EXHIBIT A TO KALFAYAN DECLARATION

ATTORNEY BIOS:

RALPH B. KALFAYAN

Ralph B. Kalfayan received a Bachelor of Science degree in Accounting from the University of San Diego in 1982. He was a member of the honors fraternity Beta Alpha Psi and graduated with honors. He received his Juris Doctor degree in 1985, and his Master of Laws degree with an emphasis in intellectual property in 2012 from the University of San Diego School of Law.

Upon graduation, Mr. Kalfayan was employed by the international firm of Arthur Andersen & Co. Mr. Kalfayan worked in the tax department, providing tax consulting and tax compliance services, and in the audit department, reviewing financial statements and helping issue audit opinions.

In 1988, Mr. Kalfayan joined the law firm of Borton, Petrini & Conron and became a partner in 1991. Mr. Kalfayan specialized in business litigation and transactional matters including real estate transactions, general commercial transactions, corporate work, partnership, contract disputes, large acquisitions, tax litigation and consulting work. Mr. Kalfayan also handled a number of civil trials before a jury and several major appeals.

In August 1993, Mr. Kalfayan became Of Counsel at the Law Offices of James C. Krause, and in January 1994, he became a member of Krause & Kalfayan. Eric Benink and Vincent Slavens later joined the firm and the firm became known as Krause Kalfayan Benink & Slavens. In June 2019, Krause Kalfayan Benink & Slavens dissolved and Mr. Kalfayan went on to create his own firm, The Kalfayan Law Firm, APC.

Publications:

- Ensuring Access to Affordable Medication: The Supreme Court's Opinion in F.T.C. v. Actavis, Inc. (Summer 2013) in Competition: The Journal of the Antitrust and Unfair Competition Law Section of the State Bar of California Vol. 22, No. 2
- Buying a Business (April 15, 1993) in Business and Industry News Vol. 3, No. 2
- Building a Business: Tools for the Entrepreneur (August 1, 1993) In Business & Industry News Vol. 3, Number 9
- Reducing your Property Taxes in the San Diego Business and tax forecast magazine, December 1991

Seminars conducted by Mr. Kalfayan:

- California Sales & Use Tax, Lorman Education Services, December 5, 1991
- Business and Finance Conference at Jack Murphy Stadium, December 5, 1990
- Estate Planning with Prudential Bache, Spring of 1990.

IAN KRUPAR

Ian Krupar received his Juris Doctor degree from the University of San Diego School of Law in 2013 with a concentration in Business and Corporate Law. In 2010, Mr. Krupar graduated from Tufts University with a major in Quantitative Economics and a minor in Political Science. He was admitted to the California State Bar in 2023.

While in law school, Mr. Krupar edited several chapters of textbooks and legal articles for various professors. Additionally, he worked for the Arizona Attorney General's office in the Tax and Bankruptcy section clearing a backlog of Chapter 13 cases as well as drafting memos to guide policy and litigation decision.

In 2020, Mr. Krupar co-founded a political fundraising platform called PolitiPledge, later renamed WeRepresent, gaining experience in technology platform development and political fundraising.

Mr. Krupar joined The Kalfayan Law Firm, APC as a clerk in 2013 and then later as an associate attorney in 2023. His practice focuses on class actions, antitrust, personal injury, and business and commercial litigation.

RESULTS

Antitrust:

- *In re Dynamic Random Access Memory (DRAM),* Master File No. M-02-1486-PJH, MDL No. 1486, United States District Court Northern District of California, Oakland Division, an indirect purchaser case under the antitrust laws, settled for over $300 million. Mr. Kalfayan defended all the consumer plaintiffs' depositions throughout the country among other discovery matters.

- *In re Cipro I and II*, JCCP 4154 and 4220, San Diego County Superior Court, the case was successfully argued before the California Supreme Court, resulting in a published opinion setting the standard for pay-for-delay cases under the Cartwright Act for the State of California. Ultimately, the case resolved for over $400 million globally with all defendants. Mr. Kalfayan served as liaison counsel for the consumer class.

- *In re Korean Airlines Co. Ltd Antitrust Litigation,* Master File No. CV 07-05107, MDL No. 1891, United States District Court Central District of California, Western Division, which was a direct purchaser case under the antitrust laws, settled for over $85 million.

- *In re Allergan*, Civil Case Number 15-307, United States District Court, Central District of California, Southern Division, settled for over $13.4 million for a class of purchasers of Botox Cosmetic directly from Allergan, Inc. who claimed Allergan, Inc. violated federal antitrust law and California antitrust and unfair competition law.

- *In re Wholesale Electricity Cases I and II*, JCCP 4204, San Diego County Superior Court, an indirect purchaser case under the antitrust laws, settled in an amount in excess of $200 million.

- *In re Natural Gas Anti-Trust Cases I, II, III, IV & V*, San Diego Superior Court, JCCP Nos. 4221, 4224, 4226, 4228, resulted in settlements of $159 million for plaintiffs.

- *Dang v National Football League Indirect Purchaser Antitrust litigation*, Case No. 5:12-cv-5481-EJD, United States District Court Northern District of California.

- *Stewart v GOGO, Inc. Antitrust Litigation*, Case No. 3:12-cv-5164-EMC, US District Court Northern District of California, settled in the amount of $500,000.

- *In re University of Southern California Tuition and Fees COVID-19 Refund Litigation,* Case No. CV 20-4066- DMG (PVCx), US District Court Central District of California, a class action resulting in a $10 million settlement for plaintiffs.

- *In re Antelope Valley Groundwater Litigation*, JCCP 4408, Los Angeles County Superior Court Case Number BC 391869. The Kalfayan Law Firm, APC represents a class of over 18,000 landowners who have lost their constitutional right to use the natural water that exists below the very land they own in the largest groundwater adjudication in the State of California with water rights valued at over one billion dollars.

- *Lopez v. Luquin, et al*., Case No. 37-2017-00022184-CU-NP-CTL, a business ownership dispute in which we represented defendants, resulted in a successful defense verdict after an eight-day bench trial before the Honorable Jeffrey B. Barton in San Diego County Superior Court.

- *Emma R. Carbonell, MD, et al. v. Kern Medical Services, Inc., et al.*, a business dispute, successfully resulted in a jury verdict in the amount of $1,504,594.30.

- *Gordon Giles v. Weiss Family Trust, et al.*, a wrongful death case, settled in the amount of $1 million.

- *Sylvia Ortega v. La Estrella Night Club, et al*., a personal injury matter, settled in the amount of $625,000.

- *Doe v. Roes* settled in the amount of $4.5 million.