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ON THE RECORD

WITH ROBBINS GELLER

APRIL 2021

Robbins Geller Obtains "Landmark" $650 Million Settlement in Facebook Biometric Class Action

Settlement Viewed as a "Major Win for Consumers" in the Area of Digital Privacy

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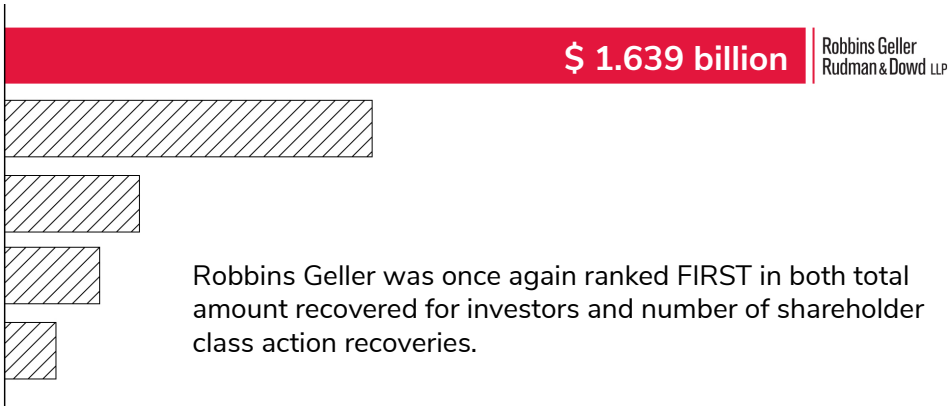
ISS SCAS Top 50 Report Ranks Robbins Geller First for Recovering $1.6 Billion for Investors in 2020, More than Twice Any Other Plaintiffs Firm



Robbins Geller was once again ranked FIRST in both total amount recovered for investors and number of shareholder class action recoveries.

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"Landmark" $650 Million Settlement in Facebook Biometric Class Action Approved as a "Major Win for Consumers" in the Area of Digital Privacy

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On February 26, 2021, the Honorable James Donato of the Northern District of California approved a "landmark" $650 million privacy class action settlement for a class of Illinois Facebook users in *In re Facebook Biometric Info. Privacy Litig.* The cutting-edge settlement resolved claims that Facebook used facial recognition technology to extract and store users' biometric identifiers without the written consent required by the Illinois Biometric Information Privacy Act ("BIPA") enacted in 2008.

After more than five years of hard-fought litigation, the settlement not only provides significant funds to Illinois Facebook users, but it also requires the company to come into full compliance with BIPA.

"This **record-breaking settlement** demonstrates five years of tireless litigation, and shows the Firm's resolve to hold Facebook accountable for violating the privacy rights of the class," said Robbins Geller partner **Shawn A. Williams**. "We prevailed against Facebook's efforts to curtail a class action that was headed to trial before negotiations resulted in the settlement."

In granting final approval, Judge Donato praised Robbins Geller and its co-counsel, noting: "By any measure, the $650 million settlement in this biometric privacy class action is a landmark result. It is one [of] the largest settlements ever for a privacy violation, and it will put at least $345 into the hands of every class member interested in being compensated." Judge Donato also noted that, "[o]verall, the settlement is a **major win** for consumers in the hotly contested area of digital privacy."

> "By any measure, the $650 million settlement in this biometric privacy class action is a **landmark result**. It is one [of] the largest settlements ever for a privacy violation . . . ."
>
> *- Honorable James Donato*

"This is a landmark settlement not only because of its sheer size, but because the participation rate of class members shattered all predictive models. This case will deliver real money to real people at a time when they desperately need it," said Robbins Geller partner **Paul J. Geller**.

In addition to Paul and Shawn, Robbins Geller attorneys **Patrick J. Coughlin**, **Ellen Gusikoff Stewart**, **Stuart A. Davidson**, **Lucas F. Olts**, and **John H. George**, along with co-counsel, obtained this result for the class.

In re Facebook Biometric Info. Privacy Litig., No. 3:15-cv-03747-JD, Order re Final Approval, Attorneys' Fees and Costs, and Incentive Awards (N.D. Cal. Feb. 26, 2021).

Paul J. Geller

Shawn A. Williams

The Blank Check Bonanza

Special Purpose Acquisition Companies Pose Unique Risks to Investors

Blank check companies have been around for decades, falling in and out of fashion along with various boom-and-bust cycles. After facilitating a series of penny-stock scams in the 1980s, regulators and legislators enacted tougher rules designed to protect investors in blank check companies. Recently, the blank check structure has experienced a historic resurgence in popularity. In 2020, blank check initial public offerings (IPOs) raised over $80 billion – more than the prior 10 years ***combined*** and exceeding amounts raised in the traditional IPO market. This trend has only accelerated, with 2020's record-setting total already eclipsed in the first three months of 2021.

Over time, blank check companies tend to significantly underperform the market. From 2015 to July 2020, blank check companies lost 19% on average following a business combination, while traditional IPOs gained 37% during this same timeframe.

Blank check companies, also known as special purpose acquisition vehicles or "SPACs," get their name from having no business or operations at the time of their IPO. Instead, blank check sponsors use IPO proceeds to acquire a business, most often within a specified industry. The skill, experience, and diligence of the blank check sponsor is particularly important because the target business is unknown to investors. After a target is identified, shareholders vote on the deal and can also elect to redeem their shares, receiving a cash payout roughly equal to their initial investment. If the deal is approved, the target business reverse merges with the blank check company, allowing it to become publicly traded. If a blank check sponsor fails to complete a business combination within the allotted timeframe (usually two years), proceeds from the blank check IPO are returned to investors.

Proponents of the blank check structure claim it offers a faster and cheaper route to a public listing for private companies as compared to a traditional IPO. In addition, the ability of blank check investors to redeem their shares allows blank check IPOs to serve as a kind of savings account with significant potential upside if a deal is viewed favorably by the market.

However, the unique structure of blank check companies poses heightened risks to investors and makes them prone to fraud and abuse. Typically, blank check sponsors receive a fee of 20% of company shares if the blank check company successfully completes a merger. This fee can be worth hundreds of millions of dollars and is forfeited if no initial business combination is completed. This creates a perverse incentive for blank

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The Blank Check Bonanza: Special Purpose Acquisition Companies Pose Unique Risks to Investors

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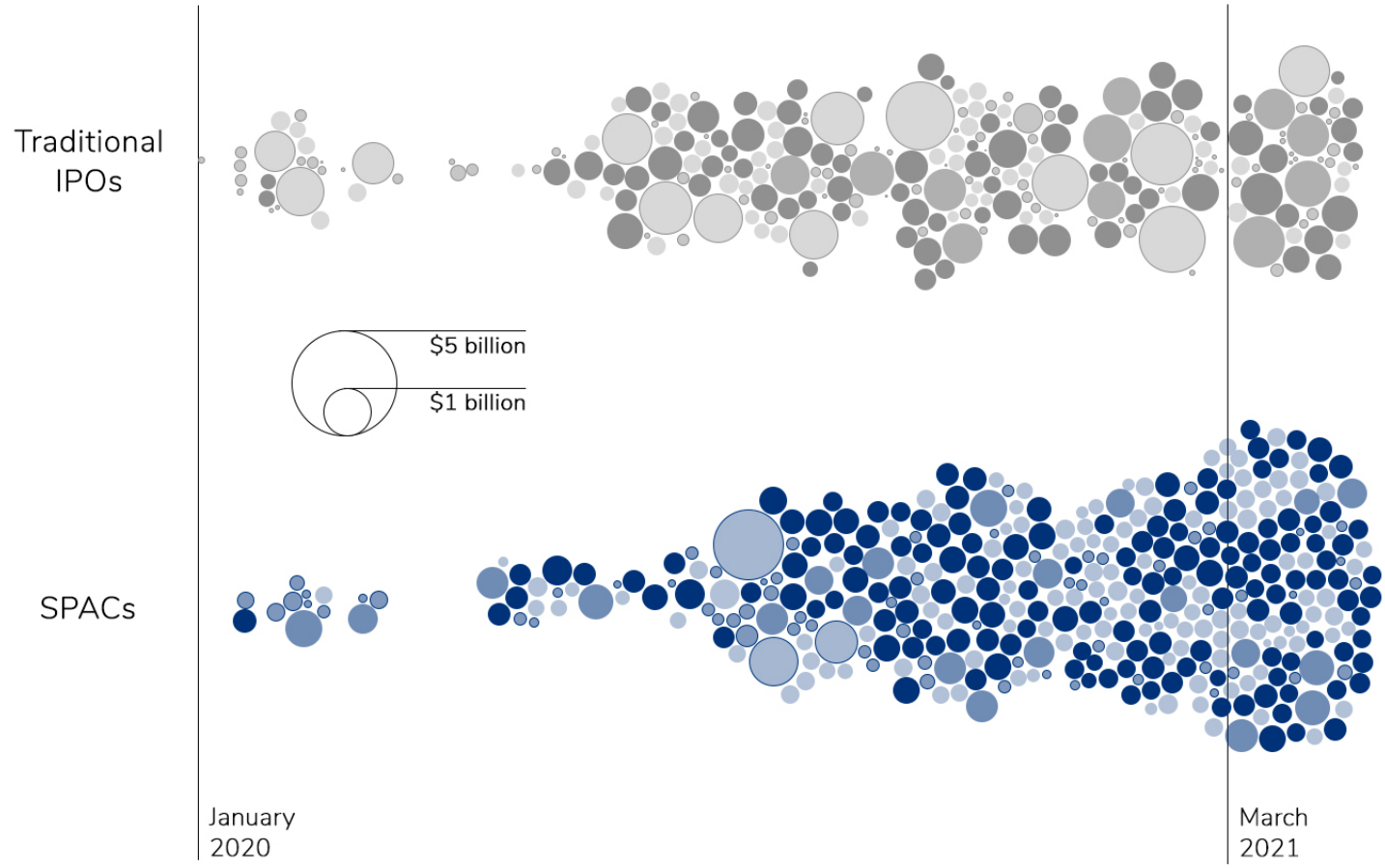


check sponsors to push shareholders to approve any merger in order to ensure that the sponsor obtains its fee, even if the merger is not in the best interest of shareholders. Additional conflicts of interest, such as hefty management fees, often provide added incentives for blank check sponsors to oversell the target company to shareholders. Less stringent disclosure requirements also apply to bringing the target company public than is the case with a traditional IPO.

Over time, blank check companies tend to significantly underperform the market. From 2015 to July 2020, blank check companies lost 19% on average following a business combination, while traditional IPOs gained 37% during this same timeframe. In addition, several recent high-profile blank check acquisitions have been followed by sobering allegations of fraud, mismanagement, and self-dealing. So far in 2021, more than a half-dozen blank check companies have already been accused of perpetrating frauds in connection with their initial business combinations, costing investors billions of dollars in losses.

Robbins Geller is leading the charge to ensure that investors don't get bilked in the blank check bonanza. The Firm has launched a committed SPAC Task Force of experienced litigators, investigators, and forensic accountants dedicated to rooting out and prosecuting fraud on behalf of injured investors in blank check companies. Robbins Geller also developed and serves as court-appointed lead counsel in one of the first securities class actions arising from the latest wave of blank check financing, *In re Alta Mesa Res. Inc. Sec. Litig.*, No. 4:19-cv-00957 (S.D. Tex.). On March 31, 2021, the United States District Court for the Southern District of Texas denied defendants' motions to dismiss in their entirety. For more information on the Firm's efforts to protect blank check investors, please visit https://www.rgrdlaw.com/news-press-Launches-SPAC-Task-Force.html.

ISS SCAS Top 50 Report

Robbins Geller Ranks First for Recovering $1.6 Billion for Investors in 2020, More than Twice Any Other Plaintiffs Firm

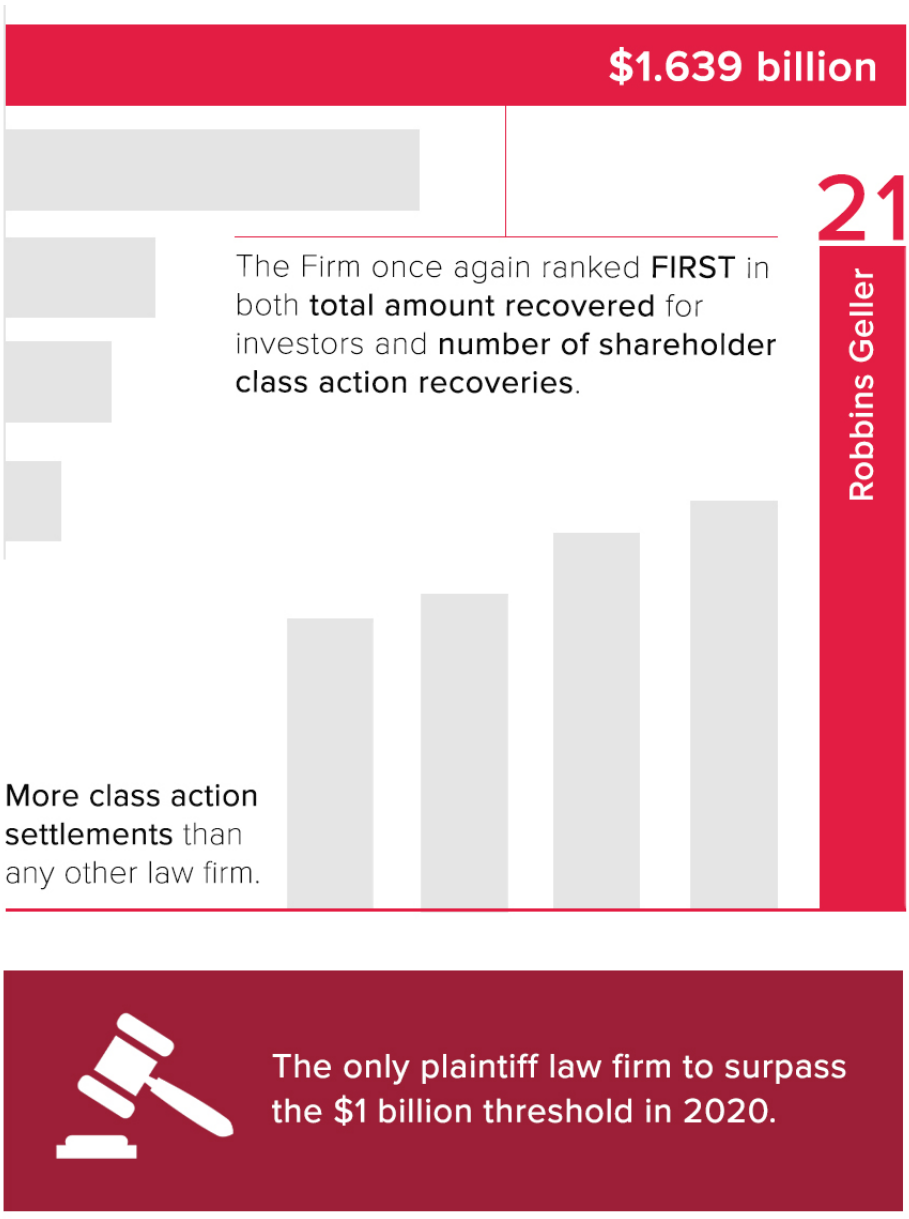
On March 23, 2021, Institutional Shareholder Services (ISS) released its annual Securities Class Action Services (SCAS) Top 50 Report with Robbins Geller ranked first among all law firms. Robbins Geller recovered more than $1.6 billion for investors in 2020, including the top two securities class action recoveries of the year: *American Realty Capital Properties, Inc.* ("*ARCP*") ($1.025 billion recovery) and *First Solar* ($350 million recovery).

"ISS SCAS' analysis of these settlements identified Robbins Geller . . . as the only plaintiff law firm to surpass the $1 billion [recovery] threshold in 2020…." ISS continues to recognize Robbins Geller at the top of its rankings with respect to both the total amount recovered for investors and the number of shareholder class action settlements.

"We are particularly pleased with the result our trial team achieved in *ARCP*," said Robbins Geller partner Darren Robbins. "This recovery of more than $1 billion for class members included a $237.5 million contribution from two individual defendants, the largest contribution ever made by individual defendants to a PSLRA settlement."

The $350 million recovery for investors in *Smilovits v. First Solar, Inc.* was achieved on the eve of trial and represents the fifth-largest PSLRA settlement ever in the Ninth Circuit and the biggest PSLRA recovery ever in the District of Arizona.

Robbins Geller Topped the Charts in 2020 Securities Litigation



ISS SCAS

Information taken from a "comprehensive listing of the top 50 plaintiff law firms ranked by the total cash amount of final North American securities class action settlements occurring in 2020."

International Investor Update:
Australia & United Kingdom

While the majority of securities fraud litigation brought on behalf of investors against corporate wrongdoers continues to occur in the United States, there has been an uptick in such class actions in both Australia and the United Kingdom. Two notable developments in these jurisdictions will impact investors' ability to pursue securities fraud claims and further highlight the importance of having an institution's investment portfolio monitored by a qualified law firm able to provide comprehensive advice and analysis in this rapidly evolving area of the law.

High Court of Australia: No Clear Analysis for Coordinating Multiple Class Actions

In April 2018, Australian wealth manager AMP Limited was examined by the Financial Services Royal Commission. The disclosure of that examination revealed major areas of misconduct, including knowingly charging clients fees for no service in various contexts and misleading the Australian Securities and Investments Commission on multiple occasions regarding the fees AMP charged its clients. The market strongly reacted to those revelations, with AMP's share price dropping over 11% and with three AMP directors, including the Board Chairman, as well as the CEO, resigning from their positions.

In response, five separate securities fraud class action complaints were filed against AMP in Australian courts. Confronted with this multiplicity of suits, the trial court engaged in a multi-factor analysis, or "beauty parade," to select one complaint to proceed, while staying the others. The plaintiffs of the "first-filed" case appealed that decision, asserting that other cases were duplicative, vexatious, or oppressive and should have been stayed in favor of the first-filed complaint.

In a highly anticipated decision issued on March 10, 2021, the High

Court of Australia found there was no one size fits all rule to apply to the multiple cases, and held the interests of the class members should be paramount when determining which case will proceed. Rather than proscribe a rigid rule, as was done in the United States via the enactment of the Private Securities Litigation Reform Act of 1995 and generally provide that the class members with the largest loss that is typical and adequate of the putative class will lead the action (and select lead counsel), the High Court of Australia instructed courts to engage in a multi-factor analysis. The court further concluded that the first filed complaint is not entitled to deference.

While the High Court of Australia did provide useful suggestions for managing multiple class actions, it declined to establish any clear rules to guide future trial courts, investors, attorneys, and litigation funders. Unless the Australian Parliament takes action to provide some

Before 1995, United States courts typically appointed the plaintiff and counsel who won the race to the courthouse to leadership positions. By enacting the PSLRA in 1995, Congress transferred the power to direct class action securities litigation – and the lawyers – to investors with a substantial financial interest in the relief sought by the class.

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International Investor Update: Australia & United Kingdom

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structure to the leadership contests, it is likely that a large institutional investor's ability to direct and control Australian securities cases – and to influence funding agreements and attorneys' fees – will continue to be somewhat uncertain.

U.K. High Court of Justice: Tardy and Improper Joinders Doom Ability to Recover

In November 2013, the U.K.'s Serious Fraud Office (SFO) began investigating multinational securities services provider G4S for an alleged scheme to defraud the Ministry of Justice in connection with contracts to electronically monitor prisoners. G4S sought to resolve those claims in March 2014, with a £108 million payment to the Ministry of Justice. However, the SFO continued its investigation into G4S, and it was not until July 2020 that G4S was able to fully resolve these claims, by entering into a deferred prosecution agreement, providing additional payments of nearly £45 million to the SFO, and admitting it "repeatedly lied" to the Ministry of Justice between 2011 and 2013. The value of G4S shares declined by over 30% in response to the investigation in 2013 and the partial settlement in 2014.

Just days before the statute of limitations was set to expire in July 2019, 43 investors filed a complaint against G4S in the U.K.'s High Court of Justice, alleging claims under §90A of the Financial Services and Markets Act 2000. After the filing, G4S agreed to an extension of time for investors to serve the claim. During that extension, some 50 additional investors attempted to join the complaint, raising the amount in issue from £10 million to £100 million.

G4S argued that these 50 additional investors lacked standing because once the statute of limitations expired, U.K. law required the consent of G4S before additional investors could join the complaint. G4S also argued that even if investors could be added without its consent, many investors, including some of the original claimants, failed to demonstrate their desire to join the litigation.

U.K. courts are continuing to take a technical view on key issues of standing and identification of the claimant.

In a judgment issued on March 10, 2021, Mr. Justice Mann of the High Court agreed with G4S and struck the claims of the additional investors. Seizing on the apparent rush with which the litigation funder and the investor's counsel sought to join the additional investors in the complaint, Mr. Justice Mann stated "that an error was made at the level of the claimant . . . and the solicitors, no doubt wishing to act quickly against the limitation background." Further, regarding an investor's duty to clearly express a desire to join the complaint, Mann found that "[g]roup claimants have a certain obligation to make their claim clear, not confused, and to do so before the claim is issued."

This judgment confirms that U.K. courts are continuing to take a technical view on key issues of standing and identification of the claimant. Investors considering U.K. group litigation are cautioned to carefully review proposals and obtain qualified legal advice before committing to U.K. group litigation.

Robbins Geller attorneys regularly advise clients regarding maximizing their global securities fraud recoveries as part of the Firm's Portfolio Monitoring Program.

2021 New Partner Spotlight:

Frank A. Richter, Ashley M. Price, and Vincent M. Serra

"The elevation of this talented group of lawyers to the partnership is the product of each individual's hard work and a willingness to put the Firm's clients at the center of everything we do. I congratulate this diverse group of outstanding lawyers and wish them every success," said founding partner Darren J. Robbins.

What made you become a lawyer?

After pursuing music for a couple years, I had reached a crossroads where I was either going to go to law school or try to start a career in the business world. Once I learned more about career options in law, the choice became obvious. Then, in law school, I started working at a plaintiffs' firm and quickly knew that was the path for me. I never looked back.

Best piece of advice you've ever been given?

My parents instilled in me the value of hard work. While there were always aspects of school, sports, music, etc. that I could not control, they told me that the work I put in is one thing I can control, and it can make all the difference.

What is your favorite hobby outside of work?

Golf in the sense of a traditional "hobby," but playing and being with my kids is my favorite way to spend time outside of work.

What is a surprising fact about you?

I have a graduate degree in jazz music performance.

What's your favorite food combination?

Apple pie and cinnamon ice cream.

Frank, of the Firm's Chicago office, practices shareholder, antitrust, and class action litigation. Since joining the Firm, he has been part of litigation teams that have recovered more than a billion dollars on behalf of shareholders, including in *Valeant Pharmaceuticals*, where Frank, along with the other members of the Robbins Geller team, obtained a $1.21 billion recovery. Frank's other notable cases include: *HCA* ($215 million); *Sprint* ($131 million); *Orbital ATK* ($108 million); and *Dana Corp.* ($64 million). Frank has been named a Rising Star by *Super Lawyers Magazine* for four consecutive years. He earned his Juris Doctorate degree from DePaul University College of Law.

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2021 New Partner Spotlight: Frank A. Richter, Ashley M. Price, and Vincent M. Serra

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What made you become a lawyer?

When I was a college intern for U.S. Senator Ben Nelson of Nebraska, I occasionally got to sit in on policy meetings. I realized that the people influencing the decisions were lawyers. And as I considered my political science degree, I decided I didn't want to merely be an observer who wrote about what other people had done; I wanted to be one of the people actively advocating for changes that improved people's lives. Becoming a lawyer seemed like the best way to realize those dreams.

What was the funniest thing you've seen recently online?

There are so many hilarious memes out there about working from home with kids while COVID-19 stay-at-home orders are in place. With two kids, ages 4 and 6, I can commiserate.

What do you wish someone taught you a long time ago?

Statistics. How to golf. How to cook vegetables that my kids (and I) will actually enjoy.

What advice would you give your young self?

You're sweating the small stuff – stop it. Travel more. Take statistics.

Based in the San Diego office, Ashley focuses her practice on complex securities litigation. She recently was a key member of the Robbins Geller litigation team in *In re American Realty Capital Properties., Inc. Litigation*, a securities class action arising out of improper accounting practices, recovering more than $1 billion for class members.The *American Realty* settlement represents the largest recovery as a percentage of damages of any major class action brought pursuant to the Private Securities Litigation Reform Act of 1995 and resolved before trial. The $1+ billion settlement included the largest personal contributions ($237.5 million) ever made by individual defendants to a securities class action settlement. Ashley has been named a Rising Star by *Super Lawyers Magazine* for the past five consecutive years. She received her Juris Doctor degree from Washington University in St. Louis, School of Law.

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2021 New Partner Spotlight: Frank A. Richter, Ashley M. Price, and Vincent M. Serra

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What made you become a lawyer?

Mostly reading and watching fictional accounts of attorneys like John Grisham books (including, ironically, "The Partner") and movies like A Few Good Men and A Time to Kill. I was also always intrigued by the fact that we live in a society governed by a system of laws that most people know very little about and that dictate, at least indirectly, everything we do.

Three dinner guests dead or alive?

Nelson Mandela, because I can't think of anyone who overcame more adversity. Bill Murray, for the laughs. Malcom Gladwell, because his books and podcasts are fascinating and the bounds of conversation would be endless.

What is the favorite case you've worked on at the firm? Why?

The Private Equity antitrust matter, *Dahl v. Bain Capital Partners, LLC*, which alleged that the largest private equity firms in the world suppressed competition for leveraged buyouts. The litigation delivered everything you could want from a case and more: mounds of incriminating emails between senior executives at supposedly competing but actually conspiring PE firms, a close-knit, team dynamic, and, most importantly, a massive $590.5 million recovery on behalf of class members.

What was the funniest thing you've seen recently online?

A friend recently sent me a link to a segment from The Daily Show that compiled clips from Bernie Sanders' 30 year-old Public Access television show that he did when he was Mayor of Burlington, Vermont. The interviews he conducted with kids are, unbeknownst to him at the time, hilarious.

Where is your favorite place to travel?

Costa Rica – for the biodiversity, "pura vida" lifestyle, and fun surf. I was lucky enough to travel there with my family just before the pandemic erupted, following a trip with my wife nearly a decade earlier and a 6-week stint studying abroad during college.

Vince, based in the Firm's Melville office, focuses his practice on complex securities, antitrust, consumer, and employment litigation, and his efforts have contributed to the recovery of over a billion dollars on behalf of aggrieved plaintiffs and class members. Vince has served as counsel in several significant antitrust recoveries, including *Dahl v. Bain Capital Partners, LLC* ($590.5 million recovery) and *In re Currency Conversion Fee Antitrust Litigation* ($336 million recovery). He has investigated and assisted with the development and prosecution of several ongoing market manipulation cases, including *In re Barclays Liquidity Cross & High Frequency Trading Litigation* and *In re Treasuries Securities Auction Antitrust Litigation*. Vince earned his Juris Doctor degree from California Western School of Law.

Robbins Geller Defeats Motion to Dismiss in Vanda Pharmaceuticals Securities Class Action

In an order dated March 10, 2021, the Honorable Frederic Block of the United States District Court for the Eastern District of New York denied in part defendants' motion to dismiss in a securities class action against Vanda Pharmaceuticals Inc., a biopharmaceutical company that develops and sells a variety of drugs.

The case alleges that Vanda and certain executives violated the Securities Exchange Act of 1934 by making materially false and misleading statements and omissions regarding an off-label promotion scheme in which Vanda's two products, Fanapt and Hetlioz, were marketed to treat disorders for which the drugs were not FDA-approved. Plaintiff also alleges that defendants made materially false and misleading statements by failing to disclose that the FDA had required Vanda to perform a safety test for tradipitant, a drug in clinical trials, that Vanda was unwilling to conduct.

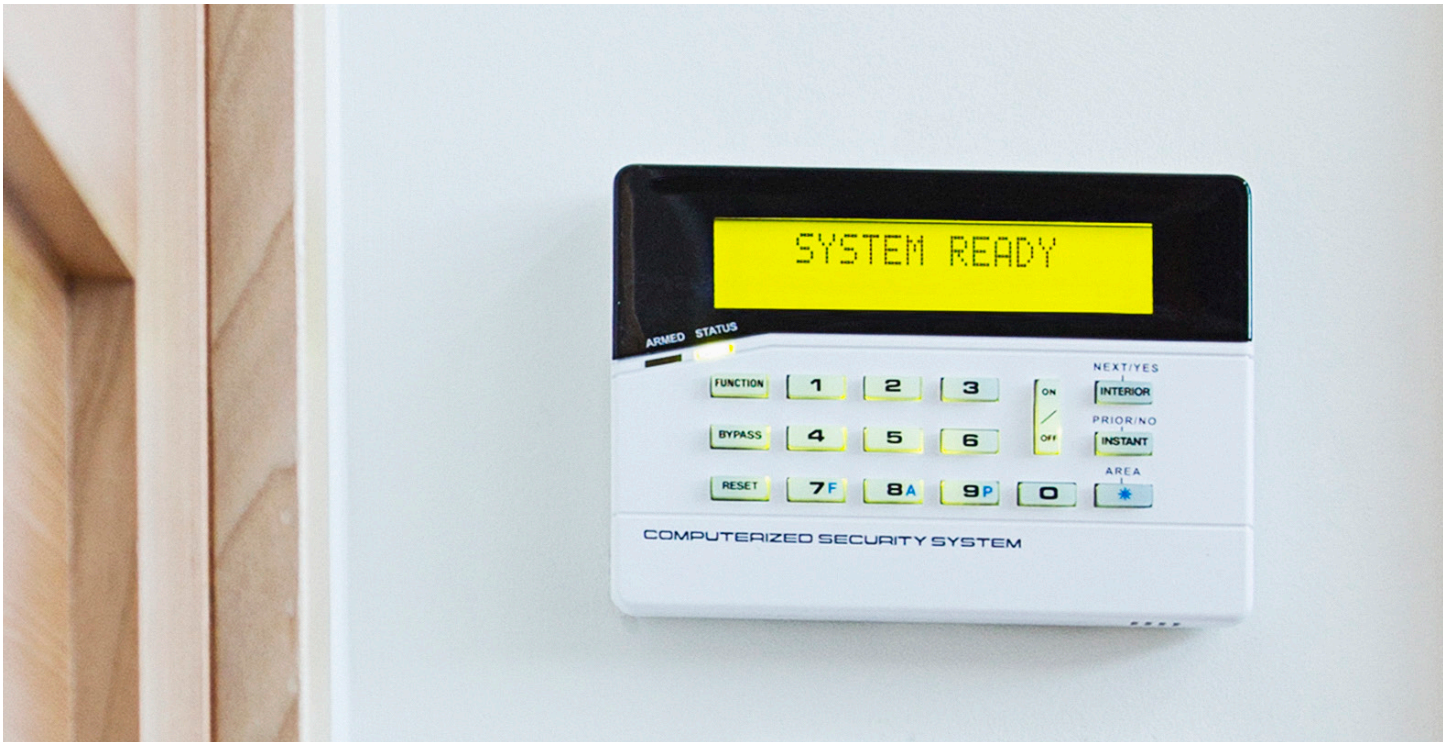
As a result of this and other information being withheld from the market, the price of the company's shares was artificially inflated during the class period, with Vanda's stock price reaching a high of more than $30 per share. After Vanda revealed on February 5 and 6, 2019 that it had sued the FDA for issuing a partial clinical hold on tradipitant because Vanda refused to perform the safety test, the company's share price declined 20%. Then, on February 11, 2019, an investment firm published a report revealing an unsealed whistleblower lawsuit that uncovered misleading and illegal activity by senior executives in promoting Fanapt and Hetlioz that ultimately led to the company's shares dropping another 5%.

In partially denying defendants' motion to dismiss, Judge Block held that the lead plaintiff had adequately established materiality, loss causation, and scienter against CEO Mihael Polymeropoulos and Vanda. The Court stated that the complaint sufficiently alleges that "Polymeropoulos actively participated in trainings where Vanda's salesforce was directed to market Hetlioz and Fanapt to individuals who did not suffer from diseases those drugs were approved to treat." The decision also held that the complaint sufficiently alleged "Polymeropoulos made affirmative statements regarding the company's marketing practices which failed to convey the company's suspect drug promotion activities." In addition, because the lead plaintiff had plausibly alleged Exchange Act claims for the Fanapt and Hetlioz misstatements and omissions, Judge Block also sustained the Exchange Act claims against Polymeropoulos and Vanda regarding tradipitant.

Teamsters Local Union No. 727 Pension Fund is serving as lead plaintiff. Robbins Geller attorneys **Samuel H. Rudman**, **David A. Rosenfeld**, and **Michael G. Capeci** obtained this result for the class.

Gordon v. Vanda Pharms. Inc., No. 1:19-cv-01108-FB, Memorandum and Order (E.D.N.Y. Mar. 10, 2021).

Robbins Geller Recovers $30 Million for ADT Investors



Robbins Geller "fairly and adequately represented the interest of the Settlement Class Member in this Action"

- Honorable Donald W. Hafele

On January 12, 2021, the Honorable Donald W. Hafele of the 15th Judicial Circuit Court of Florida approved a $30 million settlement in *In re ADT Inc. Shareholder Litigation*. The securities class action alleges that defendants violated the Securities Act of 1933 by misrepresenting and/or failing to disclose in the Registration Statement for ADT's January 2018 Initial Public Offering ("IPO") ADT's litigation with Ring.com over Ring's theft of intellectual property from ADT and the settlement in principle of that litigation, and that ADT's traditional competitors were being displaced by do-it-yourself home security offerings from certain technology companies.

In approving the settlement, Judge Hafele commended Robbins Geller for "fairly and adequately represent[ing] the interest of the Settlement Class Members in this Action" and added that class members were represented by "highly experienced counsel."

Robbins Geller attorneys **Jack Reise**, **Stephen R. Astley**, **Elizabeth A. Shonson**, **Maureen E. Mueller**, and **Sabrina E. Tirabassi** obtained this recovery for investors.

In re ADT Inc. S'holder Lit., No. 502018CA003494XXXXMB-AG, Order and Final Judgment Granting Motion for Approval of Class Action Settlement (Fla. Cir. Ct., 15th Jud. Cir. Jan. 12, 2021).

Benchmark Litigation Recognizes Robbins Geller with San Diego Firm of the Year and Impact Case Awards

Partner Debra Wyman Awarded San Diego Litigator of the Year and California Plaintiff Litigator of the Year

Debra J. Wyman

Jessica T. Shinnefield

Benchmark Litigation named Robbins Geller as San Diego Firm of the Year. Partner **Debra J. Wyman** was named San Diego Litigator of the Year and California Plaintiff Litigator of the Year. The Firm also received the Impact Case Award for its hard-fought work in *In re American Realty Capital Properties, Inc. Litig.* Debra and Robbins Geller partner **Jessica T. Shinnefield** were recognized for leading the litigation team that successfully prosecuted the case which arose out of American Realty's manipulative accounting practices, and recovered more than $1 billion for American Realty's securities holders, including $237.5 million paid by the Company's former CEO and CFO.

The 2021 San Diego Super Lawyers and Rising Stars

Super Lawyers Magazine selected nine Robbins Geller attorneys as Rising Stars for San Diego, commending them for their "high degree of peer recognition" and distinguishing them for their "professional achievement" in their respective fields.

Our Rising Stars include: Michael Albert, Darryl J. Alvarado, Jennifer N. Carnigal, Brian E. Cochran, Ashley M. Kelly, Carmen A. Medici, Ashley M. Price, Hillary B. Stakem, and Angel P. Lau (not pictured.)

We welcome your letters, comments, questions, and submissions. Please direct all inquiries to David C. Walton at (619) 231-1058 or davew@rgrdlaw.com.

CONTRIBUTORS

Nathan W. Bear, Brian E. Cochran, Michael J. Dowd, Paul J. Geller, Tor Gronborg, Danielle S. Myers, Ashley M. Price, Frank A. Richter, Darren J. Robbins, David A. Rosenfeld, Samuel H. Rudman, Vincent M. Serra, Jessica T. Shinnefield, Shawn A. Williams, and Debra J. Wyman.

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