

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

In re SANDRIDGE ENERGY, INC.
SECURITIES LITIGATION

) No. 5:12-cv-01341-G

) CLASS ACTION

This Document Relates To:

ALL ACTIONS.

)
) DECLARATION OF AMBER L. ECK
) FILED ON BEHALF HAEGGQUIST &
) ECK, LLP, IN SUPPORT OF
) APPLICATION FOR AWARD OF
) ATTORNEYS' FEES AND EXPENSES

I, Amber L. Eck, declare as follows:

1. I am a partner in the firm of Haeggquist & Eck, LLP (“HAE”). I am submitting this declaration in support of the application for an award of attorneys’ fees and expenses/charges (“expenses”) in connection with services rendered in the above-entitled action.

2. My firm, HAE, is counsel for Co-Lead Plaintiffs Vladimir Galkin and Angelica Galkin.

A. LEGAL SERVICES

3. The information in this declaration regarding HAE’s time and expenses is taken from time and expense reports and supporting documentation prepared and/or maintained by HAE in the ordinary course of business. I am the partner who oversaw and/or conducted the day-to-day activities in the litigation and I reviewed these reports (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 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. Based on this review and the adjustments made, the time reflected in HAE’s lodestar calculation and the expenses for which payment is sought herein are reasonable and were necessary for the effective and efficient prosecution and resolution of the litigation.

B. ATTORNEY'S FEES

4. After the reductions referred to above, the number of hours spent on the litigation by my Firm is 104.60. A breakdown of the lodestar is provided in the chart below. The lodestar amount for attorney/paralegal (or attorney/paraprofessional) time based on the Firm's current rates is \$97,970. The hourly rates shown below are consistent with hourly rates submitted by HAE in other securities class action litigation. The Firm's rates are set based on periodic analysis of rates charged by firms performing comparable work both on the plaintiff and defense side.

5. A breakdown of HAE's lodestar is as follows:

Name	Position	Total Hours	Hourly Rate	Total Lodestar
Amber L. Eck	Partner	102.60	\$950	\$97,470
Jill Kleinman	Sr. Paralegal	2.00	\$250	\$500
Total		104.60		\$97,970

C. EXPENSES

6. HAE seeks an award of \$978.77 in expenses in connection with the prosecution of the litigation. Those expenses and charges are summarized by category as follows:

Expense	Total
Class Action Notices/Business Wire	\$340.00
Filing Fees	\$50.00
Photocopies	\$533.75
Postage	\$1.19
Legal Research	\$53.83
Total	\$978.77

7. Photocopies: \$533.75. In connection with this case, the Firm made 2,135 in-house photocopies, charging \$0.25 per page for a total of \$533.75. Each time an in-house copy machine is used, our billing system requires that a case billing code be entered and that is how the 2,135 copies were identified as related to this case.

8. Online Legal and Financial Research: \$53.83. This category includes vendors such as Lexis, CourtLink, and PACER. These resources were used to obtain access to company filings, factual databases, legal research, dockets, and for cite-checking briefs. This expense represents the expense incurred by HAE for use of these services in connection with this litigation. The charges for these vendors vary depending upon the type of services requested.

9. 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.

10. The identification and background of my Firm and its partners is attached hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of August, 2022, at San Diego, California.



AMBER L. ECK

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2022, I electronically transmitted the attached Declaration of Amber L. Eck Filed on Behalf Haeggquist & Eck, LLP, in Support of Application for Award of Attorneys' Fees and Expenses using the ECF system for filing, which will send notification of such filing to all counsel registered through the ECF System.

s/ Evan J. Kaufman

EVAN J. KAUFMAN

EXHIBIT A



FIRM RESUME

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ABOUT HAEGGQUIST & ECK, LLP

Haeggquist & Eck, LLP is a San Diego, California based law firm dedicated to representing clients throughout California and the nation in complex consumer, employment, and securities class action litigation, as well as in individual employment litigation matters.

The firm's founding partners trained at the country's largest plaintiff's consumer and securities class action firm, and since then, we've built our reputation in employment, consumer protection, and securities fraud class action cases, taking on large corporations that have wronged employees and consumers. We pride ourselves on our fearlessness: No defendant is too large or powerful for us to tackle. In 2016, we served as Co-Lead Counsel in litigation against then-presidential candidate Donald Trump and Trump University, resulting in a \$25 million settlement for class members, where class members received approximately 90 percent of the value of their claims. We took no fees for our seven years of work on the case.

We have played instrumental roles in litigating cutting-edge employment, consumer, and securities class action cases of national importance, and have successfully advocated for employees and consumers against some of the largest corporations in the United States. We have successfully pursued class actions against corporations for a wide range of unlawful practices, including deceptive advertising; product defect; securities fraud; wage/hour violations; and sexual harassment and employment discrimination based on gender, race, religion, age, and disability. Whether we are vindicating the rights of defrauded consumers and shareholders, or representing employees who were wrongfully terminated, we are thorough, meticulous, and passionate about our work.

Our firm's culture is steeped in giving back to our community, and our lawyers sit on the boards of several innovative local nonprofit organizations. Managing Partner Alreen Haeggquist is the immediate past president of the San Diego County Bar Foundation, which strives to provide access to justice and advocacy for people in our community impacted by poverty, abuse, and discrimination. She is also a founding and advisory board member of Think Dignity, whose mission is to inspire, empower, and organize the San Diego community to advance basic dignity for those living on the streets. Partner Amber Eck is a volunteer with Genesis Diez Ministries, a nonprofit organization that creates learning experiences for orphans and migrant children in Baja California, Mexico. Our firm regularly sponsors events by, and donates to, area nonprofits and organizations including the California Innocence Project, Think Dignity, Casa Cornelia, Free to Thrive, Berry Good Food Foundation, Lawyers Club of San Diego, and the San Diego County Bar Foundation. Our team also comes together to volunteer in our community (and those

around us) by building cabins for [Rancho Genesis](#) in Baja California, Mexico for orphans and serving meals at the Monarch School for homeless youth in San Diego.

Haeggquist and Eck is a current member of the Southern District of California's Pro Bono Panel, and in 2018 -2019, partner Amber Eck and an associate donated nearly 500 hours representing an inmate from summary judgment through a jury trial for alleged violation of his Eighth Amendment rights. In 2019, Haeggquist & Eck donated more than 150 hours to handling a federal asylum case in immigration court, and partner Aaron Olsen served as local counsel for two groups of immigrant parents and children separated at the U.S.-Mexico border due to the Trump administration's "zero tolerance" policy. Mr. Olsen also served as local counsel in a case to ensure government agencies properly disseminate information about immigrants. Partner Jenna Rangel serves on the pro bono panel of Children's Legal Services of San Diego, Inc., offering pro bono legal services for adult foster youth. Alreen Haeggquist and Amber Eck serve on the pro bono panel for the United States District Court for the Southern District of California. And associate Michelle Perez-Yanez, a native of the country's southernmost border with Mexico – Brownsville, Texas – came to San Diego to continue her work serving border communities.

Our mission is simple and straightforward: to hold corporations accountable by empowering the people. We strive to achieve that mission through our commitment to the following values:

- Just Do the Right Thing
- Uplift with Passion and Positivity
- Succeed Through Teamwork
- Take Ownership of Our Work
- Instill Excellence in All We Do
- Care for Our Clients First; and
- Evolving Every Day

Haeggquist & Eck is proud to be a woman- and minority-owned law firm. In 2021 and 2022, the firm was named among the Best Law Firms in America by U.S. News and World Report. Alreen Haeggquist and Amber Eck have each been named a Super Lawyer every year since 2017, and from 2020-2022, have been named in the Top 25 Women Super Lawyers and the Top 50 San Diego Super Lawyers lists.

PRACTICE AREAS AND REPRESENTATIVE CASES

EMPLOYMENT

Haeggquist & Eck represents employees in cases involving sexual harassment, discrimination, retaliation, wrongful termination based on protected statuses including age, race, disability, gender, and religion, and wage disputes. Having resolved hundreds of employment matters, Haeggquist & Eck has recovered millions of dollars in damages on behalf of its employee clients.

Below is a small sampling of the wide-ranging employment matters we litigate in both state and federal courts against some of the largest employers in our community:

- ▶ *Del Aguila v. Herbalife International of America, Inc.*, Case No. BC689113 (Los Angeles Super. Ct.). Represented a 10-year employee who was repeatedly denied reasonable accommodations to work from home due to her high-risk pregnancy and severe morning sickness, was unilaterally forced on early maternity leave, and was wrongfully terminated just two weeks after she returned from leave and requested reasonable lactation accommodations. This case settled for a confidential amount.
- ▶ *Emerson v. Salk Institute for Biological Studies*, Case No. 37-2017-00026375-CU-OE-CTL (Consolidated into Case No. 37-2017-00025159-CU-OE-CTL) (San Diego Super. Ct.). Represented an internationally renowned female scientist (in consolidation with two other female scientists) who brought claims for gender discrimination, unequal pay, and failure to prevent discrimination against the Salk Institute for decades-long gender inequities. This case settled for a confidential amount.
- ▶ *Gonzalez v. Kaiser Foundation Health Plan, Inc.*, Case No. 37-2015-00019382-CU-WT-CTL (San Diego Super. Ct.). Represented a wrongfully terminated Kaiser employee in a unique case of first impression for “associational discrimination.” We prevailed at trial and obtained a \$492,000 verdict. In 2016, this case was awarded one of California’s Top 50 Employment Verdicts.
- ▶ *Gonzalez v. Laboratory Corporation of America Holdings, et al.*, Case No. 3:17-cv-1077-JLS-JLB (S.D. Cal.). Served as Lead-Counsel for a class of phlebotomist workers in a wage and hour class action for misclassification as independent contractors. The Court granted final approval of the Class Action Settlement providing class members with over \$700,000 in damages, plus substantial programmatic relief.
- ▶ *Heller v. Grand Pacific Resorts, Inc.*, Case No. 37-2010-57252-CU-OE-NC (San Diego Super. Ct.). Served as counsel on behalf of over 20 employees of Grand Pacific Resorts,

Inc., who were allegedly improperly classified as independent contractors by their timeshare company employer. This case settled for a confidential amount.

- ▶ ***Horton v. Orange County Fire Authority, et al.***, Case No. 30-2021-01200267-CU-WT-CJC (Orange Cnty. Super. Ct.). Representing one of California's first female helicopter fire pilots in a gender discrimination lawsuit against governmental entity the Orange County Fire Authority ("OCFA") after the OCFA wrongfully terminated this 31-year pilot just prior to the end of her one-year probationary period. This case is currently pending.
- ▶ ***Jones v. 3 Weiss Guys, Inc.***, Case No. 37-2008-00095231-CU-OE-CTL (San Diego Super. Ct.). Served as Lead Counsel on behalf of a California class of employees in a wage/hour class action against 3 Weiss Guys alleging failure to pay overtime and failure to provide rest and meal breaks. This case settled for a confidential amount.
- ▶ ***Jou v. Ambry Genetics Corporation, et al.***, Case No. 30-2014-00742811-CU-WT-CJC (Orange Cnty. Super. Ct.). Represented a former Ambry employee for sexual harassment and wrongful termination, after she was terminated for reporting her boss' unwanted sexual advances. This case settled for a confidential amount.
- ▶ ***LaFoy v. County of San Diego, et al.***, Case No. 37-2018-00029453-CU-OE-CTL (San Diego Super. Ct.). A 2021 bench trial victory on behalf of a longtime female administrative professional of the San Diego County Sheriff's Department who was sexually harassed by the Assistant Sheriff. The Court held the County and Assistant Sheriff liable for sexual harassment, and the County liable for failure to prevent sexual harassment, for a total verdict of \$627,862.94 inclusive of attorneys' fees and costs.
- ▶ ***Mahil v. Option Care Enterprises, Inc.***, Case No. 3:20-cv-01559-BEN-MDD (S.D. Cal.). Represented a clinical pharmacist against a nationwide provider of in-home infusion services who interfered with her rights under the Family and Medical Leave Act and the California Family Rights Act when it wrongfully terminated her under the guise of a reduction in force while she was on medical leave for her mental disability. This case settled for a confidential amount.
- ▶ ***Masukawa v. County of San Diego***. Represented a state employee who brought claims for constructive discharge against the County of San Diego and County Supervisor Dave Roberts for misconduct including, among other things, forcing her to work on his campaign on County time and putting pressure on her to lie to investigators. This case settled for a confidential amount.

- ▶ *Murphy, et al. v. FHR GDM Hotel Management Company, LLC.*, Case No. 37-2019-00010853-CU-WT-CTL (San Diego Super. Ct.). Represented two former female massage therapists against the Fairmont Grand Del Mar Hotel and Resort for sexual harassment and failure to prevent sexual harassment at the hands of its male spa clientele despite numerous complaints over several years to spa management and Human Resources. This case settled for a confidential amount.
- ▶ *Pidlaoan v. Honeybee Foods Corporation d/b/a Jollibee, et al.*, Case No. 37-2017-00012062-CU-WT-CTL (San Diego Super. Ct.). Represented Ms. Pidlaoan in a sexual harassment, retaliation, and wrongful termination case against Jollibee, an international fast-food chain. The case settled for a confidential amount and on December 4, 2018, the Honorable Frederic L. Link granted Haeggquist & Eck attorneys' fees and costs, totaling over \$1.2 million.
- ▶ *Spot Water Management, Inc. v. Plageman, et al.*, Case No. 37-2009-00052285-CU-JR-NC (San Diego Super. Ct.). Defended a former employee whose employer alleged misappropriation of trade secrets against him when he sought payment of wages due. At trial in August 2010, we obtained a favorable verdict on behalf of the employee. The court found that the employer brought the action in bad faith and awarded our client damages, attorneys' fees, and costs.
- ▶ *Starling v. KMK Audio Services, LLC*, Case No. 19STCV13858 (Los Angeles Super. Ct.). Represented an aspiring production sound mixer who was sexually harassed by a prominent Hollywood production sound mixer, with credits on nearly every high-profile awards show including the *Academy Awards*, *Grammys*, *Golden Globes*, and *Emmys*, who promised her mentorship and job opportunities in exchange for taking off her clothes. This case settled for a confidential amount.
- ▶ *Vaeao v. Lantern Crest Employees, Inc.*, Judicate West Case No. A246509-48 (Judicate West). Represented a former female employee against Lantern Crest Employees, Inc. for disability discrimination, perceived disability discrimination, retaliation, and wrongful termination when Lantern Crest terminated Ms. Vaeao after she requested time off due to a medical condition. Following a three-day arbitration, the Honorable Linda Quinn (Ret.) found in Ms. Vaeao's favor and issued an arbitration award. On March 16, 2020, Judge Quinn issued a Final Arbitration Award which ordered Lantern Crest to pay lost wages and economic damages to Ms. Vaeao in the amount of \$78,200 and to pay Ms. Vaeao's attorneys' fees and costs in the amount of \$322,929.52.
- ▶ *Wallace v. BAE Systems San Diego Ship Repair, Inc.*, Case No. 37-2013-00073399-CU-WT-CTL (San Diego Super. Ct.). Represented a BAE African American employee for retaliation and wrongful termination, after he was terminated after complaining to

BAE's Human Resources and Ethics Departments of being assaulted and discriminated against on the job. This case settled for a confidential amount.

- ▶ *Wood v. Barcadia, LLC*, Case No. 37-2013-00054903-CU-OE-CTL (San Diego Super. Ct.). Represented a California class of employees in a wage and hour class action against Barcadia, alleging failure to pay overtime and final pay, failure to provide meal and rest periods, and failure to itemize wage statements. This case settled for a confidential amount.
- ▶ *Yphantides v. County of San Diego*, Case No. 3:21-cv-01575-GPC-BLM (S.D. Cal.). Representing the County of San Diego's ("County") Chief Medical Officer who served the County for 11 years until he was wrongfully terminated during the COVID-19 pandemic after disclosing he was suffering from severe depression and anxiety as a result of the unfathomable stresses of the pandemic and required medical leave. This case is currently pending.

CONSUMER AND OTHER CLASS ACTIONS

Haeggquist & Eck also represents consumers in class action lawsuits against some of the nation's largest corporations seeking to uphold consumer rights. We have played instrumental roles in claims involving product defects, false advertising, mortgage lending, banking, insurance fraud, discriminatory underwriting, and senior fraud.

Some of the consumer class actions in which Haeggquist & Eck attorneys have been appointed lead counsel or named counsel are:

- ▶ Served on Plaintiffs' Executive Committee in one of the nation's largest domestic and international consumer class actions against Apple Inc., captioned as *In re Apple Inc. Device Performance Litigation*, No. 5:18-md-02827-EJD (N.D. Cal.) (the "*Apple Device Litigation*"). Plaintiffs in the *Apple Device Litigation* allege that, among other things, Apple sold defective iPhone models (and batteries for such devices), and that Apple also thereafter released iOS software updates to secretly throttle iPhone device performance. Although a global settlement was approved, it is up on appeal to the Ninth Circuit.
- ▶ Served as Co-Lead Counsel for a nationwide class of over two million purchasers of an alleged defective power adapter in a consumer product defect claim against Apple Inc. *Gordon v. Apple Computer, Inc.*, Case No. 5:06-cv-05358-JW (N.D. Cal.). A nationwide settlement was approved, and eligible class members received \$25-\$79 each.
- ▶ Served as Co-Lead Counsel for a nationwide consumer class action against Apple Inc. representing a class of laptop owners for product defect claims that Apple's power adapter is defectively designed. *In Re Magsafe Apple Power Adapter Litigation*, Case No. 5:09-cv-01911-EJD (N.D. Cal.). A nationwide settlement was approved, and eligible class members received relief for the defective adapters.
- ▶ Served as Counsel for a putative class action on behalf of telecommunications customers against U.S. TelePacific Corp. alleging that its Early Termination Fees were improper and unlawful. *Brennan v. U.S. TelePacific Corp.*, Case No. 2010-00422317-CU-MC-CXC (Orange Cnty. Super. Ct.).
- ▶ Serving as Co-Lead Counsel in a class action alleging that ConAgra falsely advertises its frozen chicken products as natural and preservative-free when in fact they contain non-natural chemicals and were made from the meat of chickens that were grown and fed with chemical-laced products and whose meat was subjected to various non-

natural anti-microbial treatments as part of the slaughtering and butchering process. *Cohen v. ConAgra Brands, Inc.*, Case No. 8:20-cv-00637-DOC-ADS (C.D. Cal.).

- ▶ Served as Co-Lead Counsel for a multi-state class action against Sony Electronics, Inc. alleging fundamental flaws in the design and/or manufacturing process in certain VAIO Touchpad Notebooks. *In Re Sony VAIO Computer Notebook Trackpad Litigation*, Case No. 3:09-cv-02109-BAS-MDD (S.D. Cal.). A settlement was approved, and eligible class members received a cash payment for the harm incurred.
- ▶ Served as Co-Lead Counsel on behalf of certified classes of Trump University seminar purchasers against Trump University, LLC and Donald Trump for violations of California, Florida, and New York consumer protection statutes, and California and Florida elder abuse claims regarding real estate investing seminars. *Low v. Trump University, LLC, et al.*, Case No. 3:10-cv-00940-GPC-WVG (S.D. Cal.). We also served as Co-Lead Counsel on behalf of a putative nationwide class of Trump University students alleging violations of the Racketeer Influenced and Corrupt Organizations Act (“RICO”) by Donald Trump. *Cohen v. Donald J. Trump*, Case No. 3:13-cv-02519-GPC-WVG (S.D. Cal.). The cases resulted in a \$25 million settlement for the plaintiffs. The settlement was deemed one of California’s Top 50 Class Action Settlements in 2016.
- ▶ Served as Co-Lead Counsel for a nationwide class of consumers who purchased defective live internet streams of Showtime’s airing of an unprecedented fight between boxing legend Floyd Mayweather and UFC superstar Conor McGregor in a class action against *Ultimate Fighting Championship, Park, et al. v. Zuffa, LLC, et al.*, Case No. 2:17-cv-02282 (D. Nev.). A nationwide settlement was approved, and eligible class members received up to a 100% refund of the purchase price, in addition to other relief.
- ▶ Serving as Co-Lead Counsel on behalf of a putative class of consumers against Williams Sonoma, Inc., alleging that it falsely advertised and illegally inflated the thread count of its luxury bedding collections sold across the company’s family of brands, including Williams Sonoma and Pottery Barn. *Rushing v. Williams Sonoma*, No. 3-16-cv-01421-WHO (N.D. Cal.)
- ▶ Serving as Co-Lead Counsel on behalf of 17 female varsity athletes who sued San Diego State University (“SDSU”) for depriving women of equal athletic financial aid and equal treatment and benefits in violation of Title IX, and for retaliating against them for trying to make SDSU comply with Title IX. *Fisk, et al. v. Board of Trustees of the California State University*, Case No. 3:22-cv-00173-TWR-MSB (S.D. Cal.)

SECURITIES FRAUD AND SHAREHOLDER DERIVATIVE LITIGATION

Haeggquist & Eck represents investors that have suffered from corporate fraud through securities class actions and shareholder derivative litigation. The firm's lead securities partner, Amber Eck, has worked for over 20 years on a wide range of complex litigation and securities fraud cases across the United States and has recovered hundreds of millions of dollars for her clients. She has also prosecuted numerous shareholder derivative actions against the executives of companies charged with violating federal environmental, labor, health and safety, and securities laws, and has conferred millions of dollars in added shareholder value through tailored corporate governance reforms designed to prevent future harm.

Haeggquist & Eck is proud to be named as one of the Best Law Firms in America by U.S. News and World Report for Litigation – Securities in 2021-2022. Some of the securities class actions and derivative cases in which Haeggquist & Eck attorneys have been appointed lead counsel or named counsel are:

- ▶ *Dulgarian v. Cinnamon (Akeena Solar, Inc. Derivative Litigation)*, Case No. 1:10-CV-173351 (Santa Clara Super. Ct.). Served as sole Lead Counsel in this action alleging breach of fiduciary duty and insider trading by Akeena Solar, Inc.'s (AKNS) founder and CEO Barry Cinnamon and the Akeena Board. The case settled in 2012 for substantial corporate governance enhancements.
- ▶ *In re ECotality, Inc. Securities Litigation*, Case No. 3:13-cv-03791-SC (N.D. Cal.). Served as named counsel in securities fraud class action against ECotality, Inc. (ECTYQ) alleging that the company, its CEO, and CFO made materially false and misleading statements concerning its electric vehicle charging and energy storing systems. The case settled in 2015 for approximately \$1.1 million.
- ▶ *In re NQ Mobile, Inc.*, Case No. 1:13-cv-7608 (S.D.N.Y.). Served as named counsel in securities fraud class action against NQ Mobile, Inc. (NQ), alleging that NQ issued a materially false or misleading Registration Statement and Prospectus in connection with its Initial Public Offering. The case settled in 2016 for approximately \$5.1 million.
- ▶ *In re Pacific Biosciences of California, Inc. Securities Litigation*, Case No. CIV509210 (San Mateo Super. Ct.). Represented shareholders in a state securities Section 11 action against Pacific Biosciences (PACB), alleging that its Registration Statement and Prospectus were false and misleading, and that Defendants were strictly liable to the Initial Public Offering share purchasers under Sections 11, 12, and 15 of the Securities Act of 1933. The case settled in 2013 for approximately \$7.6 million.

- ▶ ***In re Pacific Coast Oil Trust Securities Litigation***, Case No. BC550418 (Los Angeles Super. Ct.). Served as named counsel in a Section 11 securities fraud class action against Pacific Coast Oil Trust (PCOT), alleging that Pacific Coast violated the Securities Act of 1933 by issuing documents in connection with its Offering that were false or misleading. The case settled in 2017 for approximately \$7.6 million.
- ▶ ***In re SandRidge Energy, Inc. Securities Litigation***, Case No. 5:12-cv-01341 (W.D. Okla.). Served as named counsel in securities fraud class action against SandRidge Energy, Inc. (SD), alleging that the oil and gas exploration company made material misrepresentations regarding one of its core holdings located in Oklahoma and Kansas, including the amount of oil being produced. Meanwhile, SandRidge's founder and CEO Tom Ward engaged in a classic form of front-running – purchasing lands around where SandRidge would be developing wells and then personally benefitting from SandRidge's investments.
- ▶ ***In re Santander Consumer USA Holdings, Inc. Derivative Litigation***, Case No. C.A. No. 11614-VCG (Del. Chancery Ct.). Served as named counsel in a derivative action alleging that Santander breached its fiduciary duty by making false and misleading statements to the investing public. The case settled in 2021 for substantial corporate governance enhancements.
- ▶ ***Rosenberg v. Cliffs Natural Resources, Inc.***, Case No. CV-14-828140 (Cuyahoga Cnty., Ohio, Common Pleas Ct.). Served as named counsel in a Section 11 securities fraud class action against Cliffs Natural Resources, Inc. (CLV), alleging that Cliffs violated the Securities Act of 1933 by issuing documents in connection with its Offering that were false or misleading. The case settled in 2016 for approximately \$10 million.
- ▶ ***Turocy v. El Pollo Loco***, Case No. 8:15-cv-01343 (C.D. Cal.). Served as named counsel in a securities fraud class action alleging that El Pollo Loco (LOCO) made false and misleading statements about its business and prospects. The case settled in 2019 for \$20 million.
- ▶ ***West Palm Beach Police Pension Fund v. CardioNet, Inc.***, Case No. 37-2010-00086836-CU-SL-CTL (San Diego Super. Ct.). Served as named counsel in a securities class action against CardioNet, Inc. (BEAT) on behalf of the public purchasers in CardioNet's \$82 million March 25, 2008 Initial Public Offering and \$152 million August 6, 2008 Secondary Public Offering, alleging that CardioNet issued false and misleading statements. The case settled in 2012 for approximately \$7.25 million.

JUDICIAL COMMENDATIONS

► *Low v. Trump University, LLC*. On March 31, 2017, in granting final approval of the settlement, the Honorable Gonzalo P. Curiel hailed the settlement as “extraordinary” and “all the more exceptional when viewed in light of the risk” of continued litigation. The court further commended Haeggquist & Eck for prosecuting the case on a pro bono basis:

Class Counsel’s exceptional decision to provide nearly seven years of legal services to Class Members on a *pro bono* basis evidences not only a lack of collusion, but also that Class Counsel are in fact representing the best interests of Plaintiffs and the Class Members in this Settlement. Instead of seeking compensation for fees and costs that they would otherwise be entitled to, Class Counsel have acted to allow maximum recovery to Plaintiffs and Class Members. Indeed, that Eligible Class Members may receive recovery of 90% or greater is a testament to Class Counsel’s representation and dedication to act in their clients’ best interest. The Court commends Class Counsel for their *pro bono* representation of Plaintiffs and the Class Members.

In addition, at the final approval hearing, the Court commented that “this is a case that has been litigated – if not fiercely, zealously throughout.” *Low v. Trump University, LLC*, 246 F. Supp. 3d 1295, 1302, 1312 (S.D. Cal. 2017); *Low v. Trump University, LLC and Donald J. Trump*, No. 10-cv-0940 GPC-WVG (S.D. Cal. 2017); *Cohen v. Donald J. Trump*, No. 13-cv-2519-GPC-WVG, transcript at 7 (S.D. Cal. Mar. 31, 2017).

► *Schleicher v. Pite Duncan*. After conclusion of a two-week jury trial in an employment case chaired by Amber Eck and Aaron Olsen, Judge Pollack commented:

[It was an] [a]bsolute joy. You’re always welcome in this courtroom to try cases. I’ll try not to put you guys on the wheel if I see you guys coming up because I really -- it really has been a pleasure for me. . . . [Y]ou [and defense counsel] were cooperative, but neither side sold their client down the road. You vigorously advocated for your client but were reasonable in every position you took, and you were very polite and respectful to the Court. So an absolute joy to have [you] here.

PRO BONO

At Haeggquist & Eck, we consider it our imperative as attorneys and advocates to be a voice for the aggrieved. It's a cornerstone of our mission, and now more than ever, we are committed to doing all we can, both professionally and personally, to advance the underrepresented: women, the disabled, and the elderly; refugees, asylum-seekers, and immigrants; our LGBTQ brothers and sisters; Muslims, Christians, Jews, and atheists; and people of every creed, religion, ethnicity, and race.

Every member of our team is working to make San Diego better. And to commemorate that, we give every Haeggquist & Eck employee \$1,000 a year to donate to the charity of their choice. Recipients include the Veterans Village of San Diego; the youth arts program A Reason To Survive; the San Diego LGBT Community Center; UCSD Moore's Cancer Center; the Casa Cornelia Law Center, which provides pro bono humanitarian legal representation in immigration matters; and Passion4Kids, which allocates dollars to children in desperate situations.

We believe in paying things forward. We prove that commitment by our actions through individual volunteer work, firm-wide philanthropic initiatives, and partnerships with and support of organizations that are making a real difference in advancing justice, fairness, and equality in California and beyond.

To this end, we are committed to volunteer work, firm-wide philanthropic initiatives, and pro bono representation. Below are a few exemplar cases of our pro bono work:

- ▶ *Dora, et al. v. Jefferson B. Sessions, III*. Serving as pro bono local counsel for two groups of immigrant parents and children separated at the Mexican border under the United States government's "zero tolerance" immigration policy.
- ▶ *In the Matter of Hesham Abdullah Abdulwahab*. Represented Mr. Abdullah Adulwahab in his removal proceedings in conjunction with Casa Cornelia Law Center, a local organization that is devoted to protecting the human rights of immigrants.
- ▶ *Muslim Advocates v. U.S. Department of Justice*. Serving as pro bono local counsel in a case seeking to uphold The Information Quality Act to ensure government agencies properly disseminate information about immigrants.
- ▶ *Roberts v. Hensley, et al.* Represented an inmate pro bono from summary judgment through jury trial in federal court on his Constitutional claims that his Eighth Amendment rights were violated by the prison dentist's refusal to treat his serious medical needs.

ATTORNEYS

ALREEN HAEGGQUIST, MANAGING PARTNER

Alreen Haeggquist, the founder and Managing Partner of Haeggquist & Eck, is a nationally recognized advocate for employees who have suffered wrongful termination, sexual harassment, and discrimination at work. She has spent her entire legal career litigating on behalf of consumers and employees and is dedicated to challenging large, deep-pocketed corporate defendants on behalf of aggrieved employees and consumers.

As the lead employment partner at Haeggquist & Eck, Ms. Haeggquist works tirelessly advocating on behalf of employees who have been wrongfully terminated and/or discriminated against based on their sex, race, religion, or disability; retaliated against for refusing to engage in unlawful conduct; or who suffer from wage theft. She frequently writes and lectures on issues relating to equal pay, wage and hour theft, and legislation impacting employees at the federal and state level.

Ms. Haeggquist's passion for representing employees started at a very early age. Her parents immigrated to the United States to create a better life for their family, and watching them work to provide her with every opportunity informed her unwavering commitment to advancing human rights and giving a voice to the underrepresented. Today, the overwhelming majority of Ms. Haeggquist's clients are women who have suffered egregious wrongs at the hands of their employers. No defendant is too large or powerful for her to tackle: she has recently represented plaintiffs in employment claims against such major corporations as Herbalife, Trader Joe's, Sharp Healthcare, Manpower, Wyndham, Kaiser Permanente, the San Diego County Sheriff's Office, San Diego County, and the Fairmont Grand Del Mar. She is currently representing former San Diego County Chief Medical Officer Nick Yphantides, who led the county's COVID-19 response, in a wrongful termination suit against the county, and is counsel to Orange County's first female helicopter fire pilot in her wrongful termination suit against the Orange County Fire Authority. Ms. Haeggquist is also currently representing a group of female athletes in a Title IX discrimination suit against San Diego State University.

In 2021, Ms. Haeggquist successfully represented a secretary in the San Diego County Sheriff's Department at trial in a sexual harassment case involving the Assistant Sheriff. In 2020, Ms. Haeggquist secured a confidential settlement on behalf of two female massage therapists in a well-publicized sexual harassment lawsuit against San Diego's Fairmont Grand Del Mar. In 2019, Ms. Haeggquist obtained an over \$400,000 arbitration award (including attorneys' fees and costs) on behalf of a former employee of Lantern Crest Employees, Inc. who was discriminated against and wrongfully terminated because she requested time off due to a medical condition.

In 2018, Ms. Haeggquist represented a female scientist in a high-profile gender discrimination case against The Salk Institute, which ended with a confidential settlement shortly before trial. That same year, she also secured a confidential settlement on behalf of an employee of Jollibee, a national fast-food chain, in a case involving claims of sexual harassment, which after the motion for fees, totaled over \$1.2 million. In 2017, her jury trial verdict in a disability discrimination case against Kaiser Permanente was one of the Top 50 Employment Verdicts in California. Ms. Haeggquist also served as Class Counsel in the high-profile consumer fraud litigation against Donald Trump and Trump University, which settled in November 2016 for \$25 million. The settlement was deemed one of California's Top 50 Class Action Settlements in 2016.

Ms. Haeggquist has been named a Super Lawyer for her work in employment litigation every year since 2016, and from 2019-2022, she was named in the Top 25 Women Super Lawyers and the Top 50 San Diego Super Lawyers lists. She is also recognized as one of the Best Lawyers in America and is named as a National Trial Lawyers Top 100. She holds an AV Preeminent rating, the highest peer rating standard bestowed on attorneys by research clearinghouse Martindale-Hubbell, for professional excellence in legal knowledge, skills, and ethics.

In 2021, she was named as one of the San Diego Business Journal's "Women of Influence" and in 2020 was named by California Western School of Law as the Alumni of the Year. In February 2017, Ms. Haeggquist received the President's Award from the Consumer Attorneys of San Diego for her commitment to CASD's community outreach efforts. In September 2016, she was named one of *San Diego Metro Magazine's* "40 Under 40." In April 2016, she was nominated for the National Association of Women Business Owners' Women's Advocate of the Year award for her work on behalf of women who have been wrongfully terminated or sexually harassed in the workplace.

Ms. Haeggquist is licensed to practice in all state and federal courts in California and is a member of the Consumer Attorneys of San Diego, the Lawyers Club of San Diego, and the Public Justice Foundation. She is also a member of the San Diego County Bar Association, California Employment Lawyers Association, Consumer Attorneys of California, and the Employment Section of the California Bar Association. She served as the President of the San Diego County Bar Foundation and serves currently on the Advisory Board of Think Dignity.

Ms. Haeggquist holds a B.A. from the University of California San Diego and a J.D. from California Western School of Law, where she graduated *magna cum laude* and served as Editor-in-Chief of the *California Western Law Review* and the *International Law Journal*.

AMBER L. ECK, PARTNER

Amber Eck is a Partner at Haeggquist & Eck and for the past 26 years, she has been a tenacious advocate for shareholders, employees, and consumers. Ms. Eck has taken three cases to trial in the past few years in both state and federal court as lead trial attorney and has recovered millions of dollars for her clients in settlements. Ms. Eck was co-lead counsel in the well-publicized class action against former President Donald Trump and Trump University, which settled for \$25 million. For her work in the case, which spanned seven years, Ms. Eck and her partners took no fees. In 2016, the Trump University settlement was deemed one of California's Top 50 Class Action Settlements.

As chair of Haeggquist & Eck's Securities Litigation Practice Department, Ms. Eck is a tireless advocate for consumers, employees, and shareholders. Over the years, she has recovered hundreds of millions of dollars on behalf of shareholders, consumers, and employees who have been wronged by real estate investment scams, securities fraud, and unlawful employment practices. Ms. Eck has litigated securities class actions against El Pollo Loco (LOCO), Pacific Biosciences (PACB), HQ Sustainable (HQ), CardioNet (BEAT), SandRidge (SD), ECOtality (ECTY), NQ Mobile (NQ), and Cliffs Natural Resources (CLV). Ms. Eck was sole Lead Counsel in a shareholder derivative action against the officers and directors of Akeena Solar, Inc. (AKNS), which settled in 2012 for substantial corporate governance enhancements. In addition, Ms. Eck has represented plaintiffs in employment cases for wrongful termination, sexual harassment, unequal pay, and discrimination based on gender, race, religion, pregnancy, disability, and age against such major corporations as Trader Joe's, Calpine, Service Corporation International ("SCI"), LuLaRoe, Dollar Tree, Cemex, and Jollibee (an international fast-food chain). Ms. Eck is also currently representing a group of female athletes in a Title IX discrimination suit against San Diego State University.

Ms. Eck frequently speaks on employment and other legal issues. She spoke in August 2022 with the Honorable Anthony Battaglia on the "Southern District of California Pro Bono Panel: A Great Opportunity to Do Good," in January 2019 at the Public Interest Advocacy Collaborative on "Using a Victim Advocate to Strengthen Your Civil Case," and served as a discussion facilitator at the Lawyers Club Solutions Summit on the topic of Eliminating Sexual Harassment, Sexism & Bullying in the Workplace in 2018. Ms. Eck was also a panelist discussing "The Law as a Tool" at the 2018 International Agro-Ecological & Environmental Conference in San Francisco, and she was a panelist at the 2017 California Women Lawyers Conference on "Transitions to Leadership." Ms. Eck has been a featured guest on ESPN's Real Talk Downtown and a guest speaker on the topic of small law firms and solo practitioners at the Lawyers Club of San Diego's annual symposium.

Ms. Eck has written articles for publication, including “Lessons Learned from Mentors of the Past,” which was published in the national American Inn of Court magazine, *The Bench*. Ms. Eck currently serves as a Master in the Louis M. Welsh Inn of Court, and previously served as a Barrister and Associate in the William B. Enright Inn of Court and a Barrister in the Welsh Inn.

Ms. Eck is dedicated to providing pro bono legal assistance to underserved populations. She is a current member of the Southern District of California’s Pro Bono Panel, and in 2019 was lead trial counsel representing an inmate in a jury trial for violation of his Eighth Amendment rights. She is also a member of the Lawyers Club of San Diego Human Trafficking Collaborative. She previously received the SDVLP Distinguished Service Award for her pro bono work in the case *Sanchez v. County of San Diego* (alleging searches of welfare applicants’ homes were unconstitutional); and the Wiley M. Manuel Pro Bono Service Award for her work in *Badua v. City of San Diego* (contending that the City’s long-term disability policy unlawfully discriminated against employees with mental disabilities).

Ms. Eck has been named a Super Lawyer every year since 2017, and in 2020-2022, was named in the Top 25 Women Super Lawyers and the Top 50 San Diego Super Lawyers lists. She has also been selected by U.S. News & World Reports as one of the “Best Lawyers in America.”

Ms. Eck was recognized as one of *San Diego Business Journal’s* Best of the Bar in 2016-2019, and was a finalist for *San Diego Magazine’s* Woman of the Year Award in 2016. Ms. Eck was also nominated for the National Association of Women Business Owners’ Woman Business Owner of the Year award in 2016 and their Trailblazer’s Award in 2017. Other awards include the: Giles S. Rich Intellectual Property Moot Court Team, Best Brief, Northeast Region (1995); and Grant recipient, Harvard School of Public Health (1993).

Ms. Eck is also a member of the National Association of Securities and Consumer Attorneys, Federal Bar Association, the American Association for Justice, California Employment Lawyers Association, Lawyers Club of San Diego, Consumer Attorneys of San Diego and Consumer Attorneys of California, and formerly served on the Board of Directors for the San Diego Barristers Club. Ms. Eck formerly served as a Girl Scout leader for eight years and has served as the GATE District Advisory Council representative for Loma Portal Elementary. She is admitted to practice in California and Nevada.

Ms. Eck holds a B.A. from Pepperdine University, 1990 (*magna cum laude*), and a J.D. from Boston University School of Law (*magna cum laude*).

AARON M. OLSEN, PARTNER

Aaron Olsen is a Partner and is chair of Haeggquist & Eck's Employment Law and Complex Consumer Litigation Departments. Mr. Olsen has resolved hundreds of individual labor and employment law cases on behalf of employees. He has recovered millions of dollars in damages. Notably, Mr. Olsen was on the trial team in a unique associational disability discrimination matter against Kaiser Permanente that resulted in one of the top 50 largest labor and employment verdicts in California in 2017 on TopVerdict.com. He is also currently representing former San Diego County Chief Medical Officer Nick Yphantides, who led the county's COVID-19 response, in his wrongful termination against the county.

Mr. Olsen has served as Lead and Co-Lead Counsel prosecuting class action suits, including consumer fraud actions, product defect cases, wage and hour actions, and unfair competition and false advertising claims. He has successfully litigated against major corporations such as Apple, Sony, AT&T, UFC/Showtime, and LabCorp (to name a few), and served as Co-Lead Counsel on a team that negotiated a \$25 million settlement on behalf of students who attended Donald Trump's infamous Trump University.

Mr. Olsen served as pro bono local counsel for two groups of immigrant parents and children separated at the Mexican border under the United States government's "zero tolerance" immigration policy. He also served as local counsel in a case seeking to uphold The Information Quality Act to ensure government agencies properly disseminate information about immigrants. Mr. Olsen has also dedicated much of his time to charitable organizations throughout San Diego.

Mr. Olsen is admitted to practice in California, the United States District Court for the Southern, Central, and Northern Districts of California, and is a member of the Consumer Attorneys of San Diego, California Employment Lawyers Association, and the San Diego County Bar Association.

Mr. Olsen has been named a Super Lawyer every year since 2015 and was nominated as one of San Diego's Outstanding Young Attorneys in both 2011 and 2012. He was selected as a 2021 Leaders in the Law Awards Finalist in the *San Diego Business Journal*, and his written work has appeared in the California State Bar Litigation Review and *San Diego Lawyer*. He volunteered with the California Innocence Project, and is an Ironman finisher.

Mr. Olsen holds a B.A. in Finance from the University of Utah, and a J.D. from California Western School of Law, where he served as Editor-in-Chief of the California Western School of Law Commentary and as an Executive Board Member of the Student Bar Association.

JENNA M. RANGEL, PARTNER

Jenna Rangel is a Partner with Haeggquist & Eck. Her practice is focused on representing employees in all aspects of labor and employment litigation in federal and state courts including wrongful termination, discrimination, harassment, retaliation, and wage and hour actions, among others. To Ms. Rangel, every detail matters and she prides herself on developing and nurturing open, trusting relationships with her clients. Ms. Rangel approaches every day as an opportunity to stand up for employees, to help right the wrongs perpetrated by employers, and to provide closure to her clients so they can move forward with their lives.

Representative cases, litigated together with Haeggquist & Eck Managing Partner Alreen Haeggquist, include a bench trial win in a sexual harassment case against the San Diego Sheriff's Department and former Assistant Sheriff, a confidential settlement on behalf of massage therapists who were sexually harassed by male patrons at iconic San Diego hotel the Fairmont Grand Del Mar, and a confidential settlement in a well-publicized gender discrimination case on behalf of an internationally-renowned female scientist against The Salk Institute. Ms. Rangel is currently representing a 31-year female helicopter fire pilot in a gender discrimination lawsuit against the Orange County Fire Authority, as well as a group of female athletes in a Title IX discrimination suit against San Diego State University.

Prior to joining Haeggquist & Eck, Ms. Rangel served as an attorney at Barker Olmsted & Barnier, APLC, a general civil litigation firm representing clients in the areas of employment law, business law, construction law, and estate planning, among others. Ms. Rangel practiced primarily in the areas of employment law defense and business litigation, including state and administrative claims involving wage and hour violations, wrongful termination, discrimination, harassment, retaliation, breach of contract, misappropriation of trade secrets, interference with economic relationships, unfair business practices, misrepresentation, and premises liability. Ms. Rangel also provided employment law compliance services including drafting employee handbooks, independent contractor agreement and severance agreements, assisting in the adoption of alternative workweek schedules, and counseling employers on a variety of employment law issues.

A native San Diegan, Ms. Rangel graduated in 2010 from California Western School of Law, where her tireless dedication to public interest causes earned her a spot on the school's Pro Bono Honor Society. During law school, she worked at the nonprofit California Women's Law Center in Los Angeles on matters relating to gender discrimination in education and Title IX violations. In addition, she assisted in matters

relating to women's health and lactation accommodations for working mothers. While at CWSL, Ms. Rangel also completed an internship program in the Juvenile Dependency Division of the Office of the San Diego County Public Defender, where she assisted in the representation of foster children in court. Today, Ms. Rangel serves on the pro bono panel of Children's Legal Services of San Diego, Inc., offering pro bono legal services for adult foster youth.

Ms. Rangel holds a B.A. in business administration and marketing from California State University – Chico, a J.D. from California Western School of Law, and a paralegal certificate from the University of San Diego.

Ms. Rangel is admitted to practice in California, the United States District Court for the Central and Southern Districts of California and is a member of the California Employment Lawyers Association, Consumer Attorneys of San Diego, San Diego County Bar Association, Lawyers Club, and Federal Bar Association. She was named a Super Lawyers Rising Star in 2019 and 2020, and in 2017, she was named among the *San Diego Business Journal's* Best of the Bar. Her publications include "Employment Law from A to Z in California" (Lorman Education Services, San Diego, California, June 20, 2014) and "Setting Up an Alternative Workweek Schedule in California" (*Today's General Counsel*, August/September 2014).

MICHELLE PEREZ-YANEZ, ASSOCIATE

Michelle Perez-Yanez joined Haeggquist & Eck as an associate attorney in 2021. A graduate of California Western School of Law and the University of Texas Rio Grande Valley, Michelle has spent her legal career representing employees and consumers. In her role at HAE, Michelle represents employees in claims involving wrongful termination, discrimination, sexual harassment, retaliation, and wage and hour violations at work. Michelle habla español y ha dedicado su carrera como abogada representando clientes en casos de discriminación, hostigamiento, reclamos de salario, tiempo y horas, y despido injustificado.

Michelle is experienced in counseling employees through all stages of litigation, as well as in claims before the Equal Employment Opportunity Commission and the California Department of Fair Employment & Housing.

Michelle is admitted to practice in all California State Courts, the U.S. District Court, and is currently pending admission to the State Bar of Texas. Michelle is a member of the American Association of Justice, Consumer Attorneys of San Diego, and the San Diego County Bar Association.

A native of the country's southernmost border with Mexico – Brownsville, Texas – Michelle came to San Diego seeking to continue to serve the communities by the border. In her spare time, she enjoys hiking and reading poems by Pablo Neruda.