

**Exhibit “B”**

**THE FIRM**

Caroselli Beachler McTiernan & Conboy is a law firm headquartered in Pittsburgh, Pennsylvania with offices in Philadelphia, Pennsylvania. The firm was established in 1972 as McArdle, Caroselli, Laffey & Beachler. For over thirty-two (32) years, the firm has been led by founding partners, Bill Caroselli and Edwin Beachler. In 2008, the firm opened its Philadelphia office, led by partner David S. Senoff. The firm's concentration has been the representation of plaintiffs in all forms of class actions, personal injury matters, insurance bad faith claims, and complex litigation in state and federal courts. The firm currently includes eighteen (18) full-time attorneys, one (1) of counsel, eight (8) paralegals and a fully staffed and experienced support staff.

Among the types of complex litigation the firm has handled in the past, Caroselli Beachler McTiernan & Conboy is widely known and recognized as one of the two premier law firms prosecuting complex asbestos litigation matters in Western Pennsylvania. The firm has represented thousands of individuals and families in claims on their behalf against the manufacturers of asbestos products. The firm litigated at both the trial and appellate level some of the earliest actions regarding asbestos litigation in the country.

Cases tried, argued or brought to a successful conclusion have included insurance bad faith claims, toxic injuries, including asbestos-related cancers and

mesothelioma, silicosis claims, complex product liability claims, drug related injuries, claims for third party payors against pharmaceutical companies, complex commercial litigation, complex municipal claims, medical malpractice claims and unique workers' compensation claims.

Recently, the firm has served as liaison counsel in the United States District Court for the Western District of Pennsylvania case styled *Hall, et al. v. Babcock & Wilcox, et al.*, No. 94-951, a complex case involving personal injury and property damage to improper handling of radioactive materials. While this case has recently resolved, a trial of several representative plaintiffs resulted in what is believed to be the largest personal injury verdict in the United States District Court for the Western District of Pennsylvania.

The firm filed the Luzerne County, Pennsylvania Juvenile Litigation, a consolidated group of four class-action and non-class action cases filed by juveniles in Luzerne County, Pennsylvania who were wrongfully adjudicated and detained in violation of their federal civil rights and the United States Constitution. That consolidated matter is styled, *B.W., a minor v. Powell, et al.*, U.S.D.C. M.D. Pa. No. 09-CV-0286. Two of the firm's partners, Mr. Caroselli and Mr. Senoff, serve on the coordinated Plaintiffs' Counsel Executive Committee in that matter.

The firm has been rated as an AV firm, the highest possible rating by its peers and opponents, in Martindale-Hubbell.

**ATTORNEYS ON THIS CASE**

**William R. Caroselli**

William R. Caroselli received his A.B. degree from Brown University in 1963 and his J.D. from Dickinson School of Law in 1966. Mr. Caroselli was admitted to the Bar in 1966. He is currently admitted to the Bars of Pennsylvania, United States District Court, Western and Middle Districts of Pennsylvania, U.S. Court of Appeals for the Third Circuit, District of Columbia Circuit and U.S. Court of Military Review. He has devoted his career to the representation of individuals and/or their families in all forms of complex personal injury matters. Since 1972, along with co-founding member Edwin Beachler, he has headed his own law firm, which has grown from four (4) attorneys to a staff of fifteen (15) full-time attorneys and two (2) of counsel attorneys.

Prior to starting his own firm, Mr. Caroselli served as co-counsel in what is believed to be the first case of a tobacco user suing the tobacco manufacturers for his injuries as a result of cigarette use in the case of Pritchard v. Liggett and Myers.

During his distinguished career, Mr. Caroselli has served on numerous committees in leadership positions in local and state-wide Bar organizations, including terms as the President of the Pennsylvania Trial Lawyers Association, President of the Western Pennsylvania Trial Lawyers Association, Member of the Executive Committee of the Association of Trial Lawyers of America, Chairperson

of the Allegheny County Judicial Committee and Chairperson of the Disciplinary Board of Pennsylvania.

Mr. Caroselli has been inducted as a member of the International Academy of Trial Lawyers as well as the Academy of Trial Lawyers of Allegheny County. He has been recognized since 1987 as one of the "Best Lawyers in America" in the Woodward/White, Inc. publication. In 2004 and again in 2005, Mr. Caroselli was selected as a state-wide top 100 SuperLawyer and Pittsburgh top 50 SuperLawyer in the *Law & Politics* publication, *Pennsylvania SuperLawyers*.

Mr. Caroselli frequently serves as a panelist in Continuing Legal Education seminars presented by both the Pennsylvania Bar Institute and the Pennsylvania Trial Lawyers Association.

Mr. Caroselli has also been an active member of several non-profit organization Boards, including Easter Seals of Western Pennsylvania, Pittsburgh Opera, St. Edmund's Academy, and Winchester Thurston School.

**David S. Senoff**

David S. Senoff is a partner and the Managing Attorney of the Philadelphia office of Caroselli Beachler McTiernan & Conboy. Mr. Senoff is a 1989 graduate of the Temple University and a 1992 graduate of the Temple University School of Law. During his time at the Temple University School of Law, Mr. Senoff was the co-founder and Executive Editor of the Temple Political and Civil Rights Law

Review. He was also privileged to serve as a judicial intern for the Honorable Herbert Hutton of the United States District Court for the Eastern District of Pennsylvania.

Since graduating from Temple University School of Law, Mr. Senoff's practice has focused on insurance/HMO bad faith litigation, class action litigation involving medical provider reimbursement for services and other insurance company disputes, insurance coverage disputes, and complex personal injury litigation including medical malpractice actions.

After graduating from Temple University School of Law, Mr. Senoff was associated with the law firm of Billet & Connor, P.C. While associated with Billet & Connor, Mr. Senoff participated in all pre-trial phases of complex, insurance coverage disputes, personal injury actions and employment litigation. His experience included legal and factual research, drafting complaints and answers, motions to dismiss, oppositions to motions to dismiss, conducting all phases of pre-trial discovery, and settlement negotiations. Mr. Senoff, along with William M. Connor, Esquire was lead counsel in several notable cases, including *Eidmann v. Merit Systems Protection Board*, 976 F.2d 1400 (Fed. Cir. 1992); *Britamco Underwriters, Inc. v. Stokes*, 881 F. Supp. 196 (E.D. Pa. 1995); and *River Thames Insurance Company v. 5329 West, Inc.*, 1995 WL 241490 (E.D. Pa. 1995).

After leaving the Billet & Connor firm in November, 1997, Mr. Senoff was a principal in his own firm wherein his practice focused exclusively on insurance/HMO bad faith and complex personal injury matters. His experience included working closely with insurance experts and serving as lead counsel on all of his own cases. Several of these notable cases included: *Ginsberg v. Independence Blue Cross*, 26 Employee Benefits Cas. 1529, Pension Plan Guide (CCH) P 23973V, 2001 WL 267874 (E.D. Pa. 2001); and *Snook v. Penn State Geisinger Health Plan*, 241 F. Supp.2d 485 (M.D. Pa. 2003).

In mid 2002 Mr. Senoff returned to Billet & Connor, P.C. where his practice continued in the same fields and expanded. While still at Senoff & Griffith LLC, Mr. Senoff, along with other firms, commenced a class action against Independence Blue Cross, the region's largest health insurer, prosecuted and settled on behalf of all healthcare providers who treated defendants' insureds. In that case, *Gregg v. Independence Blue Cross, et al.*, 2004 Phila. Ct. Com. Pl. LEXIS 3, the Trial Court stated: ". . .David Senoff, Esquire of Billet & O'Connor, P.C. [sic] are highly experienced, capable and tenacious litigators." In addition to the *Gregg* case, in a case styled *Goldstein v. Doral Dental Services of PA, Inc.*, (Court of Common Pleas, Philadelphia County, June Term 2004, No. 01649), Mr. Senoff also served as Co-Lead Counsel in a class action against a regional dental insurer which was also prosecuted and settled. Furthermore, while at Billet &

Connor, P.C., Mr. Senoff also participated in several notable cases, including:

*Northwestern Mutual Life Ins. Co. v. Babayan*, 430 F.3d 121 (3d Cir. 2005).

At the end of 2008, Mr. Senoff became a partner with his current law firm, Caroselli Beachler McTiernan & Conboy, where he serves as the managing attorney of the firm's Philadelphia office. Mr. Senoff's practice continues in the same fields and has expanded to include additional class action and complex litigation. While still at Billet & Connor, Mr. Senoff, along with other firms commenced a class action against Aetna Insurance Company for alleged improper cancellation of health insurance policies. That case, styled *Kaszupski v. Aetna Insurance Company*, (Court of Common Pleas, Philadelphia County, April Term 2008, No. 00601), is currently pending and Mr. Senoff remains the partner in charge of that case. In addition, while still at Billet & Connor, Mr. Senoff was appointed as Plaintiffs' Liaison Counsel in a multi-district federal action to recover losses from the sale of equity-indexed annuities and other fixed annuities with excessive deferral periods that were fraudulently sold to the elderly. That case is styled *In re American Investors Life Insurance Co. Annuity Marketing and Sales Practices Litigation*, U.S.D.C. E.D. Pa. No. 05-MD-01712 (MDL Docket No. 1712). Mr. Senoff continues his involvement in those cases since joining Caroselli Beachler McTiernan & Conboy.



Finally, since joining Caroselli Beachler McTiernan & Conboy, Mr. Senoff along with others at the Firm filed the Luzerne County Juvenile Litigation, a consolidated group of four class-action and non-class action cases filed by juveniles in Luzerne County who were wrongfully adjudicated and detained in violation of their federal civil rights and the United States Constitution. That consolidated matter is styled, *B.W., a minor v. Powell, et al.*, U.S.D.C. M.D. Pa. No. 09-CV-0286. Mr. Senoff along with Mr. Caroselli serve on the coordinated Plaintiffs' Counsel Executive Committee in that matter and have been preliminarily named as Co-Class Counsel.

Mr. Senoff has written extensively in the field of managed care liability, including: *Insidious Tort Reform*, THE VERDICT, Volume 2006 – 2007 – Issue 2; *Recent Ruling is Bad News for Bad Faith Litigation*, THE LEGAL INTELLIGENCER, September 27, 2004; *An Anticipated Decision with Far-Reaching Results*. THE LEGAL INTELLIGENCER, June 30, 2004; *Recent Decisions Make ERISA's Hottest Issue Even Hotter?* THE LEGAL INTELLIGENCER, September 22, 2003; *Did Mishoe Court Misstep by Denying Right to Jury Trial?* THE LEGAL INTELLIGENCER, June 17, 2003; and *ERISA and Bad Faith: Strange Bedfellows or a Perfect Match?* THE LEGAL INTELLIGENCER, September 12, 2002.

Mr. Senoff is admitted to practice before all courts in the Commonwealth of Pennsylvania and the State of New Jersey. He is also admitted to the United States

Court of Appeals for the Third Circuit, the United States District Court for the Eastern District of Pennsylvania and the United States District Court for the District of New Jersey. Furthermore, Mr. Senoff is a member of the American Association for Justice, the Pennsylvania Association for Justice, where he serves on the Board of Governors, the Philadelphia Trial Lawyers Association, where he serves on the Board of Directors and the Multi-Million Dollar Advocates Forum and the Million Dollar Advocates Forum. Finally, Mr. Senoff has been selected by his peers for inclusion in the *Best Lawyers in America* for 2013.

**Lauren C. Fantini**

Lauren C. Fantini is an associate with Caroselli, Beachler, McTiernan & Conboy. She graduated from the University of Delaware in 2001 and is a 2004 graduate of the Pennsylvania State University Dickinson School of Law. Prior to joining the firm, she was the law clerk for The Honorable Arnold L. New of the Philadelphia County Court of Common Pleas.

Ms. Fantini practices in the fields of complex civil litigation, including medical malpractice actions, insurance bad faith cases, class actions and civil rights actions.

Ms. Fantini is admitted to practice in the Pennsylvania and New Jersey as well as the United States District Courts for the Eastern District of Pennsylvania

and the District of New Jersey. She is also admitted to practice before the United States Court of Appeals for the Third Circuit.

Ms. Fantini is a member of the American Association for Justice, the Pennsylvania Association for Justice, the Philadelphia Trial Lawyers Association and the Young Lawyers Divisions of the Pennsylvania and Philadelphia Bar Associations. She was recognized by Pennsylvania Super Lawyers as a Rising Star in 2008, 2010 and 2012 by the *Law & Politics* publication, *Pennsylvania SuperLawyers*. Finally, in 2012 Ms. Fantini was selected for membership in the National Trial Lawyers: Top 40 under 40. Ms. Fantini was one of 40 trial lawyers under the age of 40 selected from Pennsylvania to be chosen for membership in the Top 40 under 40.