

MAY 16 2016

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11 *Attorneys for Plaintiffs and the Class*

12 SUPERIOR COURT FOR THE STATE OF CALIFORNIA

13 COUNTY OF LOS ANGELES

14 COLIN HIGGINS PRODUCTIONS, LTD,  
15 Plaintiff,

16 vs.

17 PARAMOUNT PICTURES  
18 CORPORATION, and DOES 1-100,  
19 Defendants.

20 **CASE NO. BC499179**  
21 (related to BC499181, BC499180, BC499182,  
22 BC500040 and BC540146)

23 *Assigned to the Honorable Elihu M. Berle,  
24 Department 323*

25 **CLASS ACTION**

26 **DECLARATION OF NEVILLE L. JOHNSON  
27 IN SUPPORT OF PLAINTIFFS' MOTION  
28 FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

**Hearing**

Date: June 10, 2016

Time: 10:00 a.m.

Dept.: 323

Hon. Elihu M. Berle

1           Neville L. Johnson declares:

2           1.       I am a partner in the law firm of Johnson & Johnson LLP, one of the attorneys of  
3 record for Plaintiffs and the Class (“Plaintiffs”). I am an attorney duly admitted to practice before  
4 this Court and am a member in good standing of the State Bar of California.

5           2.       I am one of the attorneys principally responsible for the handling of this matter at  
6 Johnson & Johnson LLP. I am personally familiar with the facts set forth in this declaration. If  
7 called as a witness I could and would competently testify to the matters stated herein. I make this  
8 declaration in support of Plaintiffs’ Preliminary Approval of Class Action Settlement.

9           **A.       Background and Experience**

10          3.       The attorneys of Johnson & Johnson LLP have been involved in litigating, trying,  
11 and settling dozens of entertainment and consumer class action cases in California and elsewhere.  
12 Johnson & Johnson LLP has an office in Beverly Hills, California.

13          4.       Attached hereto as Exhibit A is a true and correct copy of the firm resume for  
14 Johnson & Johnson LLP, which reflects the experience and accomplishments of the firm and the  
15 attorneys working on this case. This firm resume reflects that the attorneys in this case have  
16 successfully adjudicated some of the largest and most important class action lawsuits in the  
17 United States.

18          5.       As more fully set forth in Exhibit A, some of the significant entertainment and  
19 consumer class action cases in which Johnson & Johnson LLP attorneys have served as class  
20 counsel or had prominent roles include the following:

21               a.       *Fears v. Wilhelmina, et. al.*, Case No. 02-CV-4911 (S.D.N.Y.). My firm  
22 pioneered a class action lawsuit against the major New York model agencies (including Ford  
23 Models, Elite, Wilhelmina) on behalf of thousands of New York models for conspiring to fix  
24 model commissions and other terms in violation of the Sherman Antitrust Act. The matter  
25 resulted in an approximate \$25 million recovery for the models, including substantial reforms in  
26 the manner in which model agencies can operate. Published Decisions: *Fears v. Wilhelmina*  
27 *Model Agency, Inc.*, 2005 WL 1325297 (S.D.N.Y. Jun 06, 2005); *Fears v. Wilhelmina Model*  
28 *Agency, Inc.*, 2004 WL 594396, 2004-1 Trade Cases P 74,351 (S.D.N.Y. 2004); *Fears v.*

1 *Wilhelmina Modeling Agency, Inc.*, 61 Fed. R. Evid. Serv. 1451 (S.D.N.Y. 2003). We were co-  
2 lead counsel in the case.

3 b. *Ory. v. Columbia House Music Club*, U.S. District Court for the Central  
4 District of California, Case No. CV02-2342SJO. My firm was co-lead counsel in a class action  
5 lawsuit for copyright infringement against record clubs, Columbia House and BMG Direct, as a  
6 result of their 30 year practice of paying composers of musical compositions only 75% of the  
7 publishing royalties they are statutorily entitled. The matter was successful (despite that a nearly  
8 identical action was dismissed by the courts 10 years earlier), resulting in a \$6.5 million  
9 settlement for composers as well as industry reforms preventing this conduct in the future.

10 c. *Webb v. Directors Guild of America, Inc.*, Los Angeles Superior Court  
11 Case No. BC352621. Johnson & Johnson LLP attorneys were class counsel in a class action for  
12 breach of contract and conversion which caused unpaid royalties to be paid out to all the members  
13 of the guild. The case was certified as a class action and settled for over \$5 million dollars.

14 d. *Osmond v. Screen Actors Guild, Inc.*, Los Angeles Superior Court Case  
15 No. BC377780. Johnson & Johnson LLP attorneys were lead counsel in a class action for money  
16 had and received and conversion was certified and settled for tens of millions of dollars in unpaid  
17 royalties to be paid to the members of the guild.

18 e. *Richert v. Writers Guild of America West, Inc.*, Los Angeles Superior Court  
19 Case No. BC352621. Johnson & Johnson LLP attorneys were lead counsel in a class action for  
20 money had and received and conversion, which was certified in 2010. The case settled for one  
21 hundred million dollars in unpaid foreign royalties to all members of the guild.

22 f. *In Re: Warner Music Group Corp. Digital Download Litigation*, Case No.  
23 CV 12-0559. Johnson & Johnson LLP attorneys were class counsel in a class action on behalf of  
24 recording artists and producers who alleged that they have been systematically underpaid  
25 royalties by the record companies. The *Warner* case settled for \$13 million and received final  
26 approval.

27 g. *Colin Higgins Productions v. Universal City Studios LLC*, Los Angeles  
28 Superior Court Case No. BC 499180. Johnson & Johnson LLP attorneys were class counsel in a

1 similar class action brought against another major film studio, where the plaintiffs alleged on  
2 behalf of themselves and other profit participants that the studio failed to pay all of the money  
3 owed to them in connection with home video revenues. The case settled for \$13 million and  
4 received final approval.

5 **B. Litigation and Settlement of the Action**

6 6. During the course of this litigation, Johnson & Johnson LLP's attorneys  
7 vigorously litigated this action in furtherance of the interests of the Class Members through  
8 strategy meetings, extensive discovery and document review, and settlement strategy and  
9 mediation.

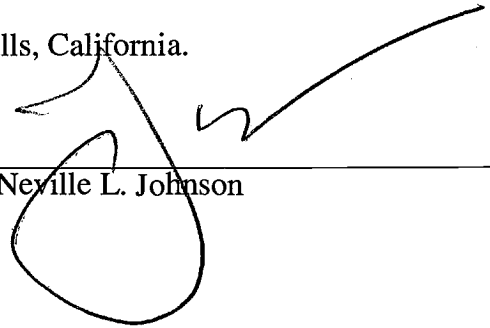
10 7. The settlement negotiations were contentious and it took over three years of  
11 litigation for the parties to come to an agreement and formalize it into a formal settlement  
12 agreement. Throughout these negotiations, Johnson & Johnson LLP helped to develop a  
13 settlement that obtained substantive monetary relief for Plaintiffs and extremely valuable  
14 prospective relief to the Class Members.

15 8. Based on my professional experience, and taking into consideration the risks of  
16 continued litigation as compared to the relief granted by the Settlement, it is my opinion that the  
17 Settlement is fair, adequate, and reasonable, and in the best interests of the Class.

18 9. My firm has no interests or involvement, by any attorney, in the governance or  
19 work of the proposed *cy pres* recipient in this action: The Motion Picture & Television Fund.

20 I declare under penalty of perjury under the laws of California and the United States of  
21 America that the foregoing is true and correct.

22 Executed on May 12, 2016, at Beverly Hills, California.

23  
24   
25 \_\_\_\_\_  
26 Neville L. Johnson  
27  
28

# EXHIBIT A

## **JOHNSON & JOHNSON LLP**

Johnson & Johnson LLP, based in Beverly Hills, California, is a litigation firm that specializes in complex litigation with a particular emphasis on privacy, entertainment, and consumer issues, including class actions in that nexus.

**Neville L. Johnson** graduated Phi Beta Kappa from the University of California, Berkeley (1971). He received his law degree from Southwestern University School of Law (1975), graduating near the top of his class. He has tried over 26 civil jury trials and over 70 civil trials without a jury. He is a member of the American Board of Trial Advocates, and is on the Board of Governors of the Consumer Attorneys of Los Angeles (CAALA), the Board of Directors of the national organization Public Justice, and was at the Beverly Hills Bar Association 2013-2015 (BHBA), and. He was nominated for Trial Lawyer of the Year in 2005 by CAALA. He was Co-Chair of the Entertainment Law Section of the Beverly Hills Bar Association from 2009 to 2011. He has appeared in courts in Arizona, Colorado, Florida, Georgia, Hawaii, Louisiana, Nevada, New York, New Jersey, New York, Oregon, Tennessee, New Mexico, Ohio, Pennsylvania, and Texas.

He and his firm has been lead counsel in many class actions.

Mr. Johnson has been designated a “SuperLawyer” (top 5% as voted by colleagues) and one of the Hollywood 100 “Power Lawyers” by the *Hollywood Reporter* every year since 2008. In 2013 *Variety* named him one of the top 50 lawyers in entertainment, one of 16 litigators. He is a Fellow of the American Bar Foundation (invitation only, top 2% in the United States).

Mr. Johnson was lead trial and appellate counsel in the precedent-setting case of *Sanders v. American Broadcasting Companies, Inc.*, 20 Cal. 4th 907 (1999), which established the right of privacy in the workplace and is studied in the leading case book on torts and the two casebooks on entertainment law. *Editor and Publisher* magazine wrote that he “is one of the most dangerous media plaintiff lawyers in the United States.”

*Privacy Torts*, the leading treatise on privacy law by Professor David Elder, contains the following dedication: *To Neville L. Johnson, of Johnson & Rishwain, LLP, Los Angeles, California, who has led the charge, often successfully (and always creatively and with great passion) in exposing some of the worst outrages of media newsgathering. Neville ranks with Brandeis and Warren as the great defenders of privacy. All America is in his debt.*

A law review article about his career is “Suing the Media, Supporting the First Amendment: the Paradox of Neville Johnson and the Battle for Privacy,” *67 Albany Law Review* 1097 (2004).

He is a frequent lecturer and written extensively on entertainment, copyright and media and other legal topics. Publications: “Talent Agency Act Survives Suit, Clarity Remains Elusive,” *Los Angeles Daily Journal* (May 10, 2013); “The Man Who Seduced Hollywood,” *36 Los Angeles Lawyer* 41 (September 2013); “To Find Employment as a Lawyer, You Must Market Yourself,” *36 Los Angeles Lawyer* 12 (June 2013); “Ten Rules for Success in the Practice of Law,” *31 Los Angeles Lawyer* 12 (June 2008). Elder, Johnson & Rishwain, “Establishing Constitutional Malice for Defamation and Privacy/False Light Claims When Hidden Cameras and Deception Are Used by the Newsgatherer,” *22 Loyola of Los Angeles Entertainment Law Review* 327 (2002); “New Developments in California Privacy and Defamation Law,” *23 California Litigation* 21 (2010); Johnson & Johnson, “What Happened to Unjust Enrichment in California? The Deterioration of Equity in the California Courts,” *44 Loyola of Los Angeles Law Review* 277 (2010); Johnson & Walsh, “The Danger of “Anti-Label Tourism” Litigation in the United States,” *32 Los Angeles Lawyer* 44 (December 2009); Johnson, “Privacy and the First Amendment”; *California Litigation* (2006); co-author “Caught in the Act,” *Los Angeles Lawyer*, (1998) (an analysis of current trends in the right of privacy). He co-authored chapters on music publishing, personal managers and getting a record deal in *The Musician's Business & Legal Guide* (2016 5th edition), and wrote the authorized biography, *The John Wooden Pyramid of Success* (Second Edition 2004).

Since 2012, Mr. Johnson has taught a course on entertainment and media litigation as an Adjunct Professor at Southwestern School of Law. From 2011-2014, he was one of the panelists teaching the Los Angeles County Bar Association new admittees course on class actions; and during the same period moderated the panel on ethical issues for the annual Year in Review for the Entertainment Section of the Beverly Hills Bar Association.

**Douglas L. Johnson** received his Bachelor of Arts in Political Science from the University of Southern California in 1996 (Dean’s List 1993-1996). Mr. Johnson received his Juris Doctorate from McGeorge School of Law in 2000 (Dean’s List 1999-2000). Mr. Johnson received the top grade in Insurance Law.

Mr. Johnson has been named a Super Lawyer “Rising Star” in the area of intellectual property litigation for seven consecutive years (2005-2013). (The Rising Star Attorneys represent the Top 2.5% of their profession in Southern California for lawyers 40 years old and younger).

Mr. Johnson specializes in entertainment, business, and class action litigation. Mr. Johnson has handled numerous high-profile and wide-reaching litigation, including music and movie royalty disputes, rights of privacy, defamation, partnership disputes, breach of contract, and class actions. Mr. Johnson has negotiated tens of millions of dollars in settlements for the firm's clients. He also secured a million dollar jury verdict for a recording artist in a copyright infringement case in Federal Court. In the past couple of years, Mr. Johnson has secured over twenty five-million dollars in settlements for the firm's clients in business-tort cases.

Many of Mr. Johnson's clients are producers, actors, directors, production companies, music artists, and record labels. He is well-known for his successes in theft of idea cases for TV and reality shows and continues to litigate TV, movies, and music royalty cases. He represented Glen Larson Productions, Inc. (creator of *Magnum PI*, *Knight Rider*, *Fall Guy*, *Battlestar Galactica*) in a large scale profit participation dispute against Universal. He also currently represents writers, actors and producers in disputes over back-end profits on several television shows and movies. This case recently settled after four years of litigation.

Mr. Johnson represented Jack Klugman (Quincy, Odd Couple) in a profit participation dispute against Universal. He also handled Mike Connors' net profit dispute on the TV show Mannix and litigated a theft of idea claim against A&E and Steven Segal over the TV show Lawman. Mr. Johnson defended blues icon B.B. King in a claim seeking declaratory relief about the right to make a movie involving his life resulting in the plaintiff dismissing his claim.

Mr. Johnson has contributed to, authored, and argued appeals before the California Court of Appeals and the United States Court of Appeals for the 9<sup>th</sup> Circuit.

#### Publications:

- Douglas L. Johnson & Neville L. Johnson, *What Happened to Unjust Enrichment in California? The Deterioration of Equity in the California Courts*, Loyola of Los Angeles Law Review Vol. 44:277, Fall 2010.

#### Published Cases:

- *Gerbosi v. Gains, Weil, West & Epstein, LLP* (2011) 193 Cal.App.4th 435
- *Walker v. Geico General Ins. Co.* (9th Cir. 2009) 558 F.3d 1025

#### Speaking Engagements:

- Panelist for Beverly Hills Bar Association, Entertainment Law Section, The Right of Publicity: The State of The Current Law (March 2014)



- Panelist for Beverly Hills Bar Association, Entertainment Law Section, “Right of Publicity: How Much Is Your Client Really Worth?” (March 2012)
- Panelist for Donald L. Stone’s Inn of St. Ives: “The Ever-Evolving Courtroom Drama of Net Profits” (2012)
- Panelist for Beverly Hills Bar Association, Entertainment Law Section, “Current Issues in Right of Likeness, Defamation and Privacy” (July 2011)
- Panelist for Loyola Law School’s Legal Symposium, Injuries Without Remedies (March 2010)

Adjunct Professor:

- Southwestern School of Law: Entertainment and Media Litigation (Spring 2012 to present)

Mr. Johnson has been lead counsel in the class actions *Webster v. Allstate Insurance Company*, *Progressive Casualty Insurance Company*, *Walker v. Geico*, *Bouchard v. Optometrix*, *Miller v. City of Los Angeles, et al.*, *Russo v. City of Beverly Hills*, *Weber v. Bank of America*, *Galavis v. LA Models*, *Armuth v. Linton* and directly involved in each class action cases listed below.

**James T. Ryan** is Of Counsel to Johnson & Johnson LLP. He received a Bachelor of Arts in Journalism with Honors and a Bachelor of Arts in Speech Communications from Indiana University in 1997. Mr. Ryan received his Juris Doctorate from Pepperdine University School of Law in 2000 (Dean's List 1998-1999). Mr. Ryan received the top grade in Communications Law.

Mr. Ryan specializes in entertainment, business, and class action litigation. Mr. Ryan has handled numerous cases involving rights of privacy, defamation, copyright infringement, theft of idea and partnership disputes. Mr. Ryan has been involved in almost all of the class actions listed below.

**Nicholas A. Kurtz** was a senior associate with Johnson & Johnson LLP. Mr. Kurtz earned a B.A. in Communications, Legal Institutions, Economics, and Government from American University in Washington, DC where he was a Presidential Scholarship recipient, a member of the School of Public Affairs Leadership Program, and a Colonial Athletic Association Scholar Athlete with the nationally ranked Division I varsity soccer team. In 2004, Mr. Kurtz earned his J.D. from Loyola Law School, where he served as the Chief Research Editor on the Loyola of Los Angeles Entertainment Law Review and garnered a First Honors Award in his Title IX Seminar course.

Some of his significant experience includes:

- Selected for inclusion as a “Rising Star” in 2009 Southern California Super Lawyers and 2012 Virginia Super Lawyers
- Directed multiple copyright infringement cases on behalf of rights holders, including for Academy award winning film *The Hurt Locker*, against infringers who utilize torrent platforms
- Litigated copyright infringement cases over the film *Drumline* and *Cars* film franchise
- Successfully represented musical artist in breach of contract litigation resulting in \$350,000 judgment against former manager
- Awarded Rule 11 sanctions in securing dismissal of corporate defendant related to promotional campaign of former Beach Boys artist Brian Wilson in British newspaper

#### Presentations:

- American Bar Association – Copyright Litigation: Finding Anonymous Copyright Infringers (March 2012)
- Beverly Hills Bar Association – Film and TV Producers: How to Squeeze the Lemon; Additional income to be collected by producers and copyright owners (June 2009)
- Los Angeles Copyright Society – The Music Download Class Action Suits (December 2006)

#### Publications:

- Electronic Evidence in Torrent Copyright Cases, Digital Evidence and Electronic Signature Review, Pario Communications, Bedfordshire, UK (2011) (pp.171-178) (co-author with Thomas M. Dunlap)

#### Published decisions:

- *Call of the Wild Movie, LLC v. Does 1-1,062* (D. D.C. 2011) 770 F.Supp.2d 332
- *Donkeyball Movie, LLC v. Does* (D. D.C. 2011) 810 F.Supp.2d 20
- *Maverick Entertainment Group, Inc. v. Does 1-2,115* (D. D.C. 2011) 810 F.Supp.2d 1
- *Voltage Pictures, LLC v. Does 1-5,000* (D. D.C. 2011) 818 F.Supp.2d 28
- *Call of the Wild Movie, LLC v. Smith* (D. D.C. 2011) 274 FRD 334
- *Maverick Entertainment Group, Inc. v. Does 1-2,115* (D. D.C. 2011) 276 FRD 389
- *Voltage Pictures, LLC v. Vazquez* (D. D.C. 2011) 277 FRD 28
- *Achte/Neunte Boll Kino Beteiligungs GmbH & Co. v. Does 1-4,577* (D. D.C. 2010) 736 F.Supp.2d 212
- *West Bay One, Inc. v. Does 1-1,653* (D. D.C. 2010) 270 FRD 13

**Brian T. Murray** was an associate at Johnson & Johnson LLP. He specializes in entertainment law, consumer protection, class actions, and complex business litigation. Mr. Murray graduated *cum laude* from Elon University where he received a Bachelor of Arts in History and a Bachelor of Fine Arts in Acting. In 2012, Mr. Murray earned his

J.D. from Pepperdine University School of Law where he was a merit scholarship award recipient. In 2012, Mr. Murray also earned his Masters Degree in Dispute Resolution from the distinguished Straus Institute for Dispute Resolution. While at Pepperdine, Mr. Murray completed an externship for a federal judge and an internship with the United States Department of Justice. Mr. Murray also served as the Managing Editor of the *Pepperdine Dispute Resolution Law Journal*.

**John D. Fowler** was an associate at Johnson & Johnson LLP. He earned a B.A. in English from Vanderbilt University. In 2010 he graduated from Loyola Law School. While there he served as the General Managing Editor of The Los Angeles Public Interest Law Journal, and as a member of the Scott Moot Court Honors Board. Mr. Fowler won “Best Overall Advocate” for highest combined oral advocacy and appellate brief score in the Scott Moot Court competition, competed in the National Moot Court Competition, and served as an Appellate Advocacy teaching assistant as a member of the board.

Mr. Fowler gained extensive litigation experience as a certified law clerk in the Los Angeles District Attorney’s office, working on over 25 cases, and personally arguing 8 juvenile bench trials. His pro-bono advocacy experience includes work with the General Relief Advocacy Project, and the Alliance for Children’s Rights.

**Ilyssa M. Adler** was an associate at Johnson & Johnson LLP. She earned a B.A. in Anthropology from Brandeis University in 2009. In 2012 she earned her J.D. from Southwestern Law School, where she was honored on the Dean’s List and was a recipient of a Merit Scholarship. While at Southwestern, Ms. Adler served as an Associate Editor of the Southwestern Journal of International Law. Ms. Adler won First Year Advocate in the Negotiation Competition at Southwestern, was a member of the Negotiation Honors Program, and in 2012 won First Place in the Lewis and Clark National Environmental Negotiation Competition.

**Aminah H. Qureshi** was an associate at Johnson & Johnson LLP. Her practice focuses on entertainment litigation, civil litigation, and complex business litigation. Ms. Qureshi earned her B.A. in International Relations, with a minor in Business Administration, from the University of Southern California, where she graduated cum laude and with honors. After graduating from the University of Southern California, Ms. Qureshi spent five years as a management consultant for Accenture, LLP, where she worked with media, entertainment and energy companies. Ms. Qureshi then earned her J.D. from the University of Richmond, where she served as the Allen Chair Executive Editor of the University of Richmond Law Review and was a board member of the University of Richmond Moot Court.

**Jennifer Ro** was an associate at Johnson & Johnson LLP. Ms. Ro graduated from Seattle University Law School in 2009. She earned a Bachelor of Arts degree in Political Science from the University of California at Berkeley in 2004, where she graduated with Honorable Distinction. Her practice is focused on intellectual property, entertainment, class action and complex business litigation. Ms. Ro has experience and success defending clients involved in a wide variety of disputes arising in the areas of copyright, trademark, trade secret, defamation, antitrust, unfair competition and rights of publicity. Ms. Ro has also defended clients involved in complex commercial litigation matters, including disputes arising out of claims for breach of contract, fraud, tortious interference and breach of fiduciary duty.

As part of the Special Complex Litigation Unit of the Los Angeles City Attorney's Office, Ms. Ro prosecuted civil enforcement actions under the Unfair Competition Law (California Business and Professions Code Section 17200 et seq.) and the False Advertising Law (California Business and Professions Code 17500 et seq.) against corporations engaged in fraud and other unlawful conduct against California consumers. Ms. Ro was a federal judicial clerk for the Honorable Christina A. Snyder, the Honorable Dean D. Pregerson, the Honorable S. James Otero and the Honorable Robert M. Takasugi for the United States District Court for the Central District of California.

## PAST AND PENDING CLASS ACTION LAWSUITS

*Bedran v. American Express Travel Related Services, Inc.*, Los Angeles Superior Court Case No. BC241979. We brought a class action against American Express that exposed a systematic error that caused card members to unnecessarily forfeit up to 1 Billion of the Membership Rewards Program (MRP) points. The matter settled for the return to card members nationwide of a minimum of 450 million and up to 1 Billion MRP points, as well as the correction of the systematic error causing the problem. We were sole counsel.

*Fears v. Wilhelmina, et. al.*, Case No. 02-CV-4911 (S.D.N.Y.). We pioneered a class action lawsuit against the major New York model agencies (including Ford Models, Elite, Wilhelmina) on behalf of thousands of New York models for conspiring to fix model commissions and other terms in violation of the Sherman Antitrust Act. The matter resulted in an approximate \$25 million recovery for the models, including substantial reforms in the manner in which model agencies can operate. Published Decisions: *Fears v. Wilhelmina Model Agency, Inc.*, 2005 WL 1325297 (S.D.N.Y. Jun 06, 2005); *Fears v. Wilhelmina Model Agency, Inc.*, 2004 WL 594396, 2004-1 Trade Cases P 74,351 (S.D.N.Y. 2004); *Fears v. Wilhelmina Modeling Agency, Inc.*, 61 Fed. R. Evid. Serv. 1451 (S.D.N.Y. 2003). We were co-lead counsel in the case.

*Gustafson v. Chase Manhattan Bank USA, N.A.*, Los Angeles Superior Court Case No. BC319892. We brought a class action that challenged Chase's improper imposition of over the limit fees in connection with cardholders' transfer of previous loan balances to certain of Chase's credit card products. The case settled and was approved by the Court, resulting in a fund of approximately \$300,000 for a nationwide class. We were sole counsel.

*Ory. v. Columbia House Music Club*, U.S. District Court for the Central District of California, Case No. CV02-2342SJO. We brought a class action lawsuit for copyright infringement against record clubs, Columbia House and BMG Direct, as a result of their 30 year practice of paying composers of musical compositions only 75% of the publishing royalties they are statutorily entitled. The matter was successful (despite that a nearly identical action was dismissed by the courts 10 years earlier), resulting in a \$6.5 million settlement for composers as well as industry reforms preventing this conduct in the future. We were co-lead counsel in the case.

*Webster v. Allstate Insurance Company, Progressive Casualty Insurance Company*, Los Angeles Superior Court Case No.: BC338075. Class action alleging violation of unfair business practices law with antitrust issues relating to payment to body shops by insurance companies. We were lead counsel in the case.

*Richert v. Writers Guild of America West, Inc.*, Los Angeles Superior Court Case No. BC339972. Class action certified in 2010. The case settled for one hundred million dollars in unpaid foreign royalties to all members of the guild. We were lead counsel.

*Webb v. Directors Guild of America, Inc.*, Los Angeles Superior Court Case No. BC352621. Class action certified and settled which will cause over \$5 million dollars of unpaid royalties to be paid out to all the members of the guild. We were sole counsel.

*Osmond v. Screen Actors Guild, Inc.*, Los Angeles Superior Court Case No. BC377780. Class action certified and settled for tens of millions of dollars in unpaid royalties to be paid to the members of the guild. We were lead counsel in the case.

*Miller v. City of Los Angeles, et al.*, Los Angeles Superior Court Case No.: BC356529. Pending class action alleging invasion of privacy based on illegal running of citizens' private records. The case was certified in 2013. The case is linked to the infamous, disgraced, private detective Anthony Pellicano. Mr. Pellicano bribed a Los Angeles police officer for over 15 years to illegally run private databases. We are sole counsel.

*Russo v. City of Beverly Hills, et al.*, Los Angeles Superior Court Case No.: BC356541. Recently settled class action alleging invasion of privacy based on illegal running of citizens' private records. The case is linked to the infamous, disgraced, private detective Anthony Pellicano. Mr. Pellicano bribed a Beverly Hills police officer for over 7 years to illegally run private databases. The case settled and the court granted final approval. We were sole counsel.

*Greenberg v. E-Trade Financial Corporation*, Los Angeles Superior Court Case No.: BC360152. Class action alleging invasion of privacy based on company's illegal recording of customers' calls. The case was certified and settled for seven million dollars. We were lead co-counsel.

*Galavis v. LA Models*, Los Angeles Superior Court Case No.: BC382372. Class action alleging breach of contract and unfair business practices for improperly calculating fees owed to the models and charging impermissible costs. We were sole counsel.

*Bouchard v. Optometrix, et al.*, Los Angeles Superior Court Case No.: BC416146. Class action alleging invasion of privacy based on hidden cameras in the exam rooms. The case was certified in 2011. This case was settled, and the court granted final approval. We were sole counsel.

*Armuth v. Linton*, U.S. District Court for the Central District of California, Case No. CV 11-0220-AHM-(Ex). Consumer class action in based on false advertising of beauty products. This case was recently settled in 2012, and the court granted final approval. We were sole counsel.

*Gerash v. Verizon Communications*, Los Angeles Superior Court Case No.: BC459508. Class action alleging violations for unfair business practices in violation of various California statutes, including without limitation *Cal. Cvi. Code* §§1722, 1750 et seq., and *Cal. Bus. & Prof.* §17200 et seq. We were sole counsel.

*In Re: Warner Music Group Corp. Digital Download Litigation.*, Case No. CV 12-0559; *Otis Williams v. UMG Records*, Case No. CV 12-1289; *Martha Davis v. EMI Group Limited*, Case No. CV 12-01602 (all in U.S. District Court for the Northern District of California). Class actions on behalf of recording artists and producers who allege that they have been systematically underpaid royalties by the record companies. The *Warner* case recently settled for thirteen million and received final approval. The *UMG* case recently settled for nearly twelve million. We are co-lead counsel.

*Susan Dukow v. Sony Pictures Entertainment*, Case No. BC566884. Class action for Sony's failure to prevent the data breach that exposed more than 47,000 of the company's current and former employees' personal data, including Social Security numbers, salaries, and medical information. A group of hackers called Guardians of Peace took over Sony's network after its release of North Korean-themed comedy, *The Interview*. The claims against Sony are for violation of privacy rights, negligence, *Cal.Civ.Code* § 1798.80, and *Cal.Civ.Code* §56. Our firm is on the executive committee.

*Friedman v. Guthy-Renker LLC and WEN by Chaz Dean, Inc.*, United States District Court for the Central District of California, Case No. 14-cv-06009. Class action for false advertising and personal injury claims relating to shampoo sold by the defendants. The case recently settled for \$26 million. We were co-counsel.

*Colin Higgins Productions, Ltd. v. Universal City Studios, LLC*, Los Angeles Superior Court Case No. BC499180. Class action for breach of contract and conversion alleging that defendant short changed profit participants by accounting for only a fraction of home video earnings. The case recently settled for \$13 million. We were co-lead counsel and the court granted final approval of the settlement.

*Colin Higgins Productions, Ltd. v. Paramount Pictures Corporation*, Case No. BC499179; *Stanley Donen Films, Inc. v. Twentieth Century Fox Film Corporation*, Case No. BC499181; *Larry E. Martindale v. Sony Pictures Entertainment, Inc.*, Case No. BC499182; *Stuntman, Inc. v. Warner Bros. Entertainment, Inc.*, Case No. BC500040;

*Joan J. Buck v. Metro-Goldwyn-Mayer Studios, Inc.*, Case No. BC540146 (all in Los Angeles Superior Court). Class actions for breach of contract and conversion alleging that movie studios have short changed profit participants by accounting for only a fraction of home video earnings. We are co-lead counsel.