

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: COMMERCIAL DIVISION

	X
MICHAEL PLUTTE, Individually and on Behalf of All Others Similarly Situated,	: Index No. 655436/2018 The Honorable Jennifer G. Schecter, J.S.C.
Plaintiff,	: PART 54
vs.	: <b>Motion Sequence No. 004</b>
SEA LIMITED, FORREST XIAODONG LI, GANG YE, TONY TIANYU HOU, COLLEEN A. DE VRIES, YUXIN REN, NICHOLAS A. NASH, DAVID HENG CHEN SENG, KHOON HUA KUOK, GOLDMAN SACHS (ASIA) L.L.C., MORGAN STANLEY & CO. INTERNATIONAL PLC, CREDIT SUISSE SECURITIES (USA) L.L.C., CLSA LIMITED, CITIGROUP GLOBAL MARKETS INC., COWEN AND COMPANY, LLC, NOMURA SECURITIES INTERNATIONAL, INC., PIPER JAFFRAY & CO., STIFEL NICOLAUS & COMPANY, INCORPORATED, PT MADIRI SEKURITAS, TUDOR, PICKERING, HOLT & CO. SECURITIES, INC., BDO CAPITAL & INVESTMENT CORPORATION, CATHAY SECURITIES CORPORATION OFFSHORE SECURITIES UNIT, DBS BANK LTD., VIET CAPITAL SECURITIES JSC and COGENCY GLOBAL INC.,	: AFFIRMATION OF ARUN G. RAVINDRAN FILED ON BEHALF OF HEDIN HALL LLP IN SUPPORT OF APPLICATION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES
Defendants.	: X

ARUN G. RAVINDRAN, an attorney duly admitted to practice before the Courts of the State of New York, hereby affirms the following, pursuant to Rule 2106 of the New York Civil Practice Law and Rules, to be true under penalty of perjury:

1. I am an attorney with the firm of Hedin Hall LLP (“Hedin Hall”). I am submitting this declaration in support of Hedin Hall’s application for an award of attorneys’ fees and expenses/charges (“expenses”) in connection with services rendered in the above-entitled action.

2. This firm is counsel of record for plaintiff.

3. The information in this declaration regarding the firm’s time and expenses is taken from time and expense records and supporting documentation prepared and/or maintained by the firm in the ordinary course of business. The partner who oversaw and/or conducted the day-to-day activities in the litigation reviewed these records (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. As a result of this review, reductions were made to both time and expenses in the exercise of billing judgment. As a result of this review and the adjustments made, I believe that the time reflected in the firm’s lodestar calculation and the expenses for which payment is sought as set forth in this declaration are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation.

4. After the reductions referred to above, the number of hours spent on this litigation by my firm is 285.50. A breakdown of the lodestar is provided in Exhibit A. The lodestar amount for attorney time based on the firm’s current rates is \$199,850.00. The hourly rates shown in Exhibit A are the usual and customary rates set by the firm for each individual.

5. Hedin Hall does not seek an award of expenses and charges in connection with the prosecution of the litigation.

6. The identification and background of my firm and its partners is attached hereto as Exhibit B.

Executed this 10th day of February 2021, at Miami, Florida.

*s/Arun G. Ravindran*

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Arun G. Ravindran

**PRINTING SPECIFICATIONS STATEMENT**

1. Pursuant to 22 N.Y.C.R.R. §202.70(g), Rule 17, the undersigned counsel certifies that the foregoing affidavit was prepared on a computer using Microsoft Word. A proportionally spaced typeface was used as follows:

Name of Typeface: Times New Roman  
Point Size: 12  
Line Spacing: Double

2. The total number of words in this affidavit, exclusive of the caption, signature block, and this Certification, is 370 words.

DATED: February 25, 2021

ROBBINS GELLER RUDMAN  
& DOWD LLP  
JOSEPH RUSSELLO

*/s/ Joseph Russello*  
\_\_\_\_\_  
JOSEPH RUSSELLO

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# **EXHIBIT A**

**EXHIBIT A**

*Michael Plutte v. Sea Limited, et al.*, No. 655436/2018

Hedin Hall LLP

Inception through February 9, 2021

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David W. Hall	(P)	280.50	\$700	\$196,350.00
Frank S. Hedin	(P)	5.00	\$700	\$3,500.00
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(P) Partner

# **EXHIBIT B**

# HEDIN HALL LLP

## FIRM RÉSUMÉ

With offices in Miami, Florida and San Francisco, California, Hedin Hall LLP represents consumers and shareholders in data-privacy, financial services, and securities class actions in state and federal courts nationwide.

Our firm prosecutes difficult cases aimed at redressing injuries suffered by large, diverse groups of people. Over the past decade alone, our work has helped secure billions of dollars in relief for consumers and investors and facilitated important changes in business practices across a wide range of industries.

## **Representative Matters**

Notable examples of our work include:

### Consumer & Data-Privacy Matters

- ¥ *Owens, et al. v. Bank of America, N.A., et al.*, No. 19-CV-20614-MGC (S.D. Fla.) (class counsel in overdraft fee class action, non-reversionary \$4.95 million settlement pending final approval)
- ¥ *Liggio v. Apple Federal Credit Union*, No. 18-cv-1059-LO (E.D. Va.) (class counsel in overdraft fee class action, non-reversionary \$2.7 million settlement granted final approval)
- ¥ *Olsen, et al. v. ContextLogic Inc.*, No. 2019CH06737 (Ill. Cir. Ct. Jan. 7, 2020) (class counsel in action alleging violation of Telephone Consumer Protection Act (“TCPA”), non-reversionary \$16 million settlement finally approved)
- ¥ *Kokoszki v. Playboy Enterprises, Inc.*, No. 19-cv-10302-BAF (E.D. Mich.) (class counsel in action alleging violation of Michigan’s Personal Privacy Preservation Act (“PPPA”), non-reversionary \$3.8 million settlement pending final approval)
- ¥ *In re Everi Holdings, Inc. FACTA Litigation*, No. 18CH15419 (Ill. Cir. Ct. Jan. 7, 2020) (class counsel in 14 related actions alleging violations of Fair and Accurate Credit Transactions Act against various casino entities and common payment processor, \$14 million non-reversionary class settlement recently reached)
- ¥ *Chimeno-Buzzi v. Hollister Co.* (S.D. Fla.) (class counsel in action alleging violation of TCPA, non-reversionary \$10 million settlement finally approved)

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- ¥ *Farnham v. Caribou Coffee Co., Inc.* (W.D. Wisc.) (class counsel in action alleging violation of TCPA, non-reversionary \$8.5 million settlement finally approved)
- ¥ *Lin v. Crain Communications, Inc.*, No. 2:19-cv-11889-VAR-APP (E.D. Mich.) (counsel for putative nationwide class in action alleging violation of Michigan’s PPPA against Michigan-based publishing conglomerate)
- ¥ *Norberg v. Shutterfly, Inc.* (N.D. Ill.) (putative class action alleging the collection of individuals’ immutable “scans of face geometry” in violation of Illinois’ Biometric Information Privacy Act (“BIPA”))
- ¥ *Rivera v. Google, Inc.* (N.D. Ill.) (putative class action arising from Google’s alleged collection of individuals’ immutable “scans of face geometry” in violation of BIPA)
- ¥ *In re Facebook Biometric Privacy Litig.* (N.D. Cal.) (first-of-its-kind data privacy class action arising from Facebook’s alleged collection of individuals’ immutable “scans of face geometry” in violation of BIPA)
- ¥ *In re: Volkswagen “Clean Diesel” Marketing, Sales Practices and Products Liability Litig.* (N.D. Cal.) (class action alleging claims in connection with the Volkswagen diesel-cheating scandal, resulting in over \$17 billion recovery)

## Securities Matters

- ¥ *City of Sterling Heights General Employees’ Retirement System v. Prudential Financial, Inc.* (D. N.J.) (\$33 million settlement for class of aggrieved investors)
- ¥ *Louisiana Municipal Police Employees’ Pension Fund v. KPMG, LLP, et al.* (N.D. Ohio) (\$32.6 million settlement for class of aggrieved investors)
- ¥ *Cyan v. Beaver County Employees Retirement Fund*, (U.S. Supreme Court) (contributed to *certiorari*, merits, and *amici* briefing in 9-0 plaintiffs’ victory on issues of first impression pertaining to concurrent jurisdiction and dual sovereignty, the PSLRA and SLUSA, and the Securities Act removal bar)
- ¥ *Wiley v. Envivio, Inc., et al.* (Cal. Sup. Ct., San Mateo Cnty.) (\$8.5 million settlement for class of aggrieved investors)
- ¥ *In re MobileIron Shareholder Litig.* (Cal. Sup. Ct., Santa Clara Cnty.) (\$7.5 million settlement for class of aggrieved investors)
- ¥ *In re Model N Shareholder Litig.* (Cal. Sup. Ct., San Mateo Cnty.) (\$8.55 million settlement for class of aggrieved investors)
- ¥ *Silverman v. Motorola, et al.* (N.D. Ill.) (\$200 million settlement for class of aggrieved investors)

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- ¥ *United Food and Commercial Workers Union Local 880 v. Chesapeake Energy Corp., et al.* (W.D. Okla.) (obtained multiple favorable precedent-setting decisions related to typicality, tracing, adequacy, materiality, and negative causation under the Securities Act of 1933)
- ¥ *Xiang v. Inovalon Holdings, Inc., et al.* (S.D.N.Y.) (obtained favorable precedent-setting decisions related to statute of limitations, falsity, causation, and materiality under the Securities Act of 1933)
- ¥ *Buelow v. Alibaba Group Holding Ltd., et al.* (Cal. Sup. Ct., San Mateo Cnty.) (\$75 million settlement, obtained several favorable precedent-setting decisions related to statute of limitations, the relation-back doctrine, falsity, causation, and materiality under the Securities Act of 1933)
- ¥ *In re Herald, Primeo, and Thema Funds Sec. Litig.* (S.D.N.Y.) (\$62.5 million settlement for victims of Madoff Ponzi scheme)

## Biographies of Principal Attorneys

### Frank S. Hedin

Frank S. Hedin manages the firm's Miami office. He is a member in good standing of the Florida Bar and the State Bar of California. Mr. Hedin received his Bachelor of Arts from University of Michigan and his Juris Doctor, *magna cum laude*, from Syracuse University College of Law. After graduating from law school, he served for fifteen months as law clerk to the Honorable William Q. Hayes, United States District Judge for the Southern District of California. Prior to establishing Hedin Hall LLP, Mr. Hedin was a partner at a litigation boutique in Miami, Florida, where he represented both plaintiffs and defendants in consumer and data-privacy class actions, employment-related collective actions, and patent and trademark litigation, and served as head of the firm's class action practice.

### David W. Hall

David W. Hall manages the firm's San Francisco office. Before founding Hedin Hall LLP, Mr. Hall managed cases for one of the largest plaintiffs' firm in the United States, where he

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pioneered and developed, inter alia, the firm's state court Securities Act and data privacy practices. Earlier in his legal career, he served as judicial law clerk to the Honorable Irma E. Gonzalez, United States District Judge for the Southern District of California. Mr. Hall is a graduate of the University of California, Hastings College of the Law, *cum laude*, and the New England Conservatory of Music. At Hastings College of the Law, he served as Staff Editor of the Hastings Business Law Journal, teaching assistant in the Legal Writing & Research Department, and extern to the Honorable Joyce L. Kennard of the California Supreme Court.

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