

EXHIBIT A



Senior Vice President

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Education & Certifications

- **J.D.** William Mitchell College of Law, 1995 (St. Paul, MN)
- **B.S. Marketing Education** University of Minnesota, 1990 (Minneapolis, MN)

Tiffany Janowicz leads Rust's consumer as well as insurance and healthcare practice areas, with a depth of experience in antitrust and product liability matters. She also provides guidance to a team of project management professionals who handle projects in the same practice areas.

Janowicz began her career as a consultant at Rust in 1996 and was promoted to senior vice president in 2003. In her current role, Janowicz specializes in customer relations and strategic consultation on claims administration programs. Rust's clients benefit from her expertise in developing and executing strategies designed to achieve their settlement administration goals.

Janowicz has overseen all aspects of hundreds of settlements, including many of the firm's largest claims-processing matters. Examples include Microsoft's antitrust settlements for the states of California, Iowa, Minnesota, New York and Wisconsin, as well as the multi-district litigation claiming that companies fixed the price of Dynamic Random Access Memory (DRAM) in the United States. Janowicz has also lead many of Rust's insurance-related settlements and a number of credit life settlements.

Following are some additional details of cases that Rust has administered under the leadership of Janowicz.

- ***In re Dynamic Random Memory (DRAM) Antitrust Litigation, MDL No. 1486 (N.D. Cal.)***. The lawsuits combined into this multi-district litigation claimed that the Defendant companies fixed the price of DRAM in the United States, causing individuals and businesses to pay more for DRAM and DRAM-containing devices. The combined direct and indirect settlements totaled \$310 million.
- ***Maksimovic v. Sony of Canada Ltd., Ontario Superior Court of Justice, No. CV-11 425487-00CP***. This Canadian settlement resolved allegations that Sony failed to adequately safeguard the computer systems used to provide the Sony PlayStation Network, the Qriocity service, and the Sony Online Entertainment services, which were attacked by criminal intruders in April 2011. Rust managed the

translation of all materials into French and provided all documentation and communication in both English and French. Rust also established a Canadian P.O. box for the matter and drop-shipped the mail to our processing center in Minnesota.

- ***In re Nutella Marketing and Sales Practices Litigation, No. 3:11-cv-01086-FLW-DEA (D.N.J.)***. Plaintiffs claimed that Defendant Ferrero U.S.A., Inc. made representations through its marketing and advertising of Nutella® brand hazelnut spread, improperly suggesting that Nutella is healthier than it actually is. Rust placed notice of the settlement in magazines and banner ads on popular websites; the settlement website received over 1 million visits and over a quarter million consumers filed claims.
- ***In re Online DVD Rental Antitrust Litig., MDL No. 2029 (N.D. Cal.)***. Rust sent over 34 million email notices to potential class members in this project. Rust has processed more than 1.1 million claims for gift cards or cash benefit in this ongoing project. Rust also created a settlement website which has to-date received over 2.2 million site visits.
- ***Microsoft I-V Cases, J.C.C.P. No. 4106, (Cal. Super. Ct. S.F. County)***. Janowicz was responsible for the design and management of the direct mail notice program that involved the mailing of 18 million notice-and-claim form packages and deployment of 7 million email notices to a class consisting of consumers who purchased at retail selected Microsoft software for use in California. During the first years of the multi-year program, Janowicz was actively involved in the daily project activities and second in project responsibility only to the company president. Janowicz was and continues to be responsible for overseeing project management, claims and voucher processing, benefits and cy pres distribution, and call center activities.
- ***The Authors Guild, Inc. v. Google, Inc., No. 05-cv-8135 (S.D.N.Y.)***. Janowicz led and continues to lead her team in the administration services provided this settlement involving rights-holders around the world. Janowicz oversaw the translations of the claim forms and supporting materials and well as the provision of telephone support in more than 30 languages. For this ongoing project, Rust's CSRs assist rights-holders in claiming their books and inserts, responding to questions related to the complex settlement and providing technical support throughout the online claims process.
- ***Thompson v. Metropolitan Life, No. 00-CIV-5071 (W.D. Pa.)***. Janowicz was second in project responsibility only to the company president in overseeing Rust's provision of services for this settlement, which included an estimated 25 million policies. Rust mailed more than 550,000 customized and 104,000 generic notices to potential class members. In this race-based underwriting insurance settlement, Rust received 220,000 claim forms, forwarded them on a rolling basis to the company for their research into class membership, and followed up on the company's direction by mailing 80,000 "cure" letters and more than 270,000 response letters to claimants. Rust's call centers answered calls generated by both the mailed notice and an extensive media campaign. During the national TV noticing campaign, there were 500 call center operators in two sites.
- ***McNeil v. American General Life & Accident, No. 3:99-1157 (D. Tenn.)***. Janowicz was second in project responsibility only to the company president in the management of Rust's claims administration services for a settlement covering 9 million class members. Rust mailed over 3 million notices within approximately two weeks. Rust also arranged for an ad campaign to help reach class members for whom the company did not have current addresses. Rust received 600,000 calls on this project, and printed and mailed more than 440,000 payments.



- **Naef v. Masonite Corp., No. CV 944033 (Ala. Cir. Ct. Mobile County).** Project involved receiving and processing according to pre-determined criteria (including proof of property ownership, proof of product ownership, and proof of damage) more than 400,000 claims, eventually distributing more than \$800 million to more than 260,000 claimants whose claims were validated. Janowicz co-directed the initial design of the claims intake process of this 10-year claims program, and managed claims review and contact center operations.

Thought Leadership

- Co-Author, “**Estimating Claims – What Every Attorney Should Know,**” What We’ve Noticed, Feb. 2015
- Co-Author, “**Increasing Judicial Attention to Claims-Filing Rates,**” What We’ve Noticed, Oct. 2014
- Co-Author, “**The Case for Simplified Notice and Claims,**” What We’ve Noticed, July 2014
- Co-Author, “**Tracking Ted...**,” What We’ve Noticed, April 2014
- Panelist, “**Crafting Class Settlement Notice Programs: Due Process, Reach, Claims Rates, and More – Minimizing Court Scrutiny and Overcoming Objector Challenges,**” Strafford CLE Webinar, Feb. 2014
- Co-Author, “**Efficient, Cost-Effective Notification and Administration in Antitrust Class Actions,**” Class Action Perspectives, 2013
- Co-Author, “**Recent Court Decisions Indicate Greater Scrutiny of Class Notice Programs,**” What We’ve Noticed, Dec. 2013
- Panelist, “**Mechanics, Logistics & Statistics: How to Settle a Class Action Lawsuit,**” FDCC Section Presentations for CLE 2013 Winter Program, March 2013
- Panelist, “**Emerging Trends in Class Action Notice,**” CLE International 6th Annual Conference Class Actions: Hot Topics, Winning Strategies and More, June 2010
- Speaker, “**Class Action Notice and Claims Administration: Trends and Innovation,**” Women Antitrust Plaintiffs’ Attorneys Networking Event, Aug. 2009
- Author, “**Anticipating Claims Filing Rates in Class Action Settlements,**” Class Action Perspectives, Nov. 2008

Bar Admissions

- Licensed to practice law in Minnesota

