

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FRANKIE LIPSETT, individually and
on behalf of all others similarly situated,

Plaintiff,

-against-

BANCO POPULAR NORTH AMERICA,
d/b/a POPULAR COMMUNITY BANK

Defendant.

Case No.: 1:22-cv-03901-MMG

**DECLARATION OF CLASS COUNSEL
IN SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT;
FINAL CERTIFICATION OF SETTLEMENT CLASS;
PAYMENT OF ATTORNEY FEES AND REIMBURSEMENT OF COSTS TO CLASS COUNSEL;
AND PAYMENT OF SERVICE AWARD TO THE CLASS REPRESENTATIVE**

We, Michael R. Reese and Jeffrey D. Kaliel (collectively “Class Counsel”), declare as follows:

1. We are counsel of record for Plaintiff and the proposed Class in the above-captioned matter. We submit this declaration in support of Plaintiff’s motion for final approval of the Settlement Agreement¹; final certification of the Settlement Class; payment of attorney fees and reimbursement of costs to Class Counsel; and payment of a service award to the Class Representative. Unless otherwise noted, we have personal knowledge of the facts set forth in this declaration and could and would testify competently to them if called upon to do so.

2. Class Counsel are highly experienced in consumer class action litigation, as demonstrated by their firm resumes. A copy of the firm resume of Reese LLP is attached hereto as Exhibit 1 and a copy of the firm resume of KalielGold PLLC is attached hereto as Exhibit 2.

3. Class Counsel collectively have decades of experience litigating consumer class actions against financial institutions and have litigated and settled dozens of class actions involving wrongful overdraft fees, insufficient fund fees, and other types of wrongful fees.

4. Class Counsel have brought their significant experience to bear in litigating and settling this case.

5. Class Counsel devoted substantial time and resources to this action, including investigating the claims against Defendant; developing the legal claims at issue; engaging in extensive motion practice—both at the District Court and Second Circuit level; engaging in discovery; and researching the likelihood of success and reasonable parameters under which courts have approved settlements in comparable cases.

¹ Unless otherwise indicated, capitalized terms shall have the meaning that the Settlement Agreement ascribes to them. *See* ECF No. 49 (“Settlement” or “Settlement Agreement”).

6. On May 2, 2024 in San Juan, Puerto Rico, Class Counsel mediated with the Honorable Jose Fusté (Ret.)—the former chief judge for the federal district court of Puerto Rico. After a full day of mediation, Judge Fusté (Ret.) made a mediator’s proposal of a common fund of \$1.5 million, which both parties accepted in principle. Prior to mediating with Judge Fusté (Ret.), Defendant provided Plaintiff’s counsel with a significant amount of data regarding the fees at issue on debit card transactions that did not overdraw an account at the time they were authorized (“OD fees”). Class Counsel spent significant time conferring with Plaintiff and analyzing data related to the assessment of the disputed fees at issue. Based upon this information, the Parties were able to evaluate the strengths and weaknesses of the case, including, but not limited to, the overall dollar amount of the OD fees at issue.

7. The Parties continued to work throughout the months following mediation to negotiate all of the terms of the settlement, eventually culminating in the Settlement Agreement.

8. Plaintiff’s objective in filing the action was to compensate Settlement Class Members allegedly wrongfully charged OD fees. Discovery revealed that approximately \$3.25 million of OD fees are at issue, with the average OD fee charged to Class Members being \$34.

9. Through the Settlement Agreement, Plaintiff achieved substantial relief for the Settlement Class. The Settlement Fund represents approximately 46% of the OD fees allegedly wrongfully charged to Settlement Class Members. Defendant also agreed to not reinstate—for a period of at least five years—the OD fee assessment practice at the heart of this case. This prospective relief will, Class Counsel estimates, save the Settlement Class accountholders approximately \$3 million over the next five years.

10. The Parties negotiated and reached agreement regarding attorney fees, costs, and expenses only after agreeing on all material terms of the Settlement.

11. Class Counsel then prepared the motion for preliminary approval, which was granted by this Court on July 26, 2024. Additionally, in connection with the Settlement, Class Counsel has responded to inquiries from Class Members and coordinated the settlement process with the Claims Administrator. Class Counsel has and will also expend additional time preparing for the final approval hearing as well as administering the Settlement after final approval.

12. The named Plaintiff performed important and valuable services for the benefit of the Settlement Class including, but not limited to, meeting, conferring, and corresponding with Class Counsel throughout the case as needed for the efficient process of this litigation.

13. The named Plaintiff possesses the same interests as the proposed Settlement Class Members because Plaintiff and the Settlement Class Members were all allegedly injured in the same manner. Accordingly, the named Plaintiff's claims are not adverse to other Class Members; to the contrary, the named Plaintiff's claims are aligned with that of other Class Members. Additionally, Class Counsel are not representing clients with interests at odds with the interests of the Settlement Class Members and are not acting as class representatives.

14. Reese LLP and KalielGold PLLC have a fee-split agreement that does not affect the relief to the Class Members. That agreement is that Reese LLP will receive 50% of attorney fees and KalielGold PLLC will receive the other 50% of the attorney fees.

15. The attorneys of Reese LLP and KalielGold PLLC have spent 476 hours to date on this matter for a lodestar of \$583,520. Moreover, Class Counsel has litigated this matter completely on a contingency basis, having not been paid anything to date for their considerable efforts.

16. Reese LLP hours and billing rates are set forth below:

<u>TIMEKEEPER</u>	<u>POSITION</u>	<u>HOURS</u>	<u>RATE/HOUR</u>	<u>TOTAL</u>
Michael R. Reese	Founder and Managing Partner	121	\$1600	\$193,660
Sue J. Nam	Partner	118	\$1600	\$188,800
TOTAL		239		\$382,460

17. KalieGold PLLC hours and billing rates are set forth below:

<u>TIMEKEEPER</u>	<u>POSITION</u>	<u>HOURS</u>	<u>RATE/HOUR</u>	<u>TOTAL</u>
Sophia Gold	Partner	188	\$839	\$157,732
Jeffrey Kalie	Partner	31	\$948	\$29,388
Brittany Bertolini	Senior Counsel	16	\$839	\$13,424
Neva Garcia	Paralegal	2	\$258	\$516
TOTAL		237		\$201,060

18. The respective hourly rates for the partners and other attorneys at Reese LLP and KalieGold PLLC are the same as the regular current rates that have been approved by courts in other class litigation. *See e.g. Vela, et al. v. AMC Networks Inc.*, case no. 1:23-cv-02524-ALC, ECF No. 64 (S.D.N.Y. May 16, 2024); *Armstrong v. Kimberly-Clark Corp.*, 2024 WL 1123034, at *6 (N.D. Tex. March 14, 2024); *see also An v. Despins et al.*, 2024 WL 1157281, at *4 (S.D.N.Y. Mar. 18, 2024) (finding hourly rates of \$1,990 for a Davis Polk & Wardwell LLP partner and \$1,440 for a Davis Polk & Wardwell LLP counsel to be reasonable and in line with prevailing market rates in the district).

19. Class Counsel also incurred the following costs and expenses in this matter. The chart below provides a breakdown of these costs and expenses:

<u>EXPLANATION</u>	<u>TOTAL AMOUNT</u>
Filing and Other Court Fees	\$ 804.00
Mediation Costs	
<u>Mediator's Fee:</u>	\$ 3,231.24
\$1,925	
<u>Travel Costs to Mediation in San Juan:</u>	
Uber to Airport NYC: \$53.95	
Airplane (NYC to San Juan): \$402.38	
Hotel in San Juan: \$575.28	
Uber to Hotel in San Juan: \$58.86	
Uber in San Juan: \$13.84	
Uber in San Juan: \$11.38	
Meal in San Juan: \$36.44	
Uber from Mediation to SJU: \$29.25	
<u>Uber from NYC Airport to home: \$124.86</u>	
Total Mediation Travel Costs: \$1,306.24	
Expert/Consultant:	\$2,600
Travel for Court Appearances:	\$870.15
TOTAL	\$7,505.39

20. Based on our extensive experience, we believe the Settlement to be an outstanding outcome for consumers. We have achieved significant monetary results on behalf of the Class as well as significant injunctive relief.

21. Although Class Counsel believe Plaintiff has a strong chance on the merits, Plaintiff might lose at trial or on appeal. Indeed, Defendant continues to deny all of Plaintiff's allegations and maintain that it will vigorously defend itself on the merits should this matter proceed in litigation. Defendant has stated that but for the Settlement, it would vigorously oppose class certification. And Defendant likely would challenge Plaintiff at every litigation step, presenting significant risks while increasing costs. Under the circumstances, Plaintiff and Class Counsel appropriately determined that Settlement outweighs the gamble of continued litigation. Class Counsel believe this Settlement provides significant relief to the Settlement Class Members and is fair, reasonable, adequate, and in the best interests of the Settlement Class.

We declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 25th day of November 2024, at New York, New York

/s/ Michael R. Reese

MICHAEL R. REESE

Executed this 25th day of November 2024, at Washington, D.C.

/s/ Jeffrey D. Kaliel

JEFFREY D. KALIEL

EXHIBIT 1

REESE LLP

Reese LLP represents consumers in a wide array of class action litigation throughout the nation. The attorneys of Reese LLP are skilled litigators with years of experience in federal and state courts. Reese LLP is based in New York, New York with offices also in California and Minnesota.

Recent and current cases litigated by the attorneys of Reese LLP on behalf of consumers include the following:

In re Fairlife Milk Products Marketing and Sales Practices Litig., case no. 1:19-cv-03924 (N.D. Illinois)(case involving milk products allegedly mislabeled); *In re Hill's Pet Nutrition, Inc. Dog Food Products Liability Litig.*, case no. 19-md-2887-JAR-TT (D. Kansas)(case involving contaminated pet food); *Hasemann v. Gerber Products Co.*, case no. 15-cv-02995-MKB-RER (E.D.N.Y.)(case involving misrepresentation of health benefits of baby formula in violation of New York consumer protection laws); *Worth v. CVS Pharmacy, Inc.*, case no. 16-cv-00498 (E.D.N.Y.)(class action for alleged misrepresentations regarding health benefits of dietary supplement); *Roper v. Big Heart Pet Brands, Inc.*, case no. 19-cv-00406-DAD (E.D. Cal.)(class action regarding pet food); *Ackerman v. The Coca-Cola Co.*, 09-CV-0395 (JG) (RML) (E.D.N.Y.)(class action for violation of California and New York's consumer protection laws pertaining to health beverages); *Rapaport-Hecht v. Seventh Generation, Inc.*, 14-cv-9087-KMK (S.D.N.Y.)(class action for violation of California and New York's consumer protection laws pertaining to personal care products); *Berkson v. GoGo, LLC*, 14-cv-1199-JWB-LW (E.D.N.Y.)(class action regarding improper automatic renewal clauses); *Chin v. RCN Corporation*, 08-cv-7349 RJS (S.D.N.Y.)(class action for violation of Virginia's consumer protection law by I.S.P. throttling consumers' use of internet); *Bodoin v. Impeccable L.L.C.*, Index No. 601801/08 (N.Y. Sup. Ct.)(individual action for conspiracy and fraud); *Huyer v. Wells Fargo & Co.*, 08-CV-507 (S.D. Iowa)(class action for violation of the RICO Act pertaining to mortgage related fees); *Murphy v. DirecTV, Inc.*, 07-CV-06545 FMC (C.D. Cal.)(class action for violation of California's consumer protection laws); *Bain v. Silver Point Capital Partnership LLP*, Index No. 114284/06 (N.Y. Sup. Ct.)(individual action for breach of contract and fraud); *Siemers v. Wells Fargo & Co.*, C-05-4518 WHA (N.D. Cal.)(class action for violation of § 10(b) of the Securities Exchange Act of 1934 pertaining to improper mutual fund fees); *Dover Capital Ltd. v. Galvex Estonia OU*, Index No. 113485/06 (N.Y. Sup. Ct.)(individual action for breach of contract involving an Eastern European steel company); *All-Star Carts and Vehicles Inc. v. BFI Canada Income Fund*, 08-CV-1816 LDW (E.D.N.Y.)(class action for violation of the Sherman Antitrust Act pertaining to waste hauling services for small businesses on Long Island); *Petlack v. S.C. Johnson & Son, Inc.*, 08-CV-00820 CNC (E.D. Wisconsin)(class action for violation of Wisconsin consumer protection law pertaining to environmental benefits of household cleaning products); *Wong v. Alacer Corp.*, (San Francisco Superior Court)(class action for violation of California's consumer protection laws pertaining to deceptive representations regarding health benefits of dietary supplement's ability to improve immune system); *Howerton v. Cargill, Inc.* (D. Hawaii)(class action for violation of various consumer protection laws regarding sugar substitute); *Yoo v. Wendy's International, Inc.*, 07-CV-04515 FMC (C.D. Cal.)(class action for violation of California's consumer protection laws pertaining to adverse health effects of partially hydrogenated oils in popular food products).

Michael R. Reese

Mr. Reese is the founding partner of Reese LLP where he litigates consumer protection class actions. Prior to entering private practice, Mr. Reese served as an assistant district attorney at the Manhattan District Attorney's Office where he served as a trial attorney prosecuting violent and white-collar crime.

Victories by Mr. Reese and his firm include a \$21 million class settlement in *In re Fairlife Milk Products Marketing and Sales Practices Litig.*, case no. 1:19-cv-03924-RMD (N.D. Illinois); a \$12.5 million dollar class settlement in *In re Hill's Pet Nutrition, Inc. Dog Food Products Liability Litig.*, case no. 19-md-2887-JAR-TT (D. Kansas) for pet owners who bought contaminated pet food; a \$6.1 million class action settlement in *Howerton v. Cargill, Inc.* (D. Hawaii) for consumers of Truvia branded sweetener; a \$6.4 million class action settlement in the matter of *Wong v. Alacer Corp.* (S.F. Superior Court) for consumers of Emergen-C branded dietary supplement; and, a \$25 million dollar settlement for mortgagees in *Huyer v. Wells Fargo & Co.* (S.D. Iowa).

Mr. Reese is a frequent lecturer and author on issues of class actions. Mr. Reese co-hosts an annual two day conference with Professor Michael Roberts of UCLA that includes panels on class action litigation; presents on class action litigation at the annual conference of the Consumer Brands Association; and, presents regularly at the Union Internationale des Advocats Annual Congress. Recent articles on class actions appear in publications by the American Bar Association; the Union Internationale des Advocats; and the Illinois State Bar Association.

Mr. Reese is also an executive committee member of the Plaintiffs' Class Action Roundtable, where he lectures on an annual basis on issues related to class actions.

Mr. Reese is a member of the state bars of New York and California as well as numerous federal district and appellate courts. Mr. Reese received his juris doctorate from the University of Virginia in 1996 and his bachelor's degree from New College in 1993.

Sue J. Nam

Ms. Nam is based in New York where she focuses on consumer class actions. Ms. Nam also runs the appellate practice at the firm and has represented clients before the Second and Ninth Circuits, as well as The Court of Appeals in New York. Ms. Nam also specialized in copyright law and represents photographers and other visual artists who have had their copyright protected works infringed.

Prior to joining the firm, Ms. Nam was the General Counsel for NexCen Brands, Inc., a publicly traded company that owned a portfolio of consumer brands in food, fashion and homeware.

Previously, Ms. Nam was Intellectual Property Counsel and Assistant Corporate Secretary at Prudential Financial, Inc., and she was an associate specializing in intellectual property and litigation at the law firms of Brobeck Phleger & Harrison LLP in San Francisco, California and Gibson Dunn & Crutcher LLP in New York, New York.

Ms. Nam clerked for the Second Circuit prior to joining private practice.

Ms. Nam received her juris doctorate from Yale Law School in 1994. She received a bachelor's degree with distinction from Northwestern University in 1991.

Kate J. Stoia

Ms. Stoia is based in San Francisco. Prior to joining the firm, Ms. Stoia was an associate specializing in general and corporate litigation and labor and employment law in the San Francisco offices of Brobeck Phleger & Harrison LLP, Gibson Dunn & Crutcher LLP, and Clarence & Snell LLP. Ms. Stoia clerked for the Honorable Charles A. Legge, Northern District of California, prior to joining private practice.

Ms. Stoia is admitted to the bars of several federal courts as well as the state bar of California. Ms. Stoia received her juris doctorate from UC Berkeley School of Law in 1995. She received a bachelor's degree from Columbia University in 1989 and a Master's of Public Affairs from UC Berkeley's Goldman School of Public Policy in 2022.

Carlos F. Ramirez

Mr. Ramirez is an accomplished trial attorney based in New York, where he focuses his practice on the litigation of consumer class actions. Prior to entering private practice in 2001, Mr. Ramirez served as an Assistant District Attorney at the Manhattan District Attorney's Office where he served as a trial attorney prosecuting both violent and white-collar crimes.

Previous and current consumer fraud class actions litigated by Mr. Ramirez include *Hasemann v. Gerber Products Co.*, case no. 15-cv-02995-MKB-RER (E.D.N.Y.)(case involving misrepresentation of health benefits of baby formula in violation of New York consumer protection laws); *Coe v. General Mills, Inc.*, No. 15-cv-5112-TEH (N.D. Cal.) (involving false advertisement claims relating to the Cheerios Protein breakfast cereal); *In re Santa Fe Natural Tobacco Company Marketing & Sales Practices Litigation*, 16-md-2695-JB/LF (D.N.M.)(involving the deceptive marketing of cigarettes as “natural” and “additive free”); and, *Lamar v. The Coca-Cola Company, et al.*, No. 17-CA-4801 (D.C. Superior Ct.) (involving the deceptive marketing of sugar drinks as safe for health).

Mr. Ramirez is a member of the state bars of New York and New Jersey. He is also a member of the bars of the U.S. District Courts for the Eastern District of New York and Southern District of New York. Mr. Ramirez received his juris doctorate from the Fordham University School of Law in 1997 and his bachelor's degree from CUNY-Joh Jay College in 1994.

George V. Granade II

Mr. Granade is a partner at Reese LLP based in Los Angeles, California, where he focuses on consumer class actions. Cases Mr. Granade has worked on include: *Barron v. Snyder's-Lance, Inc.*, No. 0:13-cv-62496-JAL (S.D. Fla.); *In re: Frito-Lay North America, Inc. "All Natural" Litigation*, No. 1:12-md-02413-RRM-RLM (E.D.N.Y.) (involving “SunChips,” “Tostitos,” and “Bean Dip” products labeled as “natural” and allegedly containing genetically-modified organisms); and *Martin v. Cargill, Inc.*, No. 0:13-cv-02563-RHK-JJG (D. Minn.) (involving “Truvia” sweetener product labeled as “natural” and allegedly containing highly processed ingredients).

Mr. Granade received his juris doctorate from New York University School of Law in 2011. He received a master's degree from the University of Georgia at Athens in 2005 with distinction and a bachelor's degree from the University of Georgia at Athens in 2003, *magna cum laude* and with High Honors.

Mr. Granade is a member of the state bars of Georgia, New York, and California. He is also a member of the bar of the U.S. Courts of Appeals for the Second Circuit and Ninth Circuit, as well as the bars of the U.S. District Courts for the Eastern District of New York, Southern District of New York, Western District of New York, Northern District of New York, Southern District of Illinois, Northern District of Illinois, Northern District of California, Southern District of California, Central District of California, and Eastern District of California.

Charles D. Moore

Mr. Moore is based in Minneapolis, Minnesota where he focuses on both consumer as well as employment class actions.

Mr. Moore has worked on a number of high profile class actions at Reese LLP as well as his prior firm where he worked as co-counsel with Reese LLP on numerous matters. His notable cases include: *Salerno v. Kirk's Natural LLC*, No. 1:21-cv-04987-BMC (E.D.N.Y.) (involving the deceptive claims for the country of origin of the products) *Marino v. Coach, Inc.*, Case No. 1:16-cv-01122-VEC (OTW) (Lead) (S.D.N.Y.) (involving deceptive reference pricing in the sale of outlet merchandise); *Raporport-Hecht v. Seventh Generation, Inc.*, Case No. 7:14-cv-09087-KMK (S.D.N.Y.) (involving the deceptive advertising of household products as “natural”); *Gay v. Tom's of Maine, Inc.*, Case No. 0:14-cv-60604-KMM (S.D. Fla.) (involving deceptive advertising of personal care products as “natural”); *Frohberg v. Cumberland Packing Corp.*, Case No. 1:14-cv-00748-KAM-RLM (E.D.N.Y.) (involving deceptive advertising of food products as “natural”); *Baharenstan v. Venus Laboratories, Inc. d/b/a Earth Friendly Products, Inc.*, Case No. 3:15-cv-03578-EDL (N.D. Cal.) (involving deceptive advertising of household products as “natural”); *Sienkaniec v. Uber Technologies, Inc.*, Case No. 17-cv-04489-PJS-FLN (D. Minn.) (involving the misclassification of Uber drivers as independent contractors); *Dang v. Samsung Electronics Co.*, 673 F. App'x 779 (9th Cir. 2017) (*cert denied* 138 S. Ct. 203) (rejecting shrink-wrap terms in California for purposes of arbitration).

Mr. Moore is a member of the state bar of Minnesota and New York. He is also a member of the bar of the U.S. District Court for the District of Minnesota, the Southern, Eastern, and Western Districts of New York, and the Northern District of Illinois. Mr. Moore received his juris doctorate from Hamline University School of Law in 2013, and his bachelor's degree from the University of North Dakota in 2007.

EXHIBIT 2



KALIELGOLD PLLC

KalielGold PLLC was founded in 2017 and is a 100% contingency Plaintiff-side law firm. Our attorneys have decades of combined experience and have secured hundreds of millions of dollars for their clients. Our firm's practice focuses on representing consumers in class action litigation and specifically on cases in the consumer financial services sector. In the four years since our firm was founded, our firm has been appointed lead counsel or co-lead counsel in numerous class action and putative class action lawsuits in state and federal courts nationwide including most recently in *Roberts v. Capital One*, No. 1:16-cv-04841 (S.D.N.Y.); *Walters v. Target Corp.*, No. 3:16-cv-00492 (S.D. Cal.); *Robinson v. First Hawaiian Bank*, Civil No.17-1-0167-01 GWBC (1st Cir. Haw.); *Liggio v. Apple Federal Credit Union*, No. 18-cv-01059 (E.D. Va.); *Morris et al. v. Bank of America, N.A.*, No. 3:18-cv-00157-RJC-DSC (W.D.N.C.); *Brooks et al. v. Canvas Credit Union*, 2019CV30516 (Dist. Ct. for Denver Cnty., Colo.); *Figueroa v. Capital One, N.A.*, Case No. 3:18-cv-00692-JM-BGS (S.D. Cal.); *White v. Members 1st Credit Union*, Case No. 1:19-cv-00556-JEJ (M.D. Pa.); *Plummer v. Centra Credit Union*, Case No. 03D01-1804-PL-001903 (Cnty. Of Bartholomew, Ind.); *Holt v. Community America Credit Union*, Case No. 4:19-cv-00629-FJG (W.D. Mo.); *Trinity Management v. Charles Puckett*, Case No. GCG-17-558960 (Super. Ct., San Francisco Cnty, Cal.); *Martin v. L&N Federal Credit Union*. No. 19-CI-022873 (Jefferson Cir. Ct., Div. One); *Clark v. Hills Bank and Trust Company*, No. LACV080753 (Iowa Dist. Ct. Johnson Cnty.); *Morris v. Provident Credit Union*, Case No. CGC-19-581616 (Super. Ct., San Francisco Cnty., Cal.).

As shown in the biographies of our attorneys and the list of class counsel appointments, KalielGold PLLC is well versed in class action litigation and zealously advocates for its clients. To learn more about KalielGold PLLC, or any of the firm's attorneys, please visit www.kalielgold.com.



JEFFREY D. KALIEL

Jeffrey Kaliel earned his law degree from Yale Law School in 2005. He graduated from Amherst College summa cum laude in 2000 with a degree in Political Science, and spent one year studying Philosophy at Cambridge University, England.

Over the last 10 years, Jeff has built substantial class action experience. He has received "Washington D.C. Rising Stars Super Lawyers 2015" recognition.

Jeff has been appointed lead Class Counsel in numerous nationwide and state-specific class actions. In those cases, Jeff has won contested class certification motions, defended dispositive motions, engaged in data-intensive discovery and worked extensively with economics and information technology experts to build damages models. Jeff has also successfully resolved numerous class actions by settlement, resulting in hundreds of millions of dollars in relief for millions of class members.

Currently Jeff is actively litigating several national class action cases, including actions against financial services entities and other entities involved in predatory lending and financial services targeting America's most vulnerable populations.

Jeff's class action successes extend beyond financial services litigation. He seeks to lead cases that serve the public interest. Jeff has worked with nonprofits such as the Humane Society, Compassion Over Killing, and the National Consumers League to fight for truth in the marketplace on food and animal products.

Jeff has over a decade of experience in high-stakes litigation. He was in the Honors Program at the Department of Homeland Security, where he worked on the Department's appellate litigation. Jeff also helped investigate the DHS response to Hurricane Katrina in preparation for a Congressional inquiry. Jeff also served as a Special Assistant US Attorney in the Southern District of California, prosecuting border-related crimes.

Jeff is a former Staff Sergeant in the Army, with Airborne and Mountain Warfare qualifications. He is a veteran of the second Iraq war, having served in Iraq in 2003.

Jeff is admitted to practice in California and Washington, DC, and in appellate and district courts across the country.

Jeff lives in Washington, D.C. with his wife, Debbie, and their three children.



SOPHIA GOREN GOLD

Sophia Goren Gold is a third-generation Plaintiff's lawyer. A *summa cum laude* graduate of Wake Forest University and the University of California, Berkeley, School of Law, Sophia has spent her entire career fighting for justice.

A fierce advocate for those in need, Sophia's practice centers around taking on financial institutions, insurance companies, and other large corporate interests. Sophia has participated in hundreds of individual and class cases in both state and federal courts across the country. Collectively, she has helped secure tens of millions of dollars in relief on behalf of the classes she represents.

In addition to providing monetary relief, Sophia's extensive litigation experience has resulted in real-world positive change. For example, she brought litigation which resulted in the elimination of the Tampon Tax in the State of Florida, and she was influential in changing the state of Delaware's Medicaid policy, resulting in greater access to life-saving medication.

Sophia is currently representing consumers in numerous cases involving the assessment of improper fees by banks and credit unions, such as overdraft fees, insufficient funds fees, and out of network ATM fees. She is also currently representing consumers who have been the victims of unfair and deceptive business practices.

Sophia is admitted to practice in California and Washington, D.C. When not working, Sophia enjoys spending time with her husband, daughter, and their goldendoodle.



BRITTANY CASOLA

Brittany Casola attended the University of Central Florida in Orlando and graduated in 2012 with a bachelor's degree in Political Science and a minor in Spanish. Brittany earned her Juris Doctorate from California Western School of Law in 2015 and graduated magna cum laude in the top 10% of her class.

Throughout the course of her law school career, she served as a judicial extern to the Honorable Anthony J. Battaglia for the United States District Court, Southern District of California and worked multiple semesters as a certified legal intern for the San Diego County District Attorney's Office. Brittany was awarded Academic Excellence Awards in law school for receiving the highest grade in Trial Practice, Health Law & Policy, and Community Property.

Before joining KalielGold PLLC, Brittany worked as a judicial law clerk for the Honorable Anthony J. Battaglia and as an associate attorney for Carlson Lynch LLP, specializing in consumer complex litigation.



AMANDA ROSENBERG

Amanda Rosenberg graduated *cum laude* from the University of California, Hastings College of the Law in 2011 and the University of California, San Diego in 2008, where she earned departmental Honors with Highest Distinction in history.

Before joining KalielGold PLLC, Amanda represented and advised small businesses and financial institutions in litigation matters including employment disputes, merchant disputes, credit and charge card disputes, wrongful foreclosures, and securities. She has successfully litigated cases in California, Illinois, and Michigan.

Amanda is an active volunteer in her community and has helped numerous individuals understand and navigate their rights in the workplace.

In law school, Amanda worked as an extern for the Honorable Judge Vaughn Walker in the United States District Court, Northern District of California. Amanda was awarded academic excellence awards for receiving the highest grades in Trial Advocacy and Litigating Class Action Employment.

When not working, Amanda loves exploring Michigan's outdoors with her husband, kids, and rescue dog.



CLASS COUNSEL APPOINTMENTS

- *Roberts v. Capital One*, No. 1:16-cv-04841 (S.D.N.Y.);
- *Walters v. Target Corp.*, No. 3:16-cv-00492 (S.D. Cal.);
- *Figueroa v. Capital One, N.A.*, Case No. 3:18-cv-00692-JM-BGS (S.D. Cal.);
- *Robinson v. First Hawaiian Bank*, Civil No.17-1-0167-01 GWBC (1st Cir. Haw.);
- *Brooks et al. v. Canvas Credit Union*, 2019CV30516 (Dist. Ct. for Denver Cnty., Colo.);
- *Liggio v. Apple Federal Credit Union*, Civil No. 18-cv-01059 (E.D. Va.);
- *Morris et al. v. Bank of America, N.A.*, Civil No. 3:18-cv-00157-RJC-DSC (W.D.N.C.);
- *White v. Members 1st Credit Union*, Case No. 1:19-cv-00556-JEJ (M.D. Pa.);
- *Plummer v. Centra Credit Union*, Case No. 03D01-1804-PL-001903 (Bartholomew Cnty., Ind.);
- *Holt v. Community America Credit Union*, Case No. 4:19-cv-00629-FJG (W.D. Mo.);
- *Trinity Management v. Charles Puckett*, Case No. GCG-17-558960 (Super. Ct., San Francisco, Cnty., Cal.);
- *Martin v. L&N Federal Credit Union*. No. 19-CI-022873 (Jefferson Cir. Ct., Division One);
- *Clark v. Hills Bank and Trust Company*, No. LACV080753 (Iowa Dist. Ct. Johnson Cnty.);
- *Morris v. Provident Credit Union*, Case No. CGC-19-581616 (Super. Ct. San Francisco Cnty., Cal.);
- *Bodnar v. Bank of America, N.A.*, 5:14-cv-03224 (E.D. Pa.);
- *In re Higher One OneAccount Marketing and Sales Practice Litigation.*, No. 12-md-02407-VLB (D. Conn.);
- *Shannon Schulte, et al. v. Fifth Third Bank.*, No. 1:09-cv-06655 (N.D. Ill.);
- *Kelly Mathena v. Webster Bank*, No. 3:10-cv-01448 (D. Conn.);
- *Nick Allen, et al. v. UMB Bank, N.A., et al.*, No. 1016 Civ. 34791 (Cir. Ct. Jackson Cnty., Mo.);
- *Thomas Casto, et al. v. City National Bank, N.A.*, 10 Civ. 01089 (Cir. Ct. Kanawha Cnty., W. Va.);
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