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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

JONATHAN GIANNOULIS, et al.

Plaintiff

v.

DIRECTV, LLC,

Defendant

Case No. BC596668

CLASS ACTION

**DECLARATION OF TODD C. WERTS
IN SUPPORT OF PLAINTIFFS'
UNOPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA ACTION SETTLEMENT
AND FOR CERTIFICATION OF
SETTLEMENT CLASS**

Date: October 26, 2021
Time: 9:00 a.m.
Dept: Spring Street Dept. 17
Judge: Hon. Maren Nelson

Action Filed: October 1, 2015
Trial Date: N/A

[Documents Filed Concurrently Herewith /
attached]

1 **DECLARATION OF TODD C. WERTS**

2 I, Todd C. Werts, declare as follows:

3 1. I am an attorney and partner with the Columbia, Missouri-based law firm Lear
4 Werts LLP (“LW”). I am counsel to plaintiffs in this matter. I make this declaration in support of
5 Plaintiffs’ Motion for Preliminary Approval of Class and PAGA Action Settlement and for
6 Certification of Settlement Class. Unless stated otherwise, I have personal knowledge of the facts
7 stated in this declaration and, if called to testify, could and would testify competently thereto.

8 2. The lawyers in my firm all are experienced with litigating collective and class
9 actions both in Missouri and nationwide. A true and correct copy of the Lear Werts LLP Firm
10 Resume is attached as **Exhibit 1**.

11 3. Brad Lear and I were the founding members of LW in September, 2003. As outlined
12 on the Firm Resume, many of the publications and speaking engagements Brad Lear and I have
13 presented have been in the area of complex and class action litigation.

14 4. Sander Sowers has been with the firm as an associate since October, 2010. Mr.
15 Sowers became a partner in the firm on July 1, 2018.

16 5. Michele Hornish was Of Counsel in the firm from May, 2011 until August 2012
17 and worked on the Litigation during that time. Prior to coming to Lear Werts, Ms. Hornish worked
18 as an attorney at Jenner & Block and then Hogan Lovells. Immediately following law school, Ms.
19 Hornish served as a law clerk to the Hon. R. Lanier Anderson III at the United States Court of
20 Appeals for the Eleventh Circuit.

21 6. Anthony Meyer joined the firm as an associate on August 1, 2020. Prior to joining
22 the firm, Mr. Meyer completed a two-year judicial clerkship for the Hon. Paul Wilson at the
23 Supreme Court of Missouri. Judge Wilson serves as Chief Justice of that Court.

24 7. The DIRECTV series of cases began for our firm on December 31, 2008 when I
25 first interviewed Jamie Arnold, a then recently separated DIRECTV installer. After meeting with
26 Mr. Arnold, my firm began working up the case that would eventually become the DIRECTV
27 Wage & Hour Litigation (“Litigation”).

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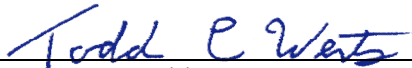
1 8. After meeting Mr. Arnold, we reached out to George Hanson and his firm, Stueve
2 Siegel Hanson (“SSH”), with whom we had worked a number of wage & hour cases around the
3 country. Throughout every step of the Litigation, we have worked hand-in-glove with SSH and
4 Mr. Hanson.

5 9. This Litigation has been a unique experience in my career. What started as the
6 complaint of an individual “sub-contractor,” grew to a wage and hour litigation that eventually
7 encompassed four separate class and collective actions (including the instant case) involving
8 several thousand technicians, approximately forty federal lawsuits in as many different district
9 courts for hundreds of individuals, and 29 individual arbitration cases around the country. The
10 settlement of this class action case is the last step in resolving all of these cases for our clients.

11 10. In addition to my legal training, I also hold a bachelor’s degree in Mathematics
12 from the University of Missouri-Columbia. That education included graduate level coursework in
13 statistics. And I am experienced in managing and analyzing large datasets. As such, I have
14 frequently been called upon to coordinate the processing and review of DIRECTV’s data both
15 internally and with an external, expert statistician, L. Scott Baggett, Ph.D. I assisted Mr. Hanson
16 with the damage calculations for this case.

17 Dated: October 1, 2021

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Todd C. Werts

FIRM RESUME

Founded in 2003, the Columbia, Missouri law firm Lear Werts LLP represents individuals in serious employment, personal injury, workers' compensation, and other complex litigation matters. Many of Lear Werts' cases involve Missouri plaintiffs. But Lear Werts has also developed a nationwide wage and hour class and collective action practice where the firm's attorneys help workers recover unpaid wages, overtime, and related damages. Additionally, the firm has a consumer class action practice.

The firm takes a collaborative approach to litigation. By design, Lear Werts only takes on a limited number of cases and each case is handled by a least two, if not three of the firm's attorneys. Further, Lear Werts frequently handles cases in co-counsel arrangements with law firms from around both Missouri and nationwide. Lear Werts has found that these sorts of multi-firm litigation teams often promote an efficient resolution to complex matters by building in an intrinsic level of review and accountability.

In addition to providing superior legal services, the lawyers at Lear Werts are each active in the legal community and are frequently asked to speak or write on a variety of legal topics. Lear Werts attorneys are also active in their non-legal communities as well. The following pages offer details about the firm's recent class action experience as well as information on each of the attorneys at Lear Werts LLP, including each lawyers' publications, speaking engagements, media appearances, court admissions, education, professional associations, and community activities.

FIRM DOSSIER OF COMPLEX LITIGATION MATTERS

RESOLVED

Little v. Advantage Nursing Services, et al., 19BA-CV04771 (Cir. Ct. Boone County, Missouri)

Lear Werts was lead counsel in this Missouri Minimum Wage Law class action case challenging the employer's practice of paying the first 40 hours of an employee's workweek through one entity and then processing any hours beyond 40 from a separate but related entity without provision for time-and-a-half. This case settled on a classwide basis.

In re Apple Inc. Device Performance Litigation, 5:18-md-02827-EJD (C.D. Cal.)

Brad Lear was appointed to the Plaintiff's Steering Committee in this Multi-District Litigation consolidating the putative class action claims of consumers from across the country and around the world based on device performance issues arising in several of Apple's iPhone and iPad devices and Apple's response to those performance issues. A settlement has received final approval that will create a common fund of between \$310 Million to resolve these claims.

Voorhis, et a. v. Greene County, 6:19-cv-3257-SRB (W.D. Mo.)

Lear Werts was lead counsel in this Missouri Minimum Wage Law and Fair Labor Standards Act class action case challenging the timekeeping practices at the Greene County Jail. After review of the relevant timekeeping records, as well as a corporate representative deposition, the parties were able to resolve this case on a classwide basis at mediation.

In re DIRECTV Wage & Hour Litigation (various federal courts and arbitration fora).

Lear Werts served as co-lead counsel on a case involving more than 2,000 satellite installation technicians paid under an allegedly illegal piece rate pay model. This case spanned nine years of intensive litigation across forty different federal district court, five circuit courts of appeals, and a certiorari petition to the United States Supreme Court. Brad Lear supervised the extensive briefing in these various appeals and in the approximately 45 separate summary judgment motions filed. Todd Werts lead the charge coordinating extensive electronic discovery and in taking 120 of the over 650 depositions taken in the case. These cases have resolved with the exception certain California claims.

Witt v. CACH, LLC, 1316-CV07031 (Cir. Ct. Jackson County, Missouri)

Lear Werts was lead counsel in this FDCPA class action case challenging a debt collector's failure to report to the three major credit reporting bureaus that certain debts being collected were disputed by the consumer. Following robust pre-certification motion practice, this case settled on a classwide basis.

Quigley v. National Asset Recovery Services, Inc., 4:13-cv-0031-RWS (E.D. Mo.)

Lear Werts was lead counsel in this FLSA collective and Missouri state law, Rule 23 class action case challenging the timekeeping and overtime calculation practices of a customer service call center. Following an agreed conditional certification, this matter settled on a classwide basis.

Blume v. International Services, Inc., 4:12-CV-165-DDN (E.D. Mo.)

Lear Werts was lead counsel on this nationwide FLSA collective action alleging that the defendant misclassified certain employees as exempt from the overtime requirements of the FLSA. The case settled on a classwide basis.

Reese v. WIS Holding Corp., 1304-04232 (Ct. of Com. Pl. Philadelphia, Pa.)

Lear Werts was co-lead counsel in this statewide Pennsylvania class action alleging that the defendants' timekeeping policies violated Pennsylvania's state wage and hour statutes and regulations. A proposed classwide settlement of this case is currently pending.

Barrett v. Hy-Vee, Inc., Case No. 4:12-CV-00480-SMR-RAW (N.D. Iowa)

Lear Werts was co-lead counsel from this 24-individual-plaintiff mass action that grew out of the *Adams v. Hy-Vee* matter. This case alleges that the plaintiffs were improperly classified as "exempt" under the FLSA. The case has settled.

Stewart v. Vion, et al., 4:11-cv-0671-BCW (W.D. Mo.)

Lear Werts was co-lead counsel in this statewide Fair Debt Collection Practices Act case challenging the defendants' use of allegedly misleading dunning letters. This case has settled on a classwide basis.

Adams v. Hy-Vee, Inc., Case No. 4:11-cv-449-DW (W.D. Mo.)

Lear Werts was co-lead counsel in this nationwide collective action alleging that the defendant failed to properly classify certain assistant managers and that it improperly paid other employees under the fluctuating workweek method. This case was settled.

Nobles v. State Farm Mut. Ins. Co., Case No. 2:10-cv-04175-NKL (W.D. Mo.)

Lear Werts was co-lead counsel in this nationwide wage and hour case challenging the defendants' "exception hourly" timekeeping system that is used for all of the defendants' non-exempt employees who work outside of the State of California. The case has settled.

Berte v. WIS Holding Corp., 07cv1932 L(NLS) (S.D. Cal.)

Lear Werts was co-lead counsel of this nationwide FLSA collective action involving approximately 4,300 current and former inventory accounting Associates from around the country (other than California) challenging the defendants' timekeeping policies. This case settled.

Sharpe v. APAC Customer Services, Inc, Case No. 3:09-cv-00329 (W.D. Wis.)

Lear Werts was co-lead counsel in this nationwide wage and hour case involving approximately 15,000 call center workers from around the country. In January, 2010, the Court issued an order conditionally certifying the case as a collective action. Thereafter, the case was resolved on a class-wide basis through voluntary mediation.

Stephenson v. Information Providers, Inc., Case No. 0:08-cv-04619 (D. Minn.)

Lear Werts was co-lead counsel in this nationwide wage and hour case. This case challenged the defendant's classification of certain employees as exempt from the overtime requirements of the Fair Labor Standards Act ("FLSA"). Lear Werts obtained an order granting partial summary judgment on the issue of liability. The case was then certified to proceed as a collective action. The case settled through continued negotiations following two mediations.

Rumble, et al v. Ted's Trash Service, Inc., Case No. 0916-CV03051 (Cir. Ct. of Jackson County, Missouri)

Lear Werts was sole lead counsel in this Missouri Minimum Wage Law class action case challenging the defendant's classification of certain employees as exempt from Missouri's overtime requirements. Lear Werts was approved as class counsel in this settled class action.

Oddson v. Swift Inc., Case No. 1:09-cv-03034 (D. Colo.)

Lear Werts was co-lead counsel in this nationwide wage and hour case. This case challenged the defendant's classification of certain employees as exempt from the overtime requirements of the FLSA. After securing an agreement to voluntarily send notice to the class, this case settled after early assessment mediation.

McClellan v. CenturyTel et al, Case No. 3:08-cv-00865 (E.D. La.)

Lear Werts was co-lead counsel in a nationwide FLSA case where the firm represented a collective of approximately 2,800 call center workers. The case was resolved through a court-approved class-wide settlement.

Chavez v. WIS Holding Corp., 07cv1932 L(NLS) (S.D. Cal.)

Lear Werts was co-lead counsel of this wage and hour case alleging violations of the FLSA and the California Labor Code. The case was broken into two parts: (1) for California workers and (2) for others across the country (*see Berte v. WIS Holding Corp., supra*). The California portion of the case was settled on a Rule 23 class action basis involving approximately 16,650 current and former inventory counting associates.

Schleipfer v. Mitek, Inc., Case No. 1:06-cv-00109 (E.D. Mo.)

Lear Werts was sole counsel in a nationwide collective action alleging that the defendant improperly misclassified certain categories of employees as exempt from the FLSA. In a case of first impression in the U.S. District Court for the Eastern District of Missouri, Lear Werts obtained conditional certification for a collective of approximately 350 employees. After protracted litigation, the parties reached a confidential settlement.

PENDING

In re American Medical Collection Agency, Inc. Customer Data Security Breach Litigation, 2:19-md-02904-MCA-MAH (D.N.J.)

Todd Werts has been appointed to the Plaintiffs' Leadership Structure as part of the Bankruptcy Liaison Committee. This case consolidates data breach lawsuits filed around the country against certain medical laboratories, including Quest Diagnostics and LabCorp, based on a data breach impacting millions of patient records at the collection agency commonly used by such labs. Discovery is pending in this case.

Houston v. Curators of the University of Missouri d/b/a MU Healthcare, 19BA-CV03205 (Cir. Ct. of Boone County, Missouri)

Lear Werts is lead counsel in this putative state-wide data breach class action case arising from MU Health Care's well-publicized data breach in mid-2019. Initial discovery and motion practice is ongoing.

In re 3M Combat Arms Earplug Products Liability Litigation, 3:19-md-2885 (N.D. Fla.)

Lear Werts represents a group of individual veterans in their claims arising from the use of defective hearing protection devices. Tens of thousands of such claims have been consolidated from around the country into a multi-district litigation. Discovery and dispositive motions have been completed and the court is currently trying a number of bellwether trials.

Dames v. Mercy Hospitals East Communities, 19AB-CC00264 (Cir. Ct. of Franklin County, Missouri)

Lear Werts is lead counsel in this putative state-wide class action challenging the hospitals practice of refusing to submit emergency room and hospital bills to a patient's health insurance when there is potential third-party liability. Initial discovery has been completed and a dispositive motion is now pending.

In re Zantac (Ranitidine) Products Liability Litigation, 9:20-md-02924-RLR (S.D. Fla.)

Brad Lear was appointed to the Leadership Development Committee in this significant multidistrict litigation. There, Brad is an active member of the Law & Briefing and Class Action Committees. This case is a consolidation of tens of thousands of claims against the designers, makers, and distributors of Zantac alleging personal injury, economic loss, and seeking medical monitoring for future injuries. Discovery is ongoing in this litigation.

In re Walmart COVID-19 Screenings Wage & Hour Litigation (W.D. Mo. and D. Ariz.)

Lear Werts has filed complaints in the United States District Courts for the Western District of Missouri and the District of Arizona alleging that Walmart required its workforce to arrive at work early, without allowing those workers to clock-in, in order to undergo mandatory COVID-19 screenings before each of their shifts throughout the pandemic. Initial Rule 12 motions are now pending.

In re Seresto Flea and Tick Collar Marketing, Sales Practices and Products Liability Litigation (N.D. Ill. / J.P.M.L.)

Lear Werts is counsel for the plaintiffs in the Northern District of Illinois in this litigation claiming that the defendants sold an essentially worthless product when they failed to disclose the number of animals, and humans, seriously injured as a result of using Seresto Flea and Tick Collars. Similar cases have been filed around the country. The matter has been consolidated into an MDL by the United States Joint Panel on Multidistrict Litigation in the U.S. Dist. Ct. for the N. Dist. of Illinois.

Gama v. Mercy Health, 21SL-CC00852 (Cir. Ct. of St. Louis County, Missouri)

Lear Werts is co-lead counsel in this putative data breach class action case arising from the unlawful access of several thousand patients' records. The defendant's motion to dismiss has been fully briefed and is awaiting resolution.

BRADFORD B. LEAR

Brad represents plaintiffs in complex federal litigation, including in consumer and employment class and collective actions. He has represented clients in federal district courts in at least 30 states around the country as well as numerous appellate courts. Many of the cases Brad works on were referred to him by fellow lawyers. He enjoys collaborating with other attorneys and frequently co-counsels with other firms on large-scale cases.

Most recently, Brad was named to the Leadership Development Committee for the plaintiffs in *In re Zantac (Ranitidine) Products Liability Litigation*. The LDC, as this group is known, is a first-of-its-kind mentorship program created by U.S. District Judge Robin Rosenberg and administered by Special Master Jamie Dodge. The purpose of the LDC is to provide future leaders of the MDL bar with “opportunity to play a meaningful role in various aspects of this MDL, including subcommittee assignments, and thereby gain further experience in preparation for future service on steering committees.” This has been an active and rewarding appointment for Brad.

Lear Werts LLP has served as lead counsel or co-lead counsel in numerous class and collective actions, a sampling of which are briefly described below:

In re DIRECTV Wage & Hour Litigation (various federal courts). Lear Werts served as co-lead counsel on a case involving more than 2,000 satellite installation technicians paid under an allegedly illegal piece rate pay model.

Witt v. CACH, LLC (Mo. Cir. Ct.). Lear Werts served as lead counsel for a certified Rule 23 class of Missouri consumers who experienced inaccurate statements on their credit reports.

Chavez v. WIS Holding Corp. (S.D. Cal.). Lear Werts was co-lead counsel for a Rule 23 class of over 16,000 workers who charged they were subjected to violations of the California Labor Code.

Stewart v. Vion (W.D. Mo.). Lear Werts was lead counsel for a Rule 23 class of consumers who contended they were subjected to illegal collection practices.

Sharpe v. APAC Customer Services (W.D. Wis.). Lear Werts was co-lead counsel for a collective action involving over 15,000 call center workers who argued they were not paid for all their working time.

Schleipfer v. Mitek, Inc. (E.D. Mo.). Lear Werts served as lead counsel in a case filed on behalf of workers who claimed they were improperly classified as exempt from the overtime protections of the FLSA. In a case of first impression in the Eastern District of Missouri, Lear Werts obtained conditional certification of a nationwide class.

BRADFORD B. LEAR

Publications & Speaking Engagements

- University of Missouri School of Law, Innovation and Technology in the Practice of Law (2020)
- 2016 Missouri Bar Solo & Small Firm Conference, Significant Seven: Important Changes to the Federal Discovery Rules
- Missouri Bar, How to Start and Build a Successful Law Practice, Should I Fly Solo or Work with Others (2013)
- 2013 Missouri Bar Solo & Small Firm Conference, What to Do When You're Removed to Federal Court
- 2012 Missouri Bar Solo & Small Firm Conference, Litigating the Class Action Case
- 2012 Missouri Association of Trial Attorneys Convention, Emergency Response Team Panel Discussion Member
- 2008 Missouri Employment Law Institute, Wage & Hour Update
- University of Missouri School of Law, Law Practice Management (2008)
- MOBAR CLE: CONTRACTS, Contract Interpretation (2007)
- University of Missouri School of Law, Securities Arbitration (2003)

In the Media

- "Ex State Farm worker alleges labor violations", Columbia Daily Tribune
- "Two ex-tax preparers sue H&R Block", Columbia Daily Tribune
- "Boys State adopts Missouri Plan for judges; change draws praise", The Daily Star-Journal (June 30, 2009)
- Hickman Students Ready for National Law Debate Contest, Columbia Daily Tribune (May 7, 2009)
- Judge qualifies suit as possible class action, St. Louis Daily Record (Sept. 5, 2007)
- Cons of Columbia, VOX Magazine (Nov. 29, 2007)
- Making the Case for Dispute Resolution, Columbia Daily Tribune (Nov. 29, 2003)

BRADFORD B. LEAR

Admitted to Practice

- Missouri State Courts
- Illinois State Courts
- U.S. Court of Appeals, Eighth Circuit
- U.S. District Court – Eastern District of Missouri
- U.S. District Court – Western District of Missouri
- U.S. District Court – Southern District of Illinois
- U.S. District Court – Northern District of Illinois
- U.S. District Court – District of Colorado

Admitted to Practice Pro Hac Vice

- U.S. District Court – Southern District of California
- U.S. District Court – Eastern District of Louisiana
- U.S. District Court – Western District of Louisiana
- U.S. District Court – Southern District of Illinois
- U.S. District Court – Western District of Wisconsin

Education

- University of Missouri – Columbia, J.D.
- Missouri Law Review
 - Order of the Coif
 - Order of Barristers

Professional Associations

- Missouri Bar Association
 - Federal Practice Subcommittee
- Missouri Association of Trial Attorneys
 - Emergency Disaster Response Team
- American Association for Justice

Community Involvement

- Missouri Boys State
 - Board of Directors
 - Dean of Law School – (2001–2011)
 - Director (2020–present)
- Hickman High School Mock Trial Team
 - Coach – 2004 to 2009
 - National Champion, 2008 American Mock Trial Invitational
 - Missouri State Champion, 2009
- Chipping in for Charity Golf Tournament
 - Planning Committee, 2007 to present

TODD C. WERTS

Todd Werts' practice primarily involves representing individuals, and groups of individuals, in claims filed in state and federal courts. He currently focuses on wage & hour, consumer, and employment cases, including class and collective actions. Todd has successfully represented thousands of workers from around the country to recover unpaid wages and overtime pay. Additionally, he represents consumers who have been subjected to unfair or fraudulent practices, or have been injured by unsafe products. Below is a short sampling of some of Todd's cases:

In re American Medical Collection Agency, Inc. Customer Data Security Breach Litigation (D.N.J.) Todd Werts has been appointed to the Plaintiffs' Leadership Structure as part of the Bankruptcy Liaison Committee. This case consolidates data breach lawsuits filed around the country against certain medical laboratories, including Quest Diagnostics and LabCorp, based on a data breach impacting millions of patient records at the collection agency commonly used by such labs. This case is pending.

In re DIRECTV Wage & Hour Litigation (various federal courts and arbitration fora) Todd served as one of three co-lead counsel in this litigation involving more than 2,000 satellite installation technicians paid under an allegedly illegal piece rate pay model. This case spanned nine years of intensive litigation across forty different federal district court, five circuit courts of appeals, and a certiorari petition to the United States Supreme Court. Todd's partner, Brad Lear, supervised the extensive briefing in these various appeals and in the approximately 45 separate summary judgment motions filed. Todd Werts led the charge coordinating extensive electronic discovery and in taking 120 of the over 650 depositions taken in the case. These cases have resolved with the exception certain California claims that remain pending.

Voorhis, et al. v. Greene County (W.D. Mo.) Todd was lead counsel in this Missouri Minimum Wage Law and Fair Labor Standards Act class action case challenging the timekeeping practices at the Greene County Jail. After review of the relevant timekeeping records, as well as a corporate representative deposition, the parties were able to resolve this case on a classwide basis at mediation.

Blume v. International Services (E.D. Mo.) Todd was lead counsel on an FLSA collective action filed on behalf of small business consultants who were not paid overtime. The case settled on behalf of a nationwide class.

Adams v. Hy-Vee (W.D. Mo.) Todd was co-lead counsel on a nationwide collective action for grocery store assistant managers in a mass action challenging their classification as exempt from the Fair Labor Standards Act. The case was settled on a class basis.

Stephenson v. Information Providers (D. Minn.) Todd was co-lead counsel on a nationwide collective action on behalf of insurance premium auditors who were denied overtime. The case settled after Todd was able to obtain a favorable ruling on plaintiffs' motion for summary judgment.

McClean v. CenturyTel (W.D. La.) Todd was co-lead counsel on a nationwide FLSA collective action on behalf of approximately 2,800 call center workers. The case was settled on a class basis.

TODD C. WERTS

Oddson v. Swift (D. Colo.). Todd was co-lead counsel on a nationwide wage and hour collective action filed on behalf of livestock buyers who were not paid overtime. The case settled on a class basis.

Todd is a frequent speaker on litigation and employment law issues as well as legal technology matters. He is an active member of the Missouri Bar and the Missouri Association of Trial Attorneys where he serves on the Board of Governors and as co-chair of the organization's amicus committee.

Publications & Speaking Engagements

- *Estate of G. Jansen v. Valmont Industries*, No. WD84369, Brief of Amici Curiae the Missouri Association of Trial Attorneys in Support of Appellant-Respondent, Missouri Court of Appeals, Western District
- Ford Truck or Wooden Duck? Personal Jurisdiction and Jurisdictional Discovery, Missouri Association of Trial Attorneys Annual Convention (2021)
- *Ordinola Velazquez v. University Physician Associates, et al.*, No. SC98977, Brief of Amici Curiae the Missouri Association of Trial Attorneys and the American Association for Justice in Support of Appellant-Respondent, Supreme Court of Missouri
- *Treasurer of the State of Missouri-Custodian of the Second Injury Fund v. Parker*, SC98704, Brief of Amicus Curiae Missouri Association of Trial Attorneys in Support of Respondent, Supreme Court of Missouri
- An Ounce of Prevention: Perspectives on a Civil Plaintiff Filing Bankruptcy from Both Sides of the 'v,' Federal Bar Association Annual Meeting (2020)
- *Ostermeier, et al. v. Prime Properties Investments, Inc., et al.* No. WD82432, Brief of the Missouri Association of Trial Attorneys as Amicus Curiae Supporting Appellant, Missouri Court of Appeals, Western District
- 2019 Missouri Bar Solo & Small Firm Conference, An Ounce of Prevention: Avoiding Unintended Consequences from Filing Bankruptcy
- 2019 Missouri Bar Solo & Small Firm Conference, #MeToo: Sexual Discrimination Issues Involving Small Town Clients
- *Civil Jury Trials Face New Barrage of Offensives*, The Missouri Trial Attorney (Spring 2019 at 31)
- Class Actions, Mass Torts, and other Aggregate Litigation, Presentation to the Boone County Bar Association (2019)
- 2018 Missouri Association of Trial Attorneys Annual Convention, Technology in the Courtroom
- 2018 Missouri Bar Solo & Small Firm Conference, From the Flintstones to the Jetsons: Moving to Video Conference Depositions
- *Griffits v. Old Republic Ins. Co., et al.*, No. SC96740, Brief of the Missouri Association of Trial Attorneys as Amicus Curiae Supporting Appellant, Supreme Court of Missouri
- *Coventry Health Care of Missouri, Inc. v. Jodie Nevils*, No. 16-149, Brief of the Missouri Association of Trial Attorneys as Amicus Curiae Supporting Respondent, U.S. Supreme Court
- The Paperless Law Office, Presentation to the Springfield [MO] Metropolitan Bar Association (2017)

TODD C. WERTS

- 2014 Missouri Association of Trial Attorneys Annual Convention, Forms for Function: Letters and Questionnaires You Need
- 2014 Missouri Bar Solo & Small Firm Conference, A Solo's Guide to Preparing Your Client for Deposition
- 2013 AAJ Summer Convention, Attorney Fees in Wage and Hour Cases: Fee Applications in Federal Wage and Hour Cases after *Perdue*, Publication Only
- Templemire v. W&M Welding, Inc.*, Case No. SC 93132, Brief of *Amicus Curiae* Missouri Association of Trial Attorneys in Support of Appellant (2013)
- Volkswagen Group of Am., Inc. v. Berry, et al.*, SC 92770, Brief of *Amicus Curiae* Missouri Association of Trial Attorneys in Support of Respondents (2012)
- 2012 Missouri Bar Solo & Small Firm Conference, What Every Solo & Small Firm Lawyer Needs to Know About Employment Law
- 2011 Missouri Bar Solo & Small Firm Conference, Workers' Compensation – Compare and Contrast with PI Cases (Medical Claims and Liens)
- 2009 Annual Workers' Compensation Institute: Healthcare Provider Applications for Direct Payment
- Sterling CLE Programs, Compensation Issues Under the FLSA/Wage and Hour Laws (2009)
- Sterling CLE Programs, ADA Update (2009)
- University of Missouri School of Law, Guest Lecturer, Law Practice Management Class (2007-2008)
- Nuts and Bolts of Missouri Practice, Employment Termination in Missouri (2007)
- MOBAR CLE: CONTRACTS, Contract Interpretation (2007)

In the Media

- Lawsuit filed over MU Health data breach, Columbia Daily Tribune, Interview with Pat Pratt (Aug. 8, 2019)
- Class action lawsuit filed against MU Health Care after information hacked, KOMU (Aug. 8, 2019)
- Former Greene County jail employees sue county, claim they were underpaid, KY3, Interview with Kara Strickland (July 26, 2019)
- How to confront age discrimination in the workplace, Missourian, Interview with Siena Debolt (Mar. 21, 2019)
- In Focus: Equal Pay. It's Complicated., Columbia Business Times, Interview with David Morrison (Feb. 27, 2019)
- \$1.5 million dollar drunk driving case gets hearing in Missouri Supreme Court, Missouri.net, Interview with Jason Taylor (Mar. 20, 2018) (regarding *Griffits v. Old Republic Ins.*)
- Sales Contracts, Missouri Bar SoundByte (June 20, 2008)
- New Online Complaint Form [for the Missouri Human Rights Commission], KOMU TV-8 (Oct. 23, 2007)
- New Clinic Aims to Aid Workers with Injuries, Columbia Daily Tribune (Mar. 3, 2006)

TODD C. WERTS

Admitted to Practice

- Missouri State Courts
- Kansas State Courts
- Arizona State Courts
- U.S. District Court – Western District of Missouri
- U.S. District Court – District of Kansas
- U.S. District Court – Eastern District of Missouri
- U.S. District Court – District of Colorado
- U.S. District Court – Northern District of Illinois (general and trial bar)
- U.S. District Court – Eastern District of Arkansas
- U.S. District Court – Eastern District of Wisconsin
- U.S. District Court – Eastern District of Michigan
- U.S. District Court – District of North Dakota
- U.S. Court of Appeals, 9th Circuit
- U.S. Court of Appeals, 11th Circuit
- U.S. Tax Court

Admitted to Practice Pro Hac Vice

- U.S. District Court – Southern District of California
- U.S. District Court – Eastern District of Louisiana
- U.S. District Court – Western District of Louisiana
- U.S. District Court – District of Minnesota
- U.S. District Court – Western District of Wisconsin
- U.S. District Court – Northern District of Oklahoma
- U.S. District Court – Northern District of California
- U.S. District Court – District of New Hampshire
- U.S. District Court – District of Massachusetts
- U.S. District Court – District of Connecticut
- U.S. District Court – Southern District of New York
- U.S. District Court – Middle District of Pennsylvania
- U.S. District Court – Eastern District of Pennsylvania
- U.S. District Court – District of New Jersey
- U.S. District Court – District of Maryland
- U.S. District Court – Southern District of Ohio
- U.S. District Court – Southern District of Indiana
- U.S. District Court – Western District of Kentucky
- U.S. District Court – Western District of Tennessee
- U.S. District Court – Middle District of North Carolina
- U.S. District Court – District of South Carolina
- U.S. District Court – Northern District of Florida
- U.S. District Court – Northern District of Georgia
- U.S. District Court – Northern District of Alabama
- U.S. District Court – Southern District of Mississippi
- U.S. District Court – Southern District of Texas
- U.S. District Court – District of New Mexico
- U.S. District Court – District of Arizona

TODD C. WERTS

Education

- University of Missouri – Columbia, J.D
- University of Missouri – Columbia, B.S., Mathematics
 - Missouri Environmental Law & Policy Review
 - Order of Barristers

Professional Associations

- Missouri Bar Association
 - Lawyer Referral Service Committee
 - Federal Practice Subcommittee

- Missouri Association of Trial Attorneys
 - Board of Governors
 - Amicus Committee
 - President’s Award, 2021

- American Association for Justice

- Federal Bar Association

- Boone County Bar Association
 - Secretary (2009-2010)

Community Involvement

- Chipping in for Charity Golf Tournament
 - Planning Committee, 2007 to present

- Acacia Lodge No. 602, A.F. & A.M

- Arabian Horse Association, Member
 - Central States Arabian Horse Association, volunteer counsel

SANDER C. SOWERS

Sander Sowers is experienced in representing people in a variety of types of litigation. His practice includes representing individuals in serious personal injury, workers' compensation, mass torts cases, wage and hour (overtime) cases, and other collective and class action cases.

Sander is a part of many professional associations and community activities. Sander was elected by his peers to serve on the Missouri Bar Association Board of Governors as the District 15 representative. Prior to serving on the Board of Governors, Sander was likewise elected by his peers to serve on the Missouri Bar Association Young Lawyers' Section Council as the District 5 representative and ultimately served as the Chair of the Young Lawyers' Section. Sander received the Dr. Warren Solomon Civic Virtue Award in 2016 for his involvement with the Missouri Bar Association's citizen education program. Sander is also an active member of the Boone County Bar Association and has served as the Young Lawyers Committee Chairperson and currently serves as the Community Involvement Committee Chairperson. For his work in organizing the Boone County Bar Association's annual charity golf tournament, Sander received the Outstanding Service Award in 2015. Sander also serves on the board of directors of the Missouri Lawyer Trust Account Foundation. Sander was involved in the Columbia Chapter of Rotaract and previously served on the board of directors of the Family Counseling Center of Missouri.

When not practicing law, Sander enjoys many hobbies, including golf, water sports, and following the University of Missouri basketball and football teams.

Speaking Engagements

- Moderator for panel discussion, View from the Bench – Perspectives and Advice from Young Judges Especially for the Young Lawyer, Missouri Bar Annual Meeting (2017)
- Third year law student Professionalism Program – New Lawyer Challenges, University of Missouri School of Law (2016)
- Missouri Bar Annual Meeting, Stepping Up to the Bar: Resources for Success in Your Legal Career (2013)
- Daughters of the American Revolution, Eldon, Missouri Chapter, Missouri's Non-Partisan Court Plan (2012)
- Cooper County Democrats, Missouri's Non-Partisan Court Plan (2011)
- Daughters of the American Revolution, Hannah Cole Chapter, Missouri's Non-Partisan Court Plan (2010)
- University of Missouri College of Agriculture, Dr. Stephen Matthews' Agricultural Law class, general practice of law (2007)

Admitted to Practice

- Missouri State Courts
- U.S. District Court – Western District of Missouri
- U.S. District Court – Eastern District of Missouri
- U.S. District Court – Northern District of Illinois

SANDER C. SOWERS

Education

- Saint Louis University, J.D.
 - Saint Louis University Law Journal
- University of Missouri – Columbia, B.S.

Professional Associations

- Missouri Bar Association
 - Board of Governors, 2018 to present
 - Young Lawyers Section Council, District 5 Representative, 2009 to present
- Missouri Association of Trial Attorneys
- Boone County Bar Association
 - Young Lawyers Committee, Chair, 2008 to present
 - Jim Butcher Memorial Picnic Committee, 2008 to present

Community Involvement

- Chipping in for Charity Golf Tournament
 - Chair, 2008 to present
- Family Counseling Center of Missouri, Inc.
 - Advisory Committee, 2012 to present
 - Board of Directors, 2011 to 2012
- Rotaract, Columbia Chapter 2007 to 2011

ANTHONY J. MEYER

Anthony (Tony) Meyer joined Lear Werts after serving as a law clerk to the Honorable Paul C. Wilson of the Missouri Supreme Court. He uses his skills as a researcher and writer to advocate for his clients throughout the course of litigation. He especially enjoys working through complex procedural or constitutional problems. His practice areas include consumer protection, mass torts, complex litigation, and employment law. He is a co-author of the chapter “Labor Law in the Public Sector” in the forthcoming legal treatise *Labor Law Landscape*.

Prior to entering law school, Tony completed a Master’s degree in English literature and worked as an English and writing instructor. As a law student at the University of Missouri, he was selected as the Managing Editor of the *Missouri Law Review* and was a member of the Veterans Law Clinic. He graduated with honors and was elected by the faculty into the Order of the Coif.

Tony enjoys all the things about the great outdoors — gardening, camping, canoeing, bike riding, and — most of all — hiking with his wife and young daughter.

Publications & Speaking Engagements

- *The Federal Arbitration Act, Rules of Decision, and Congress’ Exercise of Judicial Power*, 106 Minn. L. Rev. Headnotes (forthcoming Nov. 2021).
- *Standing in Missouri’s Federal and State Courts*, 77 J. Mo. B. 120 (2021)
- Rafael Gely & Anthony Meyer, *Labor Law in the Public Sector*, *Labor Law Landscape* (Forthcoming, Wolters Kluwer).
- *Not Objecting to Prosecutor’s Offering of Fifth Amendment Protections from a Civil Deposition Is Ineffective Assistance of Counsel*, 83 MO. L. REV. 239 (2018).
- *Sound and Fury: Substantial Evidence in State v. Bruner*, 82 MO. L. REV. 531 (2017).

Admitted to Practice

- Missouri State Courts
- California State Courts

Education

- University of Missouri, J.D.
 - Order of the Coif
 - Missouri Law Review
 - Veterans Law Clinic
- Truman State University, M.A., English
- Knox College, B.A., English

Professional Associations

- Missouri Bar Association
- Boone County Bar Association, Member
- Elwood L. Thomas Inn of Court, Associate
- Mid-Missouri Young Lawyer’s Association, 2019 Board Member

MEGAN JONES

Megan Jones is a paralegal at Lear Werts LLP. Megan concluded her bachelor's degree in Paralegal Studies from William Woods University in 2012. Thereafter, she began working with Lear Werts LLP where she handles the majority of the firm's document management, data entry, logistics, and other organizational work. Megan has taken an active role in class action and mass tort litigation pending around the country.