

EXHIBIT 4

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Attorneys for Plaintiffs

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MANTESE HONIGMAN, P.C.

By: Gerard Mantese (*admitted pro hac vice*)
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J. J. CONWAY LAW

By: John J. Conway (*admitted pro hac vice*) Michigan
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**IN THE COURT OF COMMON PLEAS OF
PHILADELPHIA COUNTY, PENNSYLVANIA**

KEVIN STEINKE, LOUIS FANTINI,
EMILY FANTINI, and DANIEL REYES,
on behalf of themselves and a class of all others similarly
situated,

Plaintiffs

vs.

AON INVESTMENTS USA, INC., et al.,

Defendants

CIVIL ACTION

JUNE TERM, 2021

No. 210601197

JURY TRIAL DEMANDED

CLASS ACTION

COMMERCE PROGRAM

DECLARATION OF GERARD V. MANTESE

I, GERARD V. MANTESE, under oath and penalty of perjury, state as follows:

1. I have personal knowledge of the following matters and, if sworn as a witness, I am competent to testify to them.

DETAILS ABOUT GERARD V. MANTESE

2. I am the CEO and the senior principals of the law firm Mantese, Honigman, P.C., which maintains its primary office in Troy, Michigan (a suburb of Detroit); and additional offices in Clayton, Missouri (a suburb of St. Louis); and New York City, New York. The Mantese Honigman firm focuses on complex commercial and business litigation and arbitration, and complex class actions.

3. I am co-lead counsel for the Plaintiff Class in this Class Action matter.

4. I graduated summa cum laude from the Saint Louis University School of Law in 1982, ranked first in my graduating class. I was first licensed to practice law in Michigan in 1982. In addition, I have subsequently been admitted to the State Bars of Missouri, New York, and Florida, and I am a current member in good standing of each of these Bars. I have practiced continually for over 42 years, handling a wide variety of litigation matters.

5. I am also admitted to practice in the United States District Courts for the Eastern and Western Districts of Michigan, the United States Supreme Court, and the Federal Courts of Appeal for the Third, Sixth, and Ninth Circuits.

6. I have held an “AV” rating from Martindale-Hubbell continually since 1996 and have been annually voted as a Michigan SuperLawyer since 2007. I have been repeatedly recognized as one of the Top 50 Business Lawyers in Michigan, and one of the Top 100 Lawyers in Michigan.

7. Over the last two decades, I and other attorneys at Mantese Honigman have handled numerous class action matters in a wide variety of subject areas, including the following:

- a. *Raider v. Archon Corporation*, Case No. A-15-712113-B (Clark County, Nevada) (class action on behalf of shareholders to recover the correct redemption price and dividends for their shares in the corporation).
- b. *Churchill v. Cigna*, Case No. 10-cv-06911 (E.D. Penn.) (nationwide ERISA class action against CIGNA arising from denial of insurance coverage for Applied Behavioral Analysis therapy for children with autism).
- c. *Minter v. Dazzo*, Case No. 10-cv-15018 (E.D. Mich.) (obtained resolution requiring the State of Michigan to provide Medicaid coverage for ABA therapy for children with autism).
- d. *Potter v. Blue Cross Blue Shield of Michigan*, Case No. 10-cv-15018 (E.D. Mich.) (nationwide ERISA class action arising from denial of insurance coverage for ABA therapy).
- e. *Johns v. Blue Cross Blue Shield of Michigan*, Case No. 08-cv-12272 (E.D. Mich.) (ERISA class action arising from refusal to pay for treatment of ABA therapy for autistic children).¹
- f. *In Re: Automotive Parts Antitrust Litigation*, Case No. 12-md-02311 (E.D. Mich.) (liaison counsel for class of automotive dealerships in multidistrict class action arising from antitrust violations in the sale of auto parts; plaintiffs recovered more than \$400 million).
- g. *Orlowski, et al. v. Bates, et al.*, Case No. 11-01396 (W.D. Tenn.) (class counsel in consumer case involving fraudulent sales of precious metals investments; obtained summary judgment for \$25 million and the principal Defendant was prosecuted and imprisoned).
- h. Lights Tobacco Class Actions (several years of class action work beginning in 2005 against Philip Morris for deceptive marketing of “Lights” cigarettes. In 2008, Mr. Mantese was co-counsel in the United States Supreme Court and successfully litigated the issue of whether claims were preempted in *Altria Group v. Good*, 555 U.S. 70 (2008)).

¹ As a result of this lawsuit, and their additional work in this field, Mr. Mantese and co-counsel John J. Conway were awarded the State Bar of Michigan's Champion of Justice Award, for “integrity and adherence to the highest principles and traditions of the legal profession; superior professional competence; and an extraordinary professional accomplishment that benefits the nation, the state, or the local community in which the lawyer or judge lives.”

8. In 2010, I was awarded the State Bar of Michigan's Champion of Justice Award, in recognition for years of my having advocated for children with autism and for obtaining successful rulings in cases that provided insurance coverage for Applied Behavior Analysis therapy, which offers autistic children and their families the opportunity to live fuller lives and participate in mainstream society. See, e.g., *Potter v. Blue Cross*, Case No. 10-cv-14981, 10 F.Supp.3d 737 (E.D. Mich. 2014).

9. I have devoted hundreds of pro bono hours to representing survivors of domestic violence, including by establishing a legal clinic where attorneys volunteered their time to assist survivors of domestic violence in obtaining restraining orders and divorces.

10. I have also served for several years on the Access to Justice committee, in Michigan, to raise funds for agencies providing free legal representation to those who cannot afford an attorney.

11. I have also volunteered many hours representing tenants being wrongfully evicted and was honored with the Volunteer of the Year Award by the Detroit Housing Coalition.

12. In 2017, I was awarded the Roberts P. Hudson Award, the State Bar of Michigan's highest honor, conferred to commend lawyers "*for their unselfish rendering of outstanding and unique service to and on behalf of the State Bar of Michigan, the legal profession, and public.*"

13. I also serve on the State Bar of Michigan Board of Commissioners and have served as co-chair of the LLC & Partnership Committee for the State Bar of Michigan's Business Law Section for the last few years.

14. Beginning in March 2022, I was named Chair of the New York County Lawyer's Association Committee on Corporations, LLCs and Partnerships.

15. My CV is attached to this declaration and contains significant additional details about my practice and experience.

THE SETTLEMENTS

16. Following private mediation with counsel for Hamilton Lane, the parties continued to negotiate, and eventually the four Plaintiffs parties reached a settlement with Hamilton Lane on May 15, 2024. At that time, the case had not yet been certified as a Class Action, but the parties in the case had exchanged approximately 765,801 pages of documents and conducted 13 depositions.

17. Likewise, following private mediation with Portfolio Advisors, the parties continued to negotiate, and on January 13, 2025, the four Class Representatives, on behalf of the now-certified Class, executed a settlement with Portfolio Advisors. By this date, the parties had exchanged approximately 1,648,990 pages of documents.

FEE AGREEMENTS WITH CLASS REPRESENTATIVES AND AMONG CLASS COUNSEL

18. The Plaintiffs and the Class in this case are represented by three law firms: Mantese Honigman, P.C., JJ Conway Law, and the Philadelphia firm Feldman Shepherd.

19. The three law firms have agreed about how to apportion any fee recovery among themselves, and that actual expenses and costs would be reimbursed to the firm that paid them.

20. For purposes of logistics, all Class counsel have agreed that funds representing fees and expenses (other than the expenses to go to A.B. Data for administration fees) may be paid from the Settlement Fund to the law firm of Mantese Honigman, and that Class Counsel will divide these amounts among themselves.

21. All four Class representatives have executed a contingent fee agreement providing for payment of one-third of any gross recovery by settlement or judgment to be paid to Class Counsel, plus reimbursement of expenses and costs of litigation.

22. A one-third contingent fee award from the \$15,250,000 Settlement Fund generated by the settlements with Hamilton Lane, L.L.C., and Portfolio Advisors, LLC, totals an attorney fee award in the amount of \$5,083,333.33, to be split among the three Class Counsel law firms.

**CROSS-CHECK: MANTESE HONIGMAN HOURS
INCURRED THROUGH JANUARY 13, 2025**

23. In the preparation of this declaration, I or others in my firm have carefully reviewed the internal billing invoices for the firm related to this matter from June 2021 to January 13, 2025 (the date on which the second settlement agreement was executed). The booked fees that the three firms have expended dramatically exceed the one-third contingency fee set forth above.

24. The time entry reports reviewed accurately reflect the time, work, and cost expended on the Plaintiffs' behalf in this case, from before the case was filed, to the date the second settlement was executed (January 13, 2025).

25. Our office uses standard timekeeping law firm software.

26. When this case began in 2021, my hourly billing rate for class action work was \$895 (the same class action rate also charged by all other lawyers in the firm with more than 30 years' experience). Lawyers with between 20-29 years' experience were billed at \$700 per hour, associates were billed at \$525 per hour, our on-staff document review associates were billed at \$320 per hour, and law clerks (i.e. law students or graduates who have not yet passed the Bar) were billed at \$200 per hour. Our firm generally does not charge for legal assistant time and did not do so in this case.

27. Effective in January 2023, our firm's class action hourly rates increased. Rates for lawyers with more than 30 years' experience rates were \$975 per hour; 20-29 years' experience were \$975 per hour (if they are a partner). Associates continued to be billed at \$525 per hour, our on-staff document review associates continued to be billed at \$320 per hour, and our paralegal (a law school graduate who has not yet taken the Bar exam) was billed at \$200 per hour. No charges were incurred for legal assistant time.

28. Our firm records show the following:

Name	Date of first admission to Bar:	Number of Hours expended:	Hourly Rate for Class Action Work: ^[2]	Total for Attorney:
Ken Chadwell	1986	2021: 144.65	895.00	\$ 129,461.75
		2022: 631.65	895.00	\$ 565,326.75
		2023: 253.90	975.00	\$ 247,552.50
		<u>2024: 68.30</u>	975.00	<u>\$ 66,592.50</u>
		Total 1,098.50 hours		\$1,008,933.50
Jenny Chaves	2021	2021: 26.60	525.00	\$ 13,965.00
		2022: 122.40	525.00	\$ 64,260.00
		<u>2023: 14.50</u>	525.00	<u>\$ 7,612.50</u>
		Total: 163.50 hours		\$ 85,837.50
Kate Eisenstein	2003	2022: 308.75	700.00	\$ 216,125.00
		2023: 236.45	700.00	\$ 165,515.00
		2024: 12.55	975.00	\$ 12,236.25
		<u>2025: 1.00</u>	975.00	<u>\$ 975.00</u>
		Total: 558.75 hours		\$ 394,851.25
Emily Fields	2017	2023: 9.0	525.00	\$ 4,725.00
		2024: 68.35	525.00	\$ 35,883.75
		<u>2025: 2.0</u>	525.00	<u>\$ 1,050.00</u>
		Total: 79.35 hours		\$ 41,658.75
David Honigman	1981	2022: 121.05	895.00	\$ 108,339.75

² As the court observed in *Braun v. Wal-Mart Stores, Inc.*, 2011 PA Super 121, 24 A.3d 875, 974–75 (2011), *aff'd*, 630 Pa. 292, 106 A.3d 656 (2014): “In the private market, lawyers charge a premium when their entire fee is contingent on winning.... The premium added for contingency compensates for the risk of nonpayment if the suit does not succeed and for the delay in payment until the end of the litigation--factors not faced by a lawyer paid promptly as litigation progresses. In the private market, the premium for contingency usually is recouped by basing the fee on a percentage of the damages recovered. The premium also could be computed as part of an hourly rate that the lawyer bills after the litigation succeeds. **Under either approach, the market-based fee or hourly rate that is contingent on success is necessarily higher than the hourly rate charged when payment is current and certain.** This fee enhancement ensures that accepting cases on a contingent basis remains an economically attractive and feasible enterprise for lawyers.” (Emphasis in original).

Name	Date of first admission to Bar:	Number of Hours expended:	Hourly Rate for Class Action Work:[2]	Total for Attorney:
		2023: 328.00 2024: 135.10 <u>2025: 58.50</u> Total: 642.65 hours	975.00 975.00 975.00	\$ 319,800.00 \$ 131,722.50 <u>\$ 57,037.50</u> \$ 616,899.75
Kristen James	2021	2022: 524.45 2023: 1,323.80 2024: 549.20 <u>2025: 25.40</u> Total: 2,422.85 hours	320.00 320.00 320.00 320.00	\$ 167,824.00 \$ 500,480.00 \$ 175,744.00 <u>\$ 8,128.00</u> \$ 852,176.00
Nicole B. Lockhart	2018	2021: 365.25 2022: 2.00 2023: 872.30 Total: 1,239.55 hours	525.00 525.00 525.00	\$ 191,756.25 \$ 1,050.00 <u>\$ 457,957.50</u> \$ 650,763.75
Gerard V. Mantese	1982	2021: 72.10 2022: 378.95 2023: 345.05 2024: 240.10 <u>2025: 30.50</u> Total: 1,066.70 hours	895.00 895.00 975.00 975.00 975.00	\$ 64,529.50 \$ 339,160.25 \$ 336,423.75 \$ 234,097.50 <u>\$ 29,737.50</u> \$1,003,948.50
TheresaMarie Mantese	1980	2021: 112.00 2022: 1,140.65 2023: 1,068.50 2024: 314.50 <u>2025: 34.00</u> Total: 2,669.65 hours	895.00 895.00 975.00 975.00 975.00	\$ 100,240.00 \$1,020,881.75 \$1,041,787.50 \$ 306,637.50 <u>\$ 33,150.00</u> \$2,502,696.75
Brian Markham	2020	2022: 131.75 2023: 97.25 2024: 46.85 <u>2025: 0.10</u> Total: 275.95 hours	525.00 525.00 525.00 525.00	\$ 69,168.75 \$ 51,056.25 \$ 24,596.25 <u>\$ 52.50</u> \$ 144,873.75
Kristin Marshner	2008	2022: 554.80 2023: 1,564.00 <u>2024: 266.20</u> Total: 2,385.00 hours	320.00 320.00 320.00	\$ 177,536.00 \$ 500,480.00 <u>\$ 85,184.00</u> \$ 763,200.00
Terry Milne Osgood	1987	2021: 298.75 2022: 977.45 2023: 1,066.55 2024: 536.30 <u>2025: 29.10</u> Total: 2,908.15 hours	895.00 895.00 975.00 975.00 975.00	\$ 267,381.25 \$ 874,817.75 \$1,039,886.25 \$ 522,892.50 <u>\$ 28,372.50</u> \$2,733,350.25
Nasrin Oveys	2023	2023: 212.00 2024: 517.00 <u>2025: 46.50</u> Total: 775.50 hours	320.00 320.00 320.00	\$ 67,840.00 \$ 165,440.00 <u>\$ 14,880.00</u> \$ 248,160.00

Name	Date of first admission to Bar:	Number of Hours expended:	Hourly Rate for Class Action Work:[2]	Total for Attorney:
Matthew Rose	2023	2022: 111.05 (law clerk) 2023: 61.60 (law clerk) <u>2024: 2.40</u> Total: 175.05 hours	200.00 200.00 525.00	\$ 22,210.00 \$ 12,320.00 <u>\$ 1,260.00</u> \$ 35,790.00
Douglas L. Toering	1982	2021: 1.0 2022: 451.95 2023: 261.55 2024: 203.65 <u>2025: 38.70</u> Total: 956.85 hours	895.00 895.00 975.00 975.00 975.00	\$ 895.00 \$ 404,495.25 \$ 255,011.25 \$ 198,558.75 <u>\$ 37,732.50</u> \$ 896,692.75
Rakia Biemel (paralegal)		2024: 198.30 <u>2025: 27.25</u> Total: 225.55 hours	200.00 200.00	\$ 39,660.00 <u>\$ 5,450.00</u> \$ 45,110.00
MANTESE TOTAL		17,643.55 hours		\$11,948,078.50

COSTS AND EXPENSES FOR THE CLASS ACTION ADMINISTRATOR

29. On behalf of the Class Members, our firm retained the Class Action Administrator, A.B. Data, located in Milwaukee, Wisconsin, to provide notice services in this matter, as well as to administer and distribute the Settlement Funds.

30. A.B. Data agreed to delay billing of its costs and expenses until monies were recovered in this case. Therefore, A.B. Data has not billed any of the Class Members, or any of Class Counsel for its services to date.

31. I have been informed that A.B. Data has submitted an Invoice and a Declaration seeking an award of \$332,287.74 for its services and expenses incurred in this case from the beginning of the case through July 31, 2025.

32. The A.B. Data invoiced amount appears to be reasonable to me, given my extensive years of class action experience. In reaching this conclusion, I note especially that the most substantial components of this Invoice are: (1) \$217,000.00 for the media notices (i.e. newspaper

publication and email notices), (2) \$40,966.39 postage, and (3) \$35,000.00 for printing the postcard notices to be mailed to Class Members.

COSTS AND EXPENSES OF LITIGATION

33. The law firm of Mantese Honigman incurred a total of \$479,926.63 in expenses in this case between June 2021 and January 13, 2025. None of the Plaintiffs have paid any of these expenses; the cost of these expenses has been borne by our law firm.

34. This figure is comprised of the following:

Category	Amount	Details, if any
Copying charges	\$ 10,196.30	
Depositions	\$ 44,848.85	16 days of depositions; costs for deposition services and transcripts. Some, but not all, depositions were video recorded.
Travel Expenses	\$35,091.51	(depositions in Chicago, New York, and Pennsylvania, motion hearings, and mediation)
Meals	\$2,724.99	incurred during travel
Expert Fees	\$288,531.00	because this case is ongoing against other defendants, Plaintiffs have not disclosed the number of experts or their respective areas of expertise.
Overnight delivery charges	\$2,273.53	
Filing Fees	\$3,057.00	including pro hac vice expenses
Conference Call Fees	\$216.64	
Long Distance Tolls	\$ 41.32	
Postage	\$ 12.11	
E- Discovery Software Charges	\$ 39,951.67	More than 1.5 million pages of document were exchanged among the parties prior to January 13, 2025
Westlaw Charges	\$ 20,793.60	
Research	\$250.71	
Mediation Fees	\$ 31,110.50	for two separate mediations (one with Hamilton Lane and one with Portfolio Advisors)
Misc. Expenses	\$ 826.90	
Total	\$479,926.63	

35. I verify that the statements in this document are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.

FURTHER DECLARANT SAYETH NOT.

/s/

GERARD V. MANTESE

Dated: August 4, 2025

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SERVICE TO THE LEGAL PROFESSION

Roberts P. Hudson Award, from the State Bar of Michigan, 2017

- Awarded the State Bar of Michigan's highest honor, conferred to commend lawyers "for their unselfish rendering of outstanding and unique service to and on behalf of the State Bar of Michigan, the legal profession, and public." Service included years of advocating for survivors of domestic violence and instructing students about our legal system.

Champion of Justice Award, from the State Bar of Michigan, 2010

- Awarded for years of advocating for children with autism spectrum disorder and obtaining successful rulings in cases that provided insurance coverage for thousands of children to access Applied Behavior Analysis therapy, which offers children with ASD the best chance to live independently. See, e.g., *Potter v. Blue Cross*, Case No. 10-cv-14981 (USDC EDMT 2014).

EDUCATION

St. Louis University School of Law

J.D. *summa cum laude* 1982

- Graduated first in class

University of Missouri

B.A. in Political Science, *summa cum laude* 1979

- GPA 4.0/4.0
- Awarded Senator Symington Scholarship
- Appointed to University Senate (prepared and supported a Resolution requiring the University to divest itself of all investments in South Africa to protest that country's racial discrimination and apartheid practices, 1979)

PROFESSIONAL EXPERIENCE

Gerard Mantese concentrates his practice on business law, including shareholder and member disputes, oppression, fiduciary duties, real estate, and business contracts. He argued the only two shareholder and member oppression cases ever accepted for review by the Michigan Supreme Court – *Madugula v. Taub*, 496 Mich. 685 (2014) and *Frank v. Linkner*, 500 Mich. 133 (2017).

Mr. Mantese is a member of the State Bars of Michigan, New York, Florida, and Missouri, as well as a member of the Bar of the United States Supreme Court, the Federal Courts of Appeal for the Third, Sixth, and Ninth Circuits, and the Federal District Courts in the Eastern and Western Districts of Michigan. He handles business and class action cases in courts across the country.

CEO and Senior Principal, Mantese Honigman, PC, 1994-present

- Mr. Mantese and his firm focus on complex commercial and business litigation and arbitration on a wide range of business and commercial clients, including breach of contract cases, employment disputes, partnership and shareholder disputes, commercial fraud cases, trade secret and non-compete litigation, real estate litigation, Uniform Commercial Code disputes, business torts, and class actions, in state and federal venues across the country.

- Each year from 2011-2020, Mantese and his team have obtained many million and multi-million-dollar recoveries in the State of Michigan, as reported in the January issue of Michigan Lawyers Weekly for the preceding year.

Adjunct Professor of Law, 1991-1997

- Trial Practice, 1991-1993, University of Detroit Mercy, School of Law
- Pretrial Practice, 1993-1997, Wayne State University Law School (strategies of motion practice, discovery, negotiations, trial preparation and trial)

Associate, then Partner, Honigman Miller Schwartz and Cohn, 1982-1994

- Elected as one of the youngest senior partners in firm history, 1990.
- Handled a wide array of complex business litigation.

REPRESENTATIVE CASES

Frank v. Linkner, 500 Mich. 133 (2017). The Court held that MCL 450.4515 is a statute of limitations, not of repose; oppressed LLC members may be able to sue even before incurring financial harm; members may toll the statute if there is fraudulent concealment of relevant facts.

Madugula v. Taub, 496 Mich. 685 (2014). The Court held oppression action is equitable, empowering the Trial Court with wide latitude to resolve shareholder disputes.

Potter v. Blue Cross, Case No. 10-cv-14981 (USDC EDM I 2014). Co-lead counsel in a nationwide ERISA class action against Blue Cross Blue Shield of Michigan arising from denial of insurance coverage for ABA therapy on the grounds that the therapy is allegedly experimental. The Court granted plaintiffs' Motion for Judgment and held that defendant's denial of coverage for ABA therapy was arbitrary and capricious. (Order dated 3-30-13, Doc. #125). Over \$2 Million recovered.

Minter, et al. v. Dazzo, Case No. 10-cv-15018 (USDC EDM I 2010). Co-lead counsel; obtained a ground-breaking settlement causing the State of Michigan to provide Medicaid coverage for ABA therapy for children with autism.

Churchill v. CIGNA, Case No. 10-6911 (USDC EDPA 2010). Co-lead class action counsel in a nationwide ERISA class action against CIGNA arising from denial of insurance coverage for ABA therapy on the grounds that it was allegedly experimental. The Court confirmed settlement under which insureds received reimbursement for ABA therapy.

Billstein, et al. v. Goodman, et al., Case No. 08-cv-13415 (USDC EDM I 2008). Represented plaintiffs in shareholder oppression matter where the Court denied defendants' Motion for Summary Judgment as to statutes of limitation and repose. Case settled for a very substantial confidential amount on the fifth day of trial. (6-14-11 Order Doc. #454).

Johns v. Blue Cross, Case No. 08-cv-12272 (USDC EDM I 2008). Co-lead class counsel in a nationwide ERISA class action against Blue Cross Blue Shield of Michigan arising from denial of insurance coverage for ABA therapy on the grounds that ABA therapy is allegedly experimental. Settlement required payment for ABA therapy.

Mantese & team also made the following recoveries (reported in Lawyers Weekly):

2022

Confidential Settlement – Mantese recovers \$8.2 Million in a shareholder oppression case.

2021

Confidential Arbitration – Mantese recovers \$35.4 Million in a shareholder dispute case.

Confidential Settlement – Mantese recovers \$40 Million in recovery in cash and real property in a dispute involving a family real estate empire and oppressive conduct.

Class Action Settlement – Mantese recovers \$9.2 Million in a shareholder class action case.

2020

Confidential Settlement – Mantese recovers \$2.4 Million in shareholder dispute case.

Confidential Settlement – Mantese recovers \$1.3 Million in a breach of contract and fiduciary duty claim case.

Confidential Settlement – Mantese recovers \$6 Million in a breach of contract case.

Confidential Settlement – Mantese recovers \$11.25 Million in a shareholder oppression and breach of fiduciary duty case.

Confidential Settlement – Mantese recovers \$11.1 Million in shareholder oppression suit.

2019

In Re Auto Parts Antitrust Litigation – As Liaison Class counsel, Mantese and team recover \$28.54 Million for auto dealers harmed by defendants' price fixing of auto parts. This multi-year case prosecution was one of the largest price-fixing class actions in history and included claims under Section 1 of the Sherman Act.

Confidential Settlement – Mantese recovers \$1 Million in breach of contract case.

2018

Confidential Settlement – Mantese recovers \$97 Million in breach of fiduciary duty and shareholder oppression case.

Confidential Settlement – Mantese recovers \$23 Million in a shareholder oppression and fiduciary duty case.

Confidential Settlement – Mantese recovers \$12.35 Million in shareholder oppression case.

Confidential Settlement – Mantese recovers \$2 Million in oppression, breach of contract case.

In Re Auto Parts Antitrust Litigation – As Liaison Class counsel, Mantese and team recover \$79.2 Million for auto dealers harmed by defendants' price fixing of auto parts.

2017

Confidential Settlement – Mantese recovers \$1.25 Million in a shareholder oppression, breach of fiduciary duty, breach of contract case.

Confidential Settlement – Mantese recovers \$900,000 in shareholder oppression, breach of fiduciary duty, breach of contract case.

Orlowski v. Bates, USDC WDTN – Mantese appointed co-lead counsel and obtains summary judgment for \$25 Million in class action against a seller of precious metals, alleging fraud and breach of contract. Mantese's initiation of suit led to prosecution and conviction of defendant.

2016

Madugula v. Taub, Washtenaw County Circuit Court – Mantese recovers \$1.55 Million in shareholder oppression case.

Confidential Settlement – Mantese recovers \$2.2 Million in breach of contract case.

Confidential Settlement – Mantese recovers \$2.1 Million in shareholder oppression case.

Confidential Settlement – Mantese recovers \$1 Million in breach of fiduciary duty, fraud and shareholder oppression case.

In Re Auto Parts Antitrust Litigation – As Liaison Class counsel, Mantese and team recover \$125 Million for auto dealers harmed by defendants' price fixing of auto parts.

2015

Confidential Settlement – Mantese recovers \$15.2 Million in member oppression under MCL 450.4515, breach of fiduciary duty case.

Confidential Settlement – Mantese recovers \$1.32 Million in breach of contract, breach of fiduciary duty, and tortious interference case.

Confidential Settlement – Mantese recovers \$1.2 Million in shareholder oppression and breach of fiduciary duty case.

Confidential Arbitration – Mantese recovers \$3.125 Million for member oppression.

In Re Auto Parts Antitrust Litigation – As Liaison Class counsel, Mantese and team recover \$58 Million for auto dealers harmed by defendants' price fixing of auto parts.

2013

Confidential Settlement – Mantese recovers \$7.45 Million in breach of contract case.

Confidential Settlement – Mantese recovers \$2.1 Million in shareholder oppression, breach of fiduciary duty, breach of contract case.

Confidential Settlement – Mantese recovers \$2 Million in breach of contract, fraud, fraud in inducement case.

Estes v Clark, Foy v. Bandemer, Wayne County Circuit – As co-lead counsel, Mantese recovers \$7.999 Million in breach of fiduciary duty class action case.

Confidential Settlement – Mantese recovers \$2.455 in a claim under ERISA alleging that plan administrator acted arbitrarily and capriciously.

Minter, et al. v. Dazzo, et al., USDC EDM I – As co-lead counsel, Mantese obtains settlement resulting in excess of \$52 Million in Medicaid benefits for parents of children with ASD; case filed under 42 USC Section 1983 case.

2012

Confidential Settlement – Mantese recovers \$13 Million in shareholder oppression, breach of fiduciary duty, usurpation of corporate opportunities case.

Schwannecke, et al. v. Schwannecke, et al., Saginaw County Circuit Court – Mantese recovers \$4.59 Million in shareholder and member oppression, breach of fiduciary duty, and breach of contract discharge case.

Confidential Settlement – Mantese recovers \$1.2 Million in shareholder oppression, breach of fiduciary duty, breach of contract case.

2011

Abass, et al. v. Shalushi, et al., USDC EDM I – Mantese obtains \$172.2 Million judgment in RICO, fraud, breach of contract case.

Sweeney v. Mucci Food Products, Ltd., et al., Wayne County Circuit Court – Mantese recovers \$2.3 Million in shareholder oppression, breach of fiduciary duty, breach of contract case.

Confidential Settlement – Mantese recovers \$1.435 Million in shareholder dispute over value of law firm.

OTHER SERVICE TO THE STATE BAR AND COMMUNITY

Member of the Access to Justice Committee

- Appointed to Access of Justice Committee, Metro Detroit, to enable those with insufficient funds to access the legal justice system, 2019-present.

Extensive pro bono work for children with Autism Spectrum Disorder

- Devoted hundreds of hours of uncompensated time, 2009-2015, assisting parents across the US with legal strategies for accessing Applied Behavior Analysis therapy for their children with autism spectrum disorder, from available insurance coverage. This therapy is a life-changing behavioral therapy that is critically important for young children with ASD.

Authored Food Waste Bill

- Co-authored food waste bill calling for food producers to donate 10% of their excess food to food pantries and related facilities. Published article advocating same, *The Wave of the Future*, Michigan Lawyers Weekly, May 28, 2018.

Mediator – Case Evaluator

- Appointed in Oakland County Circuit Court, 1994-2020; Wayne County Circuit Court, 1995-2020; and Macomb County Circuit Court, 2005-2020.

Hearing Panelist on State Bar of Michigan's Attorney Discipline Board

- Conducted hearings on a volunteer basis on attorney grievance and professional misconduct complaints, 1997-2015.

Member of Michigan Bar Journal Committee

- Member of committee charged with publishing the State-wide Michigan Bar Journal, 1994-present, reviewing and editing articles.
- Initiator and co-editor of the monthly Best Practices Column.

Legal Advocacy Project for First Step, Western Wayne County Project on Domestic Violence (Pro Bono)

- Director, First Step. Founded and directed “Legal Advocacy Project,” which coordinated dozens of volunteer attorneys who provided free legal advice to low-income women who have experienced domestic violence, 1991-and continuing. The program became a model for shelters in other States.
- Obtained restraining orders, handled divorces, staffed legal question-and-answer clinics for survivor spouses.
- Continue to consult with Executive Director on various issues.

West Publishing Company, Author

- Contributed / authored a chapter on Health Care Law for inclusion in a national treatise, 1996.

Volunteering

- United Community Housing Coalition, providing assistance to Detroit’s low-income residents facing evictions, ongoing.

RECOGNITIONS

AV Martindale-Hubbell Peer Review Rating, 1996-2022

Highest rating for legal ability and ethical standards over the last two decades.

Michigan’s Go To Business Lawyer, 2020

Recognized by Michigan Lawyer’s Weekly.

Gleaners, Largest Donor in the “Under 100 Employees” Category, 2015-2017, 2019

Hunger Free Summer program.

Volunteer Attorney of the Year, United Community Housing Coalition, 2017

Awarded for consistent support of the UCHC/MLS 36th District Court Housing Clinic to prevent evictions and allow tenants to retain their housing and avoid becoming homeless.

Best Lawyers in America and Super Lawyers, multiple years

Repeatedly recognized as one of Top 50 Business Lawyers and Top 100 Lawyers in Michigan.

21st Century Innovator Award, 2009

Recognized by Lawyer's Weekly.

Leader in the Law Award, 2009

Recognized by Lawyer’s Weekly.

Outstanding Young Lawyer of the Year, 1993

Selected by The Young Lawyers Section of the State Bar of Michigan.

40 Under 40, *Crain's Detroit Business*, 1992

Named for community service, including for hundreds of hours volunteering as a housing construction worker and internal news reporter for Habitat for Humanity.

PRESENTATIONS

- Presented to Michigan Business Law Judges on Shareholder and Member Disputes at the Michigan Judicial Institute Business Court Judicial Seminar, May 2018.
- Presented to Business Law Judges on Business Litigation, October 2013.
- Lectured before the new State of Michigan Business Court Judges appointed to the business court docket, 2013.
- Lectured to Cranbrook High School Students on Starting Your Own Business, November 2015.

RECENT PUBLICATIONS

Don't Water Down the Drinks: Anti-Dilution in Limited Liability Companies, The Michigan Business Law Journal, Summer 2025

Succession Planning and Litigation Between Owners, Journal of the Missouri Bar, May-June 2025

Touring the Business Courts, The Michigan Business Law Journal, Summer 2025

Succession Planning and the Approaching Massive Transfer of Wealth, Michigan Bar Journal, July/August 2024

Business Law: The Ripple Effects of Our Work, The Michigan Bar Journal, July/August 2024

Corporate Law Issues from a National Perspective: an Essay on a Director's Duty of Oversight – Caremark and Marchand, The Michigan Business Law Journal, Fall 2023

Shareholder Oppression and the Quest for Fairness, Journal of the Missouri Bar, October 2023

Shareholder Oppression and Business Divorces, Michigan Bar Journal, September 2022

Business Divorces and the Shareholder Primacy Norm, The Litigation Journal, Spring/Summer 2022

The Fiduciary Duty – Et tu, Brute?, Michigan Bar Journal, September 2020

Shareholder Oppression Litigation – A National Perspective, Michigan Business Law Journal, Fall 2020

Commentary: 'I don't have time for pro bono', Michigan Lawyers Weekly, July 2020

The Verdict on the Business Judgment Rule, Journal of the Missouri Bar, March-April 2020

The Business Judgment Rule, Michigan Bar Journal, January 2020

Business Litigation Theme Introduction, Michigan Bar Journal, January 2020

Operating Agreements, Partnership Agreements, and Shareholder Agreements: Business Contracts and Their Consequences, Journal of the Missouri Bar, January-February 2019

Shareholder Agreements, Operating Agreements, and Partnership Agreements, Michigan Bar Journal, September 2018

The Wave of the Future – Reducing Food Waste, Reducing Hunger, Protecting the Environment, Michigan Lawyers Weekly, May 2018

Contractual Terms in Shareholder/Operating Agreements, Stout Risius Ross Journal, April 2018

Recent Trends in New York Partnership Law, NY Business Law Journal, Winter 2017

Litigation Between Shareholders in Closely Held Corporations; Protecting Minority Shareholders From Abuse at the Hands of Majority Owners, Wayne Law Journal of Business, August 2017

A Trip to Detroit's 36th District Court, Michigan Lawyers Weekly, May 8, 2017

Michigan Business Courts and Oppression – A Review of How Michigan Business Courts Have Treated Oppression Issues Since *Madugula v. Taub*, Michigan Bar Journal, January 2017

Navigating the World of Fiduciary Duty Within the Corporate Context, Missouri Bar Journal, September-October 2016

Can't We All Just Get Along? Fiduciary Duties in the Corporate and LLC Context, Michigan Business Law Journal, Spring 2016

Lights, Camera, Action! -- The Power of Video Depositions in Business Litigation, Michigan Bar Journal, February 2016

Michigan Supreme Court Speaks: *Madugula v. Taub* and Shareholder Oppression, Mantese, Toering, Quick, Michigan Bar Journal, November 2014

Shareholder Oppression, Fiduciary Duty, and Partnership Litigation in Closely Held Companies, Stout Risius Ross Journal, November 2014

Fiduciary Duty in Business Litigation, Michigan Bar Journal, August 2014

Trial Practice, Michigan Bar Journal, January 2013

Shareholder and Corporate Oppression Actions, Michigan Bar Journal, February 2012

OTHER PROJECTS OF INTEREST

Author (Non-Legal Topics)

- *Alexandra and the Amazing History Book*, historical fiction for primary grade students, 2009 (amazon.com).

Initiator and Mentor for Cranbrook Schools Book Project

- Mentored 22 eighth graders at Girls Middle School at Cranbrook, on a project about Women Who Changed the World, 2014-2015. Authored book of same name, June 2015 (Sunbury Press). Assisting students in selecting, interviewing and writing chapters on accomplished women, including Supreme Court Justices Maura Corrigan and Bridget McCormack, and Prosecutor Kym Worthy.

Law Day Volunteer Work

- Led 20 grade school and middle school-aged students in learning about the law and creating, acting and filming three separate films, each winning first place in the annual Michigan Law Day Contest, 2012-2014. The films dealt with three Legal Milestones, specifically the trials of *Roosevelt v. Newett*; *Korematsu v. US*; and *US v. Sinclair* (students interviewed US District Court Judge Nancy Edmunds, E.D. Mich., and US Attorney Barbara McQuade, among others, about Fourth Amendment issues).