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EXHIBIT 2



Robert A. Meyer, Esq.

JAMS Mediator, Arbitrator, Referee/Special Master,
Neutral Evaluator

Case Manager

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Robert A. Meyer is available to conduct cases virtually. JAMS is equipped to provide virtual ADR services on a variety of online platforms, including Zoom, Microsoft Teams, WebEx, and more.

Biography

Robert A. Meyer, Esq. serves as a mediator in complex business litigation pending throughout the United States, including securities and derivative class actions, professional liability lawsuits against accounting and law firms, litigation involving banking and complex financial instruments, cases arising under ERISA, intellectual property disputes, consumer class actions, high-profile employment matters and other commercial disputes.

Mr. Meyer brings the skill set of both an experienced mediator and trial lawyer to his matters. He is a Fellow of the American College of Trial Lawyers and has represented both plaintiffs and defendants in securities litigation, class actions and derivative suits, intellectual property litigation (including copyright, trademark, and right of publicity lawsuits), attorneys' and accountants' professional liability lawsuits, and claims involving breach of contract and commercial fraud.

As a mediator for more than 12 years, Mr. Meyer has focused on building trust with clients and counsel. He comes to each session prepared and regularly conducts pre-mediation conference calls with counsel (and as necessary, with insurers). Mr. Meyer develops creative solutions when negotiations stall. He is persistent with follow-up after mediation sessions, keeping discussions alive, often achieving post-session settlements. Mr. Meyer is ranked on the exclusive "National Mediators" List, *Chambers USA* (2019-2021), where he is recognized for being an "extraordinarily effective [mediator] because he comes well prepared and his views carry a lot of credibility."

ADR Experience and Qualifications

- Successfully mediated numerous securities lawsuits, in federal and state courts, involving both Fortune 500 companies and start-ups. Cases include '34 Act class actions and IPO and SPO class actions under the '33 Act
- Mediation of numerous merger-related and derivative cases pending in Delaware Chancery Court and other courts throughout the country
- Mediation of complex antitrust and competition-related lawsuits
- Expertise in settling consumer class actions pending throughout the United States
- Leading mediator of ERISA lawsuits, including class actions, ESOP litigation and claims by the U.S. Department of Labor
- Extensive experience addressing insurance issues and working with insurance towers
- Mediations of complex business disputes across numerous industries, including financial services, technology, oil & gas, pharmaceuticals and medical devices, entertainment, healthcare, manufacturing retail and professional services
- Nearly 40 years of experience as a litigation attorney (for plaintiffs and defendants)

Representative Matters

Securities Class Actions

- Mediations of shareholder class actions, in federal and state courts, against pharmaceutical and medical device companies alleging misrepresentations involving the development and sale of new and mature products
- Shareholder dispute involving a Chinese investment company accused of hiding illegal lending practices from prospective investors
- *Willis v. Big Lots, Inc.* (S.D. Ohio) – settlement of '34 Act claims
- *Weston v. RCS Capital Corp.* (S.D.N.Y.) – settlement of '34 Act claims
- *In re Ubiquiti Networks, Inc. Securities Litigation* (N.D. Cal.) – settlement of '33 Act claims
- *In re Commvault Systems, Inc. Securities Litigation* (D.N.J.) – settlement of '34 Act claims
- *In re GoPro, Inc. Shareholder Litigation* (San Mateo County Superior Court – settlement of '33 Act claims
- *In re CafePress Inc. Shareholder Litigation* (San Mateo County Superior Court) – settlement of section class action under '33 Act

- *Plymouth County Retirement System v. Model N, Inc.* (San Mateo County Superior Court) – settlement of section 11 class action under '33 Act
- *In re Colonial BancGroup Inc. Securities Litigation* (M.D. Alabama) – settlement of securities class action against directors and officers and outside auditor of failed bank
- *In re Washington Mutual Mortgage Backed Securities Litigation* (W.D. Wash.) – settlement of class action by purchasers of residential mortgage backed securities
- *In re AOL Time Warner Securities Litigation* (Southern District of New York) – counsel to the Special Master; assisted in the mediation of the shareholder class actions (\$2.5 billion) as well as related ERISA, derivative, and opt-out lawsuits
- *Carlson v. Xerox Corporation* (D. Conn.) – settlement (\$750 million) of 21 consolidated shareholder class actions against corporation, management and outside auditor

Mergers and Acquisitions/Shareholder Derivative Litigation

- *In re Good Technology Corporation Stockholder Litigation* (Delaware Chancery Court – \$52 million in settlements of shareholder derivative claims against directors, investment funds and bank arising out of corporate acquisition
- *In re Sanchez Energy Corp. Derivative Litigation* (Delaware Chancery Court – \$30 million settlement of derivative lawsuit alleging breach of fiduciary duty and claims involving controlling shareholder
- *In re In re EZCorp Consulting Agreement Derivative Litigation* (Delaware Chancery Court) – settlement of derivative lawsuit against directors and controlling shareholder
- *3-Sigma Value Financial Opportunities LP v. Jones (Certus)* – \$19.2 million settlement of claims of self-dealing by officers and directors of financial services company
- *Laborers Local #231 Pension Fund v. Websense, Inc.* (San Diego County Superior Court) – settlement of shareholder claims arising out of leveraged buy-out
- *In Re PLX Technology Inc. Stockholder Litigation* – settlement of breach of fiduciary duty claims alleging flawed sales process in connection with merger transaction
- *In re Gardner Denver, Inc. Shareholder Litigation* (Delaware Chancery Court) – \$29 million settlement of shareholder litigation over fairness of merger transaction
- *In re ACS Shareholder Litigation* (Delaware Chancery Court) – settlement of fiduciary duty/shareholder cases arising out of \$6 billion corporate acquisition
- Successful mediations of post-merger adjustment claims

Life Sciences

- Lawsuit by purchaser of drug development division of foreign company seeking purchase price adjustment; defendant allegedly misled purchaser concerning regulatory approvals in China
- Buyout of founders in company developing technology to expedite new drug approvals
- Mediation of shareholder class action against foreign drug manufacturer
- Mediation of shareholder class action involving a genetics testing lab
- Mediation of shareholder class action case against an international producer and distributor of diagnostic platforms and tests

- Shareholder class action involving a clinical-stage drug development company

Banking, Financial Services and Complex Financial Matters

- *21 Institutional Investors/JP Morgan* - \$4.5 billion settlement of mortgage repurchase and servicing claims involving 330 RMBS trusts
- Settlement of multiple claims by FDIC against former officers and directors of failed banks
- Settlement of numerous lawsuits (both class actions and individual claims) arising out of purchase of complex instruments, including auction rate securities and mortgage backed securities

Consumer Class Actions

- Settlement of several class actions against retailers and manufacturers of consumer products, including claims of product defects, pricing misrepresentation and unfair competition

Entertainment and Intellectual Property

- Settlement of claims arising out of sale of film library
- Settlement of claims to trademark by three different claimants
- As attorney, handled profits accounting litigation arising from motion picture and recording agreements; motion picture finance; copyright infringement of video games; and successful defense of claims by Estate of Princess Diana alleging Lanham Act violations and publicity rights; and trial of ownership of Hard Rock Café trademark

ERISA and ESOP Litigation

- Action by participants in company ESOP, alleging fiduciaries failed to take corrective action in connection with alleged artificial inflation of IBM stock
- Numerous “church plan” class actions involving claims of non-compliance with ERISA by religiously-affiliated hospitals and health care corporations
- Multiple lawsuits involving large union health plan, including claims against administrators and claims by and against physician groups
- *U.S. Department of Labor v. First Bankers Trust* (S.D.N.Y. and D.N.J.) – settlement of three lawsuits against independent fiduciary
- *Jessop v. Bankers Trust (Mona Vie)* – settlement of parallel class action and DOL claims arising out of ESOP transaction
- *Hans v. Tharaldson* (D.N.D.) – settlement of lawsuit arising out of sale of shares in private corporation to ESOP
- *Calvin v. San Antonio Spurs* (W.D. Texas) – settlement of ERISA class action by retired players in the American Basketball Association
- *zier v. Honeywell Pension & Savings Plan* (D. Arizona) – settlement of ERISA class action

- *In re Merck & Co., Inc. Securities, Derivative & ERISA Litigation* (MDL 1658) (District of New Jersey) – settlement of shareholder “stock drop” lawsuits by participants in ERISA plans
- *In re Xerox Corp. ERISA Litigation* (District of Connecticut) - settlement of shareholder “stock drop” class actions by participants in retirement plans

Professional Liability

- Settlement of claims by manager of investment fund against Big Four accounting firm for failing to detect embezzlement of investment manager
- Settlement of malicious prosecutions against law firm and bank
- *Bankers' Bank Northeast et al. v. Berry, Dunn, McNeil & Parker* (D. Maine) – settlement of professional malpractice claims by third party lenders against accounting firm
- *Gascoyne v. Avellino (New York Supreme Court)* – settlement of claims arising out of Madoff-related investment
- *Hoberman v. Aspiriant, LLC* (Los Angeles County Superior Court) – settlement of malpractice action against business management and accounting firms
- *The Westervelt Company v. Bradley Arant Boult Cummings LLP* (Circuit Court, Alabama) – settlement of legal malpractice action involving corporate benefit and compensation plans
- Settlement of claims by withdrawn partner against former law firm; issues involving partnership agreement and valuation of interest in class action litigation
- Served as sole arbitrator and member of arbitration panel in legal malpractice actions

Antitrust and Competition Law

- Multi-million-dollar antitrust class action involving a door company that allegedly manipulated its stock price while incurring millions of dollars in liability from competing lawsuit
- Mediation of antitrust claims against health insurers involving alleged conspiracy in restraint of trade
- *In Re Transpacific Passenger Air Transportation Antitrust Litigation* – \$21 million settlement of class action involving claims that defendant conspired to fix the price of air travel
- *Pending* \$40 million settlement of class action involving pricing of dairy products
- Mediation of antitrust claims against credit card issuer

Employment

- Multiple mediations of sexual harassment claims and wrongful termination against high profile individuals and public companies
- Currently serving as arbitrator in nine related wage-and-hour claims against oil services company

Honors, Memberships, and Professional Activities

Completed Virtual ADR training conducted by the JAMS Institute, the training arm of JAMS.

- Named "Best Lawyer," *The Best Lawyers in America*, 2020-2022
- Included on the "National Mediators" List, *Chambers USA*, 2019-2021
- Named "Best Lawyer" in Bet-the-Company Litigation, Commercial Litigation and Securities Litigation, *The Best Lawyers in America*, published by Woodward White, Inc., 2010-2016
- Named "Los Angeles Litigation – Securities Lawyer of the Year," *Best Lawyers*, 2014
- Named in "Southern California Super Lawyers" in Business Litigation, Securities Litigation, and Entertainment & Sports, a *Thomson Reuters* business, 2004-2015; Listed in the Top 100 Southern California Super Lawyers, 2005
- Highest "AV Preeminent (5 out of 5)" Professional Rating, *Martindale-Hubbell Law Directory*
- Fellow, American College of Trial Lawyers
- Member, Central District of California Attorney Settlement Officer Panel
- Board of Directors, Public Counsel (the largest pro bono law office in the United States)
- Board of Directors, Attorneys Insurance Mutual (legal malpractice insurer)
- Frequent lecturer before bar associations and for conferences on various topics including mediation, legal ethics, and attorney malpractice

ADR Profiles

- "Trust is Key," *Daily Journal*, ADR Profile, October 13, 2017

Background and Education

- Partner, Chair of Professional Services Litigation and General Counsel, Loeb & Loeb LLP, 1975-2017
- J.D., Georgetown University Law Center, 1975
- B.A., *cum laude*, American University School of International Service, 1972

Counsel Comments

- "There is a small number of mediators who get hired on securities cases and he's a key player in that market."

- ***Chambers USA 2021***

- "I don't say this lightly (or often), but you really did a fantastic job yesterday. I was very impressed."

- ***Partner at a New York Law Firm***

- "Thank you for all of your help. I've never worked with a mediator who put in this much time and effort."

- Partner at a National Law Firm

- "Thank you for your efforts and consummate professionalism as a skilled mediator."

- Partner at a New York Firm

- "I am writing to express my great respect and sincere appreciation for your work mediating the dispute...and helping the parties to arrive at a settlement."

I am not primarily a litigator, but have overseen the prosecution of a number of disputes over the years and have participated in a number of mediations. From the very beginning I thought you had an exceptional grasp of the substantive issues on both sides. The timing, terms and presentation of your settlement proposal were extraordinarily effective. It may have been less than I hoped for, but that's what the process is about and I believe that it was a good settlement for both sides. Thank you."

- General Counsel of an Investment Firm

- "Anyone can make a deal when the two sides have similar valuations and motives, and a reservoir of trust. Mediators' talents really show through when counsel don't see the risks the same, don't have a good rapport or trust, and don't have the ability to bridge the gap on their own. We got a chance on this one to see a top talent at the mysterious art of getting both sides to the same place."

- Plaintiffs' Counsel

- "You did a masterful job. I look forward to working with you again."

- Partner at a California Law Firm

- "Your candor, guidance, and 'feel' for all of the issues (and players) were critical to getting a deal done."

- Partner at a New York Law Firm

- "Thank you for your patience and perseverance yesterday. This case has a long history with complicated dynamics and you parachuted in yesterday without missing a beat."

- Partner at a New York Law Firm

- "Thank you so much for your perseverance to get us to an agreement. We could not have done so without your continued help, intelligent prodding, and patience in dealing with all."

- Securities Litigation Attorney

News

- Nov. 12, 2021
Nine JAMS Panelists Recognized in 2022 Edition of Southern California Best Lawyers
<file:///news/2021/nine-jams-panelists-recognized-in-2022-edition-of-southern-california-best-lawyers>
- August 19, 2021
Four JAMS Panelists Named “Lawyers of the Year” and 61 Recognized as “Best Lawyers in America” by Best Lawyers®
<file:///news/2021/four-jams-panelists-named-lawyers-of-the-year-and-60-recognized-as-best-lawyers-in-america-by-best-lawyers>
- June 16, 2021
Fourteen JAMS Neutrals Ranked in Chambers USA 2021 Guide
<file:///news/2021/fourteen-jams-neutrals-ranked-in-chambers-usa-2021-guide>
- December 1, 2020
10 JAMS Panelists Recognized in 2021 Edition of Southern California’s Best Lawyers
<file:///news/2020/10-jams-panelists-recognized-in-2021-edition-of-southern-californias-best-lawyers>
- August 21, 2020
Seven JAMS Panelists Named “Lawyers of the Year” and 57 Recognized As “Best Lawyers in America” by Best Lawyers®
<file:///news/2020/seven-jams-panelists-named-lawyers-of-the-year-and-57-recognized-as-best-lawyers-in-america-by-best-lawyers>
- May 6, 2020
Twelve JAMS Neutrals Ranked in Chambers USA 2020 Guide
<file:///news/2020/twelve-jams-neutrals-ranked-in-chambers-usa-2020-guide>
- August 19, 2019
Five JAMS Panelists Named “Lawyers of the Year” and 59 JAMS Panelists Recognized As “Best Lawyers in America” by Best Lawyers®
<file:///news/2019/five-jams-panelists-named-lawyers-of-the-year-and-59-jams-panelists-recognized-as-best-lawyers-in-america-by-best-lawyers>
- May 2, 2019
Record Number of JAMS Neutrals Ranked in Chambers USA 2019
<file:///news/2019/record-number-of-jams-neutrals-ranked-in-chambers-usa-2019>
- August 15, 2018

Two JAMS Panelists Named Best Lawyers' "Lawyers of the Year;" 57 JAMS Panelists Recognized as 2019 Best Lawyers in America

file:///news/2018/two-jams-panelists-named-best-lawyers-lawyers-of-the-year-57-jams-panelists-recognized-as-2019-best-lawyers-in-america

- October 5, 2015

Robert A. Meyer, Esq. Joins JAMS

file:///news/2015/robert-a-meyer-esq-joins-jams

Events

- November 9, 2021

ABA Advanced ERISA Litigation Seminar

file:///events/2021/aba-advanced-erisa-litigation

Publications

- February 8, 2018

Meet the Mediators Who Brokered \$1B in 401k Bias Settlements

Bloomberg Law

file:///files/uploads/documents/articles/meyer-bloomberg-law-meet-the-mediators-who-brokered-1b-in-401k-bias-settlements-2018-02-08.pdf

- October 13, 2017

Trust is Key: Attorneys Praise Mediator Robert Meyer for his Intelligence and People Skills

Daily Journal - ADR Profile

file:///files/uploads/documents/neutrals/meyer-dailyjournal-adr-profile-trust-is-key-2017-10-13.pdf

Practice Areas

- Arbitration
- Business/Commercial
- Class Action/Mass Tort
- Entertainment and Sports
- Federal Law
- Intellectual Property
- Life Sciences
- Professional Liability
- Securities
- Special Master/Discovery Referee

Lc ons

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- Los Angeles, California
- New York, New York
- Orange County, California
- San Diego, California
- San Francisco, California
- Silicon Valley, California

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