

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

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SUSAN SWETZ, individually on behalf of	:	CASE NO. 7:20-cv-04731-NSR
	:	
herself and all others similarly situated,	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	
	:	
GSK Consumer Health, Inc.,	:	
	:	
Defendant.	:	
	:	
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**DECLARATION OF KATHERINE A. BRUCE IN SUPPORT OF PLAINTIFFS’  
MOTION FOR FINAL APPROVAL OF SETTLEMENT AND MOTION FOR  
ATTORNEYS’ FEES, LITIGATION COSTS AND SERVICE AWARDS**

I, Katherine A. Bruce, hereby declare and state as follows:

1. I am a partner at the firm of Clarkson Law Firm, P.C. (“Clarkson”), one of the law firms representing Plaintiffs in this litigation and in *White v. GlaxoSmithKline Consumer Healthcare Holdings (USA) LLC*, (No. 5:20-cv-04048) (N.D. Cal.) (“the *White Action*”), a similar case against Defendant GlaxoSmithKline Consumer Healthcare Holdings (USA) LLC (“GSK”) pending in the United States District Court for the Northern District of California (collectively, “the Benefiber Litigation”).<sup>1</sup>

2. I submit this declaration in support of: (i) Plaintiffs’ Motion for Final Approval of Settlement; and (ii) Plaintiffs’ Motion for Attorneys’ Fees, Litigation Costs and Service Awards. I

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<sup>1</sup> Unless otherwise indicated, capitalized terms shall have the same meaning as they do in the Settlement Agreement. References to “§” are to sections of the Settlement Agreement, ECF No. 46-1, and all Settlement Agreement exhibits are referred to as “Ex #.”

am personally familiar with the facts set forth in this declaration. If called as a witness I could and would competently testify to the matters stated herein.

3. Clarkson has prosecuted the Benefiber Litigation solely on a contingent-fee basis and has been at risk of not receiving any compensation for prosecuting claims against GSK.

## **I. INVESTIGATION AND MANAGEMENT OF THE BENEFIBER LITIGATION**

4. Clarkson began its investigation into GSK's false advertising in May 2020. Clarkson reviewed publicly available documents, conducted product and legal research, communicated with potential and retained class representatives, and conferred with other counsel in advance of filing the complaint in the *White* Action on June 17, 2020.

5. Since its inception, Clarkson has actively participated in all aspects of the Benefiber Litigation, including, but not limited to: (1) case investigation; (2) drafting of the initial complaint; (3) opposing GSK's motion to transfer venue; (4) opposing GSK's motion to dismiss; (5) appearing at the hearing on GSK's motion; (6) drafting amended complaints; (7) preparing written discovery; (8) participating in case strategy decisions; (9) reviewing settlement discovery; (10) participating in mediation and settlement negotiations; (11) communicating frequently with defense counsel regarding litigation and settlement matters; (12) drafting the settlement agreement; and (13) preparing the settlement approval documents.

6. Additionally, Clarkson participated in regular calls with Class Counsel. During these calls, various aspects of the Benefiber Litigation were discussed.

## **II. MEDIATION AND SETTLEMENT**

7. Shortly after the Court's ruling on GSK's motion to transfer venue and motion to dismiss in the *White* Action, the Parties engaged in settlement discussions. Clarkson and Class Counsel engaged in several months of arms'-length negotiations.

8. As part of the settlement negotiations, two mediation sessions took place with Judge Denlow (Ret.). The parties participated in a mediation with Judge Denlow on January 21, 2021. The Parties were unable to resolve the lawsuits at this mediation session. However, the parties—with the assistance of Judge Denlow—continued to pursue settlement discussions for several weeks. On February 10, 2021, the parties participated in a second mediation session with Judge Denlow.

9. The matter did not resolve at mediation, however, the parties—with the assistance of Judge Denlow—continued to pursue settlement discussions for several weeks until they reached a settlement in principle. The parties then spent months working out the details in the Agreement, which is the product of hard-fought, arm's length negotiations.

10. On May 10, 2021, a settlement was reached between the parties.

11. At all times, the months'-long negotiations and extensive efforts, which ultimately resulted in the settlement presented to the Court, were adversarial, non-collusive, and conducted at arm's length.

### **III. CLARKSON'S LODESTAR AND LITIGATION EXPENSES**

12. This declaration generally summarizes the work performed by Clarkson for Plaintiffs and the Settlement Class Members in the Benefiber Litigation. As demonstrated below, Clarkson has worked diligently to perform tasks throughout the entire course of the Benefiber Litigation, including initial case investigation, filing the initial complaint, opposing a transfer motion and pleadings challenges, filing amended complaints, discovery, settlement discussions, and preparing the settlement agreement and motions for settlement approval. Throughout the Benefiber Litigation, GSK has strongly contested jurisdiction, venue, liability, damages, and class certification.

a. Before initiating any action and throughout the Benefiber Litigation, Class Counsel conducted a thorough investigation of the claims, both legal and factual. Specifically, Clarkson researched the legal landscape of nationwide and California claims for false advertising, consumer fraud and consumer protection, breach of warranty, unjust enrichment, and fraud or misrepresentation, including liability, remedies, defenses, and certification related issues; the industry and scientific literature regarding the manufacturing process to derive wheat dextrin and the efficacy of fiber supplements to reduce appetite or otherwise “curb cravings”; the Better Business Bureau’s National Advertising Division and National Advertising Review Board’s reports regarding their investigation and analysis of Benefiber’s natural and satiety claims; the advertising of Benefiber in all mediums; and the market segment for fiber supplements, including past and projected sales for the Covered Products and nationwide marketing and sales trends, practices, and patterns for the industry. Class Counsel not only used this research and investigation to draft and file the complaint, first amended complaint, and second amended complaint on June 17, August 27, and November 30, 2020 (*White*, ECF 1, 23, 44), but also to evaluate the risks, benefits, and likelihood of outcomes in prosecuting the Benefiber Litigation in comparison to a potential early resolution.

b. Additionally, Clarkson and Moon Law, APC spent significant time interviewing and vetting potential class action plaintiffs to ensure Class Members would be fairly and adequately represented by the proposed plaintiffs, including interviews, investigations into potential plaintiffs’ background and litigation history, and conflict checks.

c. After evaluating GSK’s motion to transfer venue and dismiss filed on August 13, 2020 (ECF 15-17), and on September 24, 2020 (*White*, ECF 15-17, 33-34), Clarkson extensively researched, drafted, and filed oppositions on October 8, 2020 (*White*, ECF 36-37) and

prepared for protracted oral arguments on November 3, 2021 (*White*, ECF 41), based on the papers, including GSK's reply briefs filed October 15, 2020 (*White*, ECF 38-39) and request for judicial notice (*White*, ECF 33-1), as well as the court's tentative order filed November 2, 2021 (*White*, ECF 40), concerning a variety of complex legal and factual matters, including the proper forum and GSK's citizenship, and operational structure and presence throughout the nation; primary jurisdiction and the United States Food and Drug Administration's ("FDA's") regulatory history concerning "natural" dietary supplements; California's legislative history and enactment of the Consumers Legal Remedies Act, codified at Cal. Civ. Code §§ 1750, *et seq.*, including pre-litigation notice obligations; Article III standing to assert claims for injunctive relief despite knowledge that products were previously falsely advertised; and the underlying rationale and precedence regarding courts' equitable jurisdiction, the classification of remedies as equitable or legal, and California legislative history and precedence classifying remedies authorized under California's consumer protection statutes. Plaintiff White's efforts were rewarded in a favorable ruling by the Court denying Defendant's motions and granting him leave to amend to allege inadequate legal remedies supporting the court's jurisdiction to grant equitable relief. *See White*, Order, 11/17/2020, ECF 43; *White*, Second Amended Compl., 11/30/2020, ECF 44; *White*, Answer, 12/21/2020, ECF 45.

d. In addition, Clarkson engaged in discovery in the *White* Action. On September 22, 2020, the parties completed the initial Fed. R. Civ. P. 26(f) attorney-conference. On September 30, 2020, Plaintiff White served interrogatories and document requests to GSK designed to gather evidence necessary to certify the Benefiber Litigation as a class action and prepare it for trial on the merits. On September 25, 2020 and January 5, 2021, the parties exchanged initial Fed. R. Civ. P. 26(a)(1) disclosures. The parties agreed to hold the outstanding discovery in

abeyance in exchange for GSK's production of critical documents prior to the initiation of any settlement negotiations, including documents regarding the Covered Products' labels throughout the Class Period, GSK's substantiation of the claims at issue, including their manufacturing process, GSK's market research and related marketing campaign information, and the Covered Products' sales figures. Clarkson thoroughly investigated and researched the claims, defenses, and potential outcomes of the Benefiber Litigation at class certification and trial, which allowed Class Counsel to better evaluate the factual claims regarding GSK's representations on the Covered Products. Based on the discovery and Class Counsel's investigation, the parties agreed to early mediation.

e. Further, the parties in the *White* Action engaged in extensive conferences concerning deadlines, negotiated and finalized joint case management statements, including a proposed scheduling order, and negotiated the terms of a stipulated protective order governing confidentiality of materials produced in the Benefiber Litigation.

f. Lastly, Clarkson and Moon Law, APC, spent substantial time preparing for mediation, reviewing and negotiating the terms of any settlement, revising the Agreement, and preparing papers necessary for the preliminary and final approval of the proposed class action settlement.

13. Not including the time expended in preparing the application for fees and expenses, the table below details the hours billed and the amount billed at current rates through August 1, 2021 for Clarkson's attorneys and litigation support staff:<sup>2</sup>

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<sup>2</sup> If the Court wishes, Clarkson can provide more detailed time entries describing the work of these attorneys, as well as Clarkson's expenses.

<b>Member</b>	<b>Total Hours</b>	<b>Hourly Rate</b>	<b>Amount</b>
Ryan J. Clarkson, Managing Partner	158.7	875	\$138,862.50
Matthew T. Theriault, Partner	3.3	850	\$2,805.00
Katherine A. Bruce, Partner	267.1	775	\$207,002.50
Lauren E. Anderson	75.3	450	\$33,885.00
Senior Paralegal	0.9	275	\$247.50
Paralegal	29	225	\$6,525.00
Litigation Support Staff	12.1	175	\$2,117.50
<b>TOTAL:</b>	<b>546.4</b>		<b>\$391,445.00</b>

This summary was prepared from time records maintained by Clarkson.

14. The members of Clarkson billed this case at their usual and customary hourly billing rates, which are commensurate with the prevailing market rates of attorneys and litigation support staff of comparable experience and skill handling complex litigation.

15. During the course of the Benefiber Litigation, Clarkson incurred \$4,761.85 in unreimbursed expenses. These expenses were reasonably and necessarily incurred in connection with the prosecution of the Benefiber Litigation. These expenses are reflected in the books and records of Clarkson and are a true and accurate summary of the expenses for this case. The chart below details the expenses incurred by category:

<b>CATEGORY</b>	<b>EXPENSE AMOUNT</b>
Complaint Filing Fee	\$400.00
Postage Pre-Litigation Demand	\$13.80
Process Server for Summons & Complaint	\$1,948.05
<i>Pro Rata</i> Costs for Private Mediation	\$2,000.00
<i>Pro Hac Vice</i> Admission Fee for K. Bruce and L. Anderson	\$400.00
<b>TOTAL:</b>	<b>\$4,761.85</b>

**IV. CLARKSON ATTORNEYS ARE EXPERIENCED CONSUMER ADVOCATES**

16. Clarkson attorneys have successfully represented plaintiffs and classes in numerous complex class-action lawsuits, particularly product mislabeling cases, such as this one. A true and correct copy of the Clarkson's Firm Resume is attached as **Exhibit A**. Clarkson attorneys have also previously been appointed class counsel in a number of consumer-protection class-action cases. *See* Exhibit A. Further, Clarkson has the experience, resources, and ability to adequately represent the class members in this class-action lawsuit. Clarkson's firm resume demonstrates that the attorneys in this case have successfully adjudicated many important product-mislabeling class action lawsuits throughout the United States, and are well qualified to serve as Class Counsel.

I hereby declare under penalty of perjury under the laws of the United States that the above is true and correct to the best of my knowledge.

Dated: August 3, 2021

*/s/ Katherine A. Bruce*

Katherine A. Bruce



# **EXHIBIT A**



**CLARKSON**  
LAW FIRM

Experience. Integrity. Justice.

**FIRM RESUME**

Based out of Los Angeles, California, the attorneys of CLARKSON LAW FIRM, P.C. have represented plaintiffs and defendants, consumer classes and small businesses, in state and federal court, at trial and appellate levels, in class action and collective action cases, throughout California and the United States. We have an active civil trial practice and track record of success, having won numerous contested class certification motions and appointments as class counsel, leading to numerous class settlements, including the following:

**FALSE & DECEPTIVE ADVERTISING CLASS ACTIONS**

- *Thomas v. Nestle USA, Inc.*, Los Angeles Superior Court Case No. BC649863 (unlawful and deceptive packaging of box candy; class certification granted and appointment of Clarkson Law Firm as Class Counsel by the Hon. Daniel J. Buckley on April 29, 2020)
- *Escobar v. Just Born, Inc.*, Case No. 2:17-cv-01826-BRO-PJW (C.D. Cal.) (unlawful and deceptive packaging of movie theater box candy; class certification granted and appointment of Clarkson Law Firm as Class Counsel by Hon. Judge Terry J. Hatter, Jr. on March 25, 2019)
- *Iglesias v. Ferrara Candy Co.*, Case No. 3:17-cv-00849-VC (N.D. Cal.) (unlawful and deceptive packaging of movie theater box candy products; Clarkson Law Firm appointed Class Counsel and final approval of nationwide class granted by the Hon. Vince Chhabria on October 31, 2018)
- *Tsuchiyama v. Taste of Nature*, Los Angeles Superior Court Case No. BC651252 (unlawful and deceptive packaging of movie theater box candy; notice of settlement and stipulation of dismissal entered pursuant to final approval of nationwide class in related case *Trentham v. Taste of Nature, Inc.*, Case No. 18PG-CV00751 granted on October 24, 2018)
- *Amiri, et al. v. My Pillow, Inc.*, San Bernardino Superior Court Case No. CIVDS1606479 (United States certified class action settlement against a global direct-to-consumer novelty goods company for false advertising and mislabeling of a pillow product as able to cure ailments before the Hon. Bryan Foster; final approved and Clarkson Law Firm appointed Class Counsel on February 26, 2018)

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CONSUMER ATTORNEYS  
of CALIFORNIA



- *Garcia, et al. v. Iovate Health Sciences U.S.A., Inc.*, Santa Barbara County Superior Court, Case No. 1402915 (United States certified class action settlement against global dietary supplement manufacturer for false advertising and mislabeling weight loss product before Hon. James E. Herman; final approval and Clarkson Law Firm appointed Class Counsel on July 11, 2017)
- *Morales, et al. v. Kraft Foods Group, Inc.*, U.S. District Court, Central District of California, Western Division, Case No. 2:14-cv- 04387-JAK-PJW (California class action against the world's second largest food and beverage company for falsely advertising and mislabeling "natural" cheese, before the Hon. John D. Kronstadt; class certification and appointment of Clarkson Law Firm as Class Counsel granted on June 23, 2015)
- *Imburgia, et al. vs. DirecTV Inc.*, Los Angeles County Superior Court, Case No. BC398295 (California certified class action lawsuit on behalf of consumers against a major broadcast satellite provider for unlawful termination fees)
- *Grair vs. Johnson v. GlaxoSmithKline, Inc.*, 166 Cal. App. 4th 1497 (2009), Los Angeles County Superior Court, Case No. BC288536 (California certified class action lawsuit against a major pharmaceutical manufacturer for false advertising of the anti-depressant, Paxil, as non-habit forming before the Hon. Elihu Berle)
- *Wally v. CCA Industries, Inc.*, Los Angeles County Superior Court Case No. BC422833 (United States certified class action lawsuit against a major nutraceutical company for falsely advertising a popular weight loss supplement to millions of consumers before the Hon. Anthony J. Mohr);
- *Smart v. Obesity Research Insitute, LLC, et al.*, Los Angeles Superior Court Case No. BC407882/BC426780 (United States certified class action lawsuit against a major nutraceutical company for falsely advertising a popular weight loss product to millions of consumers before the Hon. Michael L. Stern)
- *Pagano v. Weather Shield Mfg., Inc., et al.*, Contra Costa Superior Court Case No. C080060 (California certified class action against major window manufacturer before Hon. Barry Goode)
- *Prescod v. Celsius Holdings, Inc.*, Los Angeles Superior Court Case No. 19STCV09321 (false labeling and advertisement of products as having "No Preservatives"; class certification granted and appointment of Clarkson Law Firm as Class Counsel by the Hon. Kenneth Freeman on August 2, 2021)

#### **OTHER NOTABLE CASES**

- *Fluoroquinolone Antibiotic Cases* – Mr. Clarkson was the first plaintiff attorney in the country to represent clients in connection with claims involving permanent and disabling nerve damage caused by Levaquin, Cipro, and Avelox manufactured by Johnson & Johnson and Bayer Pharmaceuticals. Mr. Clarkson represented dozens of clients across the country.
- *Skinner v. Ken's Foods, Inc.*, Santa Barbara Superior Court Case No. 18CV01618 (unlawful and deceptive packaging of salad dressing labels; \$403,364 in attorneys' fee and expense awarded to

Clarkson Law Firm because lawsuit deemed catalyst for Ken's label changes).

- *Penos vs. Zell, et al.*, Los Angeles County Superior Court Case No. BC398686 (California certified class action against employer for Labor Code violations before the Hon. Mel Red Recana).

### **RYAN J. CLARKSON**

Mr. Clarkson is Managing Partner of Clarkson Law Firm, P.C. Mr. Clarkson focuses his practice on consumer class and collective actions involving food misbranding, cosmetic mislabeling, defective pharmaceutical drugs and medical devices, and illegal employment practices. Prior to founding Clarkson Law Firm, P.C., Mr. Clarkson practiced consumer class action law at a prominent firm in Los Angeles, where he exclusively litigated consumer class actions against pharmaceutical companies, insurance carriers, food manufacturers, and other consumer goods manufacturers. Prior to that, Mr. Clarkson worked for over five years as an associate, summer associate, and law clerk at Dykema Gossett, PLLC.

Mr. Clarkson is admitted to the State Bars of California, Michigan, and New York. He is also a member of the bars of the United States District Courts for the Central, Northern, Southern, and Eastern Districts of California, the Eastern and Western Districts of Michigan, the Southern District of New York, as well as the United States Courts of Appeals for the Ninth and Sixth Circuits.

Mr. Clarkson graduated from Michigan State University School of Law, *summa cum laude* in 2005 and graduated from the University of Michigan at Ann Arbor in 1999 with a B.A.

Mr. Clarkson is a member of the Board of Directors of the Los Angeles Trial Lawyers' Charities as well as a member of the Consumer Attorneys of California, Consumers Attorneys Association of Los Angeles, and American Association for Justice.

### **SHIREEN M. CLARKSON**

Ms. Clarkson is a Partner and Class Action Practice Group Leader at Clarkson Law Firm, P.C. Ms. Clarkson focuses her practice on consumer class actions in the areas of food labeling, pharmaceutical drugs, cosmetics, exercise gear, supplements, and other consumer products. Prior to joining Clarkson Law Firm, P.C., Ms. Clarkson practiced law at a prominent Southern California class action firm where she exclusively litigated consumer class actions and mass torts cases against pharmaceutical companies, insurance carriers, food manufacturers, and other consumer goods manufacturers.

Ms. Clarkson is admitted to the State Bar of California, the bars of the United States District Courts for the Central, Northern, Eastern, and Southern Districts of California, and the Ninth Circuit Court of Appeals.

Ms. Clarkson graduated from the University of California Hastings College of the Law in 2004. In 2000, Ms. Clarkson graduated with honors from University of California, Santa Barbara where she earned a B.A.

### **KATHERINE A. BRUCE**

Ms. Bruce is a Partner at Clarkson Law Firm, P.C. Ms. Bruce has a wide-ranging practice that includes class actions brought under California consumer protection laws for violations of the Song-Beverly Consumer

Warranty Act, Consumers Legal Remedies Act, Unfair Competition Law, and False Advertising Law, among others; mass actions in multi-district litigations and similar state procedural devices; and complex financial, business, pharmaceutical, product defect, and insurance litigation. Ms. Bruce's experience involves handling cases that require the coordination of hundreds of depositions across the country, massive electronic discovery and document productions from, at times, hundreds of non-parties, and numerous counsel and parties to efficiently and expeditiously resolve matters. Having prosecuted cases on behalf of consumers and injured parties, as well as defended cases on behalf of local, national, and worldwide companies, in jurisdictions across the country, she has developed an in-depth understanding of the practical realities of litigation from both ends of the spectrum. Ms. Bruce specializes in complex law and motion practice, often involving issues of first impression and matters that impact hundreds of claims. Ms. Bruce has also tried several cases to verdict.

Ms. Bruce is admitted to the State Bar of California, and the bars for the United States District Courts for the Central, Eastern, Northern, and Southern Districts of California.

Ms. Bruce graduated from Southwestern Law School, *magna cum laude*, in 2012. While in law school, Ms. Bruce was a board member and competitor for the interscholastic Trial Advocacy Honor Program, writer for the interscholastic Moot Court Honors Program, associate editor for the Southwestern Law Review, and served as a research assistant, teaching assistant, and dean's fellow for several professors. Ms. Bruce received several scholarships and awards, including the CALI Excellence for the Future Award and Witkin Award for Academic Excellence in several classes. Prior to entering law school, Ms. Bruce earned a B.A. in Criminology, Law, and Society.

#### **BAHAR SODAIIFY**

Ms. Sodaify is a Partner at Clarkson Law Firm, P.C. Ms. Sodaify focuses her practice on consumer class actions in the areas of food labeling, cosmetics, and other consumer products. Prior to joining Clarkson Law Firm, P.C., Ms. Sodaify was a litigation associate at a Southern California personal injury firm. Ms. Sodaify was actively involved at all stages of litigation and fought vigorously against insurance companies, multimillion-dollar corporations, and government entities, and helped recover millions of dollars for her clients. Ms. Sodaify dedicated a majority of her practice to preparing and attending hearings for minors who had been injured in an accident.

Ms. Sodaify is admitted to the State Bar of California, the bars of the United States District Courts for the Central and Northern Districts of California, and the Ninth Circuit Court of Appeals.

Ms. Sodaify graduated from Southwestern Law School in 2012, where she was a member of Southwestern's Journal of International Law and The Children's Rights Clinic. In 2009, Ms. Sodaify graduated from University of California, Los Angeles, *summa cum laude* where she earned a B.A.

#### **CELINE COHAN**

Ms. Cohan is a Senior Associate at Clarkson Law Firm, P.C. Ms. Cohan focuses her practice on consumer class actions in the areas of food labeling, cosmetics, and other consumer products. Prior to joining Clarkson Law Firm, P.C., Ms. Cohan was a litigation associate at a labor and employment firm where she successfully litigated wage and hour cases, discrimination, sexual harassment, and other employment related matters. Ms. Cohan is actively involved at all stages of litigation and fights vigorously against corporate wrongdoers

helping to recover millions of dollars for her clients.

Ms. Cohan is admitted to the State Bar of California and the bars of the United States District Courts for the Central, Northern, and Eastern Districts of California.

Ms. Cohan graduated from Loyola Law School in 2011, where she graduated in the top 25% of her class. In 2008, Ms. Cohan graduated from University of California, Los Angeles, where she earned a B.A. in Political Science and History.

#### **YANA HART**

Ms. Hart is a Senior Associate at Clarkson Law Firm, P.C. Ms. Hart has always had a passion for helping individuals to access the justice system. After graduating with a J.D. as the Valedictorian of her class in 2015, Ms. Hart volunteered countless hours with various legal clinics, including the San Diego Small Claims Legal Advisory, El Cajon Legal Clinic, and San Diego Appellate Clinic.

Prior to joining Clarkson Law Firm, Ms. Hart worked for a prominent class action law firm in San Diego, Hyde and Swigart APC (which subsequently merged with Kazerouni Law Group, APC). During that time, Ms. Hart has litigated over 300 consumer cases (inclusive of class actions and complex individual cases), focusing on the Fair Debt Collection Practices Act, Fair Credit Reporting Act, California Invasion of Privacy Act, Telephone Consumer Protection Act, and many other federal and California consumer statutes. Ms. Hart was able to obtain numerous favorable decisions, published on Lexis and/or Westlaw.

Several of Ms. Hart's legal articles were also published. Ms. Hart's article "The Impact of Smith v. LoanMe on My Right to Privacy Against Recording Telephone Conversations" was published in the Gavel magazine by the Orange County Trial Lawyers Association in October 2020. On March 30, 2021, Ms. Hart's article "Stopping Collection Abuses in Medical Debt" was published in Forum Magazine by the Consumer Attorneys of California.

Ms. Hart is admitted to the State Bars of California, Florida, and D.C. Ms. Hart is admitted in every district court in California, and the Ninth Circuit Court of Appeals.

Ms. Hart graduated *summa cum laude* from Cabrini College in 2012, with a Bachelor of Science in Business Administration. Ms. Hart is fluent in Russian.

#### **ZACH CHRZAN**

Zach Chrzan is an Associate Attorney at Clarkson Law Firm. Mr. Chrzan focuses his practice on consumer class actions in the areas of food and cosmetic labeling, as well as the fraudulent advertising of vitamins and supplements.

Mr. Chrzan is admitted to the State Bar of California and the bars of the United States District Courts for the Central and Northern Districts of California.

Mr. Chrzan received his law degree from Michigan State University College of Law, where he was a member of the school's distinguished Trial Practice Institute, an Associate Editor on the Michigan State Law Review, and a teaching assistant for Civil Procedure and Property. Prior to law school, Mr. Chrzan received his

Bachelor of Science degree in Economics from Indiana University.

### **LAUREN ANDERSON**

Lauren Anderson is an Associate Attorney at Clarkson Law Firm, P.C. Ms. Anderson focuses her practice on consumer class actions and other multi party litigations in the areas of deceptive labeling of beauty and wellness products, as well as technology, data usage, and consumer rights.

Ms. Anderson is admitted to the State Bar of California and the bars of the United States District Courts for the Central, Northern, and Eastern Districts of California.

Ms. Anderson earned her law degree in 2019 from the University of Southern California Gould School of Law. During law school, Ms. Anderson served for two years in the Student Bar Association. In 2015, Ms. Anderson earned her Bachelor of Arts degree in English from the University of Pennsylvania.

### **KELSEY ELLING**

Kelsey Elling is an Associate Attorney at Clarkson Law Firm, P.C. Ms. Elling focuses her practice on consumer class actions and other multi party litigations in the areas of deceptive advertising and labeling. Prior to joining Clarkson Law Firm, Ms. Elling was a litigation associate at a defense firm where her practice focused on employment and local government law.

Ms. Elling is admitted to the State Bar of Virginia and the State Bar of California, as well as the bars of the United States District Courts for the Northern, Eastern, and Southern Districts of California.

Ms. Elling graduated from Michigan State University College of Law in 2019 with her law degree. During law school, she was a member of the school's distinguished Trial Practice Institute, Articles Editor on the Michigan State International Law Review, a member of the Civil Rights Clinic, and a teaching assistant for Constitutional Law. She graduated with her Bachelor of Arts in Social Work from Delta State University in 2015.

### **CHRISTINA MIRZAI**

Christina Mirzaie is an Associate Attorney at Clarkson Law Firm, P.C. Ms. Mirzaie focuses her practice on consumer class actions involving false advertising in the areas of food, supplements, and cosmetics.

Ms. Mirzaie is admitted to the State Bar of California.

Ms. Mirzaie earned her law degree from Southwestern Law School in 2020. While in law school, Ms. Mirzaie placed first in the Intramural Trial Advocacy Competition for Best Brief Writer and received the CALI Excellence for the Future Award in Legal Analysis Writing and Skills. Ms. Mirzaie was also a teaching assistant for Alternative Dispute Resolution and a research assistant for Professor Ronald Aronovsky. Prior to law school, Ms. Mirzaie worked as a paralegal in a personal injury law firm. In 2008, she earned her Bachelor of Arts degree in Political Science from the University of California, Riverside.