

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

FRANCIS WOODROW, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

SAGENT AUTO, LLC D/B/A SAGENT
LENDING TECHNOLOGIES,

Defendant.

Case No.: 2:18-cv-1054

Judge J.P. Stadtmueller

Magistrate Judge William E. Duffin

**DECLARATION OF MATTHEW R. WILSON IN SUPPORT OF PLAINTIFF FRANCIS
WOODROW'S MOTION FOR FEES, COSTS, AND INCENTIVE AWARD**

I, MATTHEW R. WILSON, declare as follows:

1. I am a principal attorney with the AV-rated law firm Meyer Wilson Co., LPA (“Meyer Wilson”), one of the counsel of record for Plaintiff. I respectfully submit this declaration in support of Plaintiff’s Motion for Preliminary approval of Class Settlement. I have personal knowledge of the facts set forth in this declaration, and could testify competently to them if called upon to do so.

Background and Experience

2. Meyer Wilson is a plaintiffs’ law firm with its primary office in Columbus, Ohio. With co-counsel, Meyer Wilson handles cases across the county. In addition to its practice on behalf of individual and institutional investors in arbitrations before the Financial Industry Regulatory Authority (“FINRA”), Meyer Wilson has a robust complex litigation and class action practice involving consumer, employment, financial, and securities matters. Attached hereto as **Exhibit**

A is a true and correct copy of Meyer Wilson's current firm resume, listing a substantial portion of the firm's experience in complex and class action litigation.

3. I graduated from Denison University, *magna cum laude*, in Philosophy in 1997, before graduating from the University of Virginia School of Law in 2000. I came to Meyer Wilson (then called Meyer & Associates Co., LPA) in 2006 as an associate and was promoted to named principal of the firm in 2012. Prior to coming to Meyer Wilson, I worked as an attorney at Jones Day in its Columbus office, where I defended class actions and litigated other complex civil cases. I have been the chair of the Class Action Committee of the Central Ohio Association for Justice since 2007. I was recognized this year and for the last several years as an Ohio "Super Lawyer." I have been a member of the Class Action Preservation Project with Public Justice. In addition to the California and Ohio state bars, I am also admitted to the Sixth, Seventh, Ninth, and Eleventh Circuit Courts of Appeals; to the Central, Eastern, Northern, and Southern Districts of California; the Northern and Southern Districts of Ohio; the Central and Northern Districts of Illinois; and the Eastern and Western Districts of Wisconsin. As set forth below, I have significant experience in litigating consumer class actions.

4. I and others at Meyer Wilson have been in the vanguard of the litigation of class action lawsuits under the Telephone Consumer Protection Act. Cases in which I have played a lead or active role include several of the largest TCPA class settlements:

a. *In re: Capital One Telephone Consumer Litigation*, Master Docket 1:12-cv-10064 (N.D. Ill.). Class Counsel in MDL proceeding involving privacy violations from autodialed and prerecorded message calls to cell phone by Capital One and several of its vendors. The case settled on a nationwide basis for over \$75.5 million, the largest TCPA settlement ever. Final approval, which I argued, was granted in February 2015.

b. *Mills v. HSBC Bank Nevada, N.A., et al.*, Case No. 3:12-cv-04010 (N.D. Cal.). Class Counsel in nationwide class action alleging privacy violations from autodialer calls to cell phones. Final approval, which I argued, of the \$39.975 million cash settlement was approved in February 2015.

c. *Smith v. State Farm, et al.*, Case No. 1:13-cv-02018 (N.D. Ill.). Class Counsel in nationwide class settlement alleging privacy violations from autodialer telemarketing calls by or on behalf of several large insurance companies to millions of cell phones. Final approval of approximately \$7 million cash settlement (with no claims process) was approved in December 2016.

d. *Cross v. Wells Fargo Bank, N.A.*, Case No. 1:15-cv-1270 (N.D. Ga.). (Class Counsel in nationwide class settlement of privacy violations from autodialer calls to customers and non-customers in connection with deposit accounts. Final approval of the \$30.6 million cash settlement was approved in February 2017.

e. *Markos v. Wells Fargo Bank, N.A.*, Case No. 1:15-cv-1156 (N.D. Ga.). Class Counsel in nationwide class settlement of privacy violations from autodialer debt collection calls to customers and non-customers in connection with mortgage accounts. Final approval of \$16.4 million cash settlement was approved January 2017.

f. *Prather v. Wells Fargo Bank, N.A.*, Case No. 1:15-cv-4231 (N.D. Ga.). Class Counsel in case alleging privacy violations from autodialer debt collection calls to customers and non-customers in connection with student loans. Final approval of a \$2 million cash settlement was granted August 2017.

g. *Luster v. Wells Fargo Dealer Services*, No. 1:15-cv-1058, (N.D. Ga.). Class Counsel in case alleging privacy violations from autodialer debt collection calls to

customers and non-customers in connection with auto loans. Final approval of a \$14.8 million cash settlement was granted December 2017.

h. *Ossola, et al. v. American Express Co., et al.*, Case No. 1:13-CV-4836 (N.D. Ill.). Class Counsel in nationwide class settlement alleging privacy violations from autodialer calls to cell phones. Final approval of \$8.7 million cash settlement was approved December 2016.

i. *Franklin v. Wells Fargo Bank, N.A.*, Case No. 14-cv-2349-MMA (S.D. Cal.). Class Counsel in a nationwide class settlement of privacy violations from autodialer calls to cell phones. Final approval, which I argued, of the \$13.89 million cash settlement was approved in January 2016.

j. *Rose v. Bank of America Corp., et al.*, Case No.5:11-cv-2390 (N.D. Cal.). Class Counsel in putative nationwide class action alleging privacy violations from autodialer calls to cell phones. The \$32 million cash settlement, the largest TCPA class settlement ever at the time, was approved in 2014.

k. *Bayat v. Bank of the West*, Case 3:13-cv-02376-EMC (N.D. Cal.). Class Counsel in putative nationwide class alleging privacy violations from autodialer calls to cell phones. Settlement of the \$3.35 million cash settlement approved in April 2015.

l. *Connor v. JPMorgan Chase Bank*, Case No. 10 CV 1284 DMS BGS (S.D. Cal. Mar. 12, 2012) (nationwide class settlement of \$11.67 million; final approval granted in early 2015).

m. *Wannemacher v. Carrington Mortgage Services LLC*, Case No. 8:12-cv-02016-FMO-AN (C.D. Cal.) (nationwide settlement of \$1.03 million common fund; final approval granted in December 2014).

n. *Steinfeld v. Discover Financial Services, et al.*, Case No. 3:12-cv-01118-JSW (N.D. Cal.) (nationwide settlement of \$8.7 million common fund; final approval granted in 2014).

o. *Arthur, et al. v. Sallie Mae, Inc.*, No. C10-0198 JLR (W.D. Wash.) (nationwide class settlement of \$24.15 million; at the time the largest TCPA class settlement; final approval granted in 2012).

5. I am also Class Counsel in a number of other still-pending TCPA cases that involve some of the largest banking and financial institutions in the world:

a. *Brown v. DirectTV, LLC, et al.*, Case No. 2:12-cv-08382 (C.D. Cal.) (Class Counsel in nationwide class action alleging privacy violations from calls with prerecorded messages sent to cell phones. After nearly eight years, the class was certified on March 29, 2019).

b. *Rice-Redding et al. v. Nationwide Mutual Automobile Ins. Co.*, Case No. 1:16-cv-03634-TCB (N.D.Ga.) (Class Counsel in this case in which final approval of the class settlement consisting of a \$5 million common fund is pending; preliminary approval was granted in March, 2019, with the final approval hearing scheduled for August, 2019.).

c. *Cordoba v. Directv LLC, et al.*, Case No. 1:15-cv-03755-MHC (N.D. Ga.) (Class Counsel in a nationwide class action alleging violations of federal Do Not Call List rules regulating illegal telemarketing. The class was certified by the district court in July, 2017; interlocutory 23(f) appeal is currently pending in the Eleventh Circuit.).

d. *Grogan v. Aaron's, Inc.*, Case No. 1:18-cv-02821-AT (N.D.Ga.) (Class Counsel in nationwide class action alleging unauthorized autodialer calls to cell phones).

e. *Postle v. Allstate Insurance Company*, Case No. 1:17-cv-7179 (N.D.Ill.)
(Class Counsel in nationwide class action alleging unauthorized autodialer calls to cell phones);

f. *Head v. Citibank, N.A.*, Case No. 3:18-cv-08189-MHB (D.Ariz.) (Class
Counsel in nationwide class action alleging unauthorized autodialer calls to cell phones).

g. *DeCapua v. Met. Prop. And Cas. Ins. Co.*, Case No. 1:18-cv-00590-WES-
LDA (D.R.I.) (Class Counsel in nationwide class action alleging unauthorized autodialer texts).

6. Meyer Wilson's experience in these cases, and my experience in particular, has provided me with expertise in the legal, factual, management, settlement, notice, and administration issues that characterize class actions like these related to consumer privacy.

7. In many of these matters I have been assisted by Michael J. Boyle, Jr., an associate attorney at Meyer Wilson. Mr. Boyle graduated *cum laude* from the University of Pennsylvania School of Law in 2008. Mr. Boyle clerked for the Honorable R. Guy Cole, Jr., of the United States Court of Appeals for the Sixth Circuit and worked at the international law firm Covington & Burling, LLP, prior to coming to work at Meyer Wilson in early 2013. Since coming to the firm, Mr. Boyle has worked primarily with me on our firm's class action cases. In 2014, 2016 and 2017, Mr. Boyle was recognized as an Ohio "Super Lawyer" Rising Star. Mr. Boyle is admitted to and in good standing in the bars of California and Ohio, as well as the Sixth, Seventh, Ninth, and Eleventh Circuit Courts of Appeals, the Northern, Eastern, Central, and Southern Districts of California, the Southern District of Ohio, the Central District of Illinois, and the Eastern and Western Districts of Wisconsin.

Work on This Matter

8. Work on this matter required Meyer Wilson to spend time that could have been spent on other matters. At various times during the litigation, this matter has consumed my time, along with the time of Meyer Wilson attorney Michael Boyle.

9. During the course of this litigation, Meyer Wilson has expended \$4,563.90 in expenses, including travel for a hearing, a deposition, and the mediation, as well as for research costs and other litigation expenses.

10. In light of the risks inherent in class action litigation, including TCPA class action litigation such as the *Balschmiter v. TD Bank* case, in which Plaintiff lost her class certification motion in this District on the eve of trial, as well as my experience with more than a dozen large TCPA class settlements, it is my opinion that the pending settlement is an excellent result for consumers and members of the class. The settlement is well within the range of other TCPA settlements on a dollars-per-class-member basis.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 24th day of May 2019 at Columbus, Ohio.

Dated: May 24, 2019

By: /s/ Matthew R. Wilson
Matthew R. Wilson

Meyer Wilson

The law firm of Meyer Wilson Co., LPA is devoted to the prosecution of consumer and securities class actions, other mass actions, and the representation of investors with claims against the securities industry. The Martindale-Hubbell AV-rated firm prosecutes individual cases and class actions nationwide on behalf of individuals in arbitration and litigation in court. Since its inception, Meyer Wilson has achieved jury awards, arbitration awards, and settlements with combined value of hundreds of millions of dollars on behalf of its clients.

Meyer Wilson has prosecuted numerous nationwide class actions as court-appointed Lead and Co-Lead Class Counsel in federal and state courts throughout the country, including one class action that resulted in what is believed to be the largest jury verdict in Ohio's history at that time and was also reported to be the country's largest securities class action jury verdict in history. In that case, the firm's founding principal David Meyer was appointed Co-Lead Class Counsel action against Prudential Securities. The firm represented more than 250 investors from Marion, Ohio. The jury trial lasted several weeks and the jury returned a Plaintiffs' verdict in excess of \$261 million. The case was *Burns, et al. v. Prudential Securities, Inc.*, Case No. 99CV0438, in the Court of Common Pleas of Marion County, Ohio. The case was pending for more than seven years. Following an appeal of the jury verdict by Prudential Securities, Class Members received in excess of 100% recovery of their actual losses, even after payment of attorneys' fees and expenses.

Meyer Wilson has been appointed class counsel in numerous other class actions that have resulted in significant recoveries. Recent successes in TCPA class action cases in which Meyer Wilson served as Lead or Co-Lead counsel include:

- *In re: Capital One Telephone Consumer Litigation*, Master Docket 1:12-cv-10064 (N.D. Il) (Class Counsel in MDL proceeding involving claims of improper autodialer and prerecorded message calls to cells phone by Capital One and several of its vendors. The case settled on a nationwide basis for over \$75.5 million, the largest TCPA settlement ever. Final approval was granted in February 2015.).
- *Mills v. HSBC Bank Nevada, N.A., et al.*, Case No. 3:12-cv-04010 (N.D. Cal.) (Class Counsel in nationwide class action alleging unauthorized autodialer calls to cell phones. Final approval of the \$39.975 million cash settlement was approved in February 2015.).

- *Cross v. Wells Fargo Bank, N.A.*, Case No. 1:15-cv-1270 (N.D.Ga.) (Class Counsel in nationwide class settlement of unauthorized autodialer debt collection calls to customers and non-customers in connection with deposit accounts. Final approval of \$30.6 million cash settlement was approved February 2017).
- *Markos v. Wells Fargo Bank, N.A.*, Case No. 1:15-cv-1156 (N.D.Ga.) (Class Counsel in nationwide class settlement of unauthorized autodialer debt collection calls to customers and non-customers in connection with mortgage accounts. Final approval of \$16.4 million cash settlement was approved January 2017).
- *Prather v. Wells Fargo Bank, N.A.*, Case No. 1:15-cv-4231 (N.D.Ga.) (Class Counsel in case alleging unauthorized autodialer debt collection calls to customers and non-customers in connection with student loans. Final approval of a \$2 million cash settlement was granted August 2017).
- *Luster v. Wells Fargo Dealer Services*, No. 1:15-cv-1058, (N.D. Ga.) (Class Counsel in case alleging unauthorized autodialer debt collection calls to customers and non-customers in connection with auto loans. Final approval of a \$14.8 million cash settlement was granted December 2017).
- *Smith v. State Farm, et al.*, Case No. 1:13-cv-02018 (N.D. Il.) (Class Counsel in nationwide class settlement alleging unauthorized autodialer telemarketing calls by or on behalf of several large insurance companies to cell phones. Final approval of \$7 million cash settlement was approved December 2016).
- *Ossola, et al. v. American Express Co., et al.*, Case No. 1:13-CV-4836 (N.D. Il.) (Class Counsel in nationwide class settlement alleging unauthorized autodialer calls to cell phones. Final approval of \$8.7 million cash settlement was approved December 2016).
- *Franklin v. Wells Fargo Bank, N.A.*, Case No. 14-cv-2349-MMA (S.D.Cal.) (Class Counsel in a nationwide class settlement of unauthorized autodialer calls to cell phones. Final approval of \$13.89 million cash settlement was approved January 2016).
- *Rose v. Bank of America Corp., et al.*, Case No.5:11-cv-2390 (N.D. Cal.) (Class Counsel in putative nationwide class action alleging unauthorized autodialer calls to cell phones. The \$32 million cash settlement was approved in 2014.).
- *Bayat v. Bank of the West*, Case 3:13-cv-02376-EMC (N.D. Cal.) (Class Counsel in putative nationwide class alleging unauthorized autodialer calls to cell phones. Settlement of \$3.35 million cash settlement approved in April 2015).

- *Connor v. JPMorgan Chase Bank*, Case No. 10 CV 1284 DMS BGS (S.D. Cal. Mar. 12, 2012) (Class Counsel in nationwide class alleging unauthorized autodialer calls to cell phones. Settlement of \$11.67 million was granted final approval granted in early 2015).
- *Wannemacher v. Carrington Mortgage Services, LLC*, Case No. 8:12-cv-2016-FMO-AN (C.D. Cal.) (Co-Lead Class Counsel in nationwide class action alleging unauthorized autodialer calls to cell phones. On December 23, 2014, the Court approved a \$1.03 million class settlement).
- *Steinfeld v. Discover Financial Services*, Case No. 3:12-cv-01118-JSW (N.D. Cal.) (Counsel for the class in action alleging unauthorized autodialer calls to the cell phones. On March 31, 2014, the court approved an \$8.7 million class settlement.)
- *Arthur v. Sallie Mae, Inc.*, Case No. C10-0198 (W.D. Wash) (Co-Lead Class Counsel in putative nationwide class action alleging unauthorized autodialer calls to the cell phones of borrowers who took out student loans with the national lender. The \$24.15 million nationwide settlement was granted final approval on September 17, 2012. It was believed to be, at the time, the largest TCPA settlement since that statute was enacted.)

Meyer Wilson's successes in non-TCPA cases include:

- *Yarger, et al. v. ING Bank FSB*, Case No. 1:11-cv-00154-LPS (D. Del.) (Co-Lead Class Counsel in nationwide class action alleging misrepresentations related to marketing of mortgage note modifications. A 10-state class was certified in 2012. On October 7, 2014, the Court granted final approval to a \$20.3 million class settlement).
- *Lazebnik v. Apple, Inc.*, Case No. 5:13-cv-04145-EJD (N.D. Cal.) (Co-Lead Class Counsel in nationwide class action alleging fraudulent marketing of a "season pass" of the television show *Breaking Bad* on Apple's iTunes service. In response to the lawsuit, Apple provided a full credit to the entire proposed class. On October 21, 2014, the parties settled all remaining issues).
- *Smith v. Regents of the University of California*, Case No. RG08-410004 (Alameda County, California, Superior Court) (Co-Lead Counsel in California statewide action alleging breaches of medical data privacy. The class was certified on July 9, 2009, and the case settled in late 2011).
- *Mack v. hh gregg, Inc., et al.*, Case No. 1:08-cv-664 (S.D. Indiana) (Co-Lead Counsel in putative class action involving alleged incorrect installation of dryers. Nationwide class settlement was granted final court approval on March 18, 2011).

- *Kaiser-Flores v. Lowe's Home Centers, Inc.*, Case No. 5:08-CV-00045 (W.D. North Carolina) (Co-Lead Counsel in putative class action involving alleged incorrect installation of dryers. Nationwide class settlement, including cash relief for class members, was granted final court approval on December 15, 2010).
- *Frankle v. Best Buy Stores, L.P.*, Case No. 08-5501 (D. Minnesota) (Co-Lead Counsel in putative class action involving alleged incorrect installation of dryers. Nationwide class settlement was granted final court approval on November 9, 2010).
- *Sanbrook v. Office Depot, Inc.* Case No. 07CV096374 (N.D. Cal.) (Co-Lead Class Counsel in California statewide certified class action involving misleading service plan terms and other related issues. The case settled for cash relief for class members, and was granted final approval by the Court on November 23, 2010).
- *Stout v. Jeld Wen, Inc.* Case No. 1:08-CV-652 (N.D. Ohio) (Lead Class Counsel in putative nationwide class action alleging defective windows. The Court granted final approval to the nationwide settlement on August 8, 2010).
- *Fulford v. Logitech, Inc.*, Case No. 08-cv-02041 (N.D. Cal.) (Co-Lead Class Counsel in class action alleging deceptive advertising of a consumer product. The nationwide class action settlement was granted final court approval on March 5, 2010.)
- *Schweinfurth, et al. v. Motorola, Inc.* Case No. 1:05-CV-0024 (N.D. Ohio) (Co-Lead Class Counsel in nationwide class action alleging defective cellular phones, resulting in nationwide settlement with cash relief for class members, approved by the Court on January 25, 2010).
- *Steele v. Pergo, Inc.* Case No. CV07-1493 (D. Oregon) (Lead Class Counsel in class action alleging defective laminate flooring. The nationwide settlement was granted final court approval on July 7, 2009.).
- *Jenkins v. Hyundai Motor Finance Co.*, Case No. 2:04-cv-00720 (S.D. Ohio) (Appointed Co-Lead Class Counsel in a certified class action alleging defective notices in connection with the repossession and subsequent disposition of vehicles. The case settled after certification, and was approved by the Court on July 7, 2009.)
- *Guisseppone v. Wendy's International, Inc., et al.*, Case No. 08-CVC-4-6219 (Common Pleas Court, Franklin County, Ohio) (Liaison Counsel in the derivative and class action suit involving the sale of Wendy's to the parent

company of Arby's. The nationwide class action settlement was approved by the Court on July 1, 2009.)

- *In Re Apple iPod Nano Products Liability Litigation*, MDL Docket No. M: 06-cv-01754-RMW (N.D. Cal.) (Co-Lead Counsel in the Multi-District Litigation proceeding in which nationwide class actions allege that screens on iPod Nanos were susceptible to excessive scratching under normal use and were therefore defective. A nationwide settlement of the related case in state court, including cash relief for consumers, was granted final approval by the Court on April 28, 2009.)
- *Health Science Products LLC. v. Sage Software SB, Inc.*, Case No. 1:05-CV-03329-RWS (N.D. Ga.) (Co-Lead Class Counsel in nationwide class action settlement involving allegedly defective software. Settlement included cash relief for Class Members. It was approved by the Court on April 24, 2008.)
- *Wiatrowski, et al. v. Sears, Roebuck & Co., et al.*, Case No. 1:06-CV-00637 (N.D. Ohio) (Co-Lead Counsel in a nationwide class action settlement that provided cash reimbursement of Class Members for out of pocket losses. The court granted final approval on December 20, 2007).
- *Bowen, et al. v. Whirlpool Corp., et al.*, Case No. CV05-8067 (C.D. Cal.) (Co-Class Counsel in nationwide class action alleging defective water heaters. Final approval was granted in the nationwide class settlement on October 11, 2007.)
- *Opperman, et al. v. Cellco Partnership, et al.*, Case No. BC326764 (Superior Court of the State of California, Los Angeles County 2006) (Nationwide settlement approved in 2006. Provided, *inter alia*, for the option to return improperly marketed cellular telephone for a full refund of the purchase price and cancellation of a Class Member's contract without early termination penalties).
- *Heitbrink, et al. v. eMachines*, Case No. G-4801-CI-200501229 (Court of Common Pleas of Lucas County, Ohio 2006) (Nationwide settlement provided cash relief for qualified Class Members for purchasers of defective notebook computers. The Court granted final approval on December 21, 2006.)
- *Martino, et al. v. Motorola, Inc.* Case No. 03-CIV-1562 (Court of Common Pleas, Medina County, Ohio 2004) (Nationwide class action settlement provided relief valued in the millions of dollars and included cash reimbursement of Class Members for out of pocket losses. The Court granted final approval on March 2, 2005)

Meyer Wilson currently serves as Class Counsel in numerous pending class actions throughout the country, including the following:

- *Brown v. DirectTV, LLC, et al.*, Case No. 2:12-cv-08382 (C.D. Cal.) (Class Counsel in a nationwide class action alleging unauthorized autodialer calls to cell phones. The class was certified on March 29, 2019.).
- *Cordoba v. Directv LLC, et al.*, Case No. 1:15-cv-03755-MHC (N.D. Ga.) (Class counsel in a certified nationwide class action alleging violations of federal Do Not Call List rules regulating illegal telemarketing; an appeal in this case is pending in the 11th Circuit.).
- *Rice-Redding et al. v. Nationwide Mutual Automobile Ins. Co.*, Case No. 1:16-cv-03634-TCB (N.D.Ga.) (Class Counsel in nationwide class action alleging unauthorized autodialer calls to cell phones; a \$5 million class settlement is currently pending.).
- *John Doe v. CVS Health Corp. et al.*, Case No. 2:18-cv-00488 (S.D. Ohio) (Class counsel in a class action alleging illegal disclosure of HIV status of patients as part of a mass mailing campaign; a \$4.4 million class settlement is currently pending).
- *Woodrow v. Sagent Auto LLC*, Case No. 2:18-cv-1054 (E.D.Wisc.) (Class Counsel in nationwide class action alleging unauthorized autodialer calls to cell phones; a \$1.75 million class settlement is currently pending.)
- *Goodman v. JP Morgan Investment Management, Inc.*, Case No. 2:14-cv-00414 (S.D. Ohio) (Local Counsel in class action case alleging improper and excessive mutual fund management fees charged to investors).
- *Brown & Szaller Co., LPA v. Waste Management of Ohio, Inc.*, Case No. CV-16-859588 (Cuyahoga Cty. Ct. of Common Pleas [OH]) (Class counsel in a state-wide class action alleging fraudulent and deceptive price increases).
- *Grogan v. Aaron's, Inc.*, Case No. 1:18-cv-02821-AT (N.D.Ga.) (Class Counsel in nationwide class action alleging unauthorized autodialer calls to cell phones).
- *Postle v. Allstate Insurance Company*, Case No. 1:17-cv-7179 (N.D.Ill.) (Class Counsel in nationwide class action alleging unauthorized autodialer calls to cell phones).
- *Browning v. The Ohio National Life Ins. Co.*, Case No. 1:18-cv-00763-SJD-SKB (S.D. Ohio) (Class Counsel in a nationwide class action involving commissions due to registered brokers who sold annuities to consumers).

- *DeCapua v. Met. Prop. And Cas. Ins. Co.*, Case No. 1:18-cv-00590-WES-LDA (D.R.I.) (Class Counsel in nationwide class action alleging unauthorized autodialer text messages).
- *Schultz Transfer Systems, Inc. v. Fleetcor Technologies Operating Co., LLC*, Case No. 1:19-cv-00558-LMM (N.D.Ga.) (Class Counsel in nationwide class action alleging fraudulent billing and marketing practices associated with the Fuelman fuel card program).
- *Moorhead v. HKA Enterprises, LLC*, Case No. 7:19-cv-00265-DCC (D.S.C.) (Class Counsel in a nationwide class action involving improper disclosure and handling of pre-employment background checks)
- *Head v. Citibank, N.A.*, Case No. 3:18-cv-08189-MHB (D.Ariz.) (Class Counsel in nationwide class action alleging unauthorized autodialer calls to cell phones).
- *Myers v. Memorial Health System Marietta Memorial Hospital*, Case No. 2:15-cv-02956-ALM (S.D.Ohio) (Class Counsel in a Rule 23 certified class of direct patient care professionals who had meal breaks allegedly improperly deducted from their wages).

DAVID P. MEYER is the founding principal of Meyer Wilson.

Mr. Meyer is recognized as one of the top litigation attorneys in Ohio. Thomson Reuters named him one of the Top 100 lawyers in Ohio and one of the Top 50 in Columbus in 2012. He is also listed in Best Lawyers in America® (2012) in multiple categories and the American Trial Lawyers Association selected him as one of the Top 100 Trial Attorneys in Ohio.

Mr. Meyer has the honor of winning the largest jury verdict in Ohio history; a \$261 million class action verdict against Prudential Securities on behalf of 200 individuals.

Mr. Meyer has earned a national reputation for successfully representing investors who are victims of investment fraud. He has represented over eight hundred individual investors from all across the country in FINRA/NASD securities arbitration and litigation cases against all major brokerage firms and won verdicts, judgments and settlements of hundreds of millions of dollars in losses on their behalf.

He has also been appointed lead or co-lead counsel by state and federal courts throughout the country in numerous consumer class actions.

Mr. Meyer is a recognized authority on securities arbitration procedure and often serves as a guest lecturer on securities fraud and stockbroker malpractice. Numerous bar associations have invited him to speak to attorneys at educational seminars. Mr. Meyer also provides education to investor groups, accountants, and other financial professionals concerning investor protection.

Mr. Meyer holds a business administration degree from Ohio University and a law degree and master's degree in tax law from Ohio's Capital University Law School. He is licensed to practice in the states of Ohio and Michigan.

MATTHEW R. WILSON is a principal attorney with the firm.

Mr. Wilson prosecutes the firm's class action cases. During the past eight years, Mr. Wilson has served as court-appointed class counsel to more than twenty-five certified classes, in settlement or in litigation.

Recently, Mr. Wilson has been court-appointed class counsel in numerous cases across the country in which the defendants were alleged to have made unauthorized calls and sent text messages to cellular telephones through the use of an automated telephone dialing system and/or an artificial or prerecorded voice, in violation of the TCPA. The TCPA class settlements - over the last five years alone - in which Mr. Wilson has been class counsel have provided over \$250 million in cash for consumers.

Several of Mr. Wilson's cases have resulted in nationwide settlements for consumers that are among the largest since the TCPA was enacted in 1991, including *In re: Capital One Telephone Consumer Protection Act Litigation*, 1:12-cv-10064 (N.D. Ill.) (\$75.5 million – largest all-cash TCPA class settlement) (final approval granted February, 2015; appeal pending); *Wilkins v. HSBC Bank Nevada, N.A. et al.*, 1:14-cv-00190 (N.D. Ill.) (\$39.9 million – third-largest all-cash TCPA class settlement); *Rose v. Bank of America Corp.*, 5:11-cv-02390-EJD (N.D. Cal.) (\$32 million – largest all-cash TCPA class settlement at the time final approval was granted in 2014); and *Arthur, et al. v. Sallie Mae, Inc.*, No. 10-cv-198-JLR (W.D. Wash.) (\$24.15 million – largest all-cash TCPA class settlement at the time final approval was granted).

In another matter, Mr. Wilson was co-lead counsel in *Yarger v. ING Bank, fsb*, 1:11-cv-00154-LPS (D. Del.), representing consumers who alleged that ING breached its promise to allow them to refinance their home mortgages for a fixed flat fee of \$500 or \$750, and instead charged a higher fee. In 2012, the court certified a class of consumers in ten states who purchased or retained an ING adjustable rate mortgage. In October 2014, the court approved a \$20.35 million all-cash class settlement.

In addition to Mr. Wilson's complex civil litigation practice, his pro bono services have included the representation of indigent criminal defendants in Sixth Circuit appeals in Criminal Justice Act cases, including one case in which the Sixth Circuit vacated the criminal sentence of Mr. Wilson's indigent client on appeal. See *United States v. Boards*, 202 Fed. Appx. 869 (6th Cir. 2006). He has been a frequent Interfaith Legal Services volunteer, where he has assisted low-income clients with all manner of legal difficulties, trying one such case to a jury. He is also a member of the National Association of Consumer Advocates.

Mr. Wilson graduated *magna cum laude*, Phi Beta Kappa, in Philosophy from Denison University in Granville, Ohio. He received his law degree from the University of Virginia Law School in Charlottesville, Virginia. He is admitted to practice in Ohio and California.

CHAD M. KOHLER is an attorney with the firm.

Mr. Kohler devotes his practice to the representation of investors and consumers who have claims against their investment advisors, brokerage firms and insurance companies.

Prior to joining Meyer Wilson, Mr. Kohler was a stockbroker at one of the nation's largest brokerage firms, where he obtained his Series 7, 63 and 65 securities licenses. Mr. Kohler also has experience in managing regulatory compliance matters at two SEC-registered investment adviser firms, including holding the position of Chief Compliance Officer.

He also has significant experience as a practicing attorney. Beginning in 2001, Mr. Kohler's practice focused on business litigation involving contracts, fiduciary relationships and business torts.

Mr. Kohler received his law degree from Case Western Reserve University School of Law in 2001. He is admitted to practice law in the state of Ohio.

Mr. Kohler is a member of the Ohio State Bar Association, the Central Ohio Association for Justice, the Franklin County Democratic Lawyers Club, and the Public Investors' Arbitration Bar Association (PIABA), a national organization of attorneys who represent investors in securities disputes.

MICHAEL J. BOYLE, JR. is an attorney with the firm.

Mike Boyle represents investors in FINRA arbitrations and also prosecutes the firm's class action cases on behalf of consumers and investors.

In 2014, 2016 and 2017, Mike was named a "Rising Star" by *Ohio Super Lawyers Magazine*.

Prior to joining the firm, Mike clerked for the Honorable R. Guy Cole, Jr., a judge on the United States Court of Appeals for the Sixth Circuit during the 2011-2012 term. Mike began his career with the international law firm Covington & Burling, LLP, in San Francisco. He also worked for the San Francisco firm Carroll Burdick & McDonough, LLP and the Columbus firm Carpenter Lipps & Leland, LLP. With these firms, Mike handled a wide spectrum of legal cases, from nine-figure bankruptcies and insurance coverage actions to individual real estate disputes.

Mike has also maintained a significant pro bono practice. In the aftermath of Hurricane Katrina, Mike volunteered with a free legal clinic run by Loyola University of New Orleans, in which he provided a wide range of services to displaced residents of Louisiana. Mike also served with the San Francisco Bar Association's Legal Assistance project, providing free legal assistance to low income residents of the Bay Area.

Mike attended the University of Pennsylvania School of Law, where he graduated with honors in 2008. He also served as a Senior Editor of the University of Pennsylvania Law Review, and was a finalist in the Keedy Cup Moot Court competition. Prior to law school, Mike graduated with honors from Dominican University in River Forest, Illinois, with a focus on political theory. Mike is a member of the California and Ohio Bars, and is admitted to the United States Court of Appeals for the Sixth and Ninth Circuits, as well as the United States District Courts for the Northern, Central, Southern, and Eastern Districts of California, the Southern District of Ohio, the Central and Northern Districts of Illinois, and the Eastern and Western Districts of Wisconsin.

COURTNEY YEAGER is an attorney with the firm.

As an associate attorney with Meyer Wilson, Courtney Yeager devotes her practice to the representation of investors who have claims against their investment advisors and brokerage firms. She also assists in prosecution of the firm's class action cases.

Ms. Yeager joined Meyer Wilson as a law clerk in 2010. She graduated *magna cum laude* from Capital University Law School in 2012. While at Capital Law, she participated in Moot Court and coordinated the law school's pro bono legal volunteering program. She is a member of the Order of the Curia, as well as the Order of the Barristers for excellence in scholastic brief writing and oral advocacy.

Prior to joining Meyer Wilson, Ms. Yeager interned at the Franklin County Municipal Court under the Honorable Anne Taylor, the Federal Public Defender's Office for the Southern District of Ohio, the Ohio State University Office of Legal Affairs, and the Parliament of Canada.

Courtney also regularly volunteers at the Interfaith Legal Clinic, a pro bono clinic that operates through the Legal Aid Society. Interfaith is a monthly clinic where low-income individuals with legal problems can meet with an attorney for free legal advice.

Ms. Yeager is admitted to practice law in the state of Ohio. She is currently a member of the Public Investors Arbitration Bar Association (PIABA), the Central Ohio Association for Justice (COAJ), the Ohio Association for Justice (OAJ), and the Ohio State Bar Association (OSBA). Ms. Yeager is an active participant in the Ohio Supreme Court Lawyer to Lawyer Mentoring Program.