

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)

JEROME SKOCHIN, SUSAN SKOCHIN and)	Civil Action No. 3:19-cv-00049-REP
LARRY HUBER, Individually and on Behalf)	
of All Others Similarly Situated,)	<u>CLASS ACTION</u>
)	
Plaintiffs,)	
)	
vs.)	
)	
GENWORTH LIFE INSURANCE)	
COMPANY and GENWORTH LIFE)	
INSURANCE COMPANY OF NEW YORK,)	
)	
Defendants.)	
)	
_____)	

DECLARATION OF BRIAN D. PENNY FILED ON BEHALF OF GOLDMAN SCARLATO & PENNY, P.C. IN SUPPORT OF APPLICATION FOR AWARD OF ATTORNEYS’ FEES AND EXPENSES

I, Brian D. Penny, declare as follows:

1. I am a member of the firm of Goldman Scarlato & Penny, P.C. (“GSP” or the “Firm”). I am submitting this declaration in support of this Firm’s application for an award of attorneys’ fees and expenses/charges (“expenses”) in connection with services rendered in the above-entitled action.
2. I am counsel of record for plaintiffs Jerome Skochin, Susan Skochin and Larry Huber in this action, and, along with my co-counsel, have been appointed by the Court as Class Counsel.
3. The information in this declaration regarding the Firm’s time and expenses is taken from time and expense printouts and supporting documentation prepared and/or maintained by the Firm in the ordinary course of business. I am the partner who oversaw and conducted the day-to-

day activities in the litigation and I reviewed these printouts (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. As a result of this review, I believe that the time reflected in the Firm's lodestar calculation and the expenses for which payment is sought as set forth in this declaration are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

4. After the review referred to above, the number of hours spent on this litigation by my Firm is **2,556.45**. A breakdown of the lodestar is provided in Exhibit A. The lodestar amount for attorney/paralegal time based on the Firm's current rates is **\$1,357,710.50**. The hourly rates shown in Exhibit A are the usual and customary rates set by the Firm for each individual.

5. My Firm seeks an award of **\$23,188.77** in expenses and charges in connection with the prosecution of the litigation. Those expenses and charges are summarized by category in Exhibit B.

6. The following is additional information regarding certain of these expenses:

(a) Transportation, Hotels & Meals: **\$5,682.92**. In connection with the prosecution of this case, the Firm has paid for travel expenses to, among other things, attend court hearings, meet with witnesses, mediators and opposing counsel and take or defend depositions. The date, destination and purpose of each trip is set forth in Exhibit C.

(b) Court Hearing and Deposition Reporting, and Transcripts: **\$15,245.07**. The vendors who were paid for hearing and deposition transcripts are listed in Exhibit D.

(c) Photocopies: **\$1,087.95**. In connection with this case, the Firm did not charge anything to the case for in-house copies. My Firm paid \$1,087.95 to outside copy vendors. A breakdown of these outside charges by date and vendor is set forth in Exhibit E.

(d) Online Legal and Financial Research: **\$1,172.83**. This category includes vendors such as LEXIS/NEXUS. These resources were used to obtain access to factual databases, legal research and for cite-checking of briefs. This expense represents the expense incurred by GSP for use of these services in connection with this litigation. The charges for these vendors vary depending upon the type of services requested.

7. The expenses pertaining to this case are reflected in the books and records of this Firm. These books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses.

8. The identification and background of my Firm and its partners is attached hereto as Exhibit F.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th day of May, 2020, at Conshohocken, PA.

/s/ Brian D. Penny

Brian D. Penny

EXHIBIT A

EXHIBIT A

Jerome Skochin et al. v. Genworth Life Insurance Co. et al., No. 3:19-cv-00049-REP
 Goldman Scarlato & Penny
 Inception through May 15, 2020

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Brian Penny	(P)	1,462.10	\$705	\$1,030,780.50
Otis Harper	(SA)	495.25	\$300	\$148,575.00
Joseph Orlando	(SA)	586.60	\$300	\$175,980.00
Christine Lamar	(PL)	12.50	\$190	\$2,375.00
<i>TOTAL</i>		<i>2,556.45</i>		<i>\$1,357,710.50</i>

(P) Partner

(A) Associate

(SA) Staff Attorney

(PL) Paralegal

EXHIBIT B

EXHIBIT B

Jerome Skochin et al. v. Genworth Life Insurance Co. et al., No. 3:19-cv-00049-REP
Goldman Scarlato & Penny
Inception through May 15, 2020

<i>CATEGORY</i>	<i>AMOUNT</i>
Transportation, Hotels & Meals	\$5,682.92
Court Hearing Transcripts and Deposition Reporting, Transcripts and Videography	\$15,245.07
Photocopies: Outside:	\$1,087.95
Online Legal and Financial Research	\$1,172.83
<i>TOTAL</i>	<i>\$23,188.77</i>

EXHIBIT C

EXHIBIT C

Jerome Skochin et al. v. Genworth Life Insurance Co. et al., No. 3:19-cv-00049-REP
 Goldman Scarlato & Penny
 Inception through May 15, 2020

Transportation, Hotels & Meals: \$5,582.92

<i>NAME</i>	<i>DATE</i>	<i>DESTINATION</i>	<i>PURPOSE</i>
Brian Penny	4/24/2019	Richmond, VA	First Pre-Trial Conference
Brian Penny	7/12/2019	Richmond, VA	Motion to Dismiss Argument
Brian Penny	8/16/2019	Richmond, VA	Scarpa Deposition
Brian Penny	8/28/2019	Richmond, VA	Ludden Deposition
Brian Penny	9/9/2019	Owings Mills, MD	Huber Deposition
Brian Penny	9/12/2019	Philadelphia, PA	Skochins Deposition
Brian Penny	9/19/2019	Los Angeles, CA	Nickel Deposition
Brian Penny	9/28/2019	New York, NY	NY Mediation
Brian Penny	10/17/2019	New York, NY	NY Mediation
Brian Penny	10/18/2019	New York, NY	NY Mediation
Brian Penny	1/15/2020	Richmond, VA	Preliminary Approval Hearing

EXHIBIT D

EXHIBIT D

Jerome Skochin et al. v. Genworth Life Insurance Co. et al., No. 3:19-cv-00049-REP
 Goldman Scarlato & Penny
 Inception through May 15, 2020

Court Hearing Transcripts and Deposition Reporting, Transcripts and Videography: \$15,245.07

<i>DATE</i>	<i>VENDOR</i>	<i>PURPOSE</i>
4/24/2019	Peppy Peterson, RPR	Transcript USDC Eastern District of VA
7/12/2019	Peppy Peterson, RPR	Transcript Jerome Skochin, et al v. Genworth Life
8/14/2019	Peppy Peterson, RPR	Court Reporter Fees for Conference Call
8/27/2019	David Feldman Worldwide, Veritext	Transcript of Deposition of Beth Ludden
9/10/2019	David Feldman Worldwide, Veritext	Transcript of Deposition of Larry Huber
9/12/2019	David Feldman Worldwide, Veritext	Transcript of Depositions of Jerome and Susan Skochin
9/20/2019	David Feldman Worldwide, Veritext	Video of Deposition of Theodore Nickel
9/20/2019	David Feldman Worldwide, Veritext	Transcript of Deposition of Theodore Nickel

EXHIBIT E

EXHIBIT E

Jerome Skochin et al. v. Genworth Life Insurance Co. et al., No. 3:19-cv-00049-REP
Goldman Scarlato & Penny
Inception through May 15, 2020

Outside Photocopies: \$1,087.95 (detailed below)

<i>DATE</i>	<i>VENDOR</i>	<i>PURPOSE</i>
5/31/2019	Reliable, East Norriton, PA	Color Scan for discovery
9/17/2019	Reliable, East Norriton, PA	Digital Print B&W & Color

EXHIBIT F

EXHIBIT F

FIRM RESUME

GOLDMAN SCARLATO & PENNY, P.C.

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Conshohocken, PA 19428

(484) 342-0700

GOLDMAN SCARLATO & PENNY, P.C. is a nationwide class action law firm. Our lawyers have dedicated their careers to vindicating the rights of ordinary people and businesses victimized by anticompetitive conduct, securities fraud, identity theft, deceptive consumer practices, or who have suffered harm as a result of defective medical devices and dangerous drugs. Goldman Scarlato & Penny, P.C. prosecutes securities fraud, antitrust, and consumer fraud class actions, investor arbitrations, sexual assault cases, as well as mass actions on behalf of those injured by defective medical devices and dangerous drugs throughout the United States. The Firm's lawyers have recovered hundreds of millions of dollars on behalf of their clients and helped to institute meaningful changes in business practices that seek to ensure robust competition in commercial markets, honest and fair disclosures in financial markets, and truthful advertising in retail markets.

The Firm has played prominent roles in several noteworthy and ground-breaking cases. Recently, the Firm has fought to protect those whose most sensitive and private data was compromised in *In re Anthem, Inc. Data Breach Litigation* (\$115 million settlement on behalf of healthcare patients), *In re Intuit Data Litigation*. (member of steering committee; settled) and has served as sole lead counsel in *Athens Orthopedic Clinic, P.A.* (case pending), and *United Shore Financial Services, LLC* (settled). The Firm has fought to enforce the nation's antitrust laws and ensure a level competitive playing field in cases such as *In re Air Cargo Antitrust Litigation*

(settlements of over \$1 billion), *In re Vitamins Antitrust Litigation* (settlements of over \$1.7 billion), *In re Brand Name Prescription Drugs Antitrust Litigation* (settlements of approximately \$700 million), and *Logue v. West Penn Multi-Listing Service* (\$2.75 million settlement on behalf of consumers), and it successfully challenged businesses that misrepresented their products to consumers in *Mirakay v. Dakota Growers Pasta Co.* (settlement valued at over \$23 million). In addition, the Firm has fought to protect investors and enforce the nation's securities laws in cases such as *In re Broadcom Securities Litigation* (settlement of \$150 million), and *AOL Time Warner Securities Litigation*, (settlement of over \$2.5 billion for investors).

MARK S. GOLDMAN. Since 1986, Mark Goldman has concentrated his practice in many different types of complex litigation, including cases involving violations of the federal securities and antitrust laws and state consumer protection statutes. Mr. Goldman served as co-lead counsel in a number of class actions brought against life insurance companies, challenging the manner in which premiums are charged during the first year of coverage. In the antitrust field, Mr. Goldman litigated several cases that led to recoveries exceeding \$1 billion each, for the benefit of the consumers and small businesses he represented, including *In re Air Cargo Antitrust Litigation*, Case No. 06-MD-1775 (E.D.N.Y. 2016), *In re Vitamins Antitrust Litigation*, MDL No. 1285 (D.D.C. 1999), *In re NASDAQ Antitrust Litigation*, Case No. 94-cv-3996 (S.D.N.Y. 1994), and *In re Brand Name Prescription Drugs Antitrust Litigation*, Case No. 94-c-897 (N.D. Ill. 1994). Mr. Goldman represents and has represented numerous victims of identity theft seeking to hold accountable companies that failed to protect the safety of private data maintained on their networks, including *In re Community Health Systems, Inc. Customer Data Security Breach Litigation*, 15-cv-222 (N.D. Ala. 2015), *In re Anthem, Inc. Data Breach Litigation*, Case No. 15-MD-02617-LHK (N.D. Cal. 2015), *In re Intuit Data Litigation*, 15-cv-1778 (N.D. Cal. 2015), and

Collins et al v. Athens Orthopedic Clinic, P.A., (Athens-Clark Cty, Ga 2017). In the area of securities litigation, Mr. Goldman played a prominent role in class actions brought under the antifraud provisions of the Securities Exchange Act of 1934, including *In re Nuskin Enterprises, Inc. Securities Litigation*, Master File No. 2:14-cv-00033 (D. Utah 2014), *In Re: Spectrum Pharmaceuticals, Inc. Securities Litigation*, Case No. 2:13-cv-00433 (D. Nev. 2013), and *In re Omnivision Technologies, Inc. Litigation*, Case No.: 5:11-cv-05235 (N.D. Cal. 2011). Mr. Goldman also prosecuted a number of insider trading cases brought against company insiders who, in violation of Section 16(b) of the Securities Exchange Act of 1934, engaged in short swing trading.

Mr. Goldman earned his undergraduate degree from the Pennsylvania State University in 1981 and his law degree from the University of Kansas School of Law in 1986. He is a member of the Pennsylvania bar.

PAUL J. SCARLATO. Paul Scarlato has concentrated his practice on the litigation of complex class actions since 1989. He has litigated numerous cases under the securities, consumer, antitrust and common law involving companies in a broad range of industries, and has litigated many cases involving financial and accounting fraud.

In securities fraud cases, Mr. Scarlato was one of three lead attorneys for the class in *Kaufman v. Motorola, Inc.*, a securities fraud class action that settled just weeks before trial, and along with Mr. Weinstein of his predecessor firm, was lead counsel in *Seidman v. American Mobile Systems, Inc.*, (E.D. Pa.), a securities class action that resulted in a settlement for the plaintiff class again on the eve of trial. Mr. Scarlato served as co-lead counsel in *In re: Corel Corporation Securities Litigation* (E.D. Pa.). Mr. Scarlato was one of the lead lawyers in *Leibovic v. United Shore Financial Services; Afzal v. BMW of North America, LLC*, and *Yao Yi Liu v. Wilmington*

Trust Company. He serves on the plaintiffs' Executive Committee in *Vikram Bhatia, D.D.S. v. 3M Company*, Case No. 16-cv-01304 (D. Minn.), and is counsel in *In re Platinum and Palladium Antitrust Litigation*, Case No. 14-cv-09391 (S.D.N.Y.), *In re Treasury Securities Auction Antitrust Litigation*, Case No. 15-md-02673 (S.D.N.Y.), and *In re Liquid Aluminum Sulfate Antitrust Litigation*, Case No. 15-7827 (D.N.J.).

Mr. Scarlato graduated from Moravian College in 1983 with a degree in accounting, and received his Juris Doctor degree from the Widener University School of Law in 1986. Mr. Scarlato served as law clerk to the Honorable Nelson Diaz, of the Court of Common Pleas of Philadelphia County, and thereafter as law clerk to the Honorable James T. McDermott, Justice of the Pennsylvania Supreme Court. After his clerkships, and prior to becoming a litigator, Mr. Scarlato was a member of the tax department of a major accounting firm where he provided a broad range of accounting services to large business clients in a variety of industries.

Mr. Scarlato is a member of the bars of the Commonwealth of Pennsylvania and the State of New Jersey, and those of various federal district and circuit courts.

BRIAN D. PENNY. Since joining the Firm in 2002, Mr. Penny has focused his practice on class action litigation principally in the areas of antitrust, consumer protection and securities fraud litigation. He was lead counsel in *Mirakay v. Dakota Growers Pasta Co.* (D.N.J. 2013) (alleging false and misleading advertising of pasta products and resulting in a settlement valued at over \$23 million); *Logue v. West Penn Multi-Listing Service* (W.D. Pa. 2010) (alleging price-fixing among brokers and multi-listing service and resulting in \$2.75 million settlement); *Allan v. Realcomp II* (E.D. Mich. 2010) (alleging price-fixing among brokers and multi-listing service and resulting in a \$3.25 million settlement); *Boland v. Columbia Multi-Listing Service* (D.S.C. 2009) (alleging price-fixing among brokers and multi-listing service and resulting in a \$1 million

settlement); and *Robertson v. Hilton-Head Multi-Listing Service* (D.S.C. 2009) (alleging price-fixing among brokers and multi-listing service).

Mr. Penny served on the executive committees in *In Re NHL Concussion Litigation* (D. Minn. 2014) (alleging league failed to protect players from known risks of concussions), and *In re: Community Health Systems, Inc., Customer Security Data Breach Litigation* (N.D. Ala. 2015) (alleging damages caused by data breach of health care records). He is on the Third Party Discovery Committee in *In re Disposable Contact Lenses Antitrust Litigation*, 15-md-2626 (M.D. Fla.), and is actively engaged as class counsel in *In re: Clobetasol Cases*, 16-CB-27240 (E.D. Pa. 2017) and *In re Lidocaine-Prilocaine*, 16-LD-27242 (E.D. Pa. 2017) where he leads the EPP discovery team in those cases, *In re Broiler Chicken Antitrust Litigation*, 1:16-cv-08637 (N.D. Ill. 2016); and *Bhatia v. 3M Company*, 16-cv-1304 (D. Minn. 2016); *In re EpiPen Marketing, Sales Practices and Antitrust Litigation*, 2:17-md-2785 (D. Kan. 2016).

Mr. Penny has also prosecuted numerous securities fraud class actions over the course of his career. He was a key member of the plaintiffs' teams that prosecuted *In re Broadcom Securities Litigation*, which resulted in a settlement of \$150 million for the class, and *AOL Time Warner Securities Litigation*, which resulted in a settlement of over \$2.5 billion for investors. Mr. Penny was also one of the lead attorneys representing the classes in a number of securities fraud actions arising out of stock option backdating, including, *In re Monster Worldwide, Inc. Securities Litigation* (\$47.5 million settlement), *In re Mercury Interactive Securities Litigation* (\$117.5 million settlement), *In re SafeNet, Inc. Securities Litigation* (\$25 million settlement), *Ramsey v. MRV Communications et al.* (\$10 million settlement), and *In re Semtech Securities Litigation* (\$20 million settlement).

Mr. Penny received his Bachelor of Arts degree from Davidson College, Davidson, North Carolina, in 1997 and earned his Juris Doctor degree from Pennsylvania State University in 2000. After graduating from law school, Mr. Penny served as law clerk to the Honorable John T.J. Kelly, Jr., Senior Judge of the Superior Court of Pennsylvania. He has been named a Super Lawyer or Rising Star each year since 2010. In 2015, Mr. Penny was one of four finalists for the American Antitrust Institute's Enforcement Award for Outstanding Antitrust Litigation Achievement by a Young Lawyer for his work on *Allen, et al. v. Realcomp Ltd., et al.*

ALAN L. ROSCA. Mr. Rosca focuses his legal practice on complex financial and commercial matters, particularly in the areas of securities litigation, investment fraud, and international investment disputes. He often represents institutional and individual investors in disputes with financial industry members arising out of investment fraud or misconduct. He prosecutes claims on behalf of investors through class actions in state or federal courts, and FINRA arbitrations. He also practices in the areas of wage-and-hour and other labor-related disputes, whistleblower matters, and antitrust cases, with a focus on market manipulation.

Alan has been a lecturer and adjunct professor of Securities Regulation at Cleveland-Marshall College of Law, Cleveland State University since 2012.

Alan has served as co-lead counsel, or is currently involved in a leading role, in class actions on behalf of investors who lost money as a result of alleged investment fraud or Ponzi schemes, as well as in other class action matters arising out of wage-and-hour or business disputes, including *Hanson v. Berthel Fisher & Company Financial Services, Inc., et al.* (N.D. Iowa 2013) (a securities class action on behalf of investors in an allegedly fraudulent real estate investment program that raised approximately \$26 million from investors, predicated upon the role played by the program's underwriter); *Carol Prock v. Thompson National Properties, LLC*,

et al. (C.D. Cal. 2013) (a securities class action on behalf of investors in an allegedly fraudulent real estate investment program that raised approximately \$17 million from the investing public, against the program's sponsors and promoters); *Yao-Yi Liu et al. v. Wilmington Trust Company* (W.D.N.Y. 2014) (a class action lawsuit on behalf of investors of a \$145 million fraudulent scheme, alleging that the defendant trustee and custodian bank breached its duties as an escrow agent and aided the perpetrators of the scheme); *Spaude v. Mysyk* (N.D. Ohio 2015) (a securities class action on behalf of investors in a \$55 million allegedly fraudulent oil-and-gas investment scheme, against the alleged perpetrators of the scheme and the law firm that assisted the scheme); *Jennifer Roth v. Life Time Fitness, Inc.* (D. Minn. 2015) (a wage-and-hour class action on behalf of fitness instructors seeking unpaid wages for work that was required by defendants); *Aleem v. Pearce & Durick* (D. North Dakota 2015) (a securities class action on behalf of investors in a \$65 million fraudulent investment scheme, alleging that the defendants violated their fiduciary duties to the investors and assisted in the scheme's securities violations by serving as escrow agents for the investors' investments and offering materially false opinions to the investors regarding their investments in the scheme); *Strong v. Safe Auto Insurance Group, Inc. et al.* (S.D. Ohio 2016) (a wage-and-hour class action on behalf of employees of defendants seeking unpaid wages for work that was required by defendants); *Hay v. United Development Funding IV et al.* (N.D. Texas 2016) (a securities class action on behalf of investors in a \$625 million allegedly Ponzi-like real estate investment scheme, against entities including the scheme, its principals and affiliated entities, as well as the alleged scheme's underwriter and auditor); *Fastrich v. Continental General Insurance Company* (D. Neb. 2016) (a class action on behalf of insurance agents affiliated with defendants, arising out of the alleged non-payment of certain fees and commissions owed to such agents); *Elliott v. Bank of Oklahoma* (D.N.J. 2016) (a class action

on behalf of investors in a \$198 million allegedly fraudulent investment scheme perpetrated through a series of municipal bond offerings, against the trustee bank for the bond offerings and the underwriters of some of the offerings); *Ezeude v. PayPal Holdings, Inc.* et al. (N.D. Cal. 2017) (a class action lawsuit arising out of a \$207 million allegedly fraudulent Internet investment scheme that victimized over 162,000 investors worldwide, alleging that defendants, who acted as payment processors for the scheme, facilitated and assisted the perpetration of the scheme).

Alan received his Juris Doctor degree summa cum laude from Cleveland-Marshall College of Law in May 2008. While in law school he served as a Managing Editor of the Cleveland State Law Review, received the Dean's (full) scholarship for the entire Juris Doctor program, was on the Dean's List, and won the "Best Oralist" award in the Jessup Moot Court competition, Pacific Region. He passed the Ohio Bar exam in top 1%, with the highest grade in the state to the multi-state (federal law) section.

He is licensed to practice law in the Ohio state and federal courts, and in other federal courts nationwide. He has been selected to the 2017 and 2018 Ohio Super Lawyers Rising Star list. He is a member of the Public Investors Arbitration Bar Association, the Cleveland Metropolitan Bar Association, where he served as the Chair of the Unlicensed Practice of Law Committee, and the Cleveland Diplomatic Corps. He also holds a Master of Business Administration degree from Baldwin-Wallace College, Ohio. He is a speaker on Ponzi schemes, investment fraud, cryptocurrencies, and attorney professionalism.

MELISSA FRY HAGUE. Melissa Hague has dedicated her career to the successful and diligent prosecution of complex mass tort cases. She is an advocate for consumer rights and victims injured as a result of defective medical devices and pharmaceutical drugs. She was

recently appointed by Judge Saylor of the US District Court of Massachusetts to serve on the Plaintiffs' Steering Committee in *In Re: Zofran (Ondansetron) Products Liability Litigation*, MDL 2657 on behalf of children born with birth defects as a result of in utero exposure to the drug Zofran.

Melissa has represented hundreds of clients who have suffered debilitating injuries caused by metal-on-metal hip implants, knee implants as well as transvaginal mesh implants. As a zealous advocate for her clients, Melissa has developed an intricate level of industry knowledge in this area of the law relating to the failure to properly design and test medical devices. Her mass tort litigation experience includes:

In Re Ethicon, Inc., Pelvic Repair System Products Liability Litigation,
MDL 2327

In re: DePuy Orthopaedics, Inc., ASR Hip Implant Products Liability Litigation,
MDL 2197

In re: DePuy Orthopedics, Inc., Pinnacle Hip Implant Products Liability Litigation, MDL 2244

In re: Biomet M2A Magnum Hip Implant Products Liability Litigation,
MDL 2391

In re: Stryker Rejuvenate & ABG II Hip Implant Litigation, Ber-L-936-13

In re: Zimmer NexGen Knee Implant Products Liability Litigation, MDL 2272

In re: Human Tissue Products Liability Litigation, MDL 1763

Among her early successes, Melissa was an integral part to the successful resolution of the *In re: Human Tissue Products Liability Litigation*. Melissa successfully represented individual victims who received cadaver bone and tissue that was infected and not properly screened. As part of that litigation, Ms. Hague also represented dozens of families in lawsuits against funeral homes for the mutilation and illegal harvesting of body parts from their deceased

loved ones. For her efforts, Melissa was featured with partner Larry Cohan of Anapol Weiss in national news media regarding the Human Tissue litigation.

Melissa currently serves on the Executive Committee for the American Association for Justice (AAJ) as well as the Board of Governors. She is the Immediate Past Chair of the New Lawyers Division for AAJ, she is the current Chair of AAJ's Marketing and Practice Development Committee and was recognized by the President of AAJ for her Distinguished Service in 2017. She is also a supporter of EndDD.org where she speaks to high school students in her community as well as other communities about the dangers of distracted driving.

Melissa has been named a Rising Star in Pennsylvania Super Lawyers® since 2013. She was also selected for the state of New Jersey as The National Trial Lawyers: Top 40 Under 40 members, an elite group of the top attorneys under the age of 40 who have demonstrated excellence in their field.

CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2020, I filed the foregoing pleading or paper through the Court's CM/ECF system, which sent a notice of electronic filing to all registered users.

/s/ Jonathan M. Petty

Jonathan M. Petty (VSB No. 43100)

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