

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

SANKTOKH SOHAL, Individually and on) No. 1:15-cv-00393-DAP
Behalf of All Others Similarly Situated,)
) Judge Dan Aaron Polster
Plaintiff,)
) CLASS ACTION
vs.)
)
ELLIS YAN, *et al.*,)
)
Defendants.)
)
_____)

**DECLARATION OF JACK LANDSKRONER FILED ON BEHALF OF
LANDSKRONER GRIECO MERRIMAN, LLC IN SUPPORT OF APPLICATION FOR
AWARD OF ATTORNEYS' FEES AND EXPENSES**

I, Jack Landskroner, declare as follows:

1. I am the managing member of Landskroner Grieco Merriman, LLC (“LGM”). I am submitting this declaration in support of my firm’s application for an award of attorneys’ fees and expenses/charges (“expenses”) in connection with services rendered in the above-entitled action.

2. This firm is liaison counsel of record for plaintiff Tim Williams.

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 managing member who oversaw and/or 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, reductions were made to both time and expenses in the exercise of billing judgment. As a result of this review and the adjustments made, 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 reductions referred to above, the number of hours spent on this litigation by my firm is 74.20. 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 \$39,832.00. 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 \$2,669.02 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) Filing, Witness and Other Fees: \$400.00. These expenses have been paid to the court for filing fees and or other fees. The dates of payment are set forth in Exhibit C.

(b) Transportation, Hotels & Meals: \$1,586.71. In connection with the prosecution of this case, the firm has paid for travel expenses to attend, among other things, court hearings, to meet with witnesses, mediators and opposing counsel and to take or defend depositions. The date, destination and purpose of each trip is set forth in Exhibit D.

(c) Photocopies: \$7.50. In connection with this case, the firm made 50 in-house black and white copies, charging \$0.15 per copy for a total of \$7.50. Each time an in-house copy machine is used, our billing system requires that a case or administrative billing code be entered and that is how the 50 copies were identified as related to this case.

(d) Online Legal and Financial Research: \$481.60. These included vendors:

1. Class Action Research & Litigation Support Services, Inc.; and
2. Pacer Service Center.

These expenses represent the expenses incurred by LGM 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.

The identification and background of my firm and its partners is attached hereto as Exhibit E.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of June, 2017 at Cleveland, Ohio.



JACK LANDSKRONER

EXHIBIT A

EXHIBIT A
LODESTAR

LANDSKRONER GRIECO MERRIMAN, LLC
Inception through June 15, 2017

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Jack Landskroner (3/2/15-12/31/16)	(P)	39.10	\$595	\$23,264.50
Jack Landskroner (1/1/17-Present)	(P)	6.30	\$650	\$4,095.00
Paul Grieco	(P)	2.30	\$575	\$1,322.50
Drew Legando	(A)	23.40	\$450	\$10,530.00
Paralegals		3.10	\$200	\$620.00
<i>TOTAL</i>		<i>74.20</i>		<i>\$39,832.00</i>

(P) Partner

(A) Associate

EXHIBIT B

EXHIBIT B
EXPENSES/CHARGESLANDSKRONER GRIECO MERRIMAN, LLC
Inception through June 15, 2017

<i>CATEGORY</i>	<i>TOTAL</i>
Filing, Witness and Other Fees	\$400.00
Transportation, Hotels & Meals	\$1,586.71
Telephone, Facsimile	\$33.21
Messenger, Overnight Delivery	\$160.00
Photocopies	
In-House Black and White Copies: (50 copies at \$0.15 per page)	\$7.50
Online Legal and Financial Research	\$481.60
<i>TOTAL</i>	<i>\$2,669.02</i>

EXHIBIT C

EXHIBIT C

LANDSKRONER GRIECO MERRIMAN, LLC
Inception through June 15, 2017

Filing, Witness and Other Fees: \$400.00.

<i>DATE</i>	<i>VENDOR</i>	<i>PURPOSE</i>
03/03/15	U.S. District Court Northern District of Ohio	Filing Fee

EXHIBIT D

EXHIBIT D

LANDSKRONER GRIECO MERRIMAN, LLC
Inception through June 15, 2017

Transportation, Hotels & Meals: \$1,586.71.

<i>NAME</i>	<i>DATE</i>	<i>DESTINATION</i>	<i>PURPOSE</i>
Drew Legando	11/17/16 – 11/19/16	New York	Mediation

EXHIBIT E

EXHIBIT E

LANDSKRONER GRIECO MERRIMAN
ATTORNEYS & ADVOCATES
A Limited Liability Company

1360 West 9th Street, Suite 200, Cleveland, Ohio 44113
Telephone 216.522.9000 Toll Free 866.522.9500
Facsimile 216.522.9007
Website www.lgmlegal.com
Email jack@lgmlegal.com

FIRM RESUME

Landskroner Grieco Merriman, LLC (LGM) is a Cleveland-based law firm representing plaintiffs in complex civil litigation in the state and federal courts of Ohio and throughout the United States. The firm has built a reputation on providing quality representation to its clients in conjunction with aggressive advocacy and high standards of ethical conduct to both individuals and classes of plaintiffs in Ohio and across the country.

In its complex litigation practice, LGM has successfully served in the capacity of lead, co-lead, and liaison class counsel representing consumers, small businesses, and institutions in class action litigation, including claims involving securities fraud; consumer fraud; antitrust violations; contractual breaches; bad faith insurance practices; and statutory violations, including claims under consumer protection and deceptive trade practice laws, the Fair Labor Standards Act (FLSA), the Employee Retirement Income Security Act (ERISA), and others. LGM has also served and continues to serve as “special outside counsel” to the Ohio Attorney General on behalf of the Ohio Petroleum Underground Storage Tank Release Compensation Board.

LGM has been instrumental in the recovery of hundreds of millions of dollars for consumers, investors, and businesses. For example, in *Ritt v. Billy Banks / Sanford v. West Corp.*, LGM served as co-lead counsel and secured a \$40 million recovery for tens of thousands of consumers who alleged they had been unwittingly charged for a wholesale club membership on their credit cards as a result of deceptive marketing practices. In *Staeher v. Walter*, LGM’s efforts helped to recover \$70 million and to bring about corporate governance changes for the benefit of the Cardinal Health Corporation in a shareholder derivative action that alleged self-dealing and fiduciary breaches by company insiders. In *Snodgrass/Utterback v. Bob Evans Farms, Inc.*, LGM served as class counsel helping to secure a \$17 million settlement for assistant managers denied overtime wages under the Fair Labor Standards Act. In *Eubanks v. Panther II Transportation*, LGM recovered funds for over 1000 independent over-the-road truck drivers who alleged their contracts were breached and federal truth-in-leasing laws were violated by the company’s charge-back practices. In *In re: Scrap Metal Antitrust Litigation*, LGM served to assist in the recovery of \$34 million on behalf of businesses affected by price fixing and anti-competitive behavior in the scrap metal industry.

Recently, LGM, serving as lead counsel in *Jones v. City of Los Angeles*, negotiated a settlement providing 100% recovery for over 1.6 million customers of the Los Angeles Department of Water and Power (DWP). These customers were overbilled as a result of a defective software installation of the utility’s new customer billing system. As part of the settlement, nearly \$67.5 million will be

returned to customers, and DWP has instituted substantial remedial governance and operational changes to help reform and stabilize DWP's billing operations.

In its general practice, the firm represents Ohio families in their individual claims for catastrophic harm caused by defective products, unsafe work environments, negligent medical care, as well as in claims arising from insurance disputes, breaches of fiduciary duty, and predatory lending practices. LGM also represents clients in mass tort actions and has served in leadership and on steering committees in multiple multi-district litigation (MDL) actions.

LGM attorneys have significant trial experience and have been recognized at local, state, and national levels for their skills and accomplishments as civil litigators. In addition to its three named principals, the firm employs associate attorneys, paralegals, and administrators to ensure each case is fully staffed in order to achieve a just and efficient outcome for its clients.

SAMPLE CLASS ACTION AND DERIVATIVE CASE INVOLVEMENT

Pending Cases:

- *Chapman v. Tristar Products, Inc.*, U.S.D.C. Case No. 1:16-cv-1114, N.D. Ohio: Products liability action alleging manufacturing defects in a pressure cooker
- *Lindsey, et al. v. Tire Discounters, Inc.*, U.S.D.C. Case No. 2:15-cv-3065, S.D. Ohio: Collective action under the Fair Labor Standards Act for unpaid overtime wages
- *Antwon Jones v. City of Los Angeles, et al.*, Case No. BC577267, Superior Court of the State of California, County of Los Angeles (lead counsel): Class action alleging substantial customer overbilling by the Los Angeles Department of Water and Power in breach of contract and in violation of California unfair competition laws and consumer legal remedies act (Settled: Preliminary Approval Granted December 30, 2016)
- *Clint Yoby v. City of Cleveland*, Case No. CV-15-852708, Cuyahoga Ct. Comm. Pl., Ohio: Class action alleging improper assessment of Environmental and Ecological Charges by Cleveland Power to customers, in violation of city ordinances
- *O&R Construction, LLC v. Dun & Bradstreet Credibility Corporation*, U.S.D.C. Case No. 2:12-cv-02184, W.D. Washington: Consumer class action alleging deceptive business practices by defendants in the realm of commercial credit reporting and monitoring (Settled: Pending Court Approval)
- *Kampfer v. Fifth Third Bank, et al.*, U.S.D.C. Case No. 3:14-cv-02849, N.D. Ohio: Class action under the Fair Labor Standards Act for unpaid overtime wages (Settled: Pending Court Approval)
- *In re Jimmy John's Overtime Litigation*, U.S.D.C. Case No. 14:-cv-5509, N.D. Illinois: Collective action under the Fair Labor Standards Act for unpaid overtime wages
- *Fenley v. Wood Group Mustang, Inc.*, U.S.D.C. Case No. 2:15-cv-00326, S.D. Ohio (liaison counsel): Collective action under the Fair Labor Standards Act for unpaid overtime wages and liquidated damages

- *Poteat v. Visionworks of America, Inc.*, U.S.D.C. Case No. 1:15-cv-02306, N.D. Ohio: Class action alleging violations of the Ohio Consumer Sales Practices Act (Settled: Pending Court Approval)
- *Justyn A. Grimsley v. Environmental Management Specialists, Inc.*, U.S.D.C. Case No. 2:15-cv-2371, S.D. Ohio: Collective action under the Fair Labor Standards Act for unpaid overtime wages
- *Britts v. Stevens Van Lines, Inc.*, U.S.D.C. Case No. 15-cv-01267, N.D. Ohio: Truth-in-Leasing class action against Stevens Trucking
- *Klayko, et al. v. Yaskowitz, et al.*, U.S.D.C. Case No. 1:16-cv-00268, N.D. Ohio: Collective action for violation of tip-credit provisions
- *Osman v. Grube, Inc., et al.*, U.S.D.C. Case No. 3:16-cv-00802, N.D. Ohio: Collective action for violation of tip-credit provisions
- *Jammal v. American Family Ins. Grp.*, U.S.D.C. Case No. 1:13-cv-0437, N.D. Ohio: Certified class action to obtain ERISA benefits on behalf of insurance agents improperly designated as Independent Contractors (Tried to Verdict for Plaintiffs – Pending Post-trial Motions)

Resolved Claims:

- *In re Elk Cross Timbers Decking Marketing, Sales Practices and Products Liability Litigation*, MDL No. 2577, D. New Jersey (Steering Committee member): Products liability action alleging manufacturing defects in composite wood decking
- *Wiese v. Cach LLC, et al.*, Case No. 13-2-33354-6, Superior Court of the State of Washington, King County (co-lead counsel): Class action for violation of Washington statutes alleging unlawful collection of debt purchased by debt buyer. Injunction obtained preventing collection of attorneys' fees and interest on acquired judgments
- *In re Dana Corporation Securities Litigation*, U.S.D.C. Case No. 05-cv-07393, N.D. Ohio (liaison counsel): Securities fraud class action alleging defendants violated federal securities law
- *Koster v. Fidelity Assurance Associates, LLC*, Case No. 2010-CA-003482, Circ. Court Fifth Jud. Circ. Lake Cty, FL (co-lead counsel): Class action for securities fraud related regarding sale of Viatical Insurance Investments
- *David Snodgrass v. Bob Evans Farms, Inc.*, U.S.D.C. Case No. 2:12-cv-00768, S.D. Ohio: Class action under the Fair Labor Standards Act for unpaid overtime wages and liquidated damages
- *James Utterback v. Bob Evans Farms, Inc.*, Case No. CV 14 826909, Cuyahoga Ct. Comm. Pl., Ohio: Class action under the Ohio Minimum Wage Act for unpaid overtime wages
- *In re: Vertrue, Inc. Marketing and Sales Practices Litigation*, MDL No. 2044, N.D. Ohio (co-lead counsel): Consumer class action alleging defendants violated consumer protection statutes by improperly charging consumer credit cards for a wholesale buy-club membership without authorization

- *Heather Wright, et al. v. Nationstar Mortgage LLC*, U.S.D.C., Case No. 1:14-cv-10457, N.D. Illinois: Class action alleging violations of the Telephone Consumer Protection Act
- *Michael Blank v. LCA-Vision, Inc., et al.*, Case No. A 1401239, Hamilton Ct. Comm. Pl., Ohio: Derivative and class action shareholder complaint brought on behalf of LCA-Vision Inc. breach of fiduciary duty, duty of loyalty, and/or good faith and independence owed to the company in connection with the sale of the company to PhotoMedex
- *Kirk Dahl, et al. v. Bain Capital Partners, LLC*, U.S.D.C. Case No. 1:07-cv-12388, Massachusetts: Class action alleging violation of the Sherman Act
- *Michael Auld v. Cooper Tire & Rubber Company*, Case No. 13-CV-293, Hancock Ct. Comm. Pl., Ohio: Shareholder derivative claims for alleged breach of fiduciary duty by officers and directors of Cooper Tire & Rubber Company
- *Louisiana Municipal Police Employees Retirement System v. KPMG, LLP, et al.*, U.S.D.C. Case No. 10-cv-01461, N.D. Ohio: Securities fraud class action
- *Eubanks v. Panther II Transportation, Inc.*, U.S.D.C. Case No. 1:11-cv-02705, N.D. Ohio: Class action brought on behalf of Panther truck drivers alleging violations of the Federal Truth in Leasing Act where driver were not compensated in accordance with federal requirements
- *In re JP Morgan Chase Home Equity Line of Credit Litigation*, MDL No. 2167, N.D. Illinois: Consumer class action alleging breach of contract by Chase of consumers home equity lines of credit
- *NECA-IBEW Pension Fund v. Cox, et al.*, U.S.D.C. Case No. 1:11-cv-00451, N.D. Ohio: Shareholder derivative action challenging executive compensation plan approved by the board of directors after shareholder “no” vote under the Dodd Frank Act
- *In re Kitec Plumbing System Products Liability Litigation*, MDL No. 2098, W.D. Texas: Products liability action concerning the manufacturing, marketing and distribution of defective manufacture, market, and distribute defective plumbing fittings
- *In re Keycorp Derivative Litigation*, U.S.D.C. Case No. 10-cv-01786, N.D. Ohio: Derivative claims for alleged breach of fiduciary duty, abuse of control, gross mismanagement, waste of corporate assets and unjust enrichment by officers and directors of Keycorp arising from executive compensation after a “no” vote on “say or pay” vote mandated by the Dodd Frank Act
- *Dalesandro v. Scott Cowen, et al.*, Case No. CV 2010-12-8510, Summit Ct. Comm. Pl., Ohio: Derivative claims for alleged breach of fiduciary duty, abuse of control, gross mismanagement, waste of corporate assets and unjust enrichment by officers and directors of Jo-Ann Stores, Inc.
- *Electrical Workers Pension Fund v. American Greetings*, Case No. 09-687985, Cuyahoga Ct. Comm. Pl., Ohio: Derivative claims for alleged breach of fiduciary duty, abuse of control, gross mismanagement, waste of corporate assets and unjust enrichment by officers and directors of American Greetings arising from alleged backdating of stock options

- *Ritt v. Billy Blanks*, Case No. 424237, Cuyahoga Ct. Comm. Pl., Ohio (co-lead counsel): Consumer fraud class action alleging defendants violated consumer protection statutes by improperly charging consumer credit cards for a wholesale buy-club membership without authorization
- *Sanford v. West Corporation*, Case No. GIC805541, Superior Court of California, County of San Diego (co-lead counsel): Consumer fraud class action alleging defendants violated consumer protection statutes by improperly charging consumer credit cards for a wholesale buy-club membership without authorization
- *Greenwald v. AmTrust Financial Corporation*, Case No. CV 09 681596, Cuyahoga Ct. Comm. Pl., Ohio: Consumer class action in which plaintiffs alleged defendant suspended customers' home equity lines of credit improperly and in breach of contract
- *Kaye v. Southwest Airlines Co.*, Case No. 05-00712, District Court of Dallas County, Texas: Consumer class action in which plaintiffs allege that defendant improperly retained departure fees charged to consumers when travel was not commenced
- *In re Human Tissue Litigation*, U.S.D.C. Case No. 06-cv-135, MDL Docket No. 1763, New Jersey (MDL Plaintiffs' Executive Committee): Class action for product defect, battery and fraud in the harvesting, processing and sale of human tissue used in transplant procedures
- *Staehr v. Robert D. Walter, et al.*, Case No. 02-CVG-011-639, Delaware Ct. Comm. Pl., Ohio (co-lead counsel): Shareholder derivative claims for alleged breach of fiduciary duty, abuse of control, gross mismanagement, waste of corporate assets and unjust enrichment by officers and directors of Cardinal Health
- *Leonard v. UNUMProvident Corporation*, Case No. 04-1337, Hamilton County Chancery Court, Tennessee (lead counsel): Shareholder derivative claims for alleged breach of fiduciary duty, abuse of control, gross mismanagement, waste of corporate assets and unjust enrichment by the directors and officers of UNUMProvident Corporation related to the use of alleged hidden contingent commissions and kickbacks in the sale of group insurance
- *Kaye v. Koninklijke Ahold, NV dba Royal Ahold*, U.S.D.C. Case No. 03-cv-1411, S.D. New York (cooperating counsel): Securities fraud class action alleging defendants violated federal securities law
- *In re Carbon Black Antitrust Litigation*, U.S.D.C. Master Docket No. 03-cv-10191, Massachusetts (cooperating counsel/discovery team)
- *In re FirstEnergy Corp. Securities Litigation*, U.S.D.C. Case No. 03-cv-1684, N.D. Ohio (local trial counsel): Securities fraud class action alleging defendants violated federal securities law
- *In re Empyrean Bioscience, Inc. Securities Litigation*, U.S.D.C. Master File No. 02-cv-1439, N.D. Ohio (liaison and local trial counsel): Securities fraud class action alleging defendants violated federal securities law

- *In re Scrap Metal Antitrust Litigation*, U.S.D.C. Case No. 02-cv-0844, N.D. Ohio, (cooperating counsel on discovery team): Plaintiffs allege that scrap dealers unlawfully conspired to fix the price of scrap metal
- *Menear v. Mark Nutritionals, Inc. dba Body Solutions*, Case No. 459890, Cuyahoga Ct. Comm. Pl., Ohio/U.S. Bankruptcy Court No. 02-54469, W.D. Texas (lead counsel in Ohio prior to removal to federal bankruptcy court): Consumer fraud class action alleging defendants' product was ineffective and did not provide any benefit as promised
- *In re Advanced Lighting Technologies, Inc. Securities Litigation*, U.S.D.C. Master File No. 99-cv-836, N.D. Ohio (liaison and local trial counsel): Securities fraud class action alleging defendants violated federal securities law
- *Iron Workers Local Union No. 17 Insurance Fund v. Phillip Morris, Inc.*, U.S.D.C. Case No. 97-cv-1422, N.D. Ohio (liaison and local trial counsel)
- *Hawaii Ironworkers Annuity Trust Fund v. Bernard S. Cole, et al.*, U.S.D.C. Case No. 10-cv-003761, N.D. Ohio (liaison counsel): Securities fraud class action alleging defendants violated federal securities law
- *In re Cox Enterprises, Inc. Set-Top Cable Television Box Antitrust Litigation*, U.S.D.C. Case No. 12-ML-2048-C, W.D. Oklahoma: Consumer class action alleging violation of the Sherman Act for unreasonable restraint of trade resulting from Cox's tying arrangements in conjunction with set-top cable boxes
- *Robinson v. CBC Pipeline, LLC*, U.S.D.C. Case No. 2:15-cv-03087, S.D. Ohio: Collective action under the Fair Labor Standards Act for unpaid overtime wages

JACK LANDSKRONER, ESQ.
LANDSKRONER GRIECO MERRIMAN, LLC
1360 West 9th Street, Suite 200
Cleveland, Ohio 44113-1254
jack@lgmlegal.com

CURRICULUM VITAE

EDUCATION

1989 B.A., Boston University (Law and Social Relations)
1992 J.D., Cleveland Marshall College of Law

BAR ADMISSIONS/CERTIFICATIONS

1992 Admitted to the Ohio Bar
1992 Admitted to the Northern District of Ohio Federal Trial Bar
1994 Admitted to United States Court of Appeals, Sixth Circuit
1999 Board Certified Trial Advocate by the National Board of Trial Advocacy (NBTA)
2002 Admitted to the United States Supreme Court
2003 Admitted to the United States Court of Federal Claims
2004 Admitted to the Southern District of Ohio Federal Trial Bar
2007 Admitted to the United States Court of Appeals, Ninth Circuit
2012 Board Certified Civil Pretrial Practice Advocate (NBCPPA)

EMPLOYMENT

2003-Present Principal, Landskroner Grieco Merriman, LLC
Attorney and Advocate practicing Civil Litigation; class action litigation, wrongful death, product liability, personal injury, medical malpractice, insurance law, with special interest in the representation of children.

1997-2002 Managing Member, The Landskroner Law Firm, Ltd.

1992-1996 Associate, Landskroner & Phillips Co., L.P.A.

1989-1992 Landskroner & Phillips Co., L.P.A.

PROFESSIONAL MEMBERSHIPS/APPOINTMENT/CERTIFICATES/HONORS

- Courage Award by the Ohio Association for Justice (2014)
- Ohio Litigation Star -Benchmark Plaintiff from the Publishers of Institutional Investor (2013-2014)
- Cleveland Metropolitan Bar Association (2012-2015)
- Cleveland's "Top Rated Lawyers" by Martindale Hubbell (2012-2013)
- 2010 Leading Lawyer by Inside Business Magazine - honoring the top one percent of Northeast Ohio's Attorney
- Outside Counsel to the Attorney General of the State of Ohio (2009-2016)
- AV-rated Attorney (Highest Rating Awarded Martindale Hubbell)
- Ohio SuperLawyers (2004-2017)
- Recognized as One of Ohio's Top 100 Attorneys

- Life Member: Eighth Judicial District of Ohio Conference
- American Association for Justice (AAJ)
- Ohio Association for Justice (OAJ)
- Public Justice Foundation (PJ): Elected President (2012-2013); Executive Committee Member (2006-2016); Elected to The Board of Directors (1999-Present) "State of Ohio Coordinator" (1994-Present)
- Federal Bar Association: Northern District of Ohio Chapter (2009-Present)
- Kent State University Paralegal Program Advisory Committee (1999-2012)
- Cuyahoga County Guardian Ad Litem (1999-Present)
- Cleveland Academy of Trial Attorneys (CATA)
Elected to the Board of Directors (2002-2005) (2006-2009) (2009-2012)
- 2007 Recipient of the CATA President's Award for exceptional services
- 2013 Recipient of the CATA President's Award for providing National Leadership
- Cuyahoga County Bar Association (2004-2005)
- Ohio State Bar Association (1992-2001)
- Cleveland Marshall College of Law, Alumni Association (Life Member)
- Named to InsideBusiness (2009) Recognized as one of Northeast Ohio's Top Attorneys

LECTURER/COMMENTATOR

- Eight District Judicial Conference (Moderator): Class Actions Discussion Panel (2015)
- Ohio Association of Justice (OAJ): "Consumer Law Update: Identifying Consumer Cases for the Non-Consumer Lawyer" (2014)
- National Association of Trial Lawyers - Executives (NATLE) 2013: Public Justice and Public Interest Litigation (San Francisco, CA)
- Baldwin Wallace University: Guest lecturer "Business Ethics and Legal Accountability of Multinational Corporations" (2012-2013)
- Business Tort Seminar "Shareholder Derivative Actions" (2011) (Ohio Association for Justice)
- Akron Law School: Guest speaker "Public Interest Work as a Private Practitioner" (2011)
- Federal Bar Association, Northern District of Ohio: "Update on Class Actions" Discussion Panel (2010)
- Ohio Association of Justice (OAJ): "Class Securities & Derivative Actions" (2008)
- Cleveland Academy of Trial Attorneys (CATA): "Consumer Class Action Litigation" (2004)
- Cleveland Academy of Trial Attorneys (CATA): "Employment Intentional Tort" (2002)
- National Council of Jewish Women: Child Advocacy: "Love A Kid, Lock A Gun" (2001)
- Ohio Academy of Trial Lawyers (OATL): Medical Negligence Seminar - Mediation in the Medical Malpractice Case (1999)
- 850 Radio Mike Solomon Show: "Nursing Homes Negligence" (1999)
- Faces of the Future Child Advocacy National Seminar: "Focus Groups" Atlanta, GA (1999)
- WJW TV 8 Cleveland: Tort Reform (1997)
- International Society of Refractive Surgeons; Mid-Summer Symposium: "The Role of FDA in Malpractice Liability" Minneapolis, MN (1996)

- WNPR/WCPN National Public Radio: Guest Commentator “House Bill 350-Tort Reform” (1996)
- Case Western University School of Law: “Public Interest Law” (1996)
- WERE Radio: “Bob Zashin and the Law” guest appearance “Consumer Law”, “Product Liability Law” (1994) (1999)
- WJW TV 8 Cleveland: Appearance as Guest Commentator (1995)
- Francis Payne Bolton School of Nursing, Case Western Reserve University: “Legal Aspects of Nurse Midwifery (The Federal Dumping Statute)” (1994)
- Fraternal Order of Police George Murray (Lodge 67): “Labor Relations” (1994)
- University School: Constitutional Law Classes; Business Profession Classes (1993-1995)

PUBLICATIONS

- Bar Journal (Cleveland Metropolitan Bar Association): “Arbitration and the Effects of the U.S. Supreme Court’s *Concepcion* Case” (January 2013) Co-Author F. Paul Bland
- Cleveland Academy of Trial Attorneys: News - “Bad Faith Insurance Practices” (Summer 2006) Co-Author Rebecca Castell
- Ohio Trial (Ohio Academy of Trial Lawyers): “Gender Injustice and Tort Reform” (Vol. 14, Issue 2), Co-Author David M. Beninger (Summer 2004)
- Cleveland Academy of Trial Attorneys: News: “Class Action Litigation” (Summer 2003)
- Ohio Trial (Ohio Academy of Trial Lawyers): “Fighting Federal Preemption” (Volume 13, Issue 2), Co-Authors Arthur H. Bryant and Leslie A. Brueckner
- Ohio Trial (Ohio Academy of Trial Lawyers): “Fighting Unnecessary Court Secrecy” (Volume 13, Issue 1)
- Ohio Lawyer: “U.S. Supreme Court Allows Fee-Silent Arbitration Clauses” (March/April 2001, Volume 15, No. 2)
- The Cleveland Bar Journal: “Federal Pre-Emption: *Geier* and its implications” (February 2001)
- Guest Columnist: Chagrin Valley Times (2005-Present)
- Contributor Opinion Editorials: “The Columbus Dispatch” (1997-Present)
- Contributor Opinion Editorials: “The Daily Legal News” (1995-Present)
- Contributor Option Editorials: “Cleveland Plain Dealer” (1994-Present)
- Contributor to Ohio Academy of Trial Lawyers “Advisory” (1995-Present)
- Columnist Link Magazine, The Legal Eagle: “Prenuptial Agreements, A Thing That Makes You Go Hmm” (1992)

NON-PROFESSIONAL MEMBERSHIPS AND AFFILIATIONS

- Founder of The Landskroner Foundation for Children: Children’s Advocacy Organization
- Reach Out America: Non-Profit Organization Created in 2005 to Assist Hurricane Victims
- Rotsky Foundation for Mentors
- Boston University Alumni Representative
- Sigma Alpha Mu Fraternity
- The Club at Key Center
- Stand For Children

- United Cerebral Palsy
- Volunteer: "Meals on Wheels" (1992-2001)
- Cleveland City Club (1997-2001)
- Big Brothers/Big Sisters of Cleveland - Division of Youth Visions (1992-1995)

PAUL GRIECO, ESQUIRE
LANDSKRONER GRIECO MERRIMAN, LLC
1360 West 9th Street, Suite 200
Cleveland, Ohio 44113-1254
paul@lgmlegal.com

CURRICULUM VITAE

EDUCATION

1986 B.A., University of Vermont
1989 J.D., Case Western Reserve University

BAR ADMISSIONS/CERTIFICATION

1989 Admitted to New York Bar
1994 Admitted to United States District Court - Eastern and Southern Districts of New York
1995 Admitted to Ohio Bar
1998 Admitted to United States District Court - Northern District of Ohio
2003 Admitted to United States District Court - Southern District of Ohio

EMPLOYMENT

2003-Present Principal - Landskroner Grieco Merriman, LLC
Civil Litigation, wrongful death, product liability, personal injury, medical malpractice, insurance, contract, class action litigation, business litigation, and criminal defense

1995-2002 Landskroner Law Firm, Ltd.
Civil Litigation, wrongful death, product liability, personal injury, medical malpractice, insurance, contract, class action litigation, and criminal defense

1989-1995 New York Legal Aid Society - Criminal Defense Division
Criminal misdemeanor and felony case load, representing clients at all court appearances including arraignments, grand jury proceedings, pre-trial hearings and trial

PROFESSIONAL MEMBERSHIPS

- Ohio Association for Justice (OAJ): President (2016-2017)
- The Cleveland Academy of Trial Attorneys (CATA): Board of Directors Present (2008-Present)
- Ohio State Bar Association (OSBA)
- American Association for Justice (AAJ)
- The Justinian Forum

PUBLICATIONS AND LECTURES

- Fraternal Order of Police Labor Law Workshop: Annual Speaker
- Cleveland Communicator: Fraternal Order of Police Newsletter - "Your Rights as a Plaintiff"
- Ohio State Bar Association: Basics of Civil Litigation Seminar
- National Business Institute Seminars
 - Adjusting the Automobile Injury Claim in Ohio
 - How to Win Your Next Soft Tissue Injury Trial
 - How to Litigate Your First Civil Trial in Ohio
- Cleveland Bar Association: New Lawyer Training Program
- The Cheshire Cheese Club of Cleveland: The Truth Behind Tort Reform
- Cleveland Clinic Sports Medicine Course: Medical Malpractice Tort Reform in Ohio

RECOGNITION AND AWARDS

- Recipient of the Courage Award by the Ohio Association for Justice
- Ohio SuperLawyers (2010-2017)
- Ohio Association for Justice Distinguished Service Award (2011)
- AV Peer Rating - Martindale-Hubbell

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CURRICULUM VITAE

EDUCATION

1988 J.D., *cum laude* Harvard Law School
1984 B.A., Economics, *magna cum laude*, *Phi Beta Kappa* University of Notre Dame

LEGAL EXPERIENCE

2009-Present Partner, Landskroner Grieco Merriman, LLC
1991-1994 Ohio Attorney General Lee I. Fisher, Cleveland, OH
1991-1994 Attorney General, Executive Staff
1993-1994 Deputy Ohio Attorney General
1991-1992 Managing Attorney, Cleveland Office
1989-1990 Litigation Associated, Hahn, Loeser & Parks, Cleveland, OH
1988-1989 Judicial Clerkship, Honorable Frank J. Battisti, Chief Judge, United States District Court, Cleveland, OH

JOURNALISM EXPERIENCE

2001-Present Investigative Reporter, WJW-TV, Cleveland, OH
1995-2001 Investigative Reporter, WEWS-TV, Cleveland, OH

JOURNALISM HONORS

- Alfred I. DuPont-Columbia University Silver Baton (2006)
- I.R.E. Medal, Investigative Reporters & Editors (2005) (Finalist: 2001, 2002, 2004)
- National Headliner Awards
 - Health/Science Reporting (2008)
 - Investigative Reporting (2006)
 - Investigative Reporting (2005)
 - Continuing Coverage (2005)
 - Public Service (1998)
 - Poynter Institute, Ethics Fellow, St. Petersburg, FL, 2006
 - Thirty (30) Emmy Awards
 - Five (5) Regional Edward R. Murrow Awards
 - Runner Up, National Press Photographers Association (NPPA) Special Award for Reporting (2007)
 - National Emmy Award Nominations for Investigative Reporting (2002, 2007)
 - Finalist, IRE Tom Renner Award (2002)
 - Finalist, Jack R. Howard Award (2005)
 - Best Reporter in Ohio, Society of Professional Journalists (1998, 1999, 2000, 2005)

TEACHING EXPERIENCE

- Poynter Institute, Visiting Faculty, Enterprise & Investigative Reporting, St. Petersburg, FL (2005)
- Investigative Reporters & Editors, National Conference Speaker (2001, 2003, 2005, 2006, 2007) - Lectured on hidden cameras, confrontation interviews, and investigative reporting
- Harvard Negotiation Project, Teaching Assistant, Cambridge, MA (1987-1988)
- Assisted Professor Roger Fisher, Author of "Getting to Yes"

RECOGNITION AND AWARDS

- Ohio SuperLawyers (2015-2017)

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CURRICULUM VITAE

EDUCATION

2005 B.A., The George Washington University (International Affairs & Religion)
2008 J.D., Cleveland-Marshall College of Law

LEGAL EXPERIENCE

2008-Present Associate Attorney, Landskroner Grieco Merriman, LLC
Civil litigator focusing on complex litigation, including class and collective actions under state and federal statutes, as well as appellate practice. Prior experience includes the prosecution of individual claims for personal injury and insurance disputes.

ADMISSIONS

2008 The Ohio Bar and the Supreme Court of Ohio
2008 Northern District of Ohio
2010 Southern District of Ohio
2011 U.S. Court of Appeals for the Sixth Circuit
2013 District of Colorado

APPELLATE DECISIONS

- *Stefan v. Olson, et al.*, 497 Fed. Appx. 568 (6th Cir. 2012)
- *Holbrook v. Louisiana-Pacific Corp.*, 533 Fed. Appx. 493 (6th Cir. 2013)
- *Riscatti v. Prime Props. Ltd. P'ship*, 137 Ohio St.3d 123 (Ohio S. Ct. 2013)
- *Wiese v. CACH, LLC*, 189 Wn. App. 466, 358 P.3d 1213 (Wash. Ct. App. 2015)
- *Kerber v. Cuyahoga Heights*, 2015-Ohio-2766 (Ohio Ct. App.)
- *Matt v. Ravioli, Inc.*, 2014-Ohio-1733 (Ohio Ct. App.)

PROFESSIONAL MEMBERSHIPS

- Ohio State Bar Association
- Ohio Association for Justice
- Public Justice Foundation

RECOGNITION AND AWARDS

Ohio SuperLawyers *Rising Star (2012–2017)

ADELADI (LADI) WILLIAMS

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CURRICULUM VITAE

EDUCATION

- 2003 B.A., *cum laude*, English, Kent State University
Golden Key International Honor Society
- 2006 J.D., Cleveland Marshall College of Law, Cleveland State University
Moot Court Team: Member, Moot Court Board of Governors
Legal Writing Assistant

LEGAL EXPERIENCE

- 2015-Present Associate Attorney, Landskroner Grieco Merriman, LLC
Practicing civil litigation and appeals, including: insurance litigation, personal injury, medical malpractice, premise liability, business and family immigration, consumer class actions, securities and derivative cases, and small business representation
- 2009-2014: Cleveland, OH
Practiced Personal Injury law, Chapter 7 and 13 Bankruptcy law, Immigration Law, Consumer law, employment law and contract drafting and review
- 2007-2009: Cleveland, OH
Practiced civil litigation representing creditors in matters dealing with bank loans and other secured transactions, commercial and retail collections, insurance subrogation, landlord-tenant disputes, and foreclosures
- 2007: Cleveland, OH
Practiced immigration law including drafting petitions and related documents for business related immigration matters including employer letters of support, PERM applications, and labor certifications. Also prepared family-based immigration petitions, worked on deportation defense cases, including motions to terminate and BIA Appeals
- 2006: Judicial Extern to Chief Judge Solomon Oliver, Jr., U.S. District Court of Ohio, Northern District, Eastern Division

ADMISSIONS

- 2007 Admitted to Ohio Bar
- 2008 Admitted to United States District Court, Northern District of Ohio
- 2009 Admitted to United States Bankruptcy Court, Northern District of Ohio

PROFESSIONAL MEMBERSHIPS

- Ohio State Bar Association
- Ohio Association for Justice
- Cleveland Academy of Trial Attorneys
- Legal Aid Society of Cleveland: Member, Volunteer Lawyer Program

PUBLISHED CASES

- *Dorsey v. City of Cleveland, et al.*, 8th Dist. No. 101467, 2015 Ohio 1142 (2015)

RECOGNITION AND AWARDS

- Ohio SuperLawyers *Rising Star (2015-2017)

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CURRICULUM VITAE

EDUCATION

1980 B.A. History, Georgetown Law School, *magna cum laude*, Phi Beta Kappa
1983 J.D., Harvard Law School

LEGAL EXPERIENCE

2015-Present Associate Attorney, Landskroner Grieco Merriman, LLC
2005-2007 Prosecutor, City of Euclid
Litigation Associate, Moscarino & Treu
1994-1995 Assistant Ohio Attorney General, Cleveland, Ohio
1983-1994 Litigation Associate, Arter & Hadden
*Has argued before the Sixth Circuit Court of Appeals, Ohio Supreme Court,
and Ohio Courts of Appeals*

TEACHING EXPERIENCE

**Adjunct Professor of Law, Case Western Reserve University School of Law, Taught
Courses on Trial Tactics, Appellate Practice, Health Care Legislation, and Legislation**

GOVERNMENT EXPERIENCE

1995-2004 State Representative, Ohio House of Representatives
*Served as Ranking Minority Member on House Finance & Appropriations,
Ways & Means, and Criminal Justice Committees*
2007-2011 Director of Government Relations, Ohio Department of Development
2011-2013 Director of Regional Collaboration, Cuyahoga County Government

OTHER EXPERIENCE

- Senior Associate, Cleveland Tomorrow (1984-1985)
- Delegate, American Council of Young Political Leaders Trip to Australia
- Delegate, American-Swiss Foundation Trip to Switzerland
- Delegate, German Marshall Fund Trip to Germany & Spain

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 23, 2017, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/s/ Ellen Gusikoff Stewart
ELLEN GUSIKOFF STEWART (*pro hac vice*)