

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 17-21468-CIV-RNS

LISA MOLLICONE and MILLIE LAND,)
on behalf of themselves, all others similarly)
situated, and the general public,)
)
Plaintiffs,)
)
vs.)
)
)
UNIVERSAL HANDICRAFT, INC.,)
D/B/A “Deep Sea Cosmetics” d/b/a)
“Adore Organic Innovations;” and)
SHAY SABAG SEGEV,)
)
Defendants.)
)
	/

**DECLARATION OF CULLIN O’BRIEN IN SUPPORT OF JOINT MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND
CERTIFICATION OF SETTLEMENT CLASS**

I, Cullin O’Brien, declare as follows:

1. I am one of the attorneys designated as Class Counsel for the Plaintiffs under the Settlement Agreement (“Settlement” or “Agreement”) entered into with Defendants Universal Handicraft, Inc. and Shay Sabag Segev (“Defendants”). I submit this declaration in support of the Parties’ Joint Motion for Preliminary Approval of Class Action Settlement and Certification of Settlement Class. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration, and could testify competently to them if called upon to do so.

2. I founded Cullin O’Brien Law, P.A. I am the only lawyer at the firm.

3. I graduated from Harvard Law School in 2002. I graduated from Tufts University in 1999, with a Bachelor of Arts in Philosophy. I studied philosophy and other subjects at the

University of Chile, in Santiago, Chile during the fall of 1997, as part of a Tufts in Chile program.

4. I have been a member of the Florida bar since 2002. I was admitted to the Ohio bar in late-2015. I am admitted to practice in the Southern, Middle, and Northern Federal District Courts of Florida and the Northern Federal District of Ohio. I am admitted to practice in the U.S. Supreme Court, the U.S. Court of Appeals for the 11th Circuit, 9th Circuit, 8th Circuit, 6th Circuit, and the 3rd Circuit.

5. I have extensive class action experience for many years. *See, e.g., In re Gardner Denver, Inc. S'holder Litig.*, No. 8505-VCN (Del. Ch. 2014) (\$29 million class settlement regarding corporate merger); *In re American Greetings Corp. S'holder Litig.*, Lead Case No. CV 12 792421 (Ohio Ct. Common Pleas Cuyahoga, Cnty., 2013) (shareholder class settlement resulting in \$23 million in additional merger consideration); *In re Winn-Dixie Stores, Inc. S'holder Litig.*, No. 16-2011-CA-010616 (Fla. Cir. Ct. 4th Jud. Cir., Duval, Cnty., 2014) (shareholder class settlement regarding challenge to corporate merger resulting in agreement to provide \$11.85 million in total outlay).

6. U.S. District Judge for the Central District of California, Cormac J. Carney, appointed me as class counsel in *Johnson v. General Mills*, No. SACV 10-00061-CJC(ANx), 2013 WL 3213832, at *3-*4 (C.D. Cal. June 17, 2013), noting my class action experience. The *Johnson* case settled for a common fund of \$8.5 million.

7. I have class action experience before this Court for many years. In *Smith v. Wrigley*, 663 F. Supp. 1336 (S.D. Fla. 2009), I was a member of the team that defeated the defendant's motion to dismiss. Our team later achieved a settlement on a classwide basis for a potential fund of \$7 million. *Smith v. Wm. Wrigley Jr. Co.*, No. 09-60646-CIV, 2010 WL 2401149, at *1 (S.D. Fla. June 15, 2010) (\$6 million initial tier with \$1 million additional tier). The settlement had objectors, who appealed. I was a member of the team that defeated the objection in the appeal. *Smith v. Wrigley*, No. 10-15698 (11th Cir. Mar. 16, 2011).

8. I was a member of the team that achieved a \$6.25 million settlement regarding alleged unlawful strip searches of female arrestees. *Haney v. Miami-Dade County*, Nos. 04-20516 *et al*, (S.D. Fla. 2005).

9. Cullin O'Brien Law, P.A., has an active class action practice in many jurisdictions, including in this Court. For instance, I was recently appointed as class counsel in a

\$1 million settlement in class and collective action for workers at an entertainment club. *Stevenson et al v. P.T.G. Entertainment, Inc., et al.*, No.: 15-cv-61792 (S.D. Fla. Oct. 27, 2016).

10. Based on my experience, I believe that the instant settlement is fair, adequate and reasonable.

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

Executed on this 30th day of March, 2018 in Ft. Lauderdale, Florida.

/s/ Cullin O'Brien
CULLIN O'BRIEN