

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JEWEL RANKINS and DARREN WONG,
individually and on behalf of all others
similarly situated,

Plaintiffs,

-against-

OLD LYME GOURMET COMPANY
(d/b/a DEEP RIVER SNACKS),

Defendant.

Case No.: 1:20-cv-1756-ENV-TAM

**DECLARATION OF CHARLES D. MOORE IN SUPPORT OF
PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF SETTLEMENT
AND FINAL CERTIFICATION OF SETTLEMENT CLASS**

I, Charles D. Moore, pursuant to 28 U.S.C. §1746 and under penalty of perjury, hereby declare as follows:

1. I am a Partner at Reese LLP, counsel representing Plaintiffs Jewel Rankins and Darren Wong (together, “Plaintiffs”) in this litigation. I am a member in good standing of the bar of the United States District Courts for the Eastern District of New York, Southern District of New York, Western District of New York, Northern District of Illinois, and District of Minnesota, and the state bars of New York and Minnesota. I am one of the Class Counsel¹ in the above-captioned action.

2. I respectfully submit this declaration in support of Plaintiffs’ Unopposed Motion for Final Approval of Class Action Settlement and Final Certification of Settlement Class. Except as otherwise noted, the facts set forth in this declaration are based in part upon my personal knowledge, and I would competently testify to them if called upon to do so.

3. Class Counsel have been responsible for the prosecution of this Action and for the negotiation of the Settlement Agreement. We have vigorously represented the interests of the Settlement Class Members throughout the course of the litigation and settlement negotiations.

4. On April 9, 2020, Plaintiff Jewel Rankins, filed the present lawsuit against Defendants for the misleading Seal. (ECF No. 1.) On August 24, 2020, the court stayed all discovery on damages and class certification. Over the next year, the parties engaged in limited discovery related primarily to Plaintiff Rankins, including motions to compel. On December 7, 2021, Old Lyme filed a motion to dismiss. (ECF No. 34.) On June 9, 2022, Magistrate Merkl issued a Report and Recommendation granting in part, and denying in part the motion. (ECF No.

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Settlement Agreement, which is attached hereto.

39.) On July 14, 2022, Old Lyme filed an Objection to the Report and Recommendation. (ECF No. 42.) On August 15, 2023, the Court adopted the Report and Recommendation. (ECF No. 44.) Following the Court's ruling, on October 3, 2023, discovery was opened in full. Since that time, the Parties have engaged in meaningful and extensive discovery. The *Wong* action was filed on October 12, 2020. On February 4, 2021, Old Lyme moved to dismiss. Following full briefing, on March 22, 2021, the court stayed the action under the first-filed rule. Ever since, the parties have been providing periodic status updates.

5. On March 28, 2024, the Parties conducted a full day mediation with an esteemed mediator - Jill R. Sperber, Esq. of Judicate West ("Mediator Sperber"). During the mediation, the Parties made significant process towards agreement on the material terms, but did not reach a settlement. The Parties then had a second mediation with Mediator Sperber on April 18, 2024, during which Mediator Sperber made a mediator's proposal that both sides accepted. In the following weeks, the Parties worked on drafting the terms of the settlement, eventually culminating in the Settlement Agreement.

6. Plaintiffs' objective in filing the Actions was to compensate Settlement Class Members damaged by the alleged misrepresentations. Through the Actions and the Settlement Agreement, Plaintiffs achieved substantial relief for the Settlement Class. The Settlement establishes a \$4,000,000 common fund to cover the costs of notice and administration, attorney fees and costs, as well as claims for the Settlement Class Members. Per the Settlement, each Settlement Class Member can receive \$5 for the first claim, plus \$0.50 for each additional claim without proof of purchase up to ten (10) additional claims. Additionally, there is no cap on the number of claims a class member can make with proof of purchase. Thus, the Settlement is an outstanding result for Plaintiffs and the members of the Settlement Class.

7. Class Counsel have worked steadfastly to reach a fair, reasonable, and adequate Settlement. Plaintiffs and Class Counsel believe the claims the Settlement resolves are strong and have merit. Plaintiffs and Class Counsel conducted a thorough investigation and evaluation of the claims and defenses prior to filing the Actions and continued to analyze the claims throughout the pendency of the case. Prior to agreeing to the Settlement, Class Counsel conducted extensive discovery, including interrogatories and document requests. Additionally, in the process of investigating and litigating the Actions, Class Counsel conducted significant research on the consumer protection statutes at issue, as well as the overall legal landscape, to determine the likelihood of success and reasonable parameters under which courts have approved settlements in comparable cases. Through this investigation, discovery, and ongoing analysis, Class Counsel obtained an understanding of the strengths and weaknesses of the Actions. They recognize, however, that significant expense and risk are associated with continuing to prosecute the claims through trial and any appeals. Plaintiffs recognize that, as with any litigation, the Actions involve uncertainties as to their outcome.

8. Defendant continues to deny all of Plaintiffs' allegations, has stated that but for the Settlement, it would vigorously oppose class certification. Should this matter proceed, it will vigorously defend itself on the merits. Such litigation could include contested class certification (and possibly decertification) proceedings and appeals, including competing expert testimony and contested *Daubert* motions; further costly nationwide discovery, including multiple depositions, and yet more voluminous document production; costly merits and class expert reports and discovery; and trial. Defendant would likely appeal, if possible, decisions in Plaintiffs' favor. Defendant would challenge Plaintiffs at every litigation step, presenting significant risks of ending the litigation while increasing costs to Plaintiffs and the Settlement Class Members. Further

litigation presents no guarantee for recovery, let alone a recovery greater than the recovery for which the Settlement provides.

9. The relief for which the Settlement Agreement provides is within the range of reasonableness, especially in light of the best possible recovery and in light of all the attendant risks of litigation. The gravamen of the Actions is that Defendant is deceiving consumers by misrepresenting third-party certification of its Products. Furthermore, the cash compensation to which eligible Settlement Class Members will be entitled goes a significant way toward compensating Settlement Class Members for the damages they incurred on account of Defendant's allegedly deceptive representations about the Products. The Settlement Agreement provides that Settlement Class Members shall receive a cash payment of \$5.00 for the first product, and \$0.50 per product for up to 10 products without proof of purchase, and without limit for claims with proof of purchase. Thus Settlement Class Members will receive more than full compensation for the first product and significant compensation for the additional products.

10. While Plaintiffs believe their claims are strong, continuation of this litigation poses significant risks. While continuation of the litigation might not result in an increased benefit to the Settlement Class, it would lead to substantial expenditure by both Parties. In negotiating and evaluating the Settlement, Plaintiffs and Class Counsel have taken these costs and uncertainties into account, as well as the delays inherent in complex class action litigation. Taking into account the risks and benefits Plaintiffs have outlined above, the Settlement falls within the "range of reasonableness." Class Counsel have achieved the best possible recovery considering the merits of the Settlement weighed against the cost and risks of further litigation. Class Counsel believe this Settlement provides significant relief to the Settlement Class Members and is fair, reasonable, adequate, and in the best interests of the Settlement Class.

11. Class Counsel are qualified, experienced, and able to conduct the litigation. Class Counsel have substantial experience litigating class actions and negotiating class settlements. Class Counsel are not representing clients with interests at odds with the interests of the Settlement Class Members and are not acting as class representatives. Further, they have invested considerable time and resources into the prosecution of the Action. They have qualified as lead counsel in other class actions and have a proven track record of successful prosecution of significant class actions. Attached hereto as **Exhibit 1** is a true and correct copy of the firm resume of Reese LLP and attached hereto as **Exhibit 2** is a true and correct copy of the firm resume of Sheehan & Associates, P.C.

12. Under the Settlement Agreement and Preliminary Approval Order, the Settlement Website contained the Long Form Notice in a downloadable PDF format; answers to frequently asked questions; a Contact Information page that includes the address for the Claim Administrator and addresses and telephone numbers for Class Counsel and Defendant's Counsel; the Agreement; the signed order of Preliminary Approval; a downloadable and online version of the Claim Form; a downloadable and online version of the form by which Settlement Class Members may exclude themselves from the Settlement; and the motion for Final Approval and Plaintiffs' application(s) for Attorneys' Fees and Costs and Service Award, and (when available) any Order on Final Approval. The Settlement Website also included procedural information regarding the status of the Court approval process, such as announcements of the Fairness Hearing date, if and when the Final Order and Judgment may be entered, and when the Final Settlement Date has been reached.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 1, 2025 in Hennepin County, Minnesota.

/s/Charles D. Moore
Charles D. Moore

EXHIBIT 1

REESE LLP

Reese LLP represents consumers in a wide array of class action litigation throughout the nation. The attorneys of Reese LLP are skilled litigators with years of experience in federal and state courts. Reese LLP is based in New York, New York with offices also in California and Minnesota.

Recent and current cases litigated by the attorneys of Reese LLP on behalf of consumers include the following:

In re Fairlife Milk Products Marketing and Sales Practices Litig., case no. 1:19-cv-03924 (N.D. Illinois)(case involving milk products allegedly mislabeled); *In re Hill's Pet Nutrition, Inc. Dog Food Products Liability Litig.*, case no. 19-md-2887-JAR-TT (D. Kansas)(case involving contaminated pet food); *Hasemann v. Gerber Products Co.*, case no. 15-cv-02995-MKB-RER (E.D.N.Y.)(case involving misrepresentation of health benefits of baby formula in violation of New York consumer protection laws); *Worth v. CVS Pharmacy, Inc.*, case no. 16-cv-00498 (E.D.N.Y.)(class action for alleged misrepresentations regarding health benefits of dietary supplement); *Roper v. Big Heart Pet Brands, Inc.*, case no. 19-cv-00406-DAD (E.D. Cal.)(class action regarding pet food); *Ackerman v. The Coca-Cola Co.*, 09-CV-0395 (JG) (RML) (E.D.N.Y.)(class action for violation of California and New York's consumer protection laws pertaining to health beverages); *Rapaport-Hecht v. Seventh Generation, Inc.*, 14-cv-9087-KMK (S.D.N.Y.)(class action for violation of California and New York's consumer protection laws pertaining to personal care products); *Berkson v. GoGo, LLC*, 14-cv-1199-JWB-LW (E.D.N.Y.)(class action regarding improper automatic renewal clauses); *Chin v. RCN Corporation*, 08-cv-7349 RJS (S.D.N.Y.)(class action for violation of Virginia's consumer protection law by I.S.P. throttling consumers' use of internet); *Bodoin v. Impeccable L.L.C.*, Index No. 601801/08 (N.Y. Sup. Ct.)(individual action for conspiracy and fraud); *Huyer v. Wells Fargo & Co.*, 08-CV-507 (S.D. Iowa)(class action for violation of the RICO Act pertaining to mortgage related fees); *Murphy v. DirecTV, Inc.*, 07-CV-06545 FMC (C.D. Cal.)(class action for violation of California's consumer protection laws); *Bain v. Silver Point Capital Partnership LLP*, Index No. 114284/06 (N.Y. Sup. Ct.)(individual action for breach of contract and fraud); *Siemers v. Wells Fargo & Co.*, C-05-4518 WHA (N.D. Cal.)(class action for violation of § 10(b) of the Securities Exchange Act of 1934 pertaining to improper mutual fund fees); *Dover Capital Ltd. v. Galvex Estonia OU*, Index No. 113485/06 (N.Y. Sup. Ct.)(individual action for breach of contract involving an Eastern European steel company); *All-Star Carts and Vehicles Inc. v. BFI Canada Income Fund*, 08-CV-1816 LDW (E.D.N.Y.)(class action for violation of the Sherman Antitrust Act pertaining to waste hauling services for small businesses on Long Island); *Petlack v. S.C. Johnson & Son, Inc.*, 08-CV-00820 CNC (E.D. Wisconsin)(class action for violation of Wisconsin consumer protection law pertaining to environmental benefits of household cleaning products); *Wong v. Alacer Corp.*, (San Francisco Superior Court)(class action for violation of California's consumer protection laws pertaining to deceptive representations regarding health benefits of dietary supplement's ability to improve immune system); *Howerton v. Cargill, Inc.* (D. Hawaii)(class action for violation of various consumer protection laws regarding sugar substitute); *Yoo v. Wendy's International, Inc.*, 07-CV-04515 FMC (C.D. Cal.)(class action for violation of California's consumer protection laws pertaining to adverse health effects of partially hydrogenated oils in popular food products).

The Attorneys of Reese LLP

Michael R. Reese

Mr. Reese is the founding partner of Reese LLP where he litigates consumer protection class actions. Prior to entering private practice, Mr. Reese served as an assistant district attorney at the Manhattan District Attorney's Office where he served as a trial attorney prosecuting violent and white-collar crime.

Victories by Mr. Reese and his firm include a \$21 million class settlement in *In re Fairlife Milk Products Marketing and Sales Practices Litig.*, case no. 1:19-cv-03924-RMD (N.D. Illinois); a \$12.5 million dollar class settlement in *In re Hill's Pet Nutrition, Inc. Dog Food Products Liability Litig.*, case no. 19-md-2887-JAR-TT (D. Kansas) for pet owners who bought contaminated pet food; a \$6.1 million class action settlement in *Howerton v. Cargill, Inc.* (D. Hawaii) for consumers of Truvia branded sweetener; a \$6.4 million class action settlement in the matter of *Wong v. Alacer Corp.* (S.F. Superior Court) for consumers of Emergen-C branded dietary supplement; and, a \$25 million dollar settlement for mortgagees in *Huyer v. Wells Fargo & Co.* (S.D. Iowa).

Mr. Reese and his firm are frequently appointed as co-lead counsel in multi-district litigations, including, but not limited to *In re Fairlife Milk Products Marketing and Sales Practices Litig.*; case no. 1:19-cv-03924-RMD (N.D. Illinois); *In re Hill's Pet Nutrition, Inc. Dog Food Products Liability Litig.*, case no. 19-md-2887-JAR-TT (D. Kansas); *In re Vitaminwater Sales and Marketing Practices Litig.*, case no. 11-md-2215-DLI-RML (E.D.N.Y.); and, *In re Frito-Lay N.A. "All-Natural" Sales & Marketing Litig.*, case no. 12-md-02413-RRM-RLM (E.D.N.Y.).

Mr. Reese is a frequent lecturer and author on issues of class actions. Mr. Reese co-hosts an annual two day conference with Professor Michael Roberts of UCLA that includes panels on class action litigation; presents on class action litigation at the annual conference of the Consumer Brands Association; and, presents regularly at the Union Internationale des Advocats Annual Congress.

Recent articles on class actions appear in publications by the American Bar Association; the Union Internationale des Advocats; and the Illinois State Bar Association.

Mr. Reese is also an executive committee member of the Plaintiffs' Class Action Roundtable, where he lectures on an annual basis on issues related to class actions.

Mr. Reese is a member of the state bars of New York and California as well as numerous federal district and appellate courts. Mr. Reese received his juris doctorate from the University of Virginia in 1996 and his bachelor's degree from New College in 1993.

Sue J. Nam

Ms. Nam is based in New York where she focuses on consumer class actions. Ms. Nam also runs the appellate practice at the firm and has represented clients before the Second and Ninth Circuits, as well as The Court of Appeals in New York. Ms. Nam also specialized in copyright law and represents photographers and other visual artists who have had their copyright protected works infringed.

Prior to joining the firm, Ms. Nam was the General Counsel for NexCen Brands, Inc., a publicly traded company that owned a portfolio of consumer brands in food, fashion and homeware.

Previously, Ms. Nam was Intellectual Property Counsel and Assistant Corporate Secretary at Prudential Financial, Inc., and she was an associate specializing in intellectual property and litigation at the law firms of Brobeck Phleger & Harrison LLP in San Francisco, California and Gibson Dunn & Crutcher LLP in New York, New York.

Ms. Nam clerked for the Second Circuit prior to joining private practice.

Ms. Nam received her juris doctorate from Yale Law School in 1994. She received a bachelor's degree with distinction from Northwestern University in 1991.

Carlos F. Ramirez

Mr. Ramirez is an accomplished trial attorney based in New York, where he focuses his practice on the litigation of consumer class actions. Prior to entering private practice in 2001, Mr. Ramirez served as an Assistant District Attorney at the Manhattan District Attorney's Office where he served as a trial attorney prosecuting both violent and white-collar crimes.

Previous and current consumer fraud class actions litigated by Mr. Ramirez include *Hasemann v. Gerber Products Co.*, case no. 15-cv-02995-MKB-RER (E.D.N.Y.)(case involving misrepresentation of health benefits of baby formula in violation of New York consumer protection laws); *Coe v. General Mills, Inc.*, No. 15-cv-5112-TEH (N.D. Cal.) (involving false advertisement claims relating to the Cheerios Protein breakfast cereal); *In re Santa Fe Natural Tobacco Company Marketing & Sales Practices Litigation*, 16-md-2695-JB/LF (D.N.M.)(involving the deceptive marketing of cigarettes as "natural" and "additive free"); and, *Lamar v. The Coca-Cola Company, et al.*, No. 17-CA-4801 (D.C. Superior Ct.) (involving the deceptive marketing of sugar drinks as safe for health).

Mr. Ramirez is a member of the state bars of New York and New Jersey. He is also a member of the bars of the U.S. District Courts for the Eastern District of New York and Southern District of New York. Mr. Ramirez received his juris doctorate from the Fordham University School of Law in 1997 and his bachelor's degree from CUNY-Joh Jay College in 1994.

George V. Granade II

Mr. Granade is a partner at Reese LLP based in Los Angeles, California, where he focuses on consumer class actions. Cases Mr. Granade has worked on include: *Barron v. Snyder's-Lance, Inc.*, No. 0:13-cv-62496-JAL (S.D. Fla.); *In re: Frito-Lay North America, Inc. "All Natural" Litigation*, No. 1:12-md-02413-RRM-RLM (E.D.N.Y.) (involving "SunChips," "Tostitos," and "Bean Dip" products labeled as "natural" and allegedly containing genetically-modified organisms); and *Martin v. Cargill, Inc.*, No. 0:13-cv-02563-RHK-JJG (D. Minn.) (involving "Truvia" sweetener product labeled as "natural" and allegedly containing highly processed ingredients).

Mr. Granade received his juris doctorate from New York University School of Law in 2011. He received a master's degree from the University of Georgia at Athens in 2005 with distinction and a bachelor's degree from the University of Georgia at Athens in 2003, *magna cum laude* and with High Honors.

Mr. Granade is a member of the state bars of Georgia, New York, and California. He is also a member of the bar of the U.S. Courts of Appeals for the Second Circuit and Ninth Circuit, as well as the bars of the U.S. District Courts for the Eastern District of New York, Southern District of New York, Western District of New York, Northern District of New York, Southern District of Illinois, Northern District of Illinois, Northern District of California, Southern District of California, Central District of California, and Eastern District of California.

Charles D. Moore

Mr. Moore is based in Minneapolis, Minnesota where he focuses on both consumer as well as employment class actions.

Mr. Moore has worked on a number of high profile class actions at Reese LLP as well as his prior firm where he worked as co-counsel with Reese LLP on numerous matters. His notable cases include: *Salerno v. Kirk's Natural LLC*, No. 1:21-cv-04987-BMC (E.D.N.Y.) (involving the deceptive claims for the country of origin of the products) *Marino v. Coach, Inc.*, Case No. 1:16-cv-01122-VEC (OTW) (Lead) (S.D.N.Y.) (involving deceptive reference pricing in the sale of outlet merchandise); *Raporport-Hecht v. Seventh Generation, Inc.*, Case No. 7:14-cv-09087-KMK (S.D.N.Y.) (involving the deceptive advertising of household products as “natural”); *Gay v. Tom's of Maine, Inc.*, Case No. 0:14-cv-60604-KMM (S.D. Fla.) (involving deceptive advertising of personal care products as “natural”); *Frohberg v. Cumberland Packing Corp.*, Case No. 1:14-cv-00748-KAM-RLM (E.D.N.Y.) (involving deceptive advertising of food products as “natural”); *Baharenstan v. Venus Laboratories, Inc. d/b/a Earth Friendly Products, Inc.*, Case No. 3:15-cv-03578-EDL (N.D. Cal.) (involving deceptive advertising of household products as “natural”); *Sienkaniec v. Uber Technologies, Inc.*, Case No. 17-cv-04489-PJS-FLN (D. Minn.) (involving the misclassification of Uber drivers as independent contractors); *Dang v. Samsung Electronics Co.*, 673 F. App'x 779 (9th Cir. 2017) (*cert denied* 138 S. Ct. 203) (rejecting shrink-wrap terms in California for purposes of arbitration).

Mr. Moore is a member of the state bar of Minnesota and New York. He is also a member of the bar of the U.S. District Court for the District of Minnesota, the Southern, Eastern, and Western Districts of New York, and the Northern District of Illinois. Mr. Moore received his juris doctorate from Hamline University School of Law in 2013, and his bachelor's degree from the University of North Dakota in 2007.

EXHIBIT 2

Sheehan and Associates P.C. Firm Resume

Attorneys

Spencer Sheehan

Spencer's practice focuses on representation of consumers in a range of false advertising litigation. After Mr. Sheehan became an attorney in late 2011, he worked on behalf of municipalities and local government agencies in legal disputes. Following this experience, Mr. Sheehan worked for a plaintiff's law firm representing individuals subjected to violations of state and federal laws related to minimum wage, workplace safety and discrimination.

Notable actions include *Liberski, et al v. Rhapsody International Inc.*, San Francisco County, California Superior Court, Case No. No. CGC-12- 517061. In 2014, the parties reached a class wide settlement and Mr. Sheehan was appointed co-lead counsel ("Rhapsody Subscriber Litigation Settlement").

In December 2016, he began focusing exclusively on consumer advertising issues. For instance, he was one of the first attorney to address "raw" juice products which were alleged to be treated with a non-thermal technology which had substantially the same effects as traditional thermal pasteurization. See *Alamilla v. Hain Celestial* (N.D. Cal., 2013) and *Campbell v. Freshbev LLC*, 322 F. Supp. 3d 330, 342 (E.D.N.Y. 2018) These cases attempted to apply the applicable law to the effects of novel technologies which were not considered at the time the FDA enacted regulations in this area.

He was appointed lead counsel with the law firms of Reese LLP and Aegis Law Firm, P.C., in *Cicciarella v. Califia Farms, LLC*, 7:19-cv-08785, S.D.N.Y., in summer 2020. The Court approved a nationwide settlement which resolved the underlying federal action and a California state case. It was alleged that defendant mislabeled its non-dairy milk alternative products with respect to flavoring and the presence of carrageenan.

He was appointed co-lead counsel with Reese LLP in *Vizcarra v. Unilever United States, Inc.* 4:20-cv-02777, N.D. Cal., in February 2023. The Court certified a class of purchasers of Breyer's Natural Vanilla Ice Cream where it was alleged the ice cream's vanilla flavor was from non-vanilla plant sources.

He was appointed co-lead counsel with Reese LLP in *Sharpe et al. v. A & W Concentrate Co. et al.*, 1:19-cv-00768, E.D.N.Y., in summer 2021. The Court certified a class of purchasers of A & W Root Beer and Cream Soda marketed as "Made With Aged Vanilla," where it was alleged the amount of vanilla was de minimis or non-existent and that any vanilla flavoring was provided by the synthetic ingredient of ethyl vanillin. In June 2023, that court granted preliminary approval of a settlement of \$15 million.

He played a significant role in *Marek et al. v. Molson Coors Beverage Company et al*, 3:21-cv-07174, N.D. Cal., in February 2023, where Gutride Safier LLP was appointed as lead counsel. That court certified a class of purchasers of Vizzy hard seltzer promoted as containing antioxidants including vitamin C, where it was alleged this labeling and marketing was misleading to consumers and unlawful. The court granted preliminary approval of a settlement

of \$9.5 million. Mr. Sheehan filed *Williams v. Molson Coors Beverage Company*, 3:21-cv-50207, N.D. Ill., prior to *Marek*, and *Eyzaguirre v. Molson Coors Beverage Company USA*, 0:22-cv-60889, S.D. Fl., with the Law Office of Will Wright. The *Williams* and *Eyzaguirre* actions were essentially consolidated with *Marek* following stipulations of dismissals and their subsequent joinder in *Marek*.

He was appointed to the executive committee along with the law firm Held & Hines LLP, in *Chung v. Illuminate Education, Inc.*, 8:22-cv-01547, C.D. Cal. in September 2022. That defendant is alleged to have negligently failed to safeguard the confidential information of millions of students. The litigation is ongoing.

Spencer's work has been the subject of several written profiles in national and local publications.

Spencer's pro bono work has included representing people with exotic or non-traditional animal companions. This includes representing a Floridian who came to possess an alligator over six feet in length, alleged to be in violation of Florida's wildlife laws. Mr. Sheehan's efforts contributed to resolution of that issue and allowed the woman and gator to remain together. *See* John Breslin, [Lakeland woman keeps alligator, thanks to efforts of lawyer tied to subway shooter's squirrel eviction case](#), Florida Record, January 4, 2017. He is a vegetarian, who volunteers locally in the rescue of animals, including but not limited to cats, even though he does not have any pets.

He has a Bachelor of Science Degree from Georgetown University in Foreign Service (2002) and a Master's Degree in International Relations from the School of Advanced International Studies (SAIS), Johns Hopkins University (2006). He obtained a Juris Doctorate from Fordham University School of Law (2010). He was a member of the United States Marine Corps as a Reservist.

Angele Aaron

Angele is an attorney with Sheehan and Associates, P.C. She has experience in real estate, civil litigation, and employment law. She has handled residential and commercial real estate closings. Angele graduated from the University of Westminster with a Bachelor of Law Degree and received a Master of Law Degree from the University College of London in International Law.

Lauren Cahn

Lauren is an attorney with Sheehan and Associates, P.C. Lauren has been associated with law firms in New York City and the Office of the General Counsel at New York Life Insurance Company. Lauren worked as a journalist and has written about numerous legal topics. After receiving a Bachelor of Arts from Tufts University, she obtained a Juris Doctorate from New York University School of Law.

Mitchell Domovsky

Mitchell is an attorney with Sheehan and Associates, P.C. He has a background in matters of criminal justice, evidence, and discovery. Mitchell graduated from Hunter College with a Bachelor of Arts and received a Juris Doctorate from Brooklyn Law School.

Kinga Fenikowska

Kinga is an attorney with Sheehan and Associates, P.C. She has a background in trademark, copyright, media, and space law, as well as experience in assisting homeowners facing mortgage foreclosure issues. Kinga is a member of the New York State Bar, New York City Bar, and Nassau County Bar. She graduated from the University of California, Berkeley with a Bachelor of Arts and received a Juris Doctorate from Penn State Law, University Park.

Theodore Hillebrand

Theodore is an attorney with Sheehan and Associates, P.C., with a background in financial litigation and personal injury. Theodore has worked on numerous actions including arbitration. Theodore graduated from Queens College with a Bachelor of Arts and received a Juris Doctorate from Hofstra University.

Katherine Lalor

Katherine is an attorney with Sheehan and Associates, P.C., who has had years of experience in foreclosure, trust and estates, and no-fault insurance law. Katherine has had a few publications in law journals during her time assisting homeowners facing foreclosure and has since then been focusing on assisting consumers facing misleading advertising. Katherine graduated from St. John's University with a Bachelor of Science and received a Juris Doctorate from Touro Law Center.

Andrew Xiong

Andrew is an attorney with Sheehan and Associates, P.C., who recently graduated from the University of Virginia School of Law. Andrew recently passed the New York Bar Exam but is not admitted yet in New York State. Andrew graduated from Northwestern University with a Bachelor's Degree.