

EXHIBIT B

NAGEL RICE, LLP

Nagel Rice, LLP, founded in 1983, is widely recognized as one of the premier litigation firms in the New York metropolitan area having handled complex actions in federal and state courts throughout the county and garnering nearly \$1 billion in settlement and verdicts. The firm has the distinction of having over 100 settlements and verdicts in excess of one million dollars. The firm's experience in class action litigation has been extensive and varied.

The firm has served as lead, co-counsel or in Executive Committee positions in numerous State and Federal class actions, including:

In re: Discover Card Payment Protection Plan Marketing and Sales Practices Litigation, MDL No. 2217, United States District Court for the Northern District of Illinois. Court-appointed co-lead class counsel in \$10.5 million nationwide class action settlement alleging improper marketing and administration of its Payment Protection Plan, Identity Theft Protection, Wallet Protection and Credit Score Tracker products.

Esslinger, et al. v. HSBC Bank Nevada, N.A. et als., 2:10-cv-03213, United States District Court for the Eastern District of Pennsylvania. Court-appointed co-lead class counsel in \$23.5 million nationwide class action settlement involving improper marketing and practices related to its debt suspension/debt cancellation products. In appointing Nagel Rice as co-lead counsel, the Court noted "[a]ccording to the criteria set forth in R. 23(g)(1)(A), Nagel Rice...are best qualified as Interim Co-Lead to represent the interests of the putative class." *Walker v. Discover*, 2011 WL2160889 (N.D.Ill 2011)

In re: Bank of America Credit Protection Marketing & Sales Practices Litigation, MDL No. 2269, United States District Court of the Northern District of California. Member of Executive Committee in \$20 million nationwide class action settlement involving Bank of America's marketing and sales practices relating to its debt suspension/debt cancellation products.

Mc-Kay Sales, Inc., Cantina 134, LLC v. DFS Inc., et als., 1:10-cv-02964, United States District Court for the Northern District of Illinois, Eastern Division. Plaintiff's Steering Committee in multi-million dollar national class settlement alleging involuntary enrollment in discount programs offered to Discover merchants.

O'Hara, et. al v. Medieval Times, 10-751 (TJB), United States District Court of the District of New Jersey. Court-appointed co-lead class counsel in nationwide class action settlement involving violations of the Fair and Accurate Credit

Transaction Act, resulting in multi-million dollar settlement, and other injunctive relief.

Franco v. Cigna, 07-CV-6039 (SRC) (PS), United States District Court, District of New Jersey. Court appointed co-lead counsel for subscriber claims in multi-billion class action seeking proper reimbursement for out of network medical services.

Drazin v. Horizon Blue Cross-Blue Shield of New Jersey, 06-06219 (FSH) (PS), United States District Court, District of New Jersey. Lead Counsel in class action for injunctive relief and damages relating to coverage of eating disorders as biologically based mental illnesses under the New Jersey Mental Health Parity Act; resulting in settlement of \$19 million and multiple business reforms affecting 1.5 million insureds. *Drazin v. Horizon Blue Cross Blue Shield of N.J.*, 832 F. Supp. 2d. 432 (D.N.J. 2011) *aff'd* 528 Fed. Appx. 211 (3d. Cir. 2013); *Beyle/Drazin v. Blue Cross Blue Shield of NJ*, 568 F.Supp. 2d 556 (D.N.J. 2008).

Torres-Hernandez, et al. v. STI Prepaid, et.al, 2:08-cv-1089 (SDW) (MCA), United States District Court, District of New Jersey. Court appointed co-lead counsel in class action involving sale of prepaid calling cards; \$8.2 million nationwide settlement.

DeVito v. Aetna, 536 F.Supp.3d 523 (D.N.J. 2008), Lead counsel in class action for injunctive relief and damages relating to coverage of eating disorders as biologically based mental illnesses under the New Jersey Mental Health Parity Act. Settlement involving reimbursement of past denials and multiple business reforms affecting 250,000 insureds.

In re: South African Apartheid Litigation, MDL No. 1499, United States District Court for the Southern District of New York. One of several firms leading a putative class action under the ATS against corporations who violated *jus cogen* standards of international human rights law. Settled a portion of claim against GM bankruptcy estate, entitling plaintiffs to share of the new General Motors.

Smith, et al. v. Ticketmaster, 2:09-cv-02177 (SRC) (MAS), United States District Court, Central District of California. Class action involving consumers who were wrongfully transferred to secondary market web-site that was owned by company recently acquired by Ticketmaster where they could only purchase tickets significantly higher than their ticket price. Nationwide settlement. Bruce Nagel was a member of Executive Committee.

In re Citigroup Capital Accumulation Plan, 150 F.Supp.2d 274 (D.Mass. 2001). Court-Appointed Lead Counsel in class action involving deferred compensation plan of major brokerage firm for the states of Florida, Nebraska, Colorado,

Louisiana, Georgia, and Michigan. Class certification granted for the states of Florida, Colorado and Louisiana. Claims in excess of \$300 million. Referenced in Farr, *The Manuel for Complex Litigation*, Fourth Ed. (2004), Appendix.

In re Ski Train Fire in Kaprun, Austria, 220 F.R.D. 195 (S.D.N.Y. 2003) *rev'd Kern v. Siemens Corp.*, 393 F.3d. 120 (2d Cir. 2004). Court appointed Co-lead counsel in multi-district certified class action involving the death of 153 individuals in a train fire in Austria. Class certification reversed on appeal. Settlement of \$16 million on behalf of the American plaintiffs.

In re African American Slave Descendants' Litig., 304 F.Supp.2d 1027 (N.D. Ill. 2004); *In re African American Slave Descendants' Litig.*, 307 F.Supp.2d 977 (N.D. Ill. 2004); *In re African American Slave Descendants' Litig.*, 272 F.Supp.2d 755 (N.D. Ill. 2003); and *In re African American Slave Descendants' Litig.*, 231 F.Supp.2d 1357 (J.P.M.L. 2002). Court appointed co-lead counsel in landmark reparation cases.

Rosen v. Smith Barney, 393 N.J.Super. 578 (App. Div. 2007) *aff'd* 195 N.J. 423 (2008). Lead counsel in certified class action against brokerage firm involving deferred compensation plan, resulting in \$9 million judgment against Smith Barney, reversed on appeal.

Bahramipour v. Citigroup Global Markets, Inc., Case No. 04-04440 CW, United States District Court, Northern District of California, represented numerous brokers in major brokerage house in claims for failure to pay overtime. Nagel Rice was signatory on the \$95 million Settlement Agreement and designated as Class Counsel.

Nagel Rice also has extensive experience in complex litigation. Among other cases, the firm represented the State of New Jersey in establishing liability for natural resource damages against Exxon Mobil in connection with pollution at two refinery sites which has settled for \$225 million, *N.J.D.E.P. v. Exxon Mobil*, 393, N.J. Super, 388 (App. Div. 2007), and is handling a multi-billion dollar RICO action against major hedge funds in connection with short selling scheme. *Fairfax Financial Holdings Limited v. S.A.C. Capital Management, LLC, et al.*, Docket No.: MRS-L-2032-06, Superior Court, State of New Jersey.