current position (*e.g.*, years as a partner), relevant experience, relative expertise, and the rates of similarly experienced peers at our Firm or other law firms.

9. The total number of hours expended on this Action by my Firm from its inception through and including April 30, 2026, is 6,492.90 hours. The total lodestar for my Firm for that period is \$6,446,068.50. My Firm's lodestar figures are based on the Firm's hourly rates, which do not include costs for expenses.

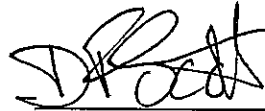
10. With respect to the standing of my Firm, attached hereto as **Exhibit 3** is a biography of my Firm and the attorneys currently employed by the Firm and involved in this matter.

11. As detailed in **Exhibit 2**, my Firm is seeking payment for a total of \$210,477.90 in expenses incurred in connection with the prosecution of this Action from its inception.

12. The expenses incurred in this Action are reflected in the records of my Firm, which are regularly prepared and maintained in the ordinary course of business. These records are prepared from expense vouchers, check records, and other source materials and accurately reflect the expenses incurred.

13. I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct. Executed on the 5th day of May, 2026, in

Richmond, Virginia.



Daryl R. Scott

EXHIBIT 1

City of Southfield Fire and Police Retirement System v. Hayward Holdings, Inc., et al., Case No. 2:23-cv-04146

**SCOTT+SCOTT ATTORNEYS AT LAW LLP
TIME REPORT**

From Inception Through April 30, 2026

Name	Hours	Hourly Rate	Lodestar
Partners			
Amanda Lawrence	66.1	\$1,230	\$81,303.00
David Scott	137	\$3,000	\$411,000.00
Don Broggi	58.6	\$1,960	\$114,856.00
Jonathan Zimmerman	79.2	\$910	\$72,072.00
Max Schwartz	1856	\$1,185	\$2,199,360.00
Mike Burnett	37.5	\$1,445	\$54,187.50
Thomas Laughlin	357.4	\$1,185	\$423,519.00
Of Counsel			
Kristen Anderson	29.4	\$1,135	\$33,369.00
Matt Peller	102.9	\$875	\$90,037.50
Senior Associates			
Cornelia Gordon	1360.2	\$910	\$1,237,782.00
Karolina Klyuchinkova	311.8	\$960	\$299,328.00
Associates			
Rhiana Swartz	25.1	\$850	\$21,335.00
Susan Hu	1,250.1	\$775	\$968,827.50
Investigators			
Jenna Goldin	354.3	\$560	\$198,408.00
Josephine Marrocco	285.9	\$560	\$160,104.00

Name	Hours	Hourly Rate	Lodestar
Paralegals			
Ellen Jordan	70	\$435	\$30,450.00
Kim Jager	46.5	\$450	\$20,925.00
Mara Waligurski	39.4	\$450	\$17,730.00
Litigation Support			
Ekene Avery	25.5	\$450	\$11,475.00
TOTALS:	6,492.9		\$6,446,068.50

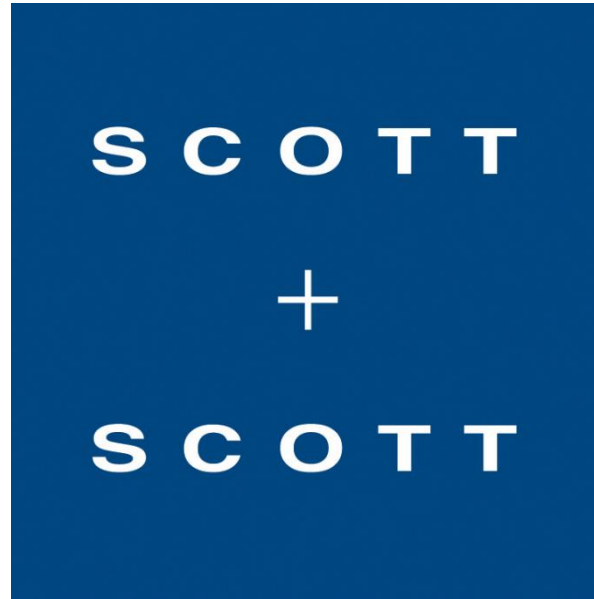
EXHIBIT 2

*City of Southfield Fire and Police Retirement System v.
Hayward Holdings, Inc., et al.*, Case No. 2:23-cv-04146

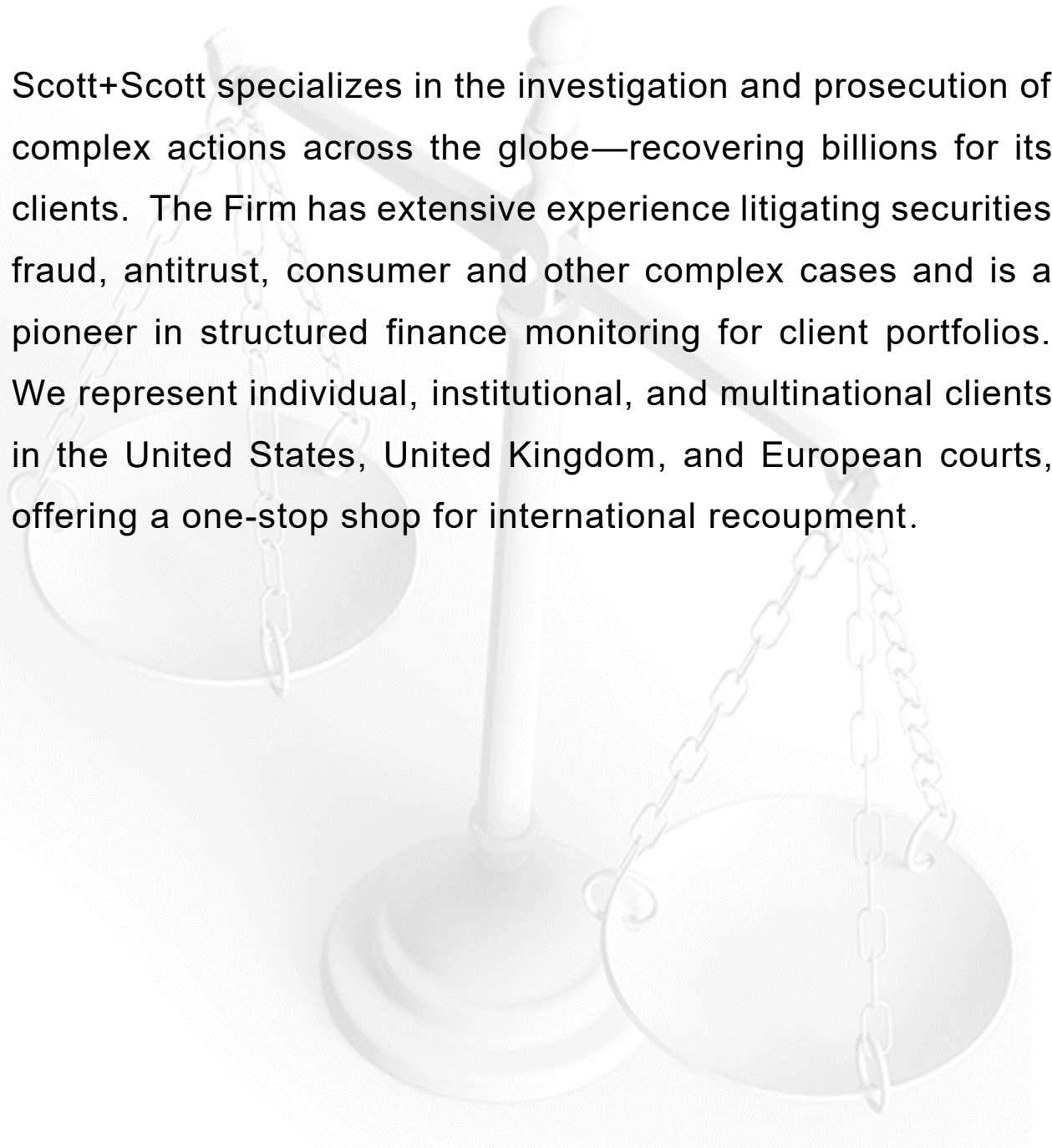
**SCOTT+SCOTT ATTORNEYS AT LAW LLP
EXPENSE REPORT**

CATEGORY	AMOUNT
Mediators	\$68,025.00
Court Fees	\$2,015.63
Document Management/Storage	\$4,165.44
Experts	\$89,180.00
Online Research	\$21,619.29
Photocopies	\$5,087.00
Process Service	\$392.10
Travel	\$19,993.44
TOTAL:	\$210,477.90

EXHIBIT 3



FIRM RESUME



Scott+Scott specializes in the investigation and prosecution of complex actions across the globe—recovering billions for its clients. The Firm has extensive experience litigating securities fraud, antitrust, consumer and other complex cases and is a pioneer in structured finance monitoring for client portfolios. We represent individual, institutional, and multinational clients in the United States, United Kingdom, and European courts, offering a one-stop shop for international recoupment.



THE FIRM

Scott+Scott was founded in 1975 and began its securities litigation practice in 1997. The Firm has since grown into one of the most respected U.S.-based law firms specializing in the investigation and prosecution of complex securities, antitrust and other commercial actions in both the United States and Europe. Today, the Firm is comprised of more than 200 team members, including more than 140 attorneys supported by a seasoned staff of paralegals, IT and document management professionals, financial analysts, and in-house investigators.

Scott+Scott's largest offices are in New York, N.Y. and San Diego, C.A., with additional U.S. offices located in Connecticut, Delaware, Nebraska, Ohio, Texas, and Virginia. The Firm's European offices are currently located in London, Amsterdam, and Berlin and the Firm's Canadian office is located in Montreal.

Scott+Scott has extensive experience litigating cases on behalf of our institutional and individual clients throughout the United States, having served as court-appointed lead or co-lead counsel in numerous securities, antitrust, and consumer class actions, as well derivative and other complex proceedings, in both state and federal courts. The Firm also represents large investors and numerous corporations in commercial and other litigation in courts within the European Union (EU) and the United Kingdom.

Scott+Scott's attorneys are recognized experts and leaders in complex litigation and corporate governance. They have been regular speakers on CLE panels as well as at institutional investor educational conferences around the world and before boards of directors and trustees responsible for managing institutional investments. Scott+Scott attorneys educate institutional investors and governmental entities on the importance of fulfilling fiduciary obligations through the adoption of appropriate asset recovery services, as well as through the development and enforcement of corporate governance initiatives. The Firm's vast experience in structured debt financial litigation has also enabled us to provide clients with in-depth monitoring of their structured finance products, which often come with substantial undisclosed risks due to investors' limited ability to assess what they are acquiring. The Firm also has experience evaluating and monitoring for our clients' debt and debentures originating from private placements and non-public companies, including municipal bonds and derivatives.



SECURITIES AND CORPORATE GOVERNANCE

Scott+Scott has extensive experience litigating claims for violations of the federal securities laws on behalf of our municipal, institutional, and individual investor clients, serving as lead counsel in numerous securities class actions brought under the Securities Act of 1933, the Securities Exchange Act of 1934, and other statutes.

Scott+Scott recognizes that, particularly since the passage of the Private Securities Litigation Reform Act of 1995, bringing successful claims for violations of the federal securities laws requires not only significant litigation experience, but also the ability to bring to bear the skills of its in-house investigators and financial analysts (and often outside consultants) to build a case that can survive both early-stage motions to dismiss and later-stage motions for summary judgment. Our philosophy is also based on our view that efforts to negotiate a successful settlement are typically built on the quality of pre-filing investigation diligence, and our willingness to litigate deep into discovery and, if necessary, through summary judgment and trial.

Our securities litigators have experience practicing in state and federal courts across the country. The Firm's attorneys have regularly retained and worked with leading accounting experts, damages experts, and relevant industry experts to build their clients' cases against defendants involved in virtually every type of industry, from pharmaceuticals to dot.coms, from retailers to manufacturers, and from investment banks to accounting firms. The Firm has also submitted *amicus curiae* briefs to the United States Supreme Court on behalf of its clients on important securities laws issues, including in support of the plaintiffs in *California Public Emps.' Ret. Sys. ANZ Securities, Inc.*, 137 S. Ct. 2042 (2017) and *Cyan Inc. v. Beaver County Emp. Ret. Fund*, 138 S. Ct. 1061 (2018).

When appropriate, Scott+Scott prosecutes actions on a class or individual basis. Through our commitment to the best interests of those the Firm represents, Scott+Scott has successfully obtained exceptional monetary results and precedent-setting corporate governance reforms on behalf of investors.

SECURITIES CASE EXAMPLES

Securities class actions where Scott+Scott currently serves as lead or co-lead counsel include:

- *Severt v. UiPath, Inc.*, No. 1:23-cv-07908 (S.D.N.Y.);
- *In re Yatsen Holding Limited Sec. Litig.*, No. 1:22-cv-08165 (S.D.N.Y.);
- *City of Southfield Fire and Police Retirement System v. Hayward Holdings, Inc.*, No. 2:23-cv-04146 (D.N.J.);
- *Eric White v. Brooge Energy Limited*, No. 2:24-cv-00959 (C.D. Cal.);
- *Marselis v. Fox Factory Holding Corp.*, No. 1:24-cv-00747 (N.D. Ga);
- *In re SentinelOne, Inc. Sec. Litig.*, No. 4:23-cv-02786 (N.D. Cal.);
- *Sundaram v. Freshworks, Inc.*, No. 3:22-cv-06750 (N.D. Cal.);
- *Strezsak v. Ardelyx Inc.*, No. 4:21-cv-05868 (N.D. Cal.);
- *Golubowski v. Robinhood Mkts.*, No. 3:21-cv-09767 (N.D. Cal.);
- *In re Vaxart, Inc. Sec. Litig.*, No. 3:20-cv-05949 (N.D. Cal.);
- *City of Birmingham Relief and Ret. Sys. v. Acadia Pharms. Inc.*, No. 3:21-cv-00762 (S.D. Cal.);
- *Frouws v. Edgio, Inc.*, No. 2:23-cv-00691 & No. 2:23-cv-01170 (D. Ariz.);
- *In re Infinity Q Divers. Alpha Fund Sec. Lit.*, No. 651295/2021 (N.Y. Supr. Ct. N.Y. Cnty.);
- *Patel v. Viatrix, Inc.*, No. GD-21-13314 (Pa. Ct. Com. Pl.);
- *In re Cloudera, Inc. Secs. Litig.*, No. 19CV348674 (Cal. Super. Ct. Santa Clara Cnty.);
- *In re Slack Techs., Inc. S'holder Litig.*, No. 19CIV05370 (Cal. Super. Ct. San Mateo Cnty.);
- *Mancour v. SmileDirectClub, Inc.*, No.: 19-1169-IV (Tenn. Chancery Ct., Davidson Cnty.);
- *Rondini v. Kyverna Therapeutics, Inc.*, No.: 24-cv-08869 (N.D. Cal.);
- *Giraudon v. Innovative Industrial Properties, Inc.*, No. 1:25-cv-00182 (D. MD.);
- *Jewik v. TransMedics Group, Inc.*, No. 1:25-cv-10385 (D. Mass.);
- *In re Actinium Pharmaceuticals, Inc. Sec. Litig.*, No. 1:25-cv-02553 (S.D.N.Y.); and



- *Tcherkezian v. Ibotta, Inc.*, No. 1:25-cv-01213 (D. Col.).

Securities class actions which have been resolved where Scott+Scott served as lead or co-lead counsel include:

- *Alaska Elec. Pension Fund v. Pharmacia Corp.*, No. 03-cv-01519 (D.N.J.) (\$164 million settlement);
- *Thurber v. Pharmacia, Inc.*, No. 2:99-cv-10368 (C.D. Cal.) (\$122 million);
- *In re LendingClub Corp. S'holder Litig.*, No. CIV 537300 (Cal. Super. Ct, San Mateo Cnty.) (part of \$125 global settlement);
- *In re Micro Focus Int'l plc Sec. Litig.*, Lead Case No. 18CIV01549 (CA Super. Ct. San Mateo Cnty.) (\$107.5 million settlement);
- *Okla. Firefighters Pens. vs. Newell Brands Inc.*, No. L-003492-18 (N.J. Sup. Ct. Hudson Cnty.) (\$102.5 million settlement);
- *In re Priceline.com, Inc. Sec. Litig.*, No. 00-cv-01884 (D. Conn.) (\$80 million settlement);
- *Irvine v. ImClone Sys., Inc.*, No. 02-cv-00109 (S.D.N.Y.) (\$75 million settlement);
- *Cornwell v. Credit Suisse Grp.*, No. 08-cv-03758 (S.D.N.Y.) (\$70 million settlement);
- *Policemen's Annuity & Benefit Fund of Chi. v. Bank of Am., N.A.*, No. 12-cv-02865 (S.D.N.Y.) (\$69 million settlement);
- *In re Nw. Corp. Sec. Litig.*, No. 4:03-cv-04049 (D.S.D.) (\$61 million);
- *In re SanDisk LLC Sec. Litig.*, No. 15-cv-01455 (N.D. Cal.) (\$50 million settlement);
- *In re Sprint Sec. Litig.*, No. 00-230077 (Mo. Cir. Ct., Jackson Cnty.) (\$50 million);
- *In re Emulex Corp. Sec. Litig.*, No. 8:01-cv-00219 (C.D. Cal.) (\$39 million);
- *Weston v. RCS Cap. Corp.*, No. 14-cv-10136 (S.D.N.Y.) (\$31 million settlement);
- *In re Greensky Sec. Litig.*, No. 1:18 Civ. 11071 (S.D.N.Y.) (\$27.5M settlement);
- *Schnall v. Annuity & Life Re (Holdings) Ltd.*, No. 3:02-cv-02133 (D. Conn.) (\$27 million);
- *In re Wash. Mut. Mortg.-Backed Sec. Litig.*, No. 2:09-cv-00037 (W.D. Wash.) (\$26 million recovery);
- *ATRS v Insulet Corp.*, No. 15-12345 (D. Mass.) (\$19.5 million settlement);



- *In re King Digit. Ent. PLC S'holder Litig.*, No. CGC-15-544770 (Cal. Sup. Ct. San Francisco Cnty.) (\$18.5 million settlement);
- *In re Evoqua Water Corp. Sec. Litig.*, No. 1:18-cv-10320 (S.D.N.Y.) (\$16.65 million settlement);
- *In re Conn's, Inc. Secs. Litig.*, No. 4:14-cv-00548 (S.D. Tex.) (\$22.5 million settlement);
- *In re DouYu Int'l Hold'gs Ltd. Sec. Litig.*, No. 651703/2020 (N.Y. Supr. Ct. N.Y. Cnty.) (\$15 million settlement);
- *Abadilla v. Precigen, Inc.*, No. 5:20-cv-06936 (N.D. Cal.) (\$13 million settlement);
- *Collins v. Oilsands Quest Inc.*, No. 11 Civ. 1288 (S.D.N.Y.) (\$10.235 million settlement);
- *Kaplan v. S.A.C. Cap. Advisors, L.P.*, No. 1:12cv-9350 (S.D.N.Y.) (\$10 million settlement);
- *Rosenberg v. Cliffs Natural Res. Inc.*, No. CV 14 828140 (Ct. Common Pleas Cuyahoga Cnty. Ohio) (\$10 million settlement);
- *Erie Cnty. Emp. Ret. Sys. v. NN, Inc.*, No. 656462/2019 (N.Y. Supr. Ct., N.Y. Cnty.) (\$9.5 million settlement);
- *In re Endochoice Holdings, Inc., Sec. Litig.*, No. 2016 CV 277772 (Ga. Sup. Ct. Fulton Cnty) (\$8.5 million settlement);
- *Okla. Police Pension Fund & Ret. Sys. v. Jagged Peak Energy, Inc.*, No. 2017 CV 31757 (Colo. Dist. Ct., Denver Cnty.) (\$8.25 million settlement);
- *In re Netshoes Secs. Litig.*, No. 157435/2018 (N.Y. Sup. Ct. N.Y. Cnty.) (\$8 million settlement);
- *City of Omaha Police & Fire Ret. Sys. v. LHC Grp, Inc.*, No. 6:12-CV-01609 (W.D. La.) (\$7.85 million settlement);
- *In re Pac. Coast Oil Trust Secs. Litig.*, No. BC550418 (Cal. Sup. Ct. Los Angeles Cnty.) (\$7.6 million settlement);
- *In re Pacific Biosci. of C.A., Inc. Sec. Litig.* (Cal. Sup. Ct. San Mateo Cnty.) (\$7.6 million recovery);
- *Plymouth Cnty. Contributory Ret. Sys. v. Adamas Pharms., Inc.*, No. RG19018715 (Cal. Sup. Ct. Alameda Cnty.) (\$7.5M settlement);
- *St. Lucie Cnty. Fire Dist. Firefighters' Pens. Trust v. Southwestern Energy Co.*, No. 2016-70651 (Tex. Dist. Ct. Harris Cnty.) (\$7 million settlement);
- *Jochims v. Oatly Group AB*, No. 1:21-cv-06360 (S.D.N.Y.);



• *Pompano Beach Police and Firefighters Ret. Sys. v. Olo Inc.*, No. 1:22-cv-08228 (S.D.N.Y.);
and

• *Mo-Kan Iron Workers Pension Fund v. Teligent, Inc.*, No. 1:19-cv-03354 (S.D.N.Y.) (\$6 million
settlement).

SHAREHOLDER DERIVATIVE CASE EXAMPLES

Shareholder derivative actions where Scott+Scott currently serves in a sole or leadership role include:

- *In re Facebook Derivative Litig.*, Consol. No. 2018-0307 (Del. Ch.);
- *Evergreen Capital Mgmt. LLC v. Pacific Coast Energy Co. LP*, No. 20STCV26290 (Cal. Sup. Ct.);
- *In re Alphabet, Inc., S'holder Derivative Litig.*, No. 3:21-cv-09388-RS (N.D. Cal.);
- *Lindsey v. Immelt*, Index No. 2020/19718 (N.Y. Sup. Ct.);
- *Okla. Firefighters Pension and Ret. Sys. v. Calhoun*, No. 1:24-cv-01200 (E.D. Va.);
- *In re Exelon Corp. Derivative Litig.*, No. 1:21-cv-03611 (N.D. Ill.);
- *Presura v. Casey*, (Del. Ch.);
- *Trimm v. Schultz*, (Wash. Sup. Ct., Kings County); and
- *In re Abbott Lab'ys Infant Formula S'holder Derivative Litig.*, No. 1:22-cv-05513 (N.D. Ill.).

Representative shareholder derivative actions litigated by Scott+Scott which have been successfully resolved include:

- *Irving Firemen's Relief & Ret. Fund v. Page*, C.A. No. 2019-0355-Sg (Del. Ch. 2020) (\$310 million in funding for corporate governance reform programs over 10 years);
- *In re DaVita Healthcare Partners Derivative Litig.*, No. 13-cv-01308 (D. Colo.) (corporate governance reforms valued at \$100 million);
- *Buffalo Grove Police Pension Fund v. Diefenderfer*, No. 19-cv-00062 (E.D. Pa.) (claims vs. Navient Corp. officers & directors settled for corporate governance reforms valued at \$139 million);
- *Tharp v. Acacia Commc'ns, Inc.*, No 1:17-cv-11504 (D. Mass.) (claims vs. company and corporate officers & directors settled for corporate governance reforms valued at \$57-\$71 million);
- *N. Miami Beach Gen. Emps. Ret. Fund v. Parkinson*, No. 10-cv-06514 (N.D. Ill.) (corporate governance reforms valued between \$50 and \$60 million);



- *In re Marvell Tech. Grp. Ltd. Derivative Litig.*, No. 06-cv-03894 (N.D. Cal.) (\$54.9 million settlement and corporate governance reforms);
- *Rudi v. Wexner*, No. 2:20-cv-3068 (S.D. Ohio) (\$90 million in funding for corporate governance reform programs over at least 5 years);
- *In re Universal Health Servs., Inc. Derivative Litig.*, No. 2:17-cv-02187 (E.D. Pa.) (settled for corporate governance reforms conservatively valued at \$110 million);
- *In re Altria Group, Inc. Deriv. Litig.*, Consol. No. 3:20-cv-00772 (E.D. Va.) (successfully resolved for corporate governance reforms with multi-year funding commitment of \$117 million);
- *In re Symantec Corp. S'holder Deriv. Litig.*, Consol. C.A. No. 2019-0224-JTL (Del. Ch.) (successfully resolved for \$12 million cash payment to company and corporate governance reforms);
- *Bottoni v. Hernandez*, No. 20-cv-01442 (S.D. Tex.) (claims vs. Fluor Corporation officers & directors settled for corporate governance reforms with four years of funding estimated at \$10 million); and
- *In re World Wrestling Ent., Inc. Derivative S'holder Litig.*, Consol. C.A. No. 2023-0039-JTL (Del. Ch.).

ACCOLADES

U.S. News & World Report “Best Law Firms”

The Firm is currently ranked by U.S. News & World Report as a “Best Law Firm” in commercial litigation in the New York region.

American Antitrust Institute

The 2018 Antitrust Annual Report recognized *In re Foreign Currency Benchmark Rates Antitrust Litigation* as the #1 settlement of 2018, as well as ranking the Firm #1 nationally for aggregate settlements: 2013-2018.

Global Competition Review

At the 6th Annual Global Competition Review (“GCR”) Awards, Scott+Scott won for Litigation of the Year – Cartel Prosecution, which recognized the Firm’s efforts in the foreign exchange settlements in the United States, a landmark case in which major banks conspired to manipulate prices paid in the \$5.3 trillion-per-day foreign exchange market and have thus far settled for more than \$2 billion.

Law 360 Glass Ceiling Report

Scott+Scott is recognized as one of the top law firms in the nation for female attorneys by the legal publication Law360. The Glass Ceiling Report honors firms that “are demonstrating that the industry’s gender diversity goals can turn into a measurable result, and boost the number of women at all levels of a law firm.”^{1,2} This selection highlights the importance Scott+Scott places on diversity and inclusion within the Firm.

Center for Constitutional Rights

Scott+Scott was the recipient of the 2010 Center for Constitutional Rights’ Pro Bono Social Change Award for its representation of the Vulcan Society, an association of African-American firefighters, in challenging the racially discriminatory hiring practices of the New York City Fire Department.

¹ <https://www.law360.com/articles/1310926>

² <https://www.law360.com/articles/1162859/the-best-law-firms-for-female-attorneys>.

WORLD-CLASS ATTORNEYS

We pride ourselves on the caliber of legal talent on our team. In addition to some of the best and brightest rising stars, we have attorneys who have served with distinction in the U.S. Department of Justice, been admitted to the U.S. Supreme Court, served in OAGs at the state level, argued before the UK's CAT and High Courts, and received virtually every accolade offered in our profession.



ADMISSIONS

U.S. Admissions: United States Supreme Court; United States Courts of Appeal for the First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, and Eleventh Circuits; United States District Courts for the Districts of California (Northern, Southern, Eastern, and Central), Colorado, Connecticut, Florida (Northern), Illinois (Northern), Maryland, Massachusetts, Michigan (Eastern and Western), Minnesota, New Jersey, New York (Northern, Southern, Eastern, and Western), Ohio (Northern and Southern), Pennsylvania (Eastern and Western), Texas (Northern, Eastern, Western, and Southern), West Virginia (Northern and Southern), Wisconsin (Eastern and Western), and the District of Columbia; and the courts of the States of Arizona, California, Colorado, Connecticut, Delaware, Florida, Illinois, Maryland, Pennsylvania, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, New Jersey, New York, Ohio, Oklahoma, West Virginia, Texas, and the District of Columbia.

ATTORNEY BIOGRAPHIES

DAVID R. SCOTT

PRACTICE EMPHASIS

Managing Partner David R. Scott represents multinational corporations, hedge funds, and institutional investors in high-stakes, complex litigation, including antitrust, commercial, and securities actions.



ADMISSIONS

States of New York, Pennsylvania, and Connecticut; United States Tax Court; United States Courts of Appeal: Second, Third, and Fifth Circuits; United States District Courts: Southern District of New York, Connecticut, Eastern District of Pennsylvania, Northern and Southern Districts of Texas, and Colorado

EDUCATION

New York University School of Law (LL.M. in taxation); Temple University School of Law (J.D., Moot Court Board, 1989); St. Lawrence University (B.A., cum laude, 1986)

HIGHLIGHTS

Mr. Scott is the Managing Partner of Scott+Scott with offices in New York, Amsterdam, London, Berlin, Montreal, California, Connecticut, Virginia, Delaware, Nebraska, Texas, and Ohio.

In addition to managing the Firm's lawyers worldwide, Mr. Scott advises some of the world's largest multinational corporations in cartel damages and other complex matters. He has been retained to design corporate policies for the global recoupment of losses, and transatlantic private enforcement programs.

He currently represents multinational companies and hedge funds in cases involving, among other things, price-fixing in the trucks, foreign exchange, high voltage power cables, cardboard, and payment card sectors.

Mr. Scott's antitrust cases in the United States have resulted in significant recoveries for victims of price-fixing cartels. Among other cases, Mr. Scott served as co-lead counsel in *Dahl v Bain Cap. Partners*, No. 1:07-cv-12388 (D. Mass.), an action alleging that the largest private equity firms in the United States colluded to suppress prices that shareholders received in leveraged buyouts and that the defendants recently agreed to settle for \$590.5 million. He was lead counsel in *Red Lion Med. Safety v. Ohmeda*, No. 06-cv-1010 (E.D. Cal.), a lawsuit alleging that Ohmeda,



one of the leading manufacturers of medical anesthesia equipment in the United States, excluded independent service organizations from the market for servicing its equipment. The case was successfully resolved in settlement negotiations before trial.

Mr. Scott has received widespread recognition for his antitrust and competition law work. He has been elected to Who's Who Legal: Competition 2015-2020, which lists the world's top antitrust and competition law lawyers, selected based on comprehensive, independent survey work with both general counsel and lawyers in private practice around the world. He has also received a highly recommended ranking by Benchmark Litigation for each of the years 2013-2015. In addition, Mr. Scott is continually recognized in the U.S. by Best Lawyers and Super Lawyers.

In addition to his extensive competition law work, Mr. Scott has also taken the lead in bringing claims on behalf of institutional investors, such as sovereign wealth funds, corporate pension schemes, and public employee retirement funds. For example, he has been retained to pursue losses against mortgaged-backed securities trustees for failing to protect investors. He also represented a consortium of regional banks in litigation relating to toxic auction rate securities ("ARS") and obtained a sizable recovery for the banks in a confidential settlement. This case represents one of the few ARS cases in the country to be successfully resolved in favor of the plaintiffs.

Mr. Scott is frequently quoted in the press, including in publications such as The Financial Times, The Economist, The Guardian, The Daily Telegraph, The Wall Street Journal, and Law360. He is regularly invited to speak at conferences around the world and before Boards of Directors and trustees responsible for managing institutional investments.



MAX SCHWARTZ

PRACTICE EMPHASIS

Max Schwartz's practice focuses on complex civil litigation, often involving financial products and services. He also counsels investment firms and institutional investors on strategies to enhance returns, or recoup losses, through a variety of legal actions.

ADMISSIONS

State of New York; United States District Courts: Southern District of New York

EDUCATION

New York University School of Law (J.D.); Columbia University (B.A., *cum laude*)

HIGHLIGHTS

Max Schwartz is a Partner in the Firm's New York office, focusing on securities matters and complex litigation. He has served as lead counsel in numerous high-stakes cases, recovering hundreds of millions of dollars for institutional investors, hedge funds and other clients. He also advises clients on strategies for using legal rights and remedies to enhance returns or recoup losses on investments.

Mr. Schwartz has expertise in matters involving a wide variety of industries, ranging from financial products to data storage and AI, and has successfully brought novel claims to obtain recoveries for clients. Following the financial crisis, Mr. Schwartz set important precedent involving mortgage-backed securities ("MBS"), arguing the first cases to find that trustees had an obligation to enforce investors' rights and have deficient mortgages repurchased from MBS trusts. In addition to fraud and other securities claims, Mr. Schwartz has significant experience litigating antitrust and shareholder cases as well.

Super Lawyers named Mr. Schwartz a Rising Star and the Legal Aid Society also recognized him with a Pro Bono Service Award for work before the New York Court of Appeals.

REPRESENTATIVE CASES

- ***Okla. Firefighters Pens. vs. Newell Brands Inc.***, No. L-003492-18 (N.J. Sup. Ct. Hudson Cnty.)
- ***Policemen's Annuity and Benefit Fund of the City of Chicago v. Bank of America, NA***, No. 1:12-cv-2865 (S.D.N.Y.)
- ***In re SanDisk LLC Sec. Litig.***, No. 15-cv-01455 (N.D. Cal.)
- ***Weston v. RCS Capital Corp.***, No. 1:14-cv-10136 (S.D.N.Y.)
- ***Dahl v. Bain Capital Partners, LLC***, No. 1:07-cv-12388 (D. Mass.)



AMANDA LAWRENCE

PRACTICE EMPHASIS

Amanda F. Lawrence is actively engaged in the Firm's complex securities, corporate governance, consumer, and antitrust litigation.

ADMISSIONS

States of Connecticut and Massachusetts; United States Courts of Appeal: First and Ninth Circuits; United States District Courts: Southern District of New York, Connecticut, and Massachusetts

EDUCATION

Yale Law School (J.D., 2002); Dartmouth College (B.A., *cum laude*, 1998)

HIGHLIGHTS

Ms. Lawrence is a partner in our Connecticut office. In the antitrust realm, Ms. Lawrence served as co-lead counsel in the matter, ***In re: GSE Bonds Antitrust Litigation***, No. 1:19-cv-01704-JSR (S.D.N.Y.) which alleged manipulation of the prices in the \$550 billion government sponsored entities bond market by some of the largest banks in the world. The case settled for \$386.5 million as well as requiring injunctive relief. Ms. Lawrence was also intricately involved in the "ISDAFix case" – ***Alaska Electrical Pension Fund v. Bank of America***, 1:14-cv-07126-JMF-OTW (S.D.N.Y.). That achieved over \$504.5 million in recovery from large financial institutions for investors. Currently, Ms. Lawrence also works on ***In Re Cattle Antitrust Litig.***, 0:22-md-03031-JRT-JFD (D. Minn.) and ***In re European Governments Bonds Antitrust Litig.***, 1:19-cv-2601 (S.D.N.Y.), two large international antitrust actions.

In her securities practice, Ms. Lawrence has worked on numerous Exchange Act and 1933 Act cases that have resulted in substantial settlements. For example, she served as co-lead counsel in ***In re: Micro Focus International PLC Securities Litigation***, No. 18-cv-01549 (Cal. Super. Ct. San Mateo Cnty.), a California 1933 Act that settled for \$107.5 million. Other securities cases Ms. Lawrence has worked on include: ***Police and Fire Retirement System of the City of Detroit v. Crane***, No. 13-cv-00945-VC (N.D. Cal.) (\$5.1 million securities class action settlement); ***Rubenstein v. Oilsands Quest Inc.***, No. 11-1288 (S.D.N.Y.) (securities settlement of \$10.235 million); ***Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass-Through Certificates***, No. 09-cv-00037 (W.D. Wash.) (\$26 million securities class action settlement); ***In re Fireeye, Inc. Securities Litigation***, No. 14-cv-266866 (Cal. Super. Ct. Santa Clara Cnty.); ***St. Lucie Cnty. Fire Dist. Firefighters' Pension Trust v. Southwestern Energy Co.***, No. 4:16-cv-569 (S.D. Tex.); ***In re LendingClub Corp. Shareholder Litig.***, No. CIV537300 (Cal. Super. Ct San Mateo Cnty.); and ***In***



re TETRA Technologies, Inc. Securities Litig., No. 4: 07-cv-00965 (S.D. Tex.) (\$8.25 million securities class action settlement).

In addition to antitrust and securities matters, Ms. Lawrence has also worked on consumer cases that have resulted in significant settlements for the affected classes. For example, Ms. Lawrence helped achieve a settlement in the *The United States v. The City of New York*, No. 07-CV-2067 (E.D.N.Y.) that awarded back pay and lost fringe benefits to a class of African American and Hispanic firefighters in New York City, as well as a settlement in *In re Prudential Life Insurance Co. of America SGLI/VGLI Contract Litig.*, No. 11-02208 (D. Mass.) that brought a \$39 million settlement on behalf of families of deceased servicemen and women against Prudential.

Ms. Lawrence has taught Trial Practice at the University of Connecticut School of Law and is very actively involved in her community, particularly in recreational organizations and events.

A five-time NCAA National Champion cyclist who raced throughout the United States, Europe, Bermuda, and Pakistan, Ms. Lawrence is now an avid endurance athlete. Ms. Lawrence has competed in dozens of marathons, including the New York Marathon and the Boston Marathon, and in 18 full-distance ironman competitions – five of which were at the Ironman World Championships in Kona, Hawaii.



DONALD A. BROGGI

PRACTICE EMPHASIS

Mr. Broggi is engaged in the Firm's securities, antitrust, mass tort, and consumer litigation practices.

ADMISSIONS

States of New York and Pennsylvania. United States District Court: Southern District of New York, Western District of Pennsylvania. United States Court of Appeals: First Circuit, Fourth Circuit, Sixth Circuit.

EDUCATION

Duquesne University School of Law (J.D., 2000); University of Pittsburgh (B.A., 1990)

HIGHLIGHTS

Mr. Broggi is a partner in the Firm's New York office and has represented institutional investors, including public pension funds and Taft-union funds in a variety of complex cases, including: ***In re Foreign Exchange Benchmark Rates Antitrust Litigation***, No. 1:13-cv-07789 (S.D.N.Y.): an antitrust class action alleging the world's largest banks conspired to fix the price of foreign currencies (\$2.3 billion in settlements to date); ***Alaska Elec. Pension Fund v. Bank of Am. Corp.***, No. 14-cv-07126 (S.D.N.Y.): an antitrust class action alleging the world's largest banks conspired to manipulate the ISDAfix rate (\$504.5 million settlement); ***Dahl v. Bain Capital Partners***, No. 07-cv-12388 (D. Mass.): an antitrust class action alleging that the nation's largest private equity firms, including KKR, Blackstone, TPG, Carlyle, Bain Capital, and Goldman Sachs, colluded to restrain competition and suppress prices paid to shareholders of public companies in connection with multi-billion dollar leveraged buyouts (\$590.5 million settlement); ***In re GSE Bonds Antitrust Litigation***, No. 19-cv-01704 (S.D.N.Y.): an antitrust class action alleging manipulation in the market for bonds issued by Government-Sponsored Entities, e.g., Freddie Mac and Fannie Mae (\$386.5 million settlement pending final approval); ***Irvine v. ImClone Sys., Inc.***, No. 02-cv-00109 (S.D.N.Y.): a securities fraud class action alleging that defendants violated Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 by issuing materially false and misleading statements to the market regarding the cancer drug Erbitux (\$75 million settlement); ***In re Wash. Mut. Mortg.-Backed Sec. Litigation***, No. 2:09-cv-00037 (W.D. Wash.): a securities fraud class action against Washington Mutual Bank alleging violations of §11 of the Securities Act for misleading investors about the quality of their mortgage-backed securities (\$26 million settlement); ***In re SanDisk LLC Sec. Litigation***, No. 15-cv-01455 (N.D. Cal.): a securities fraud class action alleging that defendants intentionally inflated the price of the Company's stock by making false and misleading statements and concealing information relating to SanDisk's business, operations, and prospects (\$50 million settlement); and ***Arkansas Teacher Retirement System v. Insulet Corp.***, No. 15-cv-12345 (D. Mass.): a securities fraud class action alleging Insulet Corporation



intentionally inflated the price of the Company's stock by issuing false and misleading statements concerning Insulet's launch of its new insulin infusion system, branded the OmniPod Eros (\$19.5 million settlement), among others.

Currently, Mr. Broggi is also representing cities, counties, and other municipalities from Massachusetts, Pennsylvania, New Jersey, and Florida in both state and federal litigation against the manufacturers and distributors of opioid medications.

Mr. Broggi also works with the Firm's institutional investor clients, including hundreds of public pension systems and Taft-Hartley funds throughout the United States, to confirm their funds have proper safeguards in place to ensure against corporate malfeasance, and regularly consults with institutional investors in the United States on issues relating to corporate fraud in the U.S. securities markets, as well as corporate governance issues and shareholder litigation.

Mr. Broggi has lectured at institutional investor conferences throughout the United States on the value of shareholder activism as a necessary component of preventing corporate fraud abuses, including the Texas Association of Public Employee Retirement Systems, Georgia Association of Public Pension Trustees, Michigan Association of Public Retirement Systems, Illinois Public Pension Fund Association, and the Pennsylvania Association of County Controllers, among others.



THOMAS LAUGHLIN

PRACTICE EMPHASIS

Thomas Laughlin's practice focuses on securities class action, shareholder derivative, ERISA, and other complex commercial litigation.

ADMISSIONS

State of New York; United States Courts of Appeal: First, Second, Third, Fourth, Sixth, Seventh, and Ninth Circuits; United States District Courts: Southern and Eastern Districts of New York, Northern District of Florida, District of Colorado, Eastern District of Wisconsin, and Eastern District of Michigan

EDUCATION

New York University School of Law (J.D., *cum laude*, 2005); Yale University (B.A. History, *cum laude*, 2001)

HIGHLIGHTS

Mr. Laughlin is a partner in the New York office and focuses on securities class action, shareholder derivative, ERISA, and other complex commercial litigation. After graduating from law school, Mr. Laughlin clerked for the Honorable Irma E. Gonzalez, United States District Court Judge for the Southern District of California.

While at Scott+Scott, Mr. Laughlin has worked on several cases that have achieved notable victories, including ***Cornwell v. Credit Suisse***, No. 1:08-cv-03758 (S.D.N.Y.) (securities settlement of \$70 million), ***In re SanDisk LLC Securities Litigation***, No. 3:15-CV-01455 (N.D. Cal.) (securities settlement of \$50 million); ***Weston v. RCS Capital Corp.***, No. 1:14-cv-10136 (S.D.N.Y.) (securities settlement of \$31 million); ***In re King Digital Entertainment plc Shareholder Litigation***, No. CGC-15-544770 (Cal. Super. Ct. San Francisco Cnty.) (securities settlement of \$18.5 million); and ***Rubenstein v. Oilsands Quest Inc.***, No. 1:11-cv-01288 (S.D.N.Y.) (securities settlement of \$10.235 million).

Mr. Laughlin also has significant appellate experience, having represented clients in connection with several appellate victories, including ***Cottrell v. Duke***, 737 F.3d 1238 (8th Cir. 2013); ***Westmoreland County Employee Ret. Sys. v. Parkinson***, 727 F.3d 719 (7th Cir. 2013); ***Pfeil v. State Street Bank and Trust Co.***, 671 F.3d 585 (6th Cir. 2012); and ***King v. VeriFone Holdings, Inc.***, 12 A.3d 1140 (Del. Sup. 2011).

In 2014, Mr. Laughlin was co-chair of a 13-day bench trial in ***Bankers' Bank Northeast v. Berry, Dunn, McNeil & Parker, LLC***, No. 12-cv-00127 (D. Me.). He represented a consortium of 10



community banks asserting negligence and professional malpractice claims against the former officers and directors of a bank and its auditor in connection with an \$18 million loan made to that bank in September 2008. Among other things, Mr. Laughlin conducted the cross-examination of all three witnesses from the defendant's auditing firm and the direct examination of plaintiff's auditing expert. The parties to the action succeeded in resolving the action after trial.

Mr. Laughlin has also been named a Super Lawyer for 2021 through 2025.



MICHAEL BURNETT

PRACTICE EMPHASIS

Michael G. Burnett practices complex securities litigation at the firm, where he consults with institutional clients on corporate fraud in the securities markets as well as corporate governance issues.

ADMISSIONS

State of Nebraska; United States District Courts: District of Nebraska

EDUCATION

Creighton University School of Law (J.D., 1984); Creighton University (B.A. Finance, 1981)

HIGHLIGHTS

In addition to his work with the firm, Mr. Burnett has specialized in intellectual property and related law. His representations include: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y.) (\$2 billion settlement); *Alaska Electrical Pension Fund v. Bank of America Corporation*, No. 14-cv-7126 (S.D.N.Y.) (\$325 million settlement); *Dahl v. Bain Capital Partners*, No. 07-cv-12388 (D. Mass.) (\$590.5 million settlement).

Michael is also a member of the Nebraska Bar Association.

PERSONAL LIFE

Mike and his wife, Mary, are lifelong residents of Nebraska. The entire Burnett family (7 in all) share a special bond with Creighton University. Mike played collegiate golf on the Creighton Division 1 golf team. Mary is a graduate of Creighton University and the University of Nebraska Medical School and was until recently a practicing anesthesiologist. Mike and Mary have five children. Three children are graduates of Creighton and two are attending the University. Two dogs (Tyson and Luna) round out the Burnett family.



KRISTEN ANDERSON

ADMISSIONS

States of California, New York, Illinois, District of Columbia; United States Courts of Appeal: Second Circuit and Ninth Circuit; United States District Court: Southern District of California, Central District of California, Northern District of California, Eastern District of California, Eastern District of New York, Southern District of New York, Northern District of Illinois.

EDUCATION

University of California College of the Law, San Francisco (J.D., 2006); Rosalind Franklin University of Medicine & Science (M.S., Psychology: Clinical Counseling, 2024); St. Louis University (B.A., Philosophy, 2003)

ASSOCIATIONS

- Member of the American Bar Association's Antitrust Section
- Past Vice Chair of the Antitrust Section's Trial Practice Committee
- Past Vice Chair of the Antitrust Section's Books & Treatises Committee

HIGHLIGHTS

Ms. Anderson represents plaintiffs in high stakes, complex litigation in federal and state courts. She has worked on antitrust class action cases recovering over \$9 billion. She served as co-lead counsel in ***Klein v. Meta Platforms, Inc.***, No. 20-cv-8570 (N.D. Cal.) and ***In re European Government Bonds Antitrust Litig.***, No. 19-cv-2601 (S.D.N.Y.). Ms. Anderson was a contributing author to the American Bar Association Antitrust Section's Proof of Conspiracy Under Federal Antitrust Laws (3d ed.), Antitrust Discovery Handbook (2d ed.), Joint Venture Handbook (2d ed.), and the 2010 Annual Review of Antitrust Law Developments. In addition, Ms. Anderson served as an editor for Model Jury Instructions in Civil Antitrust Cases (2016 ed.) and numerous other publications. During law school, Ms. Anderson was as an extern at the U.S. Department of Justice, Antitrust Division, in San Francisco and an extern to Justice Kathryn Mickle Werdegard of the Supreme Court of California. She was also a research assistant to Professor James R. McCall in the areas of antitrust and comparative antitrust law.

Recognized as a Rising Star in the 2014-21 editions of Super Lawyers; and a Super Lawyer in the 2022-2025 editions.

Frequent speaker on women in the law, mental health, and antitrust topics through the American Bar Association, Practising Law Institute, and other organizations.



Co-author of *The Misapplication of Associated General Contractors to Cartwright Act Claims*, 23 COMPETITION: J. ANTI. & UNFAIR COMP. L. SEC. ST. B. CAL. 120 (2014).

REPRESENTATIVE CASES

- ***In re Foreign Exchange Benchmark Rates Antitrust Litig.***, No. 13-cv-7789 (S.D.N.Y.) (\$2.3 billion settlement)
- ***In re European Government Bonds Antitrust Litig.***, No. 19-cv-2601 (S.D.N.Y.) (\$120 million settlement)
- ***In re GSE Bonds Antitrust Litig.***, No. 19-cv-1704 (S.D.N.Y.) (\$386.5 million settlement)
- ***Alaska Electrical Pension Fund v. Bank of America, N.A.***, No. 14-cv-7126 (S.D.N.Y.) (\$504.5 million settlement)
- ***Axiom Investment Advisors, LLC, by and through its Trustees, Gildor Management LLC v. Barclays Bank PLC***, No. 15-cv-9323 (S.D.N.Y.) (\$50 million settlement)
- ***Dahl v. Bain Capital Partners, LLC***, No. 07-cv-12388 (D. Mass.) (\$590.5 million settlement)
- ***In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.***, MDL No. 1720 (E.D.N.Y.) (\$5.54 billion settlement)

KAROLINA KLYUCHNIKOVA

PRACTICE EMPHASIS

Karolina Klyuchnikova focuses on securities class action litigation.

ADMISSIONS

State of New York; United States District Courts for the Southern and Eastern Districts of New York

EDUCATION

Brooklyn Law School (J.D., 2014); New York University (B.A., Politics, 2011)

HIGHLIGHTS

Karolina Klyuchnikova is a senior associate in Scott+Scott's New York office.

She is a seasoned litigator with years of experience handling government investigations, litigation, complex motion practice, hearings, and trials.

Throughout her career, Ms. Klyuchnikova has made thousands of court appearances over a range of issues including motion practice, trials, and hearings. Ms. Klyuchnikova is a zealous advocate and brings a thorough and strategic approach to litigation. Before joining Scott+Scott, Ms. Klyuchnikova served as Enforcement Counsel at the U.S. Securities and Exchange Commission and the Financial Industry Regulatory Authority, where she investigated and litigated violations of federal securities laws, such as fraud, insider trading, market manipulation, and material misrepresentations. Further, as a Special Assistant United States Attorney at the U.S. Attorney's Office for the Eastern District of Virginia, Ms. Klyuchnikova prosecuted cases involving money laundering, organized crime, the dark web, firearms and narcotics trafficking, and international extradition. She was also previously a Trial Attorney at the U.S. Department of Justice, where she was a subject matter expert on the Electronic Communications Privacy Act, Stored Communications Act, privacy rights, and wiretapping. Ms. Klyuchnikova began her legal career as an Assistant District Attorney at the New York County District Attorney's Office, gaining significant courtroom and trial experience prosecuting organized crime rings. She is the recipient of the SEC Staff Excellence Award, the SEC Chair's Award for Excellence, the FinCEN Director's Law Enforcement Award, and the FBI U.S. Attorney's Office Service Award.

LANGUAGES:

- English, Russian



MATTHEW PELLER

PRACTICE EMPHASIS

Matthew Peller focuses on securities class actions and other complex shareholder litigation.

ADMISSIONS

States of New York and New Jersey; United States District Courts: District of New Jersey, Southern District of New York, Eastern District of New York, Southern District of Texas, Western District of Pennsylvania, Western District of Wisconsin, District of Colorado; United States Courts of Appeals: United States Court of Appeals for the Second Circuit, United States Court of Appeals for the Fifth Circuit; United States Supreme Court

EDUCATION

Cornell Law School (J.D., 2006); Cornell University (B.S., Industrial and Labor Relations, 2003)

HIGHLIGHTS

Matthew Peller is an attorney in Scott+Scott's New York office.

Mr. Peller has more than 15 years of experience litigating all aspects of complex shareholder actions in federal and state courts, including both prosecuting and defending class and individual securities fraud actions. Mr. Peller is well-versed in litigating novel procedural, liability, and damages issues, class certification issues, contested fee applications, and settlement objections. He also has extensive experience working on complex litigation involving non-U.S. issuers, including addressing Australian, Brazilian, Canadian, Dutch, English, Israeli, and Mexican law issues.

Following law school, Mr. Peller clerked for the Honorable Roger L. Gregory, United States Circuit Court Judge for the U.S. Court of Appeals for the Fourth Circuit.

Prior to joining Scott+Scott, Mr. Peller defended complex securities and other shareholder actions for more than 10 years at Sullivan & Cromwell LLP and prosecuted individual securities and shareholder actions at Rolnick Kramer Sadighi LLP.

REPRESENTATIVE CASES

- *Amici* brief concerning treatment of Pershing Square Tontine SPAC under the Investment Company Act of 1940



CORNELIA GORDON

PRACTICE EMPHASIS

Cornelia Gordon focuses on securities litigation.

ADMISSIONS

State of California; State of New York; United States District Court for the Southern, Central, and Northern Districts of California; United States Court of Appeals for the Ninth Circuit

EDUCATION

Duke University School of Law (J.D., 2014); Centre College (B.A., 2010, *summa cum laude*)

HIGHLIGHTS

Cornelia Gordon is an attorney in Scott+Scott's San Diego office.

Prior to joining Scott+Scott, Ms. Gordon worked at a boutique litigation firm where she represented individuals, corporations, and court-appointed receivers and monitors in a variety of white collar civil and criminal matters. Her practice there consisted primarily of complex civil litigation on both the plaintiff and defense side. Before that, Cornelia worked as an associate at Sullivan & Cromwell LLP, where her practice focused on government investigations.

