

# **EXHIBIT 2**



Experience. Integrity. Justice.

### FIRM RESUME

Based out of Los Angeles, California, the lawyers of CLARKSON LAW FIRM, P.C. have represented plaintiffs and defendants throughout California and the United States. We have an active civil trial practice, having achieved substantial results on behalf of consumers and other plaintiffs throughout the state and country. Our most recent trial was *Rastegar v. Mid Century Insurance Company*, in which Mr. Clarkson served as lead trial counsel and won a two-week jury trial defeating the billion-dollar insurance company on insurance bad faith claims.

The lawyers at our firm have an active class action practice and have won numerous appointments as class counsel to successfully represent millions of class members. Our lawyers have obtained class settlements and certified numerous consumer classes pursuant to contested class certification motions, as well as served as Lead Counsel or Co-Lead Counsel in:

- a California certified class action lawsuit against the world's second largest food and beverage company for false advertising and mislabeling of food product as "natural cheese" before Hon. John D. Kronstadt (*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);
- a United States certified class action settlement against a global dietary supplement manufacturer for false advertising and mislabeling of weight loss product before Hon. James E. Herman (*Garcia, et al. v. Iovate Health Sciences U.S.A., Inc.*, Santa Barbara County Superior Court, Case No. 1402915);
- a 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 Hon. Bryan Foster (*Amiri, et al. v. My Pillow, Inc.*, San Bernardino Superior Court, Case No. CIVDS1606479);
- a California certified class action lawsuit on behalf of consumers against a major broadcast satellite provider for unlawful termination fees (*Imburgia, et al. vs. DirecTV Inc.*, Los Angeles County Superior Court, Case No. BC398295);
- a California certified class action lawsuit against a major pharmaceutical manufacturer for false advertising of the anti-depressant, Paxil (*Grair vs. Johnson v. GlaxoSmithKline, Inc.*, 166 Cal. App. 4th 1497 (2009), Los Angeles County Superior Court, Case No. BC288536);

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- a California certified class action lawsuit battling Labor Code violations against employer before Hon. Mel Red Recana (*Penos vs. Zell, et al.*, Los Angeles County Superior Court, Case No. BC398686).
- A United States certified class action lawsuit against a major nutraceutical company for falsely advertising a popular weight loss supplement to millions of consumers before Hon. Anthony J. Mohr (*Wally v. CCA Industries, Inc.*, Los Angeles County Superior Court Case No. BC422833)
- A United States certified class action lawsuit against a major nutraceutical company for falsely advertising a popular weight loss product to millions of consumers before Hon. Michael L. Stern (*Smart v. Obesity Research Institute, LLC, et al.*, Los Angeles Superior Court Case No. BC407882/BC426780)
- A California certified class action against a major window manufacturer before Hon. Barry Goode (*Pagano v. Weather Shield Mfg., Inc., et al.*, Contra Costa Superior Court Case No. C080060)

### RYAN J. CLARKSON

Mr. Clarkson is Managing Attorney 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 practice 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 and Michigan. 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, 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. In 1999, Mr. Clarkson graduated from the University of Michigan at Ann Arbor where he earned 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.

### ***Representative 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 represents dozens of clients across the country.

- *Garcia, et al. v. Iovate Health Sciences U.S.A., Inc.*, Santa Barbara County Superior Court, Case No. 1402915 – Mr. Clarkson was instrumental in settling a United States certified class action settlement against a global dietary supplement manufacturer for false advertising and mislabeling of popular Hydroxycut weight loss product. During the litigation, the Hon. James E. Herman remarked on the value Mr. Clarkson and his client added to the prosecution of the plaintiff class's claims;
- *Amiri, et al. v. My Pillow, Inc.*, San Bernardino Superior Court, Case No. CIVDS1606479 – Mr. Clarkson helped to obtain as Class Counsel a multi-million dollar settlement against a global direct-to-consumer novelty goods company for false advertising and mislabeling of a pillow product as able to cure ailments;

Mr. Clarkson is currently lead counsel in the following contested class actions in state and federal courts throughout California:

- *Thomas v. Nestle U.S.A., Inc.*, Los Angeles Superior Court Case No. BC649863 – Mr. Clarkson represents a putative class of consumers in connection with claims against one of the largest confectionary companies in the world for unlawful and deceptive packaging of popular theater box candy products such as Raisinets, Butter Finger Bites, and Bunch Crunch.
- *Escobar v. Just Born, Inc.*, U.S. District Court, Central District of California Case No. 2:17-cv-01826-BRO-PJW – Mr. Clarkson represents a putative class of consumers in connection with claims against one of the largest confectionary companies in the world for unlawful and deceptive packaging of popular theater box candy products like Mike 'N Ike and Hot Tamales.
- *Iglesias v. Ferrara Candy Co.*, U.S. District Court, Northern District of California Case No. 3:17-cv-00849-VC – Mr. Clarkson represents a putative class of consumers in connection with claims against one of the largest confectionary companies in the world for unlawful and deceptive packaging of popular theater box candy products like Jujufruits, Lemonhead, Redhots, and Trolli.
- *Gordon v. Tootsie Roll Industries, Inc.*, U.S. District Court, Central District of California Case No. 2:17-cv-02664-DSF-MRW – Mr. Clarkson represents a putative class of consumers in connection with claims against one of the largest confectionary companies in the world for unlawful and deceptive packaging of popular theater box candy products like Junior Mints and Sugar Babies.
- *Tsuchiyama v. Taste of Nature*, Los Angeles Superior Court Case No. BC651252 – Mr. Clarkson represents a putative class of consumers in connection with claims against a California confectionary company for unlawful and deceptive packaging of popular theater box candy products like Cookie Dough Bites.

## SHIREEN M. CLARKSON

Ms. Clarkson is a Shareholder 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 manufacturers.

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

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.

### *Representative Cases*

- *Morales, et al vs. Kraft Foods Group, Inc.*, U.S. District Court, Central District of California, Western Division, Case No. 2:14-cv- 04387-JAK-PJW – Ms. Clarkson filed this “natural” food labeling case while at her former law firm, Milstein Adelman LLP, where she and Ryan Clarkson, who was co-lead counsel at that time, led the case through class certification, granted by District Judge John A. Kronstadt on June 23, 2015. Thereafter, she joined Clarkson Law Firm, P.C. and continued to represent the Class with Ryan Clarkson, overcoming two stay motions based on impending FDA regulations – a feat which no other lawsuit in the country facing the same challenge was able to defeat – as well numerous other substantive motions, including a motion for summary judgment and motion to exclude plaintiffs’ damages expert report.
- *Imburgia, et al vs. DirecTV Inc.*, Los Angeles County Superior Court, Case No. BC398295 – Ms. Clarkson was actively involved in obtaining class certification of this matter involving unlawful termination fees against the satellite television giant, DirecTV, and was among the attorneys appointed as Co-Lead Class Counsel for the certified class. Most notably, Ms. Clarkson played an integral role in defeating DirecTV’s motion to compel arbitration following the United States Supreme Court’s 2011 decision in *AT&T Mobility v. Concepcion* – the only case in the nation to overcome *Concepcion*’s broad impact on consumer contracts with arbitration provisions. Ms. Clarkson participated in the further defeat of DirecTV’s appeal in the 9<sup>th</sup> Circuit. The decision was ultimately reversed by the United States Supreme Court, although Justices Thomas, Ginsburg, and Sotomayor filed dissents, consistent with plaintiffs’ position, writing that the majority’s decision “again expanded the scope of the FAA, further degrading the rights of consumers and further insulating already powerful economic entities from liability for unlawful acts.”
- *Grair vs. Johnson v. GlaxoSmithKline, Inc.*, 166 Cal. App. 4th 1497 (2009), Los Angeles County Superior Court, Case No. BC288536 – While at her former law firm, Ms. Clarkson assisted in achieving a class settlement of over \$3.5 million for a class of California consumers of the drug, Paxil. This was a hard-fought lawsuit that spanned over the course of 8 years. The settlement changed the general perception of sleeping pills which are no longer regarded as “non-habit forming” as falsely advertised by GlaxoSmithKline.

- *Penos vs. Zell, et al.*, Los Angeles County Superior Court, Case No. BC398686 – Ms. Clarkson assisted in uncovering Labor Code violations on behalf of employees in this certified class action lawsuit. She was an integral part of the discovery, briefing and negotiations that ultimately led to a class action settlement of this matter, resulting in hundreds of thousands of dollars to the employee class.

### BAHAR SODAIFY

Ms. Sodaify is an Associate Attorney 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 as well as the bars of the United States District Courts for the Central and Northern Districts of California.

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.

Ms. Sodaify is currently actively working on the following contested class actions in state and federal courts throughout California:

- *Thomas v. Nestle U.S.A., Inc.*, Los Angeles Superior Court Case No. BC649863 – Ms. Sodaify represents a putative class of consumers in connection with claims against one of the largest confectionary companies in the world for unlawful and deceptive packaging of popular theater box candy products such as Raisinets, Butter Finger Bites, and Bunch Crunch.
- *Tsuchiyama v. Taste of Nature*, Los Angeles Superior Court Case No. BC651252 – Ms. Sodaify represents a putative class of consumers in connection with claims against a California confectionary company for unlawful and deceptive packaging of popular theater box candy products like Cookie Dough Bites.
- *Escobar v. Just Born, Inc.*, U.S. District Court, Central District of California Case No. 2:17-cv-01826-BRO-PJW – Ms. Sodaify represents a putative class of consumers in connection with claims against one of the largest confectionary companies in the world for unlawful and deceptive packaging of popular theater box candy products like Mike 'N Ike and Hot Tamales.

- *Iglesias v. Ferrara Candy Co.*, U.S. District Court, Northern District of California Case No. 3:17-cv-00849-VC – Ms. Sodaify represents a putative class of consumers in connection with claims against one of the largest confectionary companies in the world for unlawful and deceptive packaging of popular theater box candy products like Jujufruits, Lemonhead, Redhots, and Trolli.
- *Gordon v. Tootsie Roll Industries, Inc.*, U.S. District Court, Central District of California Case No. 2:17-cv-02664-DSF-MRW – Ms. Sodaify represents a putative class of consumers in connection with claims against one of the largest confectionary companies in the world for unlawful and deceptive packaging of popular theater box candy products like Junior Mints and Sugar Babies.