

# EXHIBIT 15

1 Jeffrey S. Goldenberg, Esq.  
2 Goldenberg Schneider LPA  
3 1 West 4<sup>th</sup> Street, 18<sup>th</sup> Floor  
4 Cincinnati, Ohio 45202  
5 Telephone: (513) 345-8291  
6 [jgoldenberg@gs-legal.com](mailto:jgoldenberg@gs-legal.com)

7 Submitted on Behalf of:

8 Goldenberg Schneider, LPA and  
9 Minnillo & Jenkins Co., LPA

10 Counsel for Plaintiff(s) in:

11 *Sanders, et al. v. Hyundai Motor America, et al.*

12  
13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**  
15

16  
17 IN RE: HYUNDAI AND KIA FUEL  
18 ECONOMY LITIGATION

Case No. 2:13-ml-02424-GW-FFM

19 **DECLARATION OF JEFFREY S.**  
20 **GOLDENBEG IN SUPPORT OF**  
21 **REQUEST FOR ATTORNEY'S FEES**  
22 **AND EXPENSES**

23 Date: December 22, 2014  
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1 I, Jeffrey S. Goldenberg, Esq., hereby declare under penalty of perjury and  
2 pursuant to 28 U.S.C. 1746 as follows,

3 1. I am the founding partner at Goldenberg Schneider, LPA, and I am counsel  
4 for Rebecca Sanders (Ohio), Jeffrey Millar (Ohio), Molly Simons (Ohio), Paul Romero  
5 (Nevada), Richard Sydnor (West Virginia), and LaToya Davis (South Carolina) in the  
6 action titled *Sanders v. Hyundai Motor*, Case No. 1:12-cv-00853.

7 2. This declaration is submitted in support of the attorneys' fees and expense  
8 reimbursement request for work performed by Goldenberg Schneider, LPA and Minnillo  
9 & Jenkins Co., LPA ("*Sanders Counsel*") in connection with this litigation as part of the  
10 Non-Settling Plaintiffs ("NSP") Group. I have personal knowledge of the facts below  
11 and, if called upon to do so, could and would testify competently thereto. This  
12 declaration is submitted after a review of the billing records of Goldenberg Schneider,  
13 LPA and Minnillo & Jenkins Co., LPA. Minnillo & Jenkins Co., LPA is our Co-Counsel  
14 in this litigation.

15 3. *Sanders Counsel* respectfully request \$97,209.40 in attorneys' fees and  
16 \$3,420.36 in expense reimbursement. Collectively, these two amounts equal \$100,629.76  
17 and are approximately 75% of *Sanders Counsel's* lodestar. The Defendants do not object  
18 to this request.

19 4. I am admitted to the practice of law in the State of Ohio (1994), the United  
20 States Court of Appeals for the Sixth Circuit, and the United States District Court for the  
21 Southern and Northern Districts of Ohio. I also have been admitted pro hac vice to  
22 various federal district courts throughout the United States. I am a member in good  
23 standing of the Ohio Bar and have never been the subject of any disciplinary proceeding.<sup>1</sup>

24 5. The *Sanders* action was filed in the Federal District Court for the Southern  
25 District of Ohio on November 4, 2012 – two days after Hyundai and Kia announced that,  
26 following discussions with the U.S. Environmental Protection Agency, they had  
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28 <sup>1</sup> Attached hereto as Exhibit A is the firm resume for Goldenberg Schneider, LPA.

1 voluntarily restated the fuel economy for approximately 900,000 model year 2011-2013  
2 vehicles. Accordingly, the *Sanders* case was one of the earliest actions filed following  
3 Kia and Hyundai's November 2<sup>nd</sup> announcement.

4  
5 **Sanders Counsel's Contributions and Participation**

6 6. Following the transfer of the *Sanders* action to this Court by the Judicial  
7 Panel on Multi-District Litigation, the *Sanders* counsel actively participated in this  
8 litigation through the NSP Group, under the direction of Liaison Counsel, Eric Gibbs.

9 7. Specifically, the *Sanders* Counsel's contributions included:

10 a. Drafting and filing one of the earliest class action complaints  
11 following Kia and Hyundai's November 2, 2012 announcement about restated fuel  
12 economy;

13 b. Participating in the confirmatory discovery process contemplated and  
14 approved by the Court – under the direction of Liaison Counsel - to confirm that the  
15 proposed settlement is fair, adequate, and reasonable. This participation included the  
16 following specific tasks:

17 (1) Reviewing and editing Settling Plaintiffs and NSPs joint discovery  
18 requests;

19 (2) Reviewing and coding thousands of documents produced by Kia  
20 and Hyundai as assigned to *Sanders* Counsel by Liaison Counsel;

21 (3) Preparing document summaries of the documents assigned for our  
22 review;

23 (4) Participating in numerous conference calls among the NSPs where  
24 the scope and contents of the productions were discussed at length, including the extent  
25 to which the documents produced supported our claims;

26 (5) Participating via phone and a secure chatroom in the confirmatory  
27 discovery interviews when the Kia and/or Hyundai employee being deposed was a central  
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1 character in the documents we reviewed. During this process, *Sanders* Counsel provided  
2 suggestions and input into the questioning of these witnesses.

3 c. Reviewing and evaluating the terms of the proposed settlement which  
4 included the following substantive work, all of which was performed under the direction  
5 of Liaison Counsel to facilitate the settlement vetting process approved by the Court:

6 (1) Reviewing the initial Term Sheet;

7 (2) Reviewing the terms of the proposed settlement filed December  
8 23, 2013 and the two Addendums, filed January 16, 2014, and May 2, 2014. This  
9 included discussions and correspondence with NSPs regarding the settlement, the  
10 settlement negotiations conducted by Liaison Counsel, and the revisions to the  
11 settlement. It also included the review of settlement-related memos and summaries  
12 distributed to the NSPs after the settlement was filed on December 23, 2013;

13 (3) Participating in several conference calls with the NSPs to discuss  
14 the settlement's strengths and weaknesses; and

15 (4) Providing substantive written suggestions to Liaison Counsel and  
16 to the Court suggesting ways to improve the settlement. For example, *Sanders* Counsel's  
17 suggestions included: (a) adding a provision in the Settlement Agreement that would  
18 obligate Defendants to continue the Reimbursement Program for those class members  
19 who do not choose to participate in the relief offered through the class action settlement;  
20 (b) simplifying the notice and claim form (ultimately incorporated in the settlement); (c)  
21 providing an electronic claims process whereby claims can be submitted through the  
22 settlement website (ultimately incorporated in the settlement); (d) providing a unique  
23 claim identification number in the notice mailed to each class member which can be  
24 entered by the claimant during the electronic claim submission. Once the unique claim  
25 ID is entered, the claim form then automatically populates various fields with known  
26 information, simplifying the claim process (ultimately incorporated into the settlement);  
27 and (e) providing claimants on the website with claim specific information such as the  
28 value of the benefits to which they are entitled (ultimately incorporated in the settlement).

**Sanders Counsel's Lodestar Information**

8. Sanders Counsel spent 299.7 total hours on this litigation from early November 2012 through early July 2014, and this represents the time for which they seek to be compensated.

9. Sanders Counsel's lodestar from early November 2012 through early July 2014 is \$133,245.

10. Below is chart summarizing Sanders Counsel's lodestar information including: (a) the names of the individuals who worked on this litigation; (b) each individual's role; (c) each individual's total hours; (d) each individual's hourly rate; and (e) each individual's lodestar.

Name	Role	Total Hours	Billing Rate	Lodestar
Jeffrey S. Goldenberg	Sr. Partner	150	\$485	\$72,750
Todd B. Naylor	Sr. Partner	7	\$450	\$3,150
Robert B. Sherwood	Sr. Associate	116	\$415	\$48,140
Cheryl Pence	Leg. Asst.	6.2	\$150	\$930
Christian A. Jenkins	Sr. Partner	11	\$450	\$4,950
Niro M. Wijesooriya	Associate	4.2	\$350	\$1,470
Amy E. Gullifer	Associate	5.3	\$350	\$1,855
<b>TOTALS</b>		<b>299.7</b>		<b>\$133,245</b>

1 11. The approximate percentage of their time that each of these individuals spent  
2 on "Investigation and Complaint," "Court Hearings and Conferences," "NSP  
3 Communications," "Discovery," and "Settlement Review," is listed below:

Name	Investigation and Complaint	Court Hearings and Conferences	NSP Communications	Discovery	Settlement Review
Jeffrey S. Goldenberg	25%	20%	25%	25%	5%
Todd B. Naylor	--	--	10%	90%	--
Robert B. Sherwood	25%	--	--	70%	5%
Cheryl Pence	100%	--	--	--	--
Christian A. Jenkins	100%	--	--	--	--
Niro M. Wijesooriya	100%	--	--	--	--
Amy E. Gullifer	100%	--	--	--	--

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12 12. I estimate that *Sanders* Counsel has spent approximately 15 hours on this  
13 litigation since early July 2014. These 15 hours are not included in the above lodestar  
14 charts.

15 13. I also estimate that *Sanders* counsel will spend an additional 5 to 10 hours  
16 on the final approval process.

17 14. I am familiar with hourly rates charged by plaintiff attorneys engaged in  
18 complex class action litigation practice nationwide and in the Midwestern United States.  
19 It is my opinion that the hourly rates charged above are consistent with, and indeed are on  
20 the lower end of rates charged by attorneys of comparable experience and expertise in  
21 this area of the law.

22 15. Throughout this multi-district litigation process, *Sanders* Counsel was  
23 careful not to perform work unless assigned to do so by Liaison Counsel. For example,  
24 *Sanders* Counsel limited their review of documents to the range assigned by Liaison  
25 Counsel and only produced written work product as requested by Liaison Counsel.  
26 Further, *Sanders* Counsel time for which they seek compensation is limited to those  
27 conference calls approved and organized by either the Court (e.g., hearings) or Liaison  
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1 Counsel. Accordingly, the 299.7 hours spent on this litigation by the *Sanders* Counsel is  
2 reasonable in light of their role.

3 16. *Sanders* Counsel respectfully request that this Court approve the payment of  
4 \$97,209.40 in attorneys' fees. The Defendants do not object to this request.

5 **LITIGATION EXPENSES**

6 17. *Sanders* Counsel also seeks the payment of \$3,420.36 for litigation related  
7 expenses. The below chart lists the expense categories and the corresponding amounts  
8 which form the basis of this request. This chart summarizes the actual expenses paid and  
9 charges incurred during the pendency of this litigation by the *Sanders* Counsel as  
10 recorded in their business records.

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12 Expense Category	Amount
13 Court Filing Fee	\$350
14 Internal Reproduction/Copies	\$701.14
15 Computer Research	\$244.92
16 Postage/Express Delivery	\$97.25
17 Travel	\$2,027.05
18 <b>TOTAL EXPENSES</b>	<b>\$3,420.36</b>

19

20 18. *Sanders* Counsel respectfully request \$3,420.36 in litigation expense  
21 reimbursement. The Defendants do not object to this request.

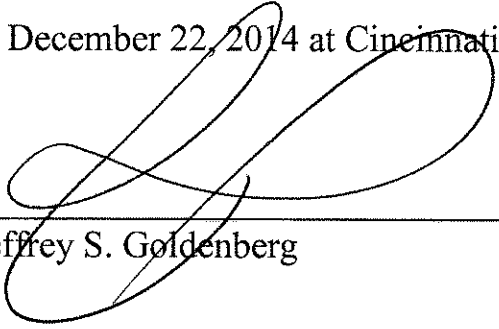
22 19. Wherefore, *Sanders* Counsel respectfully request that this Court approve  
23 \$100,629.76 as attorneys' fees and expense reimbursement to be paid by the Defendants.  
24 The \$100,629.76 amount is approximately 75% of *Sanders* Counsel's lodestar. The  
25 Defendants do not object to this request.

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So Declared and Executed this December 22, 2014 at Cincinnati, Ohio.



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Jeffrey S. Goldenberg

# EXHIBIT A

#7691



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Goldenberg Schneider, LPA

ONE W. 4<sup>TH</sup> STREET, 18<sup>TH</sup> FL  
CINCINNATI, OHIO 45202

513-345-8291  
[WWW.GS-LEGAL.COM](http://WWW.GS-LEGAL.COM)

**GOLDENBERG SCHNEIDER, L.P.A.** was founded in 1996 and focuses on prosecuting actions primarily on behalf of plaintiffs in complex civil litigation and class actions. The subject matter of the Firm's past and current representations is broad, ranging from public and consumer protection actions to employment and labor cases that include ERISA, FLSA, privacy protection and discrimination, to actions for antitrust and securities violations. The firm's litigation attorneys are experienced in every level of the state and federal judicial systems in Ohio and the country, including specialized courts.

The Firm has demonstrated its capability to successfully represent governmental entities, corporations, and individuals in the most complex of litigation. Founding partner Jeff Goldenberg served as special counsel to the Ohio Attorney General in prosecuting Ohio's Medicaid recoupment action against the tobacco industry and has served as lead or co-lead counsel on numerous nationwide class actions. The tobacco Medicaid recoupment litigation settled in 1999, resulting in a recovery to the State of Ohio of more than \$9.86 billion. Ohio and its citizens continue to benefit from the tobacco industry's historic concessions regarding youth smoking, advertising restrictions, and reformation of industry corporate culture. Factoring in the substantial, if not immeasurable non-economic components of the settlement, which curb youth smoking and addiction, the settlement proceeds also are a multiple of twelve times larger than the prior largest Ohio-based settlement.

Other class actions in which one or more of the Firm's attorneys have acted as class counsel include the following:

- *In Re: Veterans' Administration Data Theft Litigation* – Goldenberg Schneider served as co-lead counsel for a nationwide class of hundreds of thousands of veterans and current members of the military who were impacted by the August 2006 theft of personal data. Multiple actions were consolidated by the Panel on Multidistrict Litigation and sent to the Federal District Court in the District of Columbia. This action was successfully resolved with a \$20,000,000 settlement.
- *Continental Casualty Long Term Care Insurance Litigation* – Goldenberg Schneider served as co-lead counsel for a nationwide class of tens of thousands of individuals who purchased long term care policies from Continental Casualty (CNA). The lawsuit claimed that Continental Casualty wrongfully denied coverage for elderly policyholders. The case was successfully resolved with a settlement valued at approximately \$26,000,000, approved by the Federal District Court for the Northern District of Ohio.
- *Bower v. MetLife* – Goldenberg Schneider served as co-lead class counsel on behalf of a nationwide class of beneficiaries of the Federal Employees Group Life Insurance (FEGLI) Policy, the world's largest group life insurance program. Following Judge Sandra Beckwith's Order certifying the nationwide Class, the case was settled in 2012 for \$11,500,000.
- *Cates v. Cooper Tire & Rubber Company/ Johnson v. Cooper Tire & Rubber Company* – Goldenberg Schneider served as co-lead counsel for a class of more than a thousand Cooper Tire retirees who claimed that they were entitled to lifetime health

care benefits from the company. Goldenberg Schneider secured a judgment on the pleadings, certified the class, and ultimately resolved the case through a settlement valued at over \$50,000,000.

- *In Re: OSB Antitrust Litigation* – Goldenberg Schneider served on the trial team in a case that alleged illegal collusion and cooperation among the oriented strand board industry. The case was resolved through a series of settlements that collectively exceeded \$120,000,000.
- *In re: Verizon Wireless Data Charges Litigation* – Goldenberg Schneider filed the first nationwide class action challenging Verizon Wireless' improper \$1.99 data usage charges to certain pay-as-you-go customers. Goldenberg Schneider, as a member of the Plaintiffs Advisory Committee, played an active role in this litigation which recently settled (pending final approval in December 2011), resulting in benefits to the Class in excess of \$50,000,000 in refunds and reimbursement payments.
- *In Re: Consolidated Mortgage Satisfaction Cases* – Goldenberg Schneider served as lead counsel on behalf of Ohio homeowners against some of the largest national and Ohio banking and lending institutions for their failure to timely record mortgage loan payoffs. The Firm was able to consolidate all twenty actions before one trial judge and successfully upheld all the class certifications before the Ohio Supreme Court. These cases were resolved through multiple settlements valued at millions of dollars.
- *Meyer v. Nissan North America* – Goldenberg Schneider served as co-lead counsel on behalf of thousands of Nissan Quest minivan owners throughout the United States. The suit alleged that the Quest minivan developed dangerous levels of carbon

deposits in the accelerator system causing the gas pedal to stick, resulting in a roadway safety hazard including documented accidents and injuries. The case was resolved by a settlement that included the application of the vehicle warranty to remedy the problem as well as a refund of prior repair costs.

- *Daffin v. Ford Motor Company* – Goldenberg Schneider and its co-counsel successfully certified an Ohio statewide class on behalf of all Ohio purchasers or lessors of 1999 and 2000 model year Mercury Villager Minivans. The United States Court of Appeals for the Sixth Circuit upheld the class certification, and the case was resolved through a settlement.
- *Parker v. Berkeley Premium Nutraceuticals* – Goldenberg Schneider served as co-lead counsel and certified three nationwide classes in a consumer fraud class action on behalf of purchasers of herbal supplements for false and unproven claims and deceptive credit card charging practices. This case was successfully resolved with a multi-million dollar settlement. Moreover, class members retained all rights to recover a portion of the nearly \$30 million that the United States Attorney General seized in a civil forfeiture action. Goldenberg Schneider eventually recovered an additional \$24,000,000 for the victims by prosecuting a successful Petition for Remission through the federal forfeiture proceedings.
- *Carnevale FLSA Class Action* – Goldenberg Schneider served as co-lead counsel on behalf of employees working for a large industrial company that alleged violations of federal and state labor laws through the systematic misclassification of managers and other employees as salaried professionals. This case was successfully resolved through the implementation of a multi-million dollar settlement.

- *In re: Styrene Leak Litigation*– Goldenberg Schneider served on the Lead Committee in this class action that was filed following the August 2005 Styrene gas rail car release in Cincinnati, Ohio. Tens of thousands of residents and employees and hundreds of businesses either evacuated their residences or businesses or were otherwise negatively impacted by this toxic styrene release. This case was successfully resolved resulting in a multi-million dollar recovery for those individuals and businesses negatively impacted by the styrene release.
  
- *Dalesandro v. International Paper Company* – Goldenberg Schneider served as co-lead counsel for a class of employees in an ERISA action to recover severance benefits from the defendant company when its paper mill was sold. The case was certified as a class action and the plaintiffs won a multi-million dollar judgment in the United States District Court for the Southern District of Ohio. The litigation was ultimately resolved through a settlement valued at nearly \$4,000,000.

Goldenberg Schneider is also currently representing plaintiffs in other cases in which class certification is pending or the Firm's attorneys are seeking appointment as lead class counsel. Goldenberg Schneider also filed the first nationwide class action against Google that alleged widespread violations of the Federal Wiretap Act, 18 U.S.C. § 2511 et seq. The litigation alleges that Google intentionally intercepted electronic communications from Wi-Fi networks utilizing specially designed sniffer technology and software installed in its Google Street View vehicles. Goldenberg Schneider is part of the lead Plaintiffs' group in this litigation and played a significant role in recently defeating Google's motion to dismiss. *In re Google, Inc. Street View Electronic Communications Litigation*, No. 10-MD-02184, 2011 U.S. Dist. LEXIS 71572, \*53-54 (N.D. Cal., June 29, 2011), affirmed, 729 F.3d 1262 (9<sup>th</sup> Cir. 2013).

The Firm has also represented numerous individuals, states and companies in other litigation including: pharmaceutical antitrust and Average Wholesale Price (AWP) litigation; intellectual property and trade secret actions; and cases for tortious interference with commercial contracts and business relationships.



**JEFFREY S. GOLDENBERG**  
Goldenberg Schneider, LPA  
One West 4<sup>th</sup> Street, 18<sup>th</sup> FL  
Cincinnati, Ohio 45202  
(513) 345-8291  
[www.gs-legal.com](http://www.gs-legal.com)

### **LEGAL EXPERIENCE**

PARTNER, GOLDENBERG SCHNEIDER, L.P.A. (1998-present) - Civil trial and appellate practice in state and federal courts. Areas of practice include: class actions, state attorney general cost recoupment including tobacco and pharmaceutical average wholesale price litigation, employment litigation including the Fair Labor Standards Act, toxic torts, lead poisoning, antitrust, consumer protection, environmental, warranty, product liability, personal privacy information and protection, securities, personal injury, commercial disputes including insurance coverage.

ATTORNEY, DINSMORE & SHOHL (1994-1998) - General litigation practice with an emphasis on environmental litigation and compliance.

### **Bar Admissions/Licenses**

State of Ohio (admitted since 1994)  
United States Court of Appeals for the Sixth Circuit  
United States District Court for the Southern & Northern Districts of Ohio

### **Activities/Memberships**

Ohio Association for Justice  
American Association for Justice (formerly Association of Trial Lawyers of America)  
American Bar Association  
Ohio State Bar Association  
Cincinnati Bar Association  
The Cincinnati Academy of Leadership for Lawyers  
Board of Directors, University of Cincinnati Hillel Jewish Student Center  
Volunteer Attorney for the Ohio Foreclosure Mediation Project

### **EDUCATION**

Indiana University School of Law, Bloomington, Indiana, J.D. 1994  
Indiana University School of Public and Environmental Affairs, M.S.E.S. 1994  
Indiana University, B.A. Biology, 1988

**JEFFREY S. GOLDENBERG**  
**PARTNER, GOLDENBERG SCHNEIDER, LPA**  
[www.gs-legal.com](http://www.gs-legal.com)

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Mr. Goldenberg's practice includes class action and complex civil litigation with an emphasis on consumer protection. His practice areas include consumer fraud, insurance coverage, product liability and defects, overtime, personal privacy and data breach, securities, personal injury, toxic torts, and commercial disputes.

Mr. Goldenberg served as lead and/or co-counsel in numerous multi-million dollar complex civil cases throughout the United States, including Enzyte Consumer Fraud Litigation, Carnevale FLSA Litigation, Continental Casualty Long Term Care Insurance Litigation, Veterans Data Theft Litigation, Styrene Railway Car Litigation, Ford and Nissan Auto Defect litigation, Clayton Home Sales Tax Litigation, Metlife FEGLI Litigation, and Oriented Strand Board Antitrust Litigation. Jeff presently serves as lead or co-counsel on Ford Spark Plug Litigation, Google Wiretapping Litigation, Jeep Liberty Window Regulator Litigation, Rally's Overtime Litigation, Chase Home Loan Modification Litigation, and PNC Bankruptcy Discharge Litigation. Jeff also served as Special Counsel representing the State of Ohio against the Tobacco industry and was part of the litigation team that achieved an unprecedented \$9.86 billion settlement for Ohio taxpayers. He also served as lead counsel with John Murdock on the In re Consolidated Mortgage Satisfaction Cases involving twenty separate class actions. That litigation resulted in a significant Ohio Supreme Court decision defining key aspects of Ohio class action law.

Mr. Goldenberg earned three degrees from Indiana University: a Bachelor of Arts in Biology in 1988 (Phi Beta Kappa); a Masters of Science in Environmental Science in 1994; and his Juris Doctor in 1994. Jeff has practiced in all levels of Ohio trial and appellate courts as well as other courts across the nation, and is admitted to practice in the State of Ohio and the United States District Court for the Southern and Northern Districts of Ohio and the United States Sixth Circuit Court of Appeals. Jeff is a member of the American Association for Justice, the Ohio State Bar Association, and the Cincinnati Bar Association.

**TODD B. NAYLOR**

Goldenberg, Schneider, LPA  
One West 4<sup>th</sup> Street, 18<sup>th</sup> FL  
Cincinnati, OH 45202  
(513) 345-8291  
[www.gs-legal.com](http://www.gs-legal.com)

**LEGAL EXPERIENCE**

PARTNER, GOLDENBERG SCHNEIDER, L.P.A. (2003-present) Civil trial practice in state and federal courts, trial and appellate level, in securities, antitrust, products liability, toxic torts, consumer protection, and employment litigation including the Fair Labor Standards Act, with a focus on complex litigation and class actions.

ATTORNEY, MANLEY BURKE, L.P.A. (1998-2003) Civil trial practice in state and federal courts, trial and appellate level, in toxic torts, products liability, employment intentional torts, medical malpractice, wrongful death, with an emphasis on representation of workers injured or killed by toxic minerals or chemicals.

ATTORNEY, HERMANIES, MAJOR, CASTELLI & GOODMAN (1997-1998) General civil trial practice with an emphasis on personal injury and workers' compensation.

**Bar Admissions/ Licenses**

State of Ohio Trial and Appellate Courts (since 1997)  
Supreme Court of the United States  
United States Court of Appeals for the Sixth Circuit  
United States District Court for the Southern District of Ohio  
United States District Court for the Northern District of Ohio  
Admitted Pro Hac Vice in other Non-Ohio State Courts

**Activities/ Honors**

Ohio Association for Justice, Trustee/ Chair Section on Environmental Torts (2000-2004)  
American Association for Justice  
Cincinnati Bar Association  
Ohio Bar Association, Member Antitrust Law Section  
Arbitrator, Clermont County Court of Common Pleas  
Member, Cincinnati Bar Association Fee Arbitration Committee  
Fellow, Cincinnati Academy of Leadership for Lawyers, Class XII  
William O. DeSouchet Trial Advocacy Scholarship, University of Colorado School of Law  
Legal Aid and Defender Program Award, University of Colorado School of Law

**EDUCATION**

University of Colorado School of Law, J.D. 1997  
Trial advocacy scholarship winner  
Legal Aid and Defender Program Award  
Bradley University, B.A. 1994 (with honors)

**TODD B. NAYLOR**  
**PARTNER, GOLDENBERG SCHNEIDER, LPA**  
**[www.gs-legal.com](http://www.gs-legal.com)**

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Mr. Naylor's practice areas primarily include class actions, securities litigation, antitrust litigation, toxic and environmental torts, personal injury and wrongful death. He has appeared as lead counsel in courts all over the state of Ohio representing hundreds of clients at all stages of litigation. He has served on the Board of Trustees of the Ohio Academy of Trial Lawyers and chaired the section on Toxic, Environmental and Pharmaceutical Torts.

Mr. Naylor represented the State of Ohio in a securities lawsuit relating to the merger of Exxon and Mobil. Mr. Naylor has also represented multiple states, including Connecticut, in pharmaceutical pricing litigation. Mr. Naylor served on the trial team in antitrust litigation involving the oriented strand board industry that resulted in an aggregate settlement of over \$120,000,000. Mr. Naylor presently serves as lead and/or co-counsel in numerous multi-million dollar complex civil litigation cases throughout the State of Ohio and nationwide, including the Ford F-150 spark plug defect litigation, Google privacy litigation, and the Ohio BMV License Charge Litigation.

Mr. Naylor is admitted to practice in the State of Ohio, the United States Supreme Court, the United States Court of Appeals for the Sixth Circuit, and the United States District Court for the Southern and Northern Districts of Ohio. He serves as an Arbitrator for the Clermont County Common Pleas Court and the Cincinnati Bar Association Fee Arbitration Committee. Mr. Naylor is a Fellow with the Cincinnati Academy of Leadership for Lawyers.

**ROBERT B. SHERWOOD**

Goldenberg Schneider, LPA  
35 E. Seventh Street, Suite 600  
Cincinnati, Ohio 45202  
(513) 345-8291  
[www.gs-legal.com](http://www.gs-legal.com)

**LEGAL EXPERIENCE**

ASSOCIATE, GOLDENBERG SCHNEIDER, L.P.A. (2011-present) - Civil trial practice in state and federal courts, trial and appellate level, in securities, antitrust, products liability, toxic torts, and consumer protection, with a focus on complex litigation and class actions.

ASSOCIATE, SQUIRE, SANDERS & DEMPSEY, LLP (2007–2010) – Civil trial practice in firm's commercial litigation, complex litigation and class action practice groups.

ASSOCIATE, MEREDITH COHEN GREENFOGEL & SKIRNICK, Philadelphia, PA (2003-2007)  
Civil trial practice focusing on complex multi-defendant antitrust and securities class actions.

SUPERIOR COURT OF DELAWARE LAW CLERK, HON. JEROME O. HERLIHY (2002-2003)

**Bar Admissions/Licenses**

Supreme Court of Ohio  
Supreme Court of Pennsylvania  
United States District Court for the Southern District of Ohio  
United States District Court for the Eastern District of Pennsylvania

**Activities/Memberships**

Cincinnati Bar Association  
Ohio State Bar Association  
American Bar Association

**EDUCATION**

University of Pennsylvania Law School, Philadelphia, PA, J.D. 2002  
Bucknell University, Lewisburg, PA, B.A., Political Science, 1999  
Honors: *Phi Beta Kappa, magna cum laude*

Robert's practice focuses on complex civil and class action litigation. He represents clients in trial and appellate courts on the state and federal level and has experience representing both plaintiffs and defendants in multi-party disputes involving antitrust, securities, consumer fraud, civil conspiracy, qui tam, insurance coverage, product liability, and breach of contract claims.

Prior to joining Goldenberg Schneider, LPA, Robert was an associate with a large Cleveland-based corporate law firm and, prior to that, a small Philadelphia-based boutique firm specializing in antitrust class actions. Robert has served as a member of legal teams prosecuting multi-million dollar antitrust class actions, including *In re Dynamic Random Access Memory (DRAM)*

**ROBERT B. SHERWOOD**  
**ASSOCIATE, GOLDENBERG SCHNEIDER, LPA**  
[www.gs-legal.com](http://www.gs-legal.com)

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Antitrust Litigation, No.M-02-1486 (N.D. Cal.); *In re Carbon Black Antitrust Litigation*, MDL No. 1543 (D. Mass.); *In re OSB Antitrust Litigation*, No. 06-826 (E.D. Pa.); and *In re Mercedes Benz Antitrust Litigation*, No. 99-4311 (D. N.J.).

Robert received his Bachelor of Arts in 1999 from Bucknell University, from which he graduated *magna cum laude* with *Phi Beta Kappa* honors. After earning his Juris Doctor from the University of Pennsylvania in 2002, he subsequently served as law clerk to the Honorable Jerome O. Herlihy of the Superior Court of Delaware. Robert is admitted to practice in the State of Ohio and the Commonwealth of Pennsylvania, the United States District Courts for the Southern District of Ohio and Eastern District of Pennsylvania.