

**REDACTED**

**FILED UNDER SEAL**

**EXHIBIT 4**

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7 Submitted on Behalf of:

8 **BONSIGNORE, LLC**

9 Counsel for Plaintiff(s) in:

10 **Brown, et al. v. Kia Motors America, Inc.**  
11 **TeHorst, et al. v. Kia Motors America, Inc.**  
12 **Iocovozzi, et al. v. Kia Motors America, Inc.**  
13 **Cestaro, et al. v. Kia Motors America, Inc.**  
14 **Woodward, et al. v. Kia Motors America, Inc.**  
15 **Martyn, et al. v. Kia Motors America, Inc.**

16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**

18 IN RE: HYUNDAI AND KIA FUEL  
19 ECONOMY LITIGATION

Case No. 2:13-ml-02424-GW-FFM

20 **DECLARATION OF ROBERT J.**  
21 **BONSIGNORE IN SUPPORT OF**  
22 **REQUEST FOR ATTORNEYS' FEES**  
23 **AND EXPENSES**

24 Date: December 23, 2014

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**DECLARATION OF ROBERT J. BONSIGNORE IN SUPPORT OF REQUEST FOR**  
**ATTORNEYS' FEES AND EXPENSES**

1 I, Robert J. Bonsignore, declare as follows:

2 1. I am a partner at the firm of Bonsignore, PLLC d/b/a Bonsignore Trial  
3 Lawyers (“BTL”), counsel for Plaintiffs Brown, TeHorst, Iocovozzi, Cestaro, Woodward,  
4 and Martyn. This declaration is submitted in support of the fees and expenses request for  
5 work performed by BTL in connection with this litigation. I have personal knowledge of  
6 the facts below and, if called upon to do so, could and would testify competently thereto.  
7 This declaration is submitted after a review of our billing records.

8 2. This firm has substantial experience in complex litigation and consumer  
9 protection class action cases. A firm CV is attached hereto.

10 3. This firm’s compensation for services rendered in this case was wholly  
11 contingent on the success of this litigation, and was totally at risk. Prior and subsequent  
12 to the appointment of Liaison Counsel, BTL advocated for coordination and a narrowing  
13 of the issues in dispute among Non-Settling Plaintiffs (“NSP”). BTL was the first to place  
14 into focus the standard of review that this Court would adopt as a matter of law.

15 4. BTL lawyers and staff are required to only submit time that was generated  
16 contemporaneously, and kept in tenths of an hour. BTL lawyers and staff are also  
17 required to maintain time by activity category. A partner is required to review and delete  
18 time not properly generated and maintained as well as any submissions they otherwise  
19 deem not compensable.

20 5. In submitting this time for approval, BTL has voluntarily deleted time  
21 related to case investigation. In doing so, BTL does not advance the position that such  
22 time submitted by other NSP counsel’s is improper or should not be allowed. Rather, the  
23 background factual knowledge gained during case investigation was essential to  
24 efficiently carrying out the process this Court tasked the NSP counsels with. BTL  
25 thoroughly investigates all claims before they are filed.

26 6. BTL’s time submission is largely limited to tasks assigned by Liaison  
27 Counsel, tasks otherwise necessary to carry out tasks assigned or called for by Liaison  
28 Counsel, or to keep their putative class representative clients informed.

1           7.     In connection with our submitted time, BTL was involved in the following:  
2 (i) the review and responses to discovery and documents of the defendants as assigned by  
3 Liaison Counsel; (ii) the research and drafting of comments requested by Liaison counsel  
4 on discrete topics; (iii) assisting in the the taking and or review of the foreign and  
5 domestic NSP sworn statements including telephonic attendance and live exchanges; (iv)  
6 conducting legal research concerning plaintiffs' claims asserted in this litigation; (v)  
7 review of the definitive settlement agreements and the collateral documents for the  
8 purpose of identifying objectionable terms and then re-drafting objectionable terms; (vi)  
9 reviewing responses from class members and exchanges with them; (vii) conferences  
10 with co-counsel; and (xii) other matters necessary to the prosecution of this litigation.

11           8.     In connection with our services, the BTL attorneys were involved in specific  
12 assignments they were particularly suited for. To the greatest extent possible following  
13 the appointment of Liaison Counsel for the NSP's, BTL attorneys did not participate in  
14 tasks not assigned by Liaison Counsel or related to tasks assigned by liaison counsel  
15 other than those necessary to fulfill our ethical obligations to our putative class  
16 representatives and the Class. This work involved conferencing with other NSPs, pushing  
17 NSP counsels to reach consensus, and narrow the issues in dispute.

18           9.     BTL has expended in excess of \$2,707.35 in unreimbursed expenses in  
19 connection with the prosecution of this litigation for which reimbursement is requested.

20

<b>Expense Category</b>	<b>Amount</b>
Filing Fees	\$1,527.10
Pro Hac Vice Motion	\$650.00
Postage/Photocopies	\$560.25
<b>TOTAL EXPENSES</b>	<b>\$2,707.35</b>

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27           The expenses include the filing of civil actions. BTL made its usual and customary  
28 charges for expenses it paid or incurred in this litigation and added no surcharge to any

1 expense. The expenses incurred pertaining to this case are reflected in the books and  
2 records of the firm. These books and records are prepared from expense vouchers and  
3 check records and are an accurate record of the expenses incurred.

4 10. Exhibit 1 is a true and accurate summary of time submissions by BTL  
5 lawyers and professional staff. Exhibit 1 sets forth the total time submitted for approval  
6 by each attorney and paralegal of this firm on this case, and the lodestar calculation for  
7 that attorney or paralegal based on this firm's current, rather than historic billing rates  
8 because the BTL rates went down in 2014. The schedule was prepared from  
9 contemporaneous daily time records regularly maintained by this firm, which are  
10 available at the request of the Court.

11 11. Although the categories are standard and self explanatory, BTL offers the  
12 following additional detail on certain of the time categories identified below:

- 13 a. Case Assess/Investigation/Factual Research – includes time spent that  
14 did not precisely fit into a more specific category but related to  
15 investigation and factual research.
- 16 b. Court Appearance – BTL participated in or stood ready to participate  
17 in numerous court appearances. As a result of arguments made by  
18 Robert Bonsignore, this Court ordered or refined certain aspects of the  
19 discovery process.
- 20 c. Discovery – BTL volunteered to take an active role in the  
21 confirmatory discovery process coordinated by Liaison Counsel and  
22 was assigned tasks. BTL compromised by not insisting on taking the  
23 confirmatory interviews, and instead was tasked with review and  
24 coding of documents posted to the online EasyESI database that was  
25 specifically assigned by Liaison Counsel, reviewing document  
26 summaries or compilations of “hot documents” that Liaison Counsel  
27 distributed to NSPs, participating in the confirmatory discovery  
28 interviews of Hyundai and Kia personnel for the purpose of asking

1 questions on behalf on NSPs via telephone and online chatrooms that  
2 took place live in real time during the interviews, participation in task  
3 specific assigned group calls and correspondence exchange  
4 specifically regarding the document review or discovery interviews. It  
5 includes the time BTL spent providing identifying and providing hot  
6 documents and other information to the counsel conducting the  
7 interviews or to Liaison Counsel for the preparation of document  
8 summary reports and also time spent drafting proposed “interview  
9 outlines”. Discovery also includes time spent meeting and conferring  
10 on those issues and contributing to efforts to resolve discovery  
11 disputes. NSP Counsels required certain legal memoranda during the  
12 course of the confirmatory discovery process. BTL volunteered for the  
13 preparation of certain memos and carried out the related research in a  
14 specific and efficient manner.

- 15 d. Case Mgmt./Litigation Strategy & Analysis - includes time spent that  
16 did not precisely fit into a more specific category but related to the  
17 strategy advanced by the NSP as a whole.
- 18 e. Settlement – includes time reviewing and revising the proposed terms  
19 of the settlement. It also includes time working with NSP counsels on  
20 settlement related matters. This also includes certain legal memoranda  
21 during the course of the settlement negotiations that targeted  
22 settlement related topics such as this Court’s standard of review and  
23 other miscellaneous matters.

24 12. On December 8, 2014, plaintiffs’ counsel had a phone conference during  
25 which the defendants’ position on attorney’s fees was discussed. Plaintiffs’ counsel with  
26 the exception of liaison counsel who did not participate reached consensus and concluded  
27 that defendants’ proposal on attorney’s fees must be rejected absent acceptance of our  
28

1 last offer. I urged the group to file our petition for attorney’s fees together with the  
2 liaison counsel. An alternative plan was agreed to but that possibility was left open.

3 13. On December 15, 2014, liaison counsel participated in a call with NSP’s  
4 counsels. During the call it was agreed that we would join liaison counsel’s brief.

5 14. [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]

15 [REDACTED] My firm undertook work after this Court selected liaison counsel and  
16 referenced its expectations as to what would be expected to take place during a  
17 “confirmatory discovery process.” To the greatest extent possible, my firm limited its  
18 time to activities directly assigned or set up by liaison counsel.

19 A breakdown of the time spent is attached hereto as Exhibit A.

21 I declare under penalty of perjury under the laws of the United States of America  
22 that the foregoing is true and correct.

23 Executed this day, December 23rd, 2014 at Las Vegas, Nevada.

24  
25 /s/ Robert J. Bonsignore  
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**EXHIBIT 1**

<b>A - Case Assess/Investigation/Factual Research</b>	<b>Value</b>	<b>Hours</b>	<b>Avg. Rate</b>
Gray Echavarria	\$650.00	5.2	\$125.00
Robert Bonsignore	\$31,655.00	48.7	\$650.00
Rick Kirchner	\$1,925.00	3.5	\$550.00
<b>TOTAL</b>	<b>\$34,230.00</b>	<b>57.4</b>	
<b>B - Briefs/Motions/Pleadings</b>			
Lisa Sleboda			\$450.00
Fran Whitaker			\$350.00
Gray Echavarria			\$125.00
Johnna Lent			\$125.00
Rick Kirchner			\$550.00
Robert Bonsignore			\$650.00
<b>TOTAL</b>			
<b>C - Court Appearance</b>			
Robert Bonsignore	\$29,510.00	45.4	\$650.00
<b>TOTAL</b>	<b>\$29,510.00</b>	<b>45.4</b>	
<b>D - Discovery</b>			
Fran Whitaker	\$59,115.00	168.90	\$350.00
Gray Echavarria	\$512.50	4.1	\$125.00
Johnna Lent	\$2,587.50	20.7	\$125.00
Rich Kirchner	\$4,125.00	7.5	\$550.00
Robert Bonsignore	\$163,930.00	252.20	\$650.00
<b>TOTAL</b>	<b>\$230,270.00</b>	<b>453.40</b>	
<b>F - Case Mgmt./ Litigation Strategy &amp; Analysis</b>			
Fran Whitaker	\$1,295.00	3.7	\$350.00
Robert Bonsignore	\$28,275.00	43.50	\$650.00
<b>TOTAL</b>	<b>\$29,570.00</b>	<b>47.20</b>	



<b>S – Settlement</b>			
Fran Whitaker	\$2,380.00	6.8	\$350.00
Lisa Sleboda	\$270.00	.6	\$450.00
Rick Kirchner	\$2,915.00	5.3	\$550.00
Robert Bonsignore	\$28,340.00	43.6	\$650.00
<b>TOTAL</b>	<b>\$33,905.00</b>	<b>56.30</b>	
<b>Staff Summary</b>			
Fran Whitaker	\$62,790.00	179.40	\$350.00
Gray Echavarria	\$1,162.50	9.3	\$125.00
Johnna Lent	\$2,587.50	20.7	\$125.00
Lisa Sleboda	\$270.00	.6	\$450.00
Rick Kirchner	\$8,965.00	16.3	\$550.00
Robert Bonsignore	\$281,710.00	433.40	\$650.00
<b>TOTAL</b>	<b>\$357,485.00</b>	<b>659.70</b>	
<b>Category Summary</b>			
A – Case Assm	\$34,230.00	57.4	
B – Briefs/Motions/Pleadings	0	0	
C – Court Appearance	\$29,510.00	45.4	
D – Discovery	\$230,270.00	453.40	
F – Case Mgmt/Lit.	\$29,570.00	47.20	
S - Settlement	\$33,905.00	56.30	
<b>TOTAL FEES</b>	<b>\$357,485.00</b>	<b>659.70</b>	
<b>TOTAL EXPENSES</b>	<b>\$2,707.35</b>		
<b>TOTAL LODESTAR</b>	<b>\$360,192.35</b>		

## **BONSIGNORE, LLC**

### **TRIAL LAWYERS**

[www.classactions.us](http://www.classactions.us)

**BONSIGNORE TRAL LAWYERS, PLLC** are highly successful and experienced trial lawyers who limit their practice to complex litigation, class actions, and cases involving significant economic loss or public policy. The firm concentrates in the practice areas of antitrust, business-to-business wrongs, consumer protection, employment, catastrophic personal injury and Mass Tort litigation.

We have learned through experience that the best way to achieve a favorable settlement is to prepare each case to win at trial. Bonsignore, PLLC has earned a national and international reputation for its professional integrity, competence and an aggressive approach to case prosecution. Bonsignore, PLLC is capable of litigating any case in any jurisdiction.

The attorneys for Bonsignore, PLLC have represented businesses, government, consumers, and unions in federal and state courts across the United States. The Firm and its principal have been appointed to serve in leadership roles in many complex and multi-district actions. In addition, the Firm's briefing team has written precedent setting and other exemplary legal briefs. Over the years, Bonsignore, PLLC has successfully recovered hundreds of millions of dollars for their clients. In actions where Bonsignore, PLLC has served as Lead Trial Counsel, the Firm has been involved in jury verdicts that exceeded \$350 million. Robert Bonsignore has successfully argued before both Federal courts of appeal and state based Supreme Courts. Bonsignore Trial Lawyers PLLC represent clients on a national and international level. We have provided legal advise to individual consumers, sole proprietors, partnerships, unions and multi national corporations. Representative clients include national and international manufacturers, sales, service or repair specialists, health care providers financial institutions, and government.

### **REPRESENTATIVE CASES BY AREA OF PRACTICE**

#### **Antitrust Protection of Businesses**

*In re: Automotive Parts Antitrust Litigation (MDL 2311) (USDC Eastern District of Michigan Southern Division)* - Bonsignore, PLLC filed among the first 4 cases in what is anticipated to be the largest private antitrust case in United States history on behalf of an American based wire harness manufacturer headquartered in Virginia. In the originally filed complaint, Plaintiffs allege that the Defendants foreign suppliers engaged in a conspiracy over a 10-year period to illegally increase the price of "Wire Harness Systems Products," which include wire harnesses, electrical wiring, lead wire assemblies, cable bond, wiring connectors, wiring terminals, electronic control units, fuse boxes, relay boxes, junction blocks, and power distributors. Notably, in a separate governmental investigation, two of the named defendants, Furukawa Electric Co., Ltd. and Yazaki Corporation, as well as some of their executives, pleaded guilty for their involvement in the conspiracy and agreed to pay nearly \$700 million in criminal fines and serve prison sentences. Other guilty pleas have been entered as to other automotive parts. Since

that time the number of parts involved in the litigation has increased with an additional 200 plus automotive parts anticipated to be added to the list. Other products include but are not limited to: Wire harness products, Anti-lock brake products; Catalytic converter products: Alternators, starters, ignition parts, and electronics products; Occupant safety system products; Panel products; and more. This action is actively being litigated.

***In Re: Pre-Filled Propane Tank Antitrust Litigation (MDL 2567) USDC (Western District of Missouri)*** Bonsignore, PLLC filed a class action on behalf of a Michigan chain store seeking to represent all business in the United States who purchased certain propane tanks from Blue Rhino and AmeriGas. The complaint alleged that the two largest suppliers of filled propane tanks, Blue Rhinos and AmeriGas conspired to reduce the amount of propane they put in their tanks and thereby raise the per-pound price of propane in violation of federal and state antitrust laws. Plaintiffs claim that no later than Spring 2008 and continuing through at least 2010, Blue Rhino and AmeriGas conspired to fill propane tanks with only 15 pounds of propane but to continue to charge the same price they had previously charged for tanks containing 17 pounds of propane. Defendants regularly communicating to ensure that both companies maintained the agreed-upon prices and fill levels of propane tanks. In May of this 2013, the U.S. Federal Trade Commission issued a complaint against the Defendants alleging substantially the same conspiracy alleged by Bonsignore PLLC. Shortly thereafter, a group of consumers who purchased filled propane tanks from retailers filed.

***Darbar Cuisine, Inc. v Chef's Choice Mesquite Charcoal, Lazzari Fuel Company LLC, California Charcoal and Firewood, Inc., (USDC Northern District of California 3:13-CV-05331 JSC)*** - After a year long investigation, Bonsignore, PLLC filed a related class action complaint in the Northern District of California on behalf of all businesses in the United States who purchased bulk lump mesquite charcoal directly from the Defendants. The Plaintiffs' allege the Defendants engaged in unlawful combination and conspiracy to fix, raise, maintain and/or stabilize the prices of mesquite charcoal sold directly by the Defendants and their affiliates during the period from approximately January 1, 2000 through at least September 30, 2010 (the "Class Period"). .

***In Re: Target Corporation Customer Data Security Breach Litigation, (MDL 2522) (USDC District of Minnesota)*** - Bonsignore PLLC represents a financial institution in claims related to the major security breach at Target stores that began on or around Nov. 27, just before "Black Friday," and continued through at least Dec. 15, which allowed hackers access to customers' credit and debit card information. As a result of Target's Data Breach, the personal information of approximately 70 million individuals and the confidential financial information of approximately 40 million credit and debit card accounts was accessed by hackers. See [Target Now Says 70 Million People Hit in Data Breach](#), The Wall Street Journal, Jan. 10, 2014. Target's wrongful conduct caused banks and credit unions to incur ascertainable economic loss and the class action lawsuit seeks compensation for financial losses associated with the cost of customer fraud loss reimbursements, the cost of credit and debit card cancellations and re-issuances, lost interest, the administrative expenses associated with preventing fraud, the

ascertainable administrative expenses associated with customer inquiries, and the economic cost of fraudulent transactions.

***In re: Batteries (MDL 2420) (USDC Northern District of California)*** - Bonsignore, PLLC filed the second case nationally and represents direct purchasers of Lithium Ion Batteries. The complaint alleges that several of the largest lithium-Ion Battery producers, including LG Chem, Ltd. (KSE: 051910.KS), Panasonic Corporation (NYSE: PC), Sanyo Corporation (TAI: 1614.TW), Sony Corp. (NYSE: SNE), Samsung SDI (KSE: 006405.KS), Hitachi, Ltd. (OTC: HTHIY) and Maxell Corporation of America collectively controlled between 60 to 90 percent of the market for lithium-ion batteries between 2000 and 2011 unlawfully conspired to fix and artificially increase the price of the batteries, inflating the cost of notebooks and other portable computers paid by consumers. The complaint also alleges that battery prices fell by nearly 50 percent when several Korean companies entered the market in the early 2000s and that, in response, the Japanese companies who had long controlled the market entered into an illegal price-fixing agreement, resulting in a stabilization of prices that lasted until 2008. In 2008, the lawsuit claims that the defendants received notice that they were being investigated for price-fixing activities by both American and European regulators. Almost immediately after the investigations were disclosed, prices began to fall again, about 10 percent in three months. This action is actively being litigated.

***In re: Aluminum Warehousing Antitrust Litigation (MDL 2481) (USDC Northern District of New York)*** - Bonsignore, PLLC represents direct purchasers of primary aluminum (“Aluminum”) on the spot market in the United States from February 1, 2010 through the present at prices linked to or explicitly incorporating London Metal Exchange prices, including the Platts MW US Transaction Premium price and the Platts MW US net-cash premium (the “Midwest Premium”). The litigation is advanced under the antitrust laws of the United States. More specifically, Plaintiffs allege that the Defendants engaged in an unlawful conspiracy for the purposes of restricting the supply of aluminum and thereby increasing the price of aluminum sold both on the LME and in the spot market. This action is actively being litigated.

***In re: Zinc Antitrust Litigation) (USDC Northern District of New York)*** - Bonsignore, PLLC filed the first in the nation antitrust class action on behalf of direct purchasers of zinc (“Zinc”). The complaint alleges that direct purchasers and those who incurred storage fees at one of the defendants warehouses paid substantially more for physical lead and/or zinc (“Zinc”) than they otherwise would have since September 15, 2010, due to a conspiracy between major bankers, metals warehousing companies, commodities trading companies, metals trading companies and the company that oversees global metals trading – the London Metal Exchange. [CLICK HERE TO SEE A COPY OF THE COMPLAINT](#)

***Dale Bozzio v. EMI Group Limited et al (USDC Northern District of California Oakland Division and Ninth Circuit Court of Appeals #13-15685)*** - Bonsignore, PLLC filed a lawsuit in the Northern District of California, that arises from the widespread and systematic breach of

recording contracts involving legacy musicians. The complaint was brought on behalf of a nationwide class for breach of contract and statutory violations of California law against Defendants EMI Group Limited; Capitol Records, LLC; EMI North America, LLC; EMI Recorded Music; and EMI Marketing (collectively referred to herein as “EMI”). The complaint alleges that EMI’s failure to properly account for and pay its recording artists and music producers for income it has received, and continues to receive, from the licensees of its recorded music catalog for the sale of digital downloads, ringtones and streaming music (collectively, “digital content”). The Standard EMI Recording Agreement typically sets forth payments to EMI’s recording artists and producers for licensing of masters at 50% of the receipts of EMI, rather than a lesser percentage (typically 12% to 20%) as a royalty paid to the artist or producer based on the price of each unit sold. The Ninth Circuit has held, in an analogous action against another major record label that royalties for digital downloads and ringtones should be paid pursuant to the amounts agreed to for a “license” and not at the lower rate of a “sale Record labels are paying these musicians a fraction of what they are owed when digital versions of their songs are streamed, downloaded, or installed on phones as ringtones. The USDC dismissed the action as to Bozzio on the basis of standing and an appeal is being actively litigated. Bonsignore, PLLC is co-author of the appellate briefing and will present oral argument.

***In re: After Market Filters Antitrust Litigation (MDL 1957) (USDC Northern District of Illinois)*** – Bonsignore, PLLC represented a direct purchasers of replacement automobile air and oil filters in this nationwide, anti trust price fixing case. This action is actively being litigated.

***In re: Optical Disc Drive Litigation (MDL 2143) (USDC Northern District of California)*** - Bonsignore, PLLC represented direct purchasers in an antitrust action challenging the price fixing of optical disc drive in this international antitrust price fixing case. This action is actively being litigated.

***In re: Employee Benefit Insurance Brokerage Litigation (MDL 1663) (USDC New Jersey)*** – Bonsignore, PLLC filed one of the first bid-rigging class actions in the country on behalf of a large upstate New York employer and major plastics manufacturer. The lawsuit alleged that insurance companies and brokers conspired with one another to allocate customers and markets and initiated kickbacks (“contingent commissions”) with certain insurance companies. Using the kickback agreements to obtain inflated or false price quotes that they used to steer their customers into purchasing higher priced insurance policies issued by the insurance companies that paid the brokers the highest kickbacks. Bonsignore, LLC serves as Class Counsel and has been assigned to the Discovery and Class Certification Committees in the multi-district action pending in New Jersey. Robert J. Bonsignore was responsible for taking numerous depositions of the defendants corporate officers and other firm members carried out numerous massive document review projects. On August 16, 2010, the Third Circuit Court of Appeals partially reversed the district court’s dismissal of the suit and reinstated many of the core claims in the case. The case was remanded to the district court for further proceedings on the reinstated claims. The Class Plaintiffs have settled with the Zurich, Gallagher and Marsh Defendant groups for an aggregate amount in excess of \$218 million. Objections to those settlements were either rejected by the Court of Appeals or dismissed by the appellants, and those settlements are final.



On May 23, 2011, Plaintiffs submitted a brief to the Court seeking Preliminary Approval of an additional Settlement Agreement, with 12 of the remaining 16 Defendants, in the amount of \$41 million. Final approval of that Settlement was heard on September 14, 2011. For more information about that Settlement and to view a copy of the Detailed Notice of Settlement, please visit the settlement website at [www.insurancebrokeragesettlement.com](http://www.insurancebrokeragesettlement.com).

***In re: Cement Antitrust Litigation 1:05 cv 979 (USDC Southern District of Indiana)*** – Bonsignore, PLLC represented a direct purchaser (business) in an antitrust action challenging the price fixing of cement in the mid west United States. The Firm served as Class Counsel in the multi-district litigation that settled for more than \$24 INSERT million in the United States District Court for the District of Indiana.

***SKYVA International v. ABB (Privately Settled)*** - Complex matter involving arbitration, mediation, litigation and negotiation of multiple disputes revolving around a \$600 million contract and related business relationships and pending relationships with and between Microsoft, IBM, Adjenture, ABB and SKYVA. Choice of law issues involving this product technology included Swiss, New York, Delaware and Massachusetts' law.

***In Re: Polyester Staple Antitrust Litigation (MDL 1516) (USDC North Carolina)*** – Bonsignore, PLLC filed one of the first direct purchaser (business) cases in the country representing Malden Mills a major textile manufacturing firm. The firm represented direct purchasers of Polyester Staple in a case alleging a single, nationwide conspiracy among defendants to fix, raise, maintain and/or stabilize the price of, and/or allocate markets and customers for, Polyester Staple in the United States in violation of Section 1 of the Sherman Act, 15 U.S. C. § 1. The claims brought on behalf of Plaintiffs further alleged that, as a result of the unlawful conspiracy, they and other purchasers of Polyester Staple paid more for Polyester Staple than they would have paid absent the conspiracy. Defendants named in the Complaints included Wellman, Inc., Nan Ya Plastics Corporation; Nan Ya Plastics Corporation, America; E.I. DuPont de Nemours and Company, DAK Americas LLC; DAK Fibers LLC.; Arteva Specialties LLC d/b/a KoSa and now named INVISTA S.ar.l.; Arteva Specialties S.ar.l.; and Koch Industries. By Order dated April 22, 2003, the Judicial Panel on Multidistrict litigation centralized the Polyester Staple Antitrust Litigation in the United States District Court for the Western District of North Carolina for coordinated and consolidated pretrial proceedings. On May 20, 2004, the court granted final approval of a \$17,150,000 settlement with the DAK defendants. In addition to the settlement amount paid by the DAK Defendants, the Settlement Agreement required these defendants to cooperate with Plaintiffs in connection with their prosecution of claims in this action against the other defendants. On October 5, 2005, the court preliminarily approved settlements with two other defendants, Wellman and Nan Ya, with \$6,800,000 being paid to the Class from Wellman and \$4,000,000 from Nan Ya. The court held a Fairness Hearing on December 15, 2005. Subsequently, the court granted Plaintiffs' motion for final approval of these settlements and distributions were made to Class members at the end of 2006. On June 24, 2008, the court granted final approval of a \$33,000,000 settlement with the Arteva defendants d/b/a KoSa.

### **Exemplar Antitrust, Securities & Consumer Protection Litigation**

***In re: Apple Shareholders Derivative Litigation-*** Bonsignore, PLLC filed among the first 3 shareholder lawsuits against Apple. The complaint alleges Apple entered into illegal non solicitation agreements with high level executives at other companies including Google and Intel and asserts violations of §§10(b) and 14(a) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. §§ 78j(b) and 78n(a) as well as California law. These agreements provided that Apple and other companies would not recruit each other’s employees. Accordingly, they regulated the competition for talent and suppressed job mobility. *Bloomberg Businessweek* reported “Silicon Valley’s vast wealth and warped sense of entitlement led to an audacious conspiracy to suppress salaries.” As a result shareholders suffered significant ascertainable economic loss. This action is being litigated.

***In re TelexFree Securities Litigation (MDL 2566)*** Bonsignore, PLLC filed among the first cases against TelexFree, its owners, insider promoters, retained professionals and others for violations of the state and federal law including the unregistered sale of securities, fraud, aiding and abetting and violations of the Racketeer Influenced Corrupt Organizations Act. Less than one-half of one percent of TelexFree’s total revenue came from sales of TelexFree’s VOIP between August 2012 and March 2014. During this same period TelexFree received approximately \$1.3 million from the sale of about 26,300 VoIP Programs. During this period, TelexFree promised to pay its Promoters returns of over \$1.1 billion – nearly a thousand times the amount of revenue derived from sales of the VoIP Programs. Plaintiffs allege TelexFree was a pyramid scheme. This action is being litigated.

***In re: Vehicle Carrier Services Antitrust Litigation (MDL 2471) (USDC District of New Jersey)*** Bonsignore, PLLC represents indirect purchasers of Vehicle Carrier Services in multiple states including Arkansas, Hawaii, Iowa, Kansas, Mississippi, Nebraska, Nevada, New Hampshire, North Dakota, South Dakota and Vermont. “Vehicle Carriers” transport large numbers of cars, trucks or other automotive vehicles including agriculture and construction equipment (collectively “Vehicles”) across large bodies of water using specialized cargo ships known as Roll On/Roll Off vessels (“RoRos”). “Vehicle Carrier Services” refers to the paid ocean transportation of Vehicles by RoRo. The complaint alleges violations of state law in approximately 30 states were a direct result of a conspiracy among certain Vehicle Carriers, between January 1, 2008 and May 24, 2013, to fix, raise, maintain and/or stabilize prices, and allocate the market and customers in the United States for, Vehicle Carrier Services in violation of certain state and federal laws. This action is being litigated.

***In re: Hyundai and Kia Fuel Economy Litigation (2424) (USDC Central District of California)*** - Bonsignore LLC filed a putative class-action lawsuit against Hyundai Motor America, Hyundai Motor Company of Korea, Kia Motors America, and Kia Motor Company of Korea because they admitted they overstated the fuel economy for many vehicles they sold in the United States after independent tests by the Environmental Protection Agency (EPA) showed a discrepancy. Bonsignore PLLC and others (“Non-Settling Parties”) are serving to test the sufficiency of a proposed settlement. Bonsignore LLC was requested and did play a major role in

the related litigation advanced by the Non-Settling Parties and as a result the original settlement was greatly improved. Bonsignore LLC supports the current settlement that is pending final approval.

The multi-district class action lawsuit filed in the U.S. District Court for the District of Central California was brought on behalf all consumers who own or lease Hyundai and Kia vehicles whose EPA fuel economy ratings were less than the fuel economy rating produced by the applicable federal test in that model's year. Hyundai will lower fuel-consumption estimates on most Hyundai and Kia models produced in 2012 and 2013. It will reportedly lower estimates by as much as five miles-per-gallon for its Kia Soul Eco and by one or two miles-per-gallon for most other models.

***In re: (CRT) Antitrust Litigation (MDL 1917) (USDC Northern District of California) -***

Bonsignore, PLLC filed one of the first indirect purchaser cases in the country and coordinated the filing of 12 other cases. The nationwide action alleges a price fixing conspiracy in the CRT industry. Bonsignore presently represents end use indirect consumers in Nevada and South Dakota.

***In re: Publication Paper Antitrust Litigation (M.D.L.1631) (USDC Connecticut) -***

Robert Bonsignore served as the Court appointed Lead Counsel in MDL 1631 for all indirect end use purchasers. The firm was instrumental in the coordination and prosecution of a number of multi-state indirect purchaser actions. This action focuses on the alleged national and international price fixing of certain types of publication grade paper during certain time periods. Final Approval of a class action settlement against the last remaining Defendants was approved and the litigation is finally resolved.

***In re: Intel Corp. Microprocessor Antitrust Litigation, MDL 1717 (D. Del.) -***

Bonsignore PLLC represent indirect end use purchasers in a number of states in the multi-district class-action lawsuit. Plaintiffs' claim the microprocessor giant unlawfully maintained a monopoly by engaging in a relentless, worldwide campaign to coerce customers to refrain from dealing with Advanced Micro Devices, Inc. (AMD), another microprocessor manufacturer. Specifically, that Intel forced PC makers and technology partners to boycott its competitors product launches and promotions; forced major customers into exclusive or near-exclusive deals, conditioned rebates, allowances, and market development funding on customers' agreements to severely limit purchases from its competitor AMD; established a system of discriminatory, retroactive, first-dollar rebates triggered by purchases at such high levels that in effect deny customers the freedom to purchase any significant volume of processors; threatened retaliation against customers introducing AMD computer platforms; established and enforced quotas among key retailers effectively requiring them to stock overwhelmingly, if not exclusively, Intel-powered computers, thereby limiting consumer choice; and otherwise unlawfully leveraged its market power by forcing technical standards and products on the industry. This action is actively being litigated.

***In re: Massachusetts Smokeless Tobacco Litigation (Massachusetts Superior Court Business Litigation Session) -***

Robert Bonsignore was appointed as Co-Lead Counsel by the Chief Justice



of the Business Litigation Session for the Commonwealth of Massachusetts. This action was fiercely litigated for 7 years. Notably, this was the first contested indirect purchaser class action in the Commonwealth of Massachusetts to be certified. The action sought economic damages for consumers and alleged that U.S. Smokeless unlawfully created and maintained an unlawful monopoly and artificially inflated prices. The action was also noteworthy because counsels certified a fifteen-year class period by successfully establishing that fraudulent concealment of the bad acts was included in the questioned conduct. The all cash \$10.16 million dollar settlement provided the greatest recovery per consumer (consumer class members are eligible to receive up \$700 cash) in any price fixing action brought against the manufacturers of moist smokeless tobacco. The settlement received Preliminary Approval on May 22, 2009 and received Final Approval on October 23, 2009.

***In re: California Vitamin Cases (San Francisco Superior Court)*** – Robert Bonsignore served on the Executive Committee in *In Re: Vitamin Cases* which was settled on behalf of California indirect purchasers. This action advanced antitrust claims against an international cartel of vitamin manufacturers accused of fixing prices and allocating markets in every level of the chain of distribution. In January 2002, the Court granted final approval of a \$96 million settlement with certain vitamin manufacturers in a class action alleging that these and other manufacturers engaged in price fixing of particular vitamins. In December 2006, the Court granted final approval to over \$8.8 million in additional settlement

***In re: Dynamic Random Access Memory Antitrust Litigation (MDL 1486) (USDC Northern District of California)*** – Robert Bonsignore filed one of the first indirect purchaser DRAM cases in the country. Robert Bonsignore was selected to serve as a member of the Executive Committee. Subsequent to filing, Bonsignore, LLC coordinated the consolidation and coordination of like cases in 48 states. The nationwide action alleges a price fixing conspiracy in the DRAM industry. Robert Bonsignore was appointed by the USDC to serve as interim lead counsel of a related putative class later absorbed into MDL 1486.

***In re: Chocolate Antitrust Litigation (MDL 1935) (USDC Middle District of Pennsylvania)*** - Bonsignore PLLC represented indirect end use purchaser of chocolate in 14 of 29 states involved in the litigation. The action alleges an international price fixing conspiracy in the Chocolate industry. Robert J. Bonsignore was responsible for taking numerous depositions of the defendant's corporate officers, corporate document discovery, and was designated to serve as the discovery liaison with the largest purchaser of chocolate in the United States. Mr. Bonsignore also served on the 5-person Plaintiffs' Settlement Negotiation team and the expert witness and class certifications teams. Other firm members carried out numerous massive document review projects.

***In re: Neurontin Marketing Litigation (MDL) (USDC District of Massachusetts)*** – Bonsignore, PLLC filed a consumer protection class action alleging that the manufacturers of Neurontin falsely represented that the drug was effective for conditions that completely lacked any scientific support and validity. Plaintiffs pointed to internal documents comparing this

unfair and deceptive marketing plan to the sale of “snake oil.” Plaintiffs further offered proof that the manufacturers targeted the most vulnerable and defenseless segments of population in our society - the mentally ill, the terminally ill, and those in chronic pain.

### **Employment**

***In re: Wal-Mart Wage and Hour Practices Litigation (M.D.L. 1735) (USDC District of Nevada and Ninth Circuit Court of Appeals)*** - This successfully and finally resolved multi – district class action is the largest certified class in a wage and hour case in United States history. The filing, coordination and prosecution of coordinated proceedings in 39 states were found to have been the brainchild of Robert Bonsignore. Bonsignore first successfully, argued that the litigation should be granted MDL status and coordinated for all pre-trial proceedings. Mr. Bonsignore was then appointed by the court to serve as national Co-Lead Counsel in this Multi District Litigation and fully litigated the action. This action focused on allegations that Wal-Mart systematically failed to pay its hourly employees for all time worked, including supplemental benefits. The action settled for \$85 million dollars plus injunctive relief designed to prevent the alleged violations from occurring again. After the settlement received Finally Approval a law firm that entered the case one-month prior to the execution of the Settlement Agreement purchased an interest in the attorney fees award. (Objector) After the allocation of the attorney fees was arbitrated, the Objector filed an FAA 10 appeal of the Arbitration Award. The District Court rejected that appeal in a lengthy opinion, finding the challenge to be meritless. The Objector appealed to the Ninth Circuit Court of Appeals. On December 18, 2013, nearly 10 years after the litigation was filed the 9<sup>th</sup> Circuit Court of Appeals found the appeal to be meritless and affirmed the District Courts ruling. Robert Bonsignore briefed and argued all appeals. Mr. Bonsignore’s oral argument before the 9<sup>th</sup> Circuit Court of Appeals can be heard at [http://www.ca9.uscourts.gov/media/view.php?pk\\_id=0000011351](http://www.ca9.uscourts.gov/media/view.php?pk_id=0000011351). (Carolyn Burton, et al v. Class Counsel and Party to Arb, et al No. 11-17718)

***In re: Wal-Mart Massachusetts Wage and Hour Litigation-*** Bonsignore served as Class Counsel in *Salvas v. Wal-Mart Stores, Inc.*, a certified Massachusetts class action of 67,000 hourly employees alleging wage and hour violations against Wal-Mart occurring in the Commonwealth of Massachusetts. This action is the largest certified employment class in Massachusetts state history. Notably, rulings and bodies of evidence obtained in this action have been relied upon in other employment litigation around the country. Attorney Robert Bonsignore successfully convinced the Massachusetts Supreme Judicial Court to reverse a trial court decision decertifying the class. The argument, which is the second most watched archived SJC argument, set numerous precedents that have been frequently cited in numerous decisions.

***In re: Federal Express (MDL 1700) (Northern District of Indiana)*** – Bonsignore represented misclassified employees of Federal Express in South Dakota and Colorado. The action seeks to reclassify route drivers as employees and to obtain back compensation for the economic loss suffered by the drivers during the period they were misclassified. The litigation is pending with certification granted in part and denied in part. Attorney Generals in a number of states requested Fed Ex on July 1, 2009 to properly classify their drivers. The litigation is presently on appeal.

### **Exemplar Products Liability & Mass Tort Cases**

***In re: Silicone Gel Breast Implant Product Liability Litigation (MDL 926) (USDC Northern District of Alabama and USDC Eastern District of Michigan)*** – Bonsignore represented over 400 pre-1991 recipients of saline and silicone breast implants. During the multi-district litigation, Bonsignore, LLC served as Co-Counsel and on the Discovery Committee. Robert Bonsignore was part of the discovery team. A \$2.35 billion fund was created in one of the largest class action settlements in U.S. history.

***In re: Mercury Vaccine Litigation*** – Bonsignore filed several of the first consumer protection class action cases in the country alleging that the toxic levels of mercury coupled with the increased number of vaccinations poisoned infants and directly caused their learning disabilities and autism. The action sought medical monitoring, a public release of related studies and data that could be used in diagnosis and treatment, and to reimburse the families as well as local and federal government for the staggering costs associated with the treatment of the affected children. The Firm helped spearhead a collective group of North America’s best trial lawyers and significantly contributed to this national litigation. Bonsignore, LLC served on the Executive, Science, Expert, Class Certification, State Coordination and Discovery Committees. The related claims gained no traction because the science relied upon were compromised when a researcher exaggerated his findings. The sudden and continuing spike in the rate of autism remains stunning and unexplained.

***In re: Rezulin Products Liability Litigation (MDL 1348) (USDC Southern District of New York)*** - Bonsignore filed one of the first wrongful death, liver failure and consumer protection class action cases in the country. The action alleged that the makers of the diabetes drug did not adequately test its safety and efficacy prior to mass marketing it to consumers. On March 21, 2000, per the FDA's request, Warner-Lambert finally issued the Rezulin recall after its controversial run on the U.S. market. Robert Bonsignore’s early aggressive discovery lead to the key admission that Warner Lambert had health department reviewers of the drug on its payroll at the time it was approved. Robert Bonsignore served on the Science, Expert, Class Certification, State Coordination and Discovery Committees in the multi-district action. In addition, Robert Bonsignore was selected to take critical depositions. Mr. Bonsignore also secured the largest single award in an individual action, obtaining a \$3.75 million dollar recovery for his client.

***In re: Sulzer Orthopedics, Inc., Hip Prosthesis and Knee Prosthesis Product Liability Litigation (MDL 1410) (USDC Northern District of Ohio)*** - Bonsignore filed one of the first hip failure consumer protection class actions cases in the country. Bonsignore, LLC took and attended the first depositions obtaining key admissions. The aggressive discovery conducted by Bonsignore, LLC resulted in key admissions by one of its chief worldwide recall investigators. The multi-district class action alleged that the makers of hip and knee prostheses negligently coated these medical devices with commercial grade motor oil and did not adequately test safety and efficacy prior to mass marketing to consumers. The related products were recalled from the United States market. A settlement was reached approximating \$1 billion.

***In re: VIOXX Product Liability Litigation (MDL 1657) (USDC Eastern District of Louisiana)*** Bonsignore, served as class-counsel in the multi-district action concerning VIOXX. The Firm represented patients who claimed that it's manufacturer didn't adequately disclose Vioxx safety data to the U.S. Food and Drug Administration, didn't properly warn doctors and patients of the drug's risks and misrepresented the potential harm in marketing materials and suffered personal injury as a result. A class settlement was reached with Janssen Pharmaceutica, a Johnson & Johnson company, and the creation of a \$90 million settlement fund.

***In re: Propulsid Product Liability Litigation (MDL 1355) (USDC Eastern District of Louisiana)*** - Bonsignore, served as class-counsel and member of the Discovery Committee in the multi-district action concerning the heartburn drug Propulsid. The Firm represented patients who alleged that Propulsid caused them heart problems. A class settlement was reached with Janssen Pharmaceutica, a Johnson & Johnson company, and the creation of a \$90 million settlement fund.

***In re: Lead Paint*** – Bonsignore represented the City of Providence Rhode Island in an action seeking to have the manufacturers of lead paint pay for its removal and to pay for the costs absorbed by the city for the health care and special education of children who suffered from lead paint poisoning. Most recently Bonsignore served as antitrust advisor to the Chief Counsel for the City of Providence. Legislation Mr. Bonsignore drafted that provided for municipalities and school districts to bring an indirect purchaser antitrust case was signed into law in 2013.

## **PRINCIPAL**

**ROBERT J. BONSIGNORE.** Mr. Bonsignore began his career in the Office of the District Attorney for Middlesex County, Massachusetts. Since 1990 when he began his own law firm specializing in complex litigation and trial work, he has been lead trial counsel in cases with jury verdicts totaling in excess of \$350 million dollars. Mr. Bonsignore has extensive experience in antitrust, consumer protection, complex litigation, class actions, multi-district litigation, Judicial Panel on Multi District Litigation proceedings, and commercial cases. He also has received significant jury verdicts in wrongful death and catastrophic injury cases.

Between 2001 and 2004, Mr. Bonsignore was appointed Lead Counsel in five separate certified class actions by the Chief Justice of the Business Litigation Session for the Commonwealth of Massachusetts advancing claims raised pursuant of Massachusetts General Law 93A. All received Final Approval without appeal. Mr. Bonsignore was also appointed Lead or Co-Lead counsel in four other certified and class actions that received Final Approval. Mr. Bonsignore successfully argued the re-certification of the largest employment class action in Massachusetts' history at the Supreme Judicial Court level. At the trial court level, Mr. Bonsignore presented the oral argument at the first contested consumer indirect purchaser monopolization class action to be certified pursuant to Mass. General Laws Chapter 93A.

In cases pending in United States Federal Courts, Mr. Bonsignore has been appointed national Lead Counsel in 2 cases assigned Multi District Litigation status by the Judicial Panel on Multi-District Litigation. MDL 1631 consolidated all indirect purchaser anti-trust actions filed nationwide addressing price fixing in the Publication Paper Industry. M.D.L 1735 consolidated cases nationwide addressing Wage and Hour violations by Wal-Mart Inc. Both actions in which Mr. Bonsignore was appointed Lead Counsel were settled after being aggressively litigated and received Final Approval.

Mr. Bonsignore has served as a member of the American Antitrust Institute's Board of Directors since 2009. The American Trial Lawyers Association has selected him as a peer reviewed "Top Trial Lawyer" each year since 2007. In 2010 he received the Outstanding Public Service Award from the Ipswich River Foundation. He is a 2010 graduate of the Trial Lawyers College.

Mr. Bonsignore was extensively involved in trial preparation in cases against tobacco manufacturers brought by public entities as well as private attorneys general and was counsel of record for the former Governor of California as well as Orange and Los Angeles counties. Mr. Bonsignore is frequently requested to speak at Continuing Legal Education seminars across the country. He has lectured on topics ranging from antitrust to consumer advocacy and from trial techniques to ethics.

Mr. Bonsignore has successfully tried to verdict several high profile cases including cases selected by the Association of Trial Lawyers of America (ATLA) as the most outstanding jury verdicts of the year. Legal publications have featured Mr. Bonsignore's success in first obtaining admissions of payoffs to medical reviewers in the Rezulin litigation. Mr. Bonsignore's finding of Sulzer's document destruction in the hip replacement litigation was publicized in the United States and Europe. His work on Sulzer hip litigation also merited a feature story in the European news magazine FACTS, where he was headlined as the "American Killer Lawyer." Mr. Bonsignore is AV rated by Martindale Hubbell and was awarded Diplomat status by the National College of Advocacy. He has co-authored a trial techniques treatise, writing on Direct Examination for Lexus/Nexus.

Mr. Bonsignore is a past recipient of the Association of Trial Lawyers of America (ATLA) F. Scott Baldwin Most Outstanding Young Trial Lawyer in America Award that he received in 1997. He also is a seven-time recipient of the prestigious Wiedemann-Wysocki Citation of Excellence Award that is awarded by the trial bar (ATLA) to the most outstanding members of its ranks. In 1994, he received the Massachusetts Junior Chamber of Commerce Most Outstanding Young Leader Award, and in 1997 he was honored by the Massachusetts Bar Association with the Most Outstanding Young Lawyer Award. In 2005, Mr. Bonsignore was presented with the Joseph Tonihill award that is recognized as the most prestigious award presented by the Association of Trial Lawyers of America for consumer advocacy. Mr. Bonsignore is a Life Member of the Massachusetts Bar Foundation, National Association of Criminal Defense Lawyers, and the Association of Trial Lawyers of America (ret.) and the Spence Trial Lawyer College Ranch Club.



As a past Chair of the Association of Trial Lawyers of America, Young Lawyers Division, Mr. Bonsignore was credited with creating the practice of appointing one man and one woman representative wherever possible in each representative member state, province or country for the purpose of representing the interests of young lawyers to the bar. He created and instituted a program promoting local public service by young lawyers. In recognition of the nature and scope of this undertaking and its continued viability over time, each year, the Association of Trial Lawyers of America Young Lawyers Division, presented the Robert J. Bonsignore Public Service Award to a representative bar group that performs the most outstanding acts of public service.

Mr. Bonsignore previously served on the Boards of the non-profit Trial Lawyers for Public Justice and is a national officer for the Civil Justice Foundation. Mr. Bonsignore is a life member of the National Conference of Bar Presidents of the American Bar Association and has served on the Articles and Bylaws Committee since 1999. Mr. Bonsignore has previously served as a Consumer Advisory Commissioner for the Office of the Attorney General for the Commonwealth of Massachusetts and as an Assistant District Attorney for Middlesex County. Forbes Sky Radio as one of America's Best Lawyers selected Mr. Bonsignore.

Mr. Bonsignore is frequently called upon to serve as counsel in team approach litigation because of his decade long experience and proven track record in Multi District Litigation. After establishing himself as a trial lawyer and working cooperatively in the Breast Implant litigation in 2000, Mr. Bonsignore was selected as the firm representative of Robinson, Calcagnie & Robinson to the "megafirm" of Herman, Middleton, Casey, Kitchens & Robinson (HMCKR). HMCKR formally brought together nationally top-ranked law firms to jointly prosecute MDL actions (multi-district class actions) and other complex litigation involving antitrust, unfair competition, and pharmaceutical matters. Other mega-firm members selected Mr. Bonsignore based on his skill, experience, work ethic accomplishment, and demonstrated ability to work cooperatively with co-counsel and opposing counsel on a multitude of projects. Most recently Mr. Bonsignore served as lead counsel in MDL 1735, the largest WH class certified in United States history and MDL 1631, an international antitrust matter. Both are finally resolved. Mr. Bonsignore previously selected to serve as lead counsel in over a dozen multi party class actions against including those against Smokeless Tobacco. Mr. Bonsignore was behind or an integral part of the prosecution of many other class actions.

**The Curriculum Vitae of each lawyer in the Firm is available upon request.<sup>1</sup> All inquiries should be directed to:**

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**<sup>1</sup> DISCLAIMER State Practice Advertising Restrictions & Disclaimers**

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Our attorneys litigate in federal district courts throughout the United States. Our attorneys may also litigate in state courts where they are licensed to practice. We currently have attorneys licensed to practice in the following states: Hawaii, Massachusetts, Pennsylvania, Nevada and New Hampshire.

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