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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
MATTHEW F. GATELY 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)**

BRENNEMAN, TIMOTHY WALSH,
CHRISTOPHER BERTRAND, and
KEVIN BROWN

Defendants.

I, MATTHEW F. GATELY, hereby declare as follows:

1. I am an attorney-at-law admitted to practice in the District of New Jersey and a partner with the law firm of Cohn Lifland Pearlman Herrmann & Knopf LLP (“CLPHK”). 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 CLPHK 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. CLPHK serves as Liaison Counsel for the Settlement Class in this Action.

3. The schedule attached hereto as **Exhibit 1** is a summary indicating the amount of time spent by each CLPHK attorney and professional support staff employee involved in this 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 5

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.

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.

4. The information in this certification regarding the CLPHK's time and expenses is taken from time and expense reports and supporting documentation prepared and/or maintained by CLPHK in the ordinary course of business. I am currently the Partner responsible for overseeing and/or conducting the day-to-day activities in the litigation² and I reviewed these reports (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. As a result of this review, reductions were made to both time and expenses in the exercise of billing judgment. Based on this review and the adjustments made, I believe that the time reflected in CLPHK's lodestar calculation and the expenses for which payment is sought herein are reasonable and were necessary for the effective and efficient prosecution and resolution of the litigation. In addition, all time expended in preparing this application for fees and expenses has been excluded.

² Prior to Mr. Pearlman's retirement on December 31, 2024, he and I shared responsibility for this matter.

5. The hourly rates for the CLPHK 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 class action or other complex litigation fee applications. 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.

6. The total number of hours expended on this Action by my Firm from its inception through and including April 30, 2026, is 153.5 hours. The total lodestar for my Firm for that period is \$121,642.00. My Firm's lodestar figures are based on the Firm's hourly rates, which do not include costs for expenses.

7. 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.

8. As detailed in **Exhibit 2**, my Firm is seeking payment for a total of \$192.48 in expenses incurred in connection with the prosecution of this Action from its inception.

9. The expenses incurred in this Action are reflected in CLPHK's records, 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.

10. I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

/s/ Matthew F. Gately
Matthew F. Gately

Dated: May 5, 2026

EXHIBIT 1

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

**COHN LIFLAND PEARLMAN HERRMAN & KNOPF LLP
TIME REPORT**

From Inception Through April 30, 2026

Name	Hours	Hourly Rate	Lodestar
Partners			
Matthew F. Gately	55.5	\$750	\$40,860.00
Audra DePaolo	8.3	\$750	\$6,225.00
Senior Counsel			
Peter S. Pearlman	81	\$900	\$70,940.00
Associates			
Michael A. Alderman	5.5	\$550	\$3,025.00
Paralegals			
Melinda Lugo	3.2	\$185	\$592.00
TOTALS:	153.5	N/A	\$121,642.00

EXHIBIT 2

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

**COHN LIFLAND PEARLMAN HERRMANN & KNOPF LLP
EXPENSE REPORT**

CATEGORY	AMOUNT
Delivery Services/Messengers	\$30.65
Online Research	\$161.83
TOTAL:	\$192.48

EXHIBIT 3

COHN LIFLAND PEARLMAN HERRMANN & KNOFF LLP

COUNSELLORS AT LAW

PARK 80 WEST - PLAZA ONE 250 PEHLE AVE. SUITE 401 SADDLE BROOK N.J. 07663 201-845-9600 FAX 201-845-9423
General E-mail: cphk@njlawfirm.com
Internet Address: www.njlawfirm.com

Founded in 1924, Cohn Lifland is a firm dedicated to the general practice of law at the highest level of professional competence, striving to achieve maximum benefit for our clients in the most efficient and professionally responsible manner. The Firm has a wide-ranging litigation practice at both the trial and appellate levels of the federal and New Jersey state court systems.

Many members of our firm are recognized experts in their particular areas of practice and have written, lectured, and taught regularly. Articles authored by firm members have been published in leading legal publications and repeatedly cited in reported decisions including those of the New Jersey Supreme Court. Cohn Lifland is consulted frequently by other members of the bar throughout the United States and the Firm acts as counsel in New Jersey to more than 100 leading law firms and practitioners both from within and without the state.

Our clientele includes many national and international corporations, local and regional companies, the State of New Jersey (which we represent in both securities and environmental litigation), government agencies, and pension funds, as well as individuals from all walks of life, presenting problems requiring a high degree of professional skill and practical counseling.

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Above all we take great pride in the high quality of services rendered and in our steadfast dedication to the diligent representation of the interests of each of our clients.

As relates to this application, Cohn Lifland has a particularly expansive and impressive record of handling complex, high-stakes class and derivative litigation, in the areas of corporate and securities fraud, lender and accounts' liability, consumer protection, franchise, antitrust, *qui tam*, RICO, employment, and intellectual property. In these areas of law, the Firm has achieved both significant recoveries and set important precedent. Cohn Lifland's representative matters include the following matters in which it has served as lead, co-lead, liaison counsel, or in which it has played a significant and substantive role:

- *In re Lucent Securities Litigation* (D.N.J.) (\$517 million recovery);
- *In re Diet Drug Litigation*, No. MRS-L-3042-97 (N.J. Sup. Ct.) (\$2.5 billion total recovery);
- *In re AT&T Securities Litigation*, 455 F.3d 160 (3d Cir. 2006) (\$100 million settlement for the benefit of the class);
- *Castro v. Sanofi Pasteur, Inc.*, 137 F. Supp. 3d 820 (D.N.J. 2015) (\$61.5 million settlement for the benefit of the class);
- *City of Sterling Heights General Employees' Retirement System v. Prudential Financial, Inc.*, 2015 WL 5097883 (D.N.J. Aug. 31, 2015) (\$33 million settlement for the benefit of the class);
- *In re Honeywell International Securities Litigation*, 211 F.R.D. 255 (D.N.J. 2002) and 182 F. Supp. 2d 414 (D.N.J. 2002) (\$100 million settlement obtained for the benefit of the class);

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- *In re K-Dur Antitrust Litigation*, 686 F.3d 197 (3d Cir. 2012), *vacated and remanded in view of Actavis, Upsher Smith Labs., Inc. v. Louisiana Wholesale Drug Co., Inc.*, 133 S. Ct. 2849 (2013), and 338 F. Supp. 2d 517 (D.N.J. 2004) (\$60,200,000 settlement for the benefit of the class; the Firm received the 2017 American Antitrust Institute Award for Outstanding Antitrust Litigation Achievement in Private Law Practice for Peter S. Pearlman's work in this matter which spanned 16 years of litigation);
- *In re Hibbard Brown Securities Litigation*, No. 93-1150, MDL No. 962 (D.N.J.) (\$150 million approved claim in bankruptcy);
- *Rolnik v. AT&T Wireless Services, Inc.*, No. ESX-L-180-04 (N.J. Sup. Ct.) (\$43 million recovery);
- *In re Remeron Antitrust Litigation*, No. 02-2007 (D.N.J.) (\$75 million recovery);
- *In re Lipitor Antitrust Litigation*, No. 12-2389 (D.N.J.) (\$93 million settlement);
- *In re Effexor Antitrust Litigation*, No. 11-479 (D.N.J.) (\$39 million settlement as against one defendant);
- *Shumacher v. Osmotica Pharma*, No. SOM-L-540-19 (N.J. Sup. Ct.) (\$5,250,000 settlement);
- *Williams v. Chatmon*, No. ESX-L-10940-97 (N.J. Sup. Ct.) (\$1.6 million jury verdict in securities litigation);
- *Lerch v. Citizens First Bancorp*, 805 F. Supp. 1142 (D.N.J. 1992) and 144 F.R.D. 247 (D.N.J. 1992) (\$4 million settlement achieved for the benefit of the class);
- *Zinberg v. Washington Bancorp*, 138 F.R.D. 397 (D.N.J. 1990) (\$2.1 million settlement achieved for the benefit of the class);
- *In re C.R. Bard, Inc. Securities Litigation*, No. 90-948 (D.N.J.) (\$18.1 million settlement);

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- *Newman v. On Line Software International, Inc.*, No. 88-3247 (D.N.J.) (\$4.1 million recovery during trial in class action securities litigation);
- *In re California Life Insurance Company Securities Litigation*, MDL Docket No. 400 (C.D. Cal.) (\$3.25 million recovery);
- *In re General Public Utilities Corporation Securities Litigation*, No. 79-1420 (D.N.J.) (\$24.5 million settlement achieved for the benefit of the class);
- *Aviva Partners LLC v. Exide Technologies*, No. 05-3098 (D.N.J.) (\$13.7 million settlement on behalf of the class);
- *In re The Regina Company, Inc. Securities Litigation*, No. 88-4149 (D.N.J.) (\$7.3 million recovery);
- *Cammer v. Bloom*, 711 F. Supp. 1264 (D.N.J. 1989) (\$15 million settlement achieved for the benefit of the class);
- *Metz v. Jupiter Industries*, No. 85-8414 (N.D. Ill.) (\$3.1 million recovery in class action securities litigation);
- *In re Todd Shipyards Securities Litigation*, No. 88-2580 (D.N.J.) (\$12.6 million recovery);
- *In re Amerada Hess Corporation Securities Litigation*, No. 02-3359 (D.N.J.) (\$9 million settlement on behalf of the class);
- *In re Cambrex Corp. Securities Litigation.*, No. 03-4896 (D.N.J.) (\$3.15 million settlement on behalf of the class);
- *Burgo v. Volkswagen of America*, 183 F. Supp. 2d. 683 (D.N.J. 2001) (\$1.3 million recovery);
- *Weikel v. Tower Semiconductor, Ltd.*, 183 F.R.D. 377 (D.N.J. 1998) (\$16.25 million recovery in class action securities litigation);
- *In re Anadigics, Inc. Securities Litigation*, No. 98-917 (D.N.J.) (\$11.5 million recovery);

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- *In re Mobilemedia Securities Litigation*, 28 F. Supp. 2d. 901 (D.N.J. 1998) (\$23.95 million recovery);
- *Easton & Co. v. Mutual Benefit Life Insurance Co.*, Nos. 91-4012, 92-2095 (\$2.75 million recovery);
- *U.S. ex rel. Quinn v. Omnicare Inc.*, 382 F.3d 432 (3d Cir. 2004) (establishing standards for Qui Tam litigation in the Third Circuit and holding pharmaceutical suppliers to long term care facilities in New Jersey had no obligation to reimburse Medicaid for returned medications, even if those medications later were resold by the suppliers);
- *Reufenacht v. O'Halleran*, 737 F.2d 320 (3d Cir. 1984), *aff'd, sub. nom. Gould v. Reufenacht*, 471 U.S. 701 (1985) (succeeded in persuading the Supreme Court to disavow the “sale of business doctrine” and afford a private right of action under the antifraud provisions of the federal securities laws to those who purchase businesses by acquiring stock rather than assets);
- *In re PSE&G Shareholder Litigation*, 173 N.J. 258 (2002) (adopting new pleading standards for plaintiffs in shareholder derivative litigation in New Jersey);
- *In re Lipitor Antitrust Litigation*, 855 F.3d 126 (3d Cir. 2017) (clarifying the Third Circuit’s jurisdiction over reverse payment antitrust claims) and 868 F.3d 231 (establishing pleading standards in reverse-payment antitrust actions);
- *Gelles v. TDA Industries*, 44 F.3d. 102 (2d. Cir. 1994) (establishing standards in the Second Circuit on the “in connection with” principle for securities fraud);
- *Abramowitz v. Posner*, 672 F.2d 1025 (2d Cir. 1982) (setting standards for shareholders derivative litigation in the Second Circuit);
- *Willis v. Zim*, 705 F. Supp. 205 (D.N.J. 1988) (clarifying the right of arbitrators to award punitive damages on investors claims);
- *Grassi v. Information Resources, Inc.*, 63 F. 3d. 596 (7th Cir. 1995) (class action securities litigation tried to conclusion);

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- *King Drug Co. of Florence, Inc. v. SmithKline Beecham Corp.*, 791 F.3d 388 (3d Cir. 2015) (reverse payment in violation of antitrust laws need not be in cash);
- *In re Merck & Co. Securities, Derivative & ERISA Litigation*, 493 F.3d 393 (3d Cir. 2007) (the use of after acquired information obtained through discovery may be utilized to establish demand futility in shareholder derivative litigation); and
- *In re Nazi Era Cases Against German Defendants*, 198 F.R.D. 429 (D.N.J. 2000); *Burger-Fischer v. DeGussa AG*, 65 F. Supp. 2d. 248 (D.N.J. 1999); (pursuing claims against corporations that participated in the horrors of the Nazi regime).

Matthew F. Gately
Partner

Matthew Gately has been certified by the Supreme Court of New Jersey as a Civil Trial Attorney and has tried cases in state and federal courts, as well as in private arbitration. His practice primarily involves complex commercial/contractual disputes and class/collective actions. Mr. Gately's class action practice is particularly broad, as he has represented both putative class representatives and corporate defendants in cases involving, among other things, securities fraud, ERISA, consumer fraud, and federal and state wage/hour laws. He has been part of the litigation team representing direct purchasers of pharmaceutical products in several antitrust and RICO class actions, including *In re K-Dur Antitrust Litigation* (\$60.2m settlement), *In re Lipitor Antitrust Litigation* (\$93m settlement), and *In re Effexor XR Antitrust Litigation* (D.N.J.) (\$39m settlement against one defendant). He currently serves as interim liaison counsel for the Class Action Track in *In re Insulin Pricing Litigation* (D.N.J.), and for the Direct Purchaser Plaintiffs in *In re Effexor XR Antitrust Litigation*, and *In re Vascepa Antitrust Litigation* (D.N.J.). He has also served as counsel in securities class actions and derivative litigations that have resulted in significant recoveries, including *Shumacher v. Osmotica Pharma* (N.J. Superior Court) (\$5.25m settlement) and *In re Prudential Financial Securities Litigation* (D.N.J.) (\$35m settlement).

Additionally, Mr. Gately has represented clients in personal injury and malpractice cases, investor litigation/arbitration, partnership and other intra-business disputes, and employment discrimination matters. He has also provided counsel to New Jersey state agencies in environmental cost-recovery litigations.

He currently serves as Chair of the Bergen County Bar Association's Federal Practice Committee and a Trustee of the Association of the Federal Bar of New Jersey. He is also a member of the New Jersey State Bar Association and the Trial Attorneys of New Jersey. Mr. Gately has both written and presented on issues of federal practice.

Mr. Gately is AV rated by Martindale-Hubbell and was invited to become the second Associate Fellow of Litigation Counsel of America in New Jersey. Mr. Gately has also been named a "New Leader of the Bar" by the *New Jersey Law Journal*, a "Rising Star" by *Super Lawyers*, and a "Top Lawyer" by both *(201) Magazine* and *Bergen Magazine*. He has also received recognition for his *pro bono* service.

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Before joining Cohn Lifland, Mr. Gately clerked for the Hon. Madeline Cox Arleo, U.S.D.J., D.N.J., and the Hon. Michael A. Hammer, U.S.M.J., D.N.J., and worked for several years in the commercial litigation group of an AmLaw 100 law firm. Mr. Gately received his J.D. from Columbia Law School, where he was a Harlan Fiske Stone Scholar and published member of the *Columbia Business Law Review*. He received his B.A. (in three years), *magna cum laude*, from Lafayette College with a double major in Government & Law and Philosophy.

Mr. Gately was admitted in the state courts of New Jersey and New York, the United States Court of Appeals for the Third Circuit, the United States District Court for the District of New Jersey, the United States District Court for Southern District of New York, the United States District Court for the Eastern District of New York, and the United States District Court for the Western District of Arkansas.

Peter S. Pearlman
Senior Counsel

Peter S. Pearlman practices primarily in the areas of complex commercial and class action litigation in both federal and state courts. Cases in which he has been involved have been the subject of more than 60 published opinions, many of which have established important legal precedents. He also regularly represent clients before the Financial Industry Regulatory Authority, the American Arbitration Association, JAMS, and various other alternate dispute fora.

Mr. Pearlman has been certified by the Supreme Court of New Jersey's board on Trial Attorney Certification as a civil trial attorney continuously since that certification first became available.

As a transactional attorney, Mr. Pearlman has represented numerous clients in the formation, purchase, sale, reorganization and franchising of corporations, partnerships and limited liability companies in transactions ranging from a few hundred thousand dollars to in excess of \$100 million.

In addition to his receipt of the American Antitrust Institute Award for Outstanding Antitrust Litigation Achievement in Private Law Practice for his work on *K-Dur*, Mr. Pearlman is AV rated by Martindale-Hubbell and has been recognized in

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Best Lawyers in America, as well as *SuperLawyers* in New Jersey for Business Litigation continuously in every year since that recognition first became available. He also is listed in *SuperLawyers* Corporate Counsel and was included in (201) *Magazine's* list of Bergen's "Top Lawyers" in 2014, 2015, 2016 and 2017, in Civil Litigation and Litigation.

He served as a member of the Lawyers Advisory Committee to the United States District Court for the District of New Jersey, trustee of the Association of the Federal Bar of New Jersey, and two terms as co-chair of the Class Action Committee of the New Jersey State Bar Association.

In 2017, Mr. Pearlman was selected by the Association of the Federal Bar of New Jersey and the New Jersey Commission on Professionalism in Law as a recipient of the Professional Lawyer of the Year Award.

Mr. Pearlman holds a J.D. from Seton Hall University School of Law and an A.B. from the University of Illinois. He is admitted to practice and has represented clients before: all courts in the State of New Jersey; the United States District Courts for the District of New Jersey, the Northern, Southern, and Eastern Districts of New York, and the Northern District of California; the United States Court of Federal Claims; the United States Circuit Courts of Appeals for First, Second, Third, Fourth, Seventh, and District of Columbia Circuits; and the United States Supreme Court.

Mr. Pearlman has lectured on topics involving business litigation for the American Bar Association and the New Jersey Institute for Continuing Legal Education. He has taught trial advocacy for The National Institute of Trial Advocacy and also taught trial and appellate skills at Hofstra, Widener, and Roger Williams schools of law. Mr. Pearlman co-wrote "*Trends in the Analysis of Choice of Law in National Class Actions in State and Federal Courts of New Jersey*" in the April 2015 issue of *New Jersey Lawyer*.

Audra DePaolo
Partner

Audra DePaolo practices primarily in the areas of appellate, class action and complex commercial litigation. Upon graduation from law school, Ms. DePaolo was a judicial law clerk to the Hon. Peter Ciolino, A.J.S.C. (retired) former Assignment Judge of Bergen County.

Ms. DePaolo is a member of the New Jersey State Bar Association and a member of the Appellate Practice Committee. She is also a member of the Bergen County Bar Association and the Association of the Federal Bar of New Jersey. She has been selected to the list of Bergen County's Top Lawyers in Appellate Practice and Commercial Litigation. She was named on the list of Bergen's Top Lawyers by *(201) Magazine* in Appellate Practice and Litigation. She was recognized on the list of Rising Stars by SuperLawyers in 2009 and 2010. She is Co-editor of the LexisNexis Practice Guide New Jersey Personal Injury Litigation, 2017-2025 editions by Mathew Bender/Lexis-Nexis. She is also co-author of the Medical Malpractice chapter in the LexisNexis Practice Guide New Jersey Personal Injury Litigation, 2007-2025 editions by Mathew Bender/Lexis-Nexis. She is Co-author of "McDougall v. Lamm: New Jersey Supreme Court Ruling that Emotional Distress Damages Are Not Available for Witnessing Death of Beloved Pet Keeps Man's Best Friend in the Dog House," 2012 LexisNexis Emerging Issues 6645 (September 2012) and the expert commentary "Federal Court in *Bashir v. The Home Depot* Slices Lessor's Defense under NJPLA in Stump Grinder Case," 2011 LexisNexis Emerging Issues 6153 (December 2011).

Select Decisions

- *State of N.J. Dept. of Treasury v. Merrill Lynch & Co.*, 2013 WL 1830874 (NJ App. Div. 2013);
- *Fred Pond, L.L.C. v. Whitlock Mills, L.P.*, 2009 WL 3430145 (N.J. App. Div. 2009) (affirming settlement of litigation);
- *Lisowski v. New Jersey Transit*, 2008 WL 4648396 (NJ App. Div. 2008) (affirming jury verdict in favor of plaintiff);
- *Donleavy v. Casey*, 2006 WL 3770883 (NJ App. Div. 2006) (affirming summary judgment for bank);
- *Hyams v. Halifax PLC*, 2005 WL 3441230 (NJ App. Div. 2005) (remanding for further proceedings)

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- *Naviant Marketing Solutions, Inc. v. Larry Tucker, Inc.*, 339 F.3d 180 (3d Cir. 2003) (reversing order imposing sanctions for failure to provide discovery);
- *Dupree v. City of Clifton*, 351 N.J. Super. 237 (App. Div. 2002), *aff'd*, 175 N.J. 449 (2003) (affirming summary judgment for church in personal injury action);
- *Noorily v. Thomas & Betts Corp.*, 188 F.3d 153 (3d Cir. 1999), *cert. denied*, 529 U.S. 1053 (2000) (reversing ERISA award for severance benefits).

Michael J. Alderman
Associate

Michael Alderman is an associate in the civil litigation practice group. He has been part of the litigation team representing plaintiffs in various class actions. Michael graduated *cum laude* from Seton Hall University School of Law and earned recognition for excellence in the Entertainment and New Media Law specialization. While in law school, Michael served as the Executive Editor of Volume 48 of the *Seton Hall Journal of Legislation and Public Policy* and published his Comment entitled “Free Speech Versus Compelled Speech: A First Amendment Reform of Section 230.” Michael also received recognition for excellence for his participation in the Civil Litigation and Practice Clinic, where he represented tenants in eviction proceedings in Essex and Bergen Counties.

Prior to joining Cohn Lifland, Michael clerked for the Hon. Marcy M. McMann, P.J.F.P., during her honor’s tenures in both the Law Division and the Chancery Division, Family Part. During his clerkship, Michael also served as a settlor on landlord-tenant cases in the Morris/Sussex Vicinage.

Before law school, Michael attended the University of South Florida, where he graduated *cum laude* with a Bachelor of Science in Social Science Education. While in college, Michael also served as a volunteer firefighter and first responder in his hometown of Ellenton, Florida. After graduation, Michael moved to New Jersey where he taught sixth-grade Language Arts Literacy at a charter school in Newark, New Jersey. Following his time as a teacher, Michael held various positions in nonprofit management, including roles in education management organizations and nonprofit media.

Melinda Lugo
Litigation Paralegal

Melinda Lugo is a litigation paralegal with over 20 years of experience supporting complex civil and commercial litigation matters. Since joining Cohn Lifland Pearlman Herrmann & Knopf LLP in 2008, she has worked on a broad range of cases, including employment, personal injury, products liability, and malpractice matters, in state and federal courts in New Jersey and New York, as well as at the appellate level.

Ms. Lugo manages high-volume litigation dockets from inception through resolution, including drafting pleadings, discovery demands and responses, correspondence, and motions, as well as conducting legal research. She has significant experience overseeing and organizing large-scale discovery, including the review, management, and production of voluminous records in complex matters.

Prior to joining Cohn Lifland, Ms. Lugo worked at Pryor Cashman LLP in New York City and Melli Guerrin & Wall in New Jersey, and also has experience in financial services operations. Her background includes prior roles in office management and client services, which enhance her efficiency in case administration and client coordination.

Ms. Lugo received her Associate Degree in Business Administration from Berkeley College and her Bachelor's Degree in English from Fairleigh Dickinson University. She is currently pursuing her Juris Doctor at Vermont Law School's Online Hybrid JD program, with an expected graduation date of December 2027.