

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

WOOD MOUNTAIN FISH LLC,

Plaintiff,

v.

Mowi ASA (fka Marine Harvest ASA), Marine Harvest USA, LLC, Marine Harvest Canada, Inc., Ducktrap River of Maine LLC, Grieg Seafood ASA, Grieg Seafood BC Ltd., Bremnes Seashore AS, Ocean Quality AS, Ocean Quality North America Inc., Ocean Quality USA Inc., Ocean Quality Premium Brands, Inc., SalMar ASA, Leroy Seafood Group ASA, Leroy Seafood USA Inc., and Scottish Sea Farms Ltd.,

Defendants.

CASE NO. 1:19-CV-22128-UU

DECLARATION OF FRED T. ISQUITH IN SUPPORT OF A MOTION FOR AN ORDER APPOINTING WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP AS INTERIM CLASS COUNSEL

I, Fred T. Isquith, hereby declare the following:

1. I am a partner at the law firm of Wolf Haldenstein Adler Freeman & Herz LLP (“Wolf Haldenstein”). I submit this declaration in support of the Movant Wood Mountain Fish LLC’s Motion for an Order Appointing Wolf Haldenstein Adler Freeman & Herz LLP as Interim Class Counsel in the above captioned action.

2. My partner, Thomas H. Burt, sent letters to the Attorneys General of Arizona, Nevada, New York, Oregon, and Utah on May 24, 2019 to meet the requirements of the statutes under which plaintiffs allege claims for those respective states. Further, Mr. Burt also wrote to Defendants as required by Massachusetts law on May 24, 2019.

3. Attached hereto are true and correct copies of the following documents:

Exhibit A: Consolidation Order from Judge Altonaga dated May 13, 2019;

- Exhibit B: Notice of Pending, Refiled, Related, or Similar Actions and Motion to Transfer and Coordinate with Related Consolidated Actions filed by Wood Mountain Fish, LLC dated May 30, 2019;
- Exhibit C: The Firm Resume of Wolf Haldenstein Adler Freeman & Herz LLP;
- Exhibit D: Relevant portions of the August 15, 2007 hearing transcript in *In re Dynamic Random Access Memory (DRAM) Antitrust Litigation*, No. 02-md-01486-PJH (N.D. Cal.);
- Exhibit E: The Firm Resume of Shepherd Finkelman Miller & Shah;
- Exhibit F: The Firm Resume of Lockridge Grindal Nauen P.L.L.P.; and
- Exhibit G: The Firm Resume of Pritzker Levine LLP.

Signed under penalty of perjury this 31st day of May 2019.

/s/ Fred T. Isquith

Fred T. Isquith