

ZELDES HAEGGQUIST & ECK, LLP

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28 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re ECOtality, Inc. Securities Litigation

Case No.: 3:13-CV-03791-SC

This Document Relates To:

ALL ACTIONS.

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

DATE: August 14, 2015
TIME: 10:00 a.m.
CTRM: The Honorable Samuel Conti

ZELDES HAEGGQUIST & ECK, LLP

1 I, Amber L. Eck, declare as follows:

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

6 2. My firm is counsel of record for Lead Plaintiff Joe Vale. My firm’s resume,
7 containing the background and experience of me, my firm, and our attorneys is attached as
8 Exhibit A.

9 **A. ATTORNEYS’ FEES**

10 3. The chart below sets forth, for each attorney or paralegal at my firm who has
11 worked on this matter, the person’s name, the number of hours worked on the matter, their
12 current hourly billing rate, and their current lodestar. The hourly rates are the usual and
13 customary rates charged by my firm in this type of litigation. The chart was prepared from
14 contemporaneous, daily time records regularly prepared and maintained by my firm. I
15 conducted the day-to-day litigation of this case for my firm and reviewed these records (and
16 backup documentation where necessary or appropriate) to confirm both the accuracy of the
17 entries, as well as the necessity for, and reasonableness of, the time and expenses committed to
18 the litigation. As a result of this review, reductions were made to both time and expenses in
19 the exercise of “billing judgment.” As a result of this review and the adjustments made, I
20 believe that the time reflected in my firm’s lodestar calculation and the expenses for which
21 payment is sought are reasonable in amount and were necessary for the effective and efficient
22 prosecution and resolution of the litigation. In addition, I believe that the expenses are all of a
23 type that would normally be charged to a fee-paying client in the private legal marketplace.

24 4. After the reductions referred to above, the number of hours spent on this
25 litigation by my firm is 113.65. The total lodestar amount for attorney/paralegal time is
26 \$72,192.50. A breakdown of my firm’s lodestar is as follows:

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Name	Position	Total Hours	Hourly Rate	Total Lodestar
Amber L. Eck	Partner	99.5	\$690	\$68,655.00
Ruth A. Cameron	Paralegal	14.15	\$250	\$ 3,537.50
Total		113.65		\$72,192.50

B. EXPENSES

5. My firm seeks an award of \$427.50 in expenses and charges in connection with the prosecution of the litigation. Those expenses and charges are summarized by category as follows:

Expense	Total
Class Action Notices/BusinessWire	\$350.00
Photocopies	\$ 70.00
LexisNexis, Westlaw, PACER, Online Research	\$ 7.50
Total	\$427.50

6. 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.

7. The following is additional information regarding certain of these expenses:

(a) Class Action Notices/Business Wire: \$350.00. This expense was necessary under the Private Securities Litigation Reform Act of 1995's "early notice" requirements, which provides, among other things, that "[n]ot later than 20 days after the date on which the complaint is filed, the plaintiff or plaintiffs shall cause to be published, in a widely circulated national business-oriented publication or wire service, a notice advising members of the purported plaintiff class – (I) of the pendency of the action, the claims asserted therein, and the purported class period; and (II) that, not later than 60 days after the date on which the notice is published, any member of the purported class may move the court to serve as lead plaintiff of the purported class." *See* 15 U.S.C. §78u-4(a)(3)(A)(i).

(b) Photocopies: \$70.00. In connection with this case, the firm made 280 in-house copies, charging \$0.25 per copy. Each time our in-house copy machine is used, our billing system requires that a case or administrative billing code be entered and that is how the 280 copies were identified as related to this case.

1 (c) Online Legal and Financial Research: \$7.50. These included vendors
2 such as Lexis/Nexis, Westlaw and PACER. These databases were used to obtain access to
3 SEC filings, legal research, and court filings. This expense represents the expense incurred by
4 ZHE for use of these services in connection with this litigation.

5 I declare under penalty of perjury that the foregoing is true and correct. Executed this
6 8th day of April, 2015, at San Diego, California.

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AMBER L. ECK

ZELDES HAEGGQUIST & ECK, LLP

EXHIBIT A



FIRM RESUME

Zeldes Haeggquist & Eck, LLP is a San Diego, California based law firm dedicated to representing clients throughout California and the nation in complex consumer, employment, securities, insurance, and human rights class action litigation, as well as individual employment litigation matters. Zeldes Haeggquist & Eck, LLP attorneys bring a combined 25 years of business experience to the table and more than a half century of litigation experience to their practice.

Zeldes Haeggquist & Eck, LLP is committed to excellence and integrity. We built our reputation in consumer protection and securities fraud class action cases, taking on large corporations that had wronged individuals or smaller businesses. Whether we are vindicating the rights of consumers and shareholders that were defrauded, representing employees who were wrongfully terminated, advocating on behalf of victims of human rights violations and human trafficking, we are thorough, meticulous and passionate about our work.

We believe in giving back to our community and sit on the boards of several nonprofit organizations. Alreen Haeggquist is a founding and advisory board member and Helen Zeldes is a former board member and a current advisory board member of the Girl's Think Tank, which takes on issues ranging from homelessness, to trafficking of young women, to youth empowerment to carbon emissions. Amber is a volunteer with Genesis Diez, a non-profit organization in Baja which assists orphanages.

The partners at Zeldes Haeggquist & Eck, LLP have played instrumental roles in litigating cutting edge nationwide consumer, securities, insurance, antitrust, and human rights class actions and have successfully advocated for consumers against the largest corporations in America. They played instrumental roles in class actions brought against corporations for a wide range of unlawful practices, including, but not limited to, deceptive advertising, product defect, senior annuities fraud, securities fraud, wage/hour violations, employment discrimination based on race, religion, age, and disability, race discrimination in insurance underwriting, and price-fixing.

Zeldes Haeggquist & Eck, LLP Firm Resume

PRACTICE AREAS

CONSUMER

Zeldes Haeggquist & Eck, LLP 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.

- ▶ Appointed Co-Lead Counsel on behalf of a certified class 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 its real estate investing seminars. *Makaeff v. Trump University, LLC, et al.*, Case No. 3:10-CV-00940-IEG-WVG (S.D. Cal.), as well 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.).
- ▶ Serving 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-JW (N.D. Cal).
- ▶ Serving 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. 09-CV-02109-AJB-MDD (S.D. Cal.).
- ▶ 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-MC0CXC (Orange County Super. Ct.).
- ▶ 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 class action against **Apple, Inc.** *Gordon v. Apple, Inc.*, Case No. 5:06-CV-05358-JW. A nationwide settlement was approved (Helen Zeldes appointed Co-Lead Counsel for the settlement class), wherein eligible class members received \$25-\$79 each.

Zeldes Haeggquist & Eck, LLP Firm Resume

SECURITIES FRAUD AND SHAREHOLDER DERIVATIVE LITIGATION

Zeldes Haeggquist & Eck, LLP 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 19 years on a wide range of complex litigation and securities fraud cases across the United States, recovering millions of dollars for her clients. She has also prosecuted numerous shareholder derivative actions against the executives of companies charged with violating the nation's environmental, labor, health and safety, and securities laws, conferring millions of dollars in added shareholder value through tailored corporate governance reforms designed to prevent future harm.

Some of the securities class actions and derivative cases in which Zeldes Haeggquist & Eck, LLP attorneys have been lead or named counsel are:

- ▶ ***West Palm Beach Police Pension Fund v. CardioNet, Inc.***, No. 37-2010-00086836-CU-SL-CTL (San Diego Super. Ct.). Served as Co-Lead Counsel in a securities class action against CardioNet, Inc. on behalf of the public purchasers in CardioNet, Inc.'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 offering documents that misstated and/or omitted known business trends and reimbursement uncertainties that were required to be disclosed by the federal securities laws.
- ▶ ***Dulgarian v. Cinnamon (Akeena Solar, Inc. Derivative Litigation)***, 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's founder and CEO Barry Cinnamon and the Akeena Board. The case settled for substantial corporate governance enhancements.
- ▶ ***Morgan v. Sporns (HQ Sustainable Consolidated Derivative Litigation)***, No. 11-2-16742-9 SEA (King County Sup. Ct.). Served as Class Counsel in this shareholder derivative case, alleging substantial breaches of fiduciary duty by the HQ Board which resulted in the delisting of HQ's stock.
- ▶ ***In re Pacific Biosciences of California, Inc. Securities Litigation***, No. CIV 509210 (San Mateo Superior Court). Representing shareholders in state securities Section 11 action, alleging that the Registration Statement and Prospectus were false and misleading and that Defendants are strictly liable to the IPO share purchasers under Sections 11, 12 and 15 of the 1933 Securities Act.
- ▶ ***Cantor v. Gold Resource Corporation, et al.***, No. 1:12-CV-0283 (District of Colorado). Named counsel in securities fraud class action against mining company Gold Resource Corp. ("GORO"), alleging that GORO materially overstated its

Zeldes Haeggquist & Eck, LLP Firm Resume

mining business successes, artificially inflating its revenue expectations and stock price.

► *In re SandRidge Energy, Inc. Securities Litigation*, No. 5:12-CV-01341 (Western District of Oklahoma). Named counsel in securities fraud class action against SandRidge, 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 ECotality, Inc. Securities Litigation*, No. 3:13-CV-03791-SC (N.D. Cal.). Named counsel in securities fraud class action against ECotality, alleging that the company, its CEO and CFO made materially false and misleading statements concerning its electric vehicle charging and energy storing systems.

EMPLOYMENT

Zeldes Haeggquist & Eck, LLP also represents employees in cases involving wage disputes, sexual harassment, discrimination or wrongful termination based on age, race, disability, gender and or/religion. Zeldes Haeggquist & Eck, LLP has recovered millions of dollars in damages on behalf of its employee clients.

► *Vann v. Massage Envy Franchising, LLC et al.*, Case No. 3:13-CV-02221-BEN(WVG) (S.D. Cal.). Representing a California class of employees in a wage and hour class action against **Massage Envy** alleging failure to pay minimum wage and final wages, failure to itemize wage statements, and failure to provide rest periods.

► *Wood v. Barcadia, LLC*, Case No. 37-2013-00054903-CU-OE-CTL (San Diego Super. Ct.). Representing 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.

► *Heller v. Grand Pacific Resorts, Inc.*, Case No. 37-2010-57252-CU-OE-NC (San Diego Super. Ct.). Served as lead counsel for over twenty employees who were improperly classified as independent contractors, rather than employees, by their timeshare company employer.

► *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 rest and meal breaks.

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- ▶ ***Spot Water Management, Inc. v. Kevin Plageman, et al.***, Case No. 37-2009-00052285-CU-JR-NC (San Diego Super. Ct.). Zeldes Haeggquist & Eck, LLP took this case, where an employer was alleging misappropriation of trade secrets against a former employee who merely sought payment of wages due, to trial in August 2010 and obtained a favorable verdict on behalf of the employee. The court found that the employer plaintiff brought the action in bad faith and awarded Zeldes Haeggquist & Eck LLP's client's damages, attorneys' fees and costs.

- ▶ ***Wallace v. BAE Systems San Diego Ship Repair, Inc.***, Case No. 37-2013-00073399-CU-WT-CTL (San Diego Super. Ct.). Represented a former African-American BAE employee for retaliation and wrongful termination because he was terminated after complaining to BAE's Human Resources and Ethics Departments of being assaulted and discriminated on the job.

- ▶ ***Moore v. Diamond Environmental Services, LP.***, Case No. 37-2013-00080961-CU-WT-NC (San Diego Super. Ct.). Represented a former Diamond employee for pregnancy discrimination and wrongful termination because she was terminated while on maternity leave caring for her new baby.

ATTORNEYS

ALREEN HAEGGQUIST, MANAGING PARTNER

Alreen Haeggquist, a founding member and the managing partner of Zeldes Haeggquist & Eck, LLP, has spent her entire legal career litigating on behalf of consumers and employees. Ms. Haeggquist is the lead employment partner at Zeldes Haeggquist & Eck, LLP and works tirelessly advocating on behalf of employees that have been wrongfully terminated and/or discriminated based on their sex, race, religion, or disability; retaliated against for refusing to engage in unlawful conduct; or who are owed wages earned.

Before starting Zeldes Haeggquist & Eck, LLP, Ms. Haeggquist practiced law at the nation's largest plaintiff's class action firm, Robbins Geller Rudman & Dowd (formerly "Lerach Coughlin" and "Milberg Weiss"), where she litigated numerous nationwide consumer and antitrust class actions. Ms. Haeggquist participated and played an instrumental role in the successful prosecution and settlement of numerous antitrust and unfair competition cases, including the Rubber Chemicals indirect purchaser cases, which resulted in significant *cy pres* funds to non-profit groups advocating for competition and the Bank Privacy Cases (S.F. Sup. Ct.), which resulted in better bank privacy policies, funding to non-profit groups advocating for privacy rights, and benefits to credit cardholders.

Zeldes Haeggquist & Eck, LLP Firm Resume

Ms. Haeggquist was also a major part of the team that obtained judgment of over \$115 million against Farmers Insurance Exchange and against the Automobile Club for not disclosing the total premium to policyholders as required by law. Ms. Haeggquist also has been involved in a number of precedent-setting appellate decisions, including *McKell v. Washington Mutual*, 142 Cal. App. 4th 1457 (2006), *Dehoyos v. Allstate Corp.*, 345 F.3d 290 (5th Cir. 2003) and *Lorix v. Crompton Corp.*, 736 N.W.2d 619 (Minn. 2007).

Ms. Haeggquist has published numerous articles for the annual publication of *California Litigation Review* regarding recent developments in class action and discovery law.

Ms. Haeggquist is licensed to practice in all state and federal courts in California and is a Board Member of the Consumer Attorneys of San Diego, where she serves as the Co-Chair of the Community Outreach Committee. Ms. Haeggquist 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.

Education: B.A., University of California, 1999; J.D., California Western School of Law, 2002 (*magna cum laude*).

Honors/Awards: Editor-in-Chief, California Western Law Review and International Law Journal; Honors Instructor and Academic Tutor, International L.L.M. Students; Dean's List All Semesters; California Innocence Project Distinguished Alumni Award.

AMBER L. ECK, PARTNER

Amber Eck is an experienced lawyer who has been litigating all aspects of complex individual and class actions for the past 19 years, with an emphasis on securities and derivative litigation, consumer fraud, employment law, and general business litigation. She is currently serving as Class Counsel in consumer fraud class actions against Trump University and Donald Trump and TelePacific. Ms. Eck has also been litigating securities class actions against Pacific Biosciences, HQ Sustainable and CardioNet (which settled in 2012 for over \$7 million), and been involved in filing securities class actions against Neptune Technologies (NEPT); Gold Resources Inc. (GORO); SandRidge (SD); Kosmos Energy (KOS), Office Depot (ODP); Cooper Companies (COO), K-V Pharmaceuticals (K-V), ECOTALITY (ECTY), NQ Mobile (NQ) and Cliffs Natural Resources (CLV).

Amber Eck was sole lead counsel in a shareholder derivative action against the officers and directors of Akeena Solar, Inc., which settled in 2012 for substantial corporate governance enhancements. In addition, Ms. Eck has represented both plaintiffs and defendants in individual civil business litigation, breach of contract actions and defamation actions.

Zeldes Haeggquist & Eck, LLP Firm Resume

Before joining Zeldes Haeggquist & Eck, LLP, Ms. Eck was a partner at the nation's largest plaintiff's class action firm, Robbins Geller Rudman & Dowd (formerly "Coughlin Geller") from 1997-2009. During her 12 years there, Ms. Eck litigated numerous shareholder and derivative class actions which resulted in substantial recoveries for the investors, and extensive corporate governance changes, including: \$80 million settlement against Hanover Corp. (and unprecedented corporate governance reforms); \$50 million settlement against Sprint (and adoption of 60+ new corporate governance provisions); \$42.3 million settlement against Fruit of the Loom, Inc.; and \$29.5 million settlement against Plains All American Pipeline.

Amber Eck also worked as a defense attorney for two years at Chapin Fleming & Winet, specializing in complex civil litigation, and served as a Law Clerk to the Honorable Jan M. Adler, United States Magistrate Judge for the Southern District of California. Before law school, she was a writer and photographer for two years for the Los Angeles legal newspaper, the Metropolitan News Enterprise.

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*, in January, 2011. She has also lectured to law school students and attorneys, including recently at the Lawyers Club and Thomas Jefferson School of Law sponsored symposium regarding Small Law Firms and Sole Practitioners in 2010. Ms. Eck served as a Barrister in the William B. Enright American Inn of Court, and a Barrister in the Louis M. Welsh American Inn of Court in 2010-2011. She is also a member of the Lawyers Club, San Diego County Bar Association and Federal Bar Association, and formerly served on the Board of Directors for the San Diego Barristers Club. Ms. Eck currently serves as a Girl Scout leader and the GATE District Advisory Council representative for Loma Portal Elementary. Ms. Eck is admitted to practice in California and Nevada.

Education: B.A., Pepperdine University, 1990 (*magna cum laude*); J.D., Boston University School of Law, 1995 (*magna cum laude*).

Honors/Awards: Distinguished Service Award for pro bono service in *Sanchez v. County of San Diego* (2002), which was the subject of a "Colbert Report" feature; Wiley W. Manuel Pro Bono Service Award for *Badua v. City of San Diego* (1999); *International Law Journal*, Case & Notes Editor (1993-1995); Giles S. Rich Intellectual Property Moot Court Team, Best Brief, Northeast Region (1995); Grant recipient, Harvard School of Public Health (1993).

HELEN I. ZELDES, PARTNER

Ms. Zeldes is a founding member of Zeldes Haeggquist & Eck, LLP whose practice focuses on class action litigation, employment discrimination, and human rights. Ms. Zeldes has extensive experience litigating complex consumer class actions with an emphasis on actions brought by policyholders against life, auto and other insurers for

Zeldes Haeggquist & Eck, LLP Firm Resume

deceptive sales practices, mortgage lending and banking fraud, product defect claims, wage/hour violations, and human rights, civil rights and antitrust violations.

Ms. Zeldes also has more than 20 years small business experience: from retail and manufacturing to importing and wholesaling to e-commerce, Ms. Zeldes has owned and operated eight businesses over the past two decades. Ms. Zeldes brings a business owner's sensibilities to the table in her litigation practice.

Ms. Zeldes is currently serving as Co-Lead Counsel in a nationwide putative class action against Apple, Inc. representing a class alleging product defect and consumer claims that Apple's power adapter is defectively designed. *In Re Magsafe Apple Power Adapter Litigation*, Case No. 5:09-CV-01911-JW (N.D. Cal). Ms. Zeldes is also representing a putative class of consumers in a product defect and consumer class action against Sony Electronics, Inc. alleging that fundamental flaws in the design and/or manufacturing process in the VAIO Touchpad Notebooks render it almost impossible to use because the touchpad is prone to cause the onscreen cursor to track in reverse, freeze; and/or engage in erratic behavior. Plaintiff alleges that Sony knew or should have known about this defect since at least the first quarter of 2007, but has continued to manufacture, market and sell the defective VAIO Touchpad Notebooks, which are unsuitable for the purposes for which they are ordinarily purchased. *In Re Sony Vaio Computer Notebook Trackpad Litigation*, Case No. 09-CV-02109-AJB-MDD (S.D. Cal.). Ms. Zeldes also litigated a nationwide consumer product defect class action against Apple, Inc. on behalf of a class of over two million purchasers of an alleged defective power adapter. *Gordon v. Apple, Inc.*, Case No. 5:06-cv-05358-JW (N.D. Cal). A nationwide settlement was reached wherein eligible class members received \$25-\$79 each.

Prior to starting Zeldes Haeggquist & Eck, LLP, Ms. Zeldes worked for many years at the nation's largest plaintiff's class action firm, Robbins Geller Rudman & Dowd (formerly "Lerach Coughlin" and "Milberg Weiss") in its consumer and insurance fraud class action practice group. There, Ms. Zeldes was instrumental in litigating a series of nationwide senior annuities fraud class actions in which her former firm was appointed Co-Lead Counsel.¹ Other nationwide class actions Ms. Zeldes litigated at her former firm included: a wage/hour overtime action against Cintas, one of the nation's largest commercial laundries for violations of the Fair Labor Standards Act for misclassifying truck drivers as salesmen to avoid payment of overtime wages; race discrimination underwriting class actions against large insurance companies for their practice of intentionally charging

¹ *Buhs v. American International Group*, No. CGC 04-435919 (S.F. Super. Ct. Oct. 24, 2004); *Bacon v. American International Group*, No. 05-04979 MMC (N.D. Cal. Dec. 2, 2005)(originally filed July 15, 2005 in San Francisco Superior Court, No. CGC 05-443149); *Kaiser v. Midland National Life Insurance Co.*, No. 05-00972-HLA-TEM (M.D. Fla. Sept. 20, 2005); *Healey v. Allianz Life Insurance Co. of North America*, No. 05-8908 (C.D. Cal. Dec. 22, 2005); *Anagnostis v. American Equity Investment Life Insurance Co.*, No. CV-06-388 MMM (C.D. Cal. Jan. 20, 2006); *Edwards v. AmerUs Group Co.*, No. 8:05-1590 (M.D. Fla.); and *Petry v. National Western Life Insurance Co.*, No. 05CV-2336J (S.D. Cal.).

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African-Americans and other minorities more for life insurance than similarly situated Caucasians (cases that collectively recovered over \$400 million for African-Americans and other minority class members as redress for the civil rights abuses they were subject to); race discrimination underwriting class actions against insurance companies based upon the improper use of credit scoring or geographical redlining to charge minorities higher premiums against insurance giants like Allstate and State Farm; a statewide consumer class action over the propriety of a private contractor operating “red light camera” systems throughout California, *Red Light Photo Enforcement Cases*, JCCP No. 4305, a case which Ms. Zeldes co-chaired at trial; a multi-state antitrust action entitled *In re Medical Waste Services Antitrust Litigation*, MDL No. 1546 (D. Utah), in which plaintiffs brought claims for defendants’ alleged conspiracy to allocate customers and territories in the market for the collection, transportation and disposal of medical waste, as well as for unlawful monopolization. Ms. Zeldes was also involved in the *Carbon Fiber Antitrust Litigation*, Case No. CV-99-7796 (C.D. Cal), in which a class of purchasers alleged that the major producers of carbon fiber fixed the price of carbon fiber from 1993 to 1999. The case ultimately settled for \$675 million.

Ms. Zeldes is licensed to practice law in the States of California and Hawaii and is admitted to practice before all the federal district courts in both states.

Education: B.A., University of California at Davis, 1988; J.D., University of Hawaii, William S. Richardson School of Law, Honolulu, Hawaii, 2002 (*cum laude*).

Honors/Awards: University of Hawaii Law Review, Outside Articles Editor, Editorial Board Recipient, Edward H. Nakamura Memorial Public Interest/Service Scholarship; CALI Award for Highest Grade in Domestic Ocean & Coastal Law.

AARON M. OLSEN, ASSOCIATE

Nominated as one of San Diego’s Outstanding Young Attorneys in 2011 and 2012, Aaron M. Olsen is an associate in the consumer, business and employment law litigation departments of Zeldes Haeggquist & Eck, LLP, where he represents plaintiffs in federal and state court. Mr. Olsen’s practice is focused on prosecuting complex class action suits, including consumer fraud actions, product defect cases, antitrust litigation, wage & hour actions, and unfair competition and false advertising claims, among others.

Mr. Olsen’s practice is also dedicated to representing clients in general business litigation matters, particularly small to medium size businesses seeking assistance with contractual disputes, interference with business relations, partnership issues, and all aspects of labor and employment litigation representing employees.

Mr. Olsen’s notable current cases and accomplishments include serving as Co-Lead Counsel for a nationwide consumer class of purchasers of an alleged defective power adapter in a consumer product defect class action against **Apple, Inc.** *In re MagSafe Apple*

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Power Adapter Litig., Case No. C 09-01911 JW. On September 27, 2011, the Northern District Court, Judge Ware, issued an Order Granting Conditional Certification of Settlement. Subsequently, on March 8, 2011, Judge Ware issued an Order Granting Final Approval of Class Action Settlement. Mr. Olsen is also serving as Co-Lead Counsel for a nationwide consumer class of Trump University seminar purchasers in a class action against **Trump University, LLC and Donald Trump** for violations of California consumer protection statutes and material misrepresentations regarding its seminars. *Makaeff v. Trump University, LLC, et al.*, Case No. 3:10-CV-00940-IEG-WVG (S.D. Cal.). Finally, Mr. Olsen is serving as Co-Lead Counsel for a nationwide consumer class action against **Sony Electronics, Inc.** alleging fundamental flaws in the design and/or manufacturing process in the VAIO Touchpad Notebooks. *In Re Sony Vaio Computer Notebook Trackpad Litigation*, Case No. 09-CV-02109-AJB-MDD (S.D. Cal.)

Prior to joining Zeldes Haeggquist & Eck, LLP, Mr. Olsen served as an attorney at the Law Offices of Nicholas Boylan, APC, wherein Mr. Olsen represented individuals and small business entities in all stages of complex litigation in state and federal courts, emphasizing in contract and partnership disputes, mortgage fraud, state securities cases, employment matters, interference with business relations, personal injury, and construction defect. Mr. Olsen also served as a law clerk for the nation's largest plaintiff's class action law firm, Robbins Geller Rudman & Dowd (formerly "Lerach Coughlin" and "Milberg Weiss") in its consumer class action practice group. While there, Mr. Olsen focused on prosecuting insurance companies for inappropriately pushing deferred annuities on senior citizens throughout the country. Moreover, Mr. Olsen gained invaluable experience in the courtroom while serving as a law clerk for the San Diego County Office of the Public Defender ("Public Defender Office"). At the Public Defender Office, Mr. Olsen vigorously argued on his clients' behalf at numerous arraignment proceedings, readiness conferences, disposition hearings, settlement conferences, plea negotiations, and evidentiary hearings.

Mr. Olsen is admitted to practice in California, the United States District Court for the Southern, Central and Northern District 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 is also a real estate broker, licensed by the State of California Department of Real Estate, License No. 01914011.

Education: B.A., University of Utah, 2002; J.D., California Western School of Law, 2008 (Editor in Chief, California Western School of Law Commentary; Student Bar Association, Executive Board Member).

Honors/Awards/Publications: San Diego Outstanding Young Attorneys 2011 and 2012 Nominee; Guest Writer, San Diego Lawyer Magazine; Volunteer, California Innocence Project; Editor-in-Chief, California Western School of Law Commentary; Publication - Discovery Update, 2010 California State Bar Litigation Review; Small Business Award

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Judge, 2010 San Diego Regional Chamber of Commerce; Judge, 2010 USD School of Law Appellate Moot Court Competition.

JENNA M. CRISCI, ASSOCIATE

Jenna M. Crisci is a new associate with Zeldes Haeggquist & Eck, LLP. Ms. Crisci's practice is focused on representing employees in all aspects of labor and employment litigation in federal and state court including wrongful termination, discrimination, harassment, retaliation, and wage and hour actions, among others.

Prior to joining Zeldes Haeggquist & Eck, LLP, Ms. Crisci 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. Crisci practiced primarily in the areas of employment law defense and business litigation including state and administrative claims involving wage and hour, wrongful termination, discrimination, harassment, retaliation, breach of contract, misappropriation of trade secrets, interference with economic relationships, unfair business practices, misrepresentation, and premises liability. Ms. Crisci also provided employment law compliance services including drafting employee handbooks, independent contractor agreements, and severance agreements, assisting in the adoption of alternative workweek schedules, and counseling employers on a variety of employment law issues.

Ms. Crisci is admitted to practice in California, the United States District Court for the Southern District of California, and is a member of the Consumer Attorneys of San Diego, and the San Diego County Bar Association.

Education: B.S., California State University, Chico, 2003; J.D., California Western School of Law, 2010.

Speaking Engagements/Publications: "Employment Law from A to Z in California," Lorman Education Services, San Diego, CA, June 20, 2014; and "Setting Up an Alternative Workweek Schedule in California," Today's General Counsel, August/September 2014.

CERTIFICATE OF SERVICE

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I hereby certify that on May 4, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 4, 2015.

s/ Christopher P. Seefer
CHRISTOPHER P. SEEFER

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Mailing Information for a Case 3:13-cv-03791-SC In Re Ecotality, Inc. Securities Litigation

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Manual Notice List

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- (No manual recipients)