

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

IN RE INFINITY Q DIVERSIFIED ALPHA FUND SECURITIES LITIGATION)	Index No. 651295/2021
)	<u>CLASS ACTION</u>
)	Part 53: Justice Andrew S. Borrok
THIS DOCUMENT RELATES TO: THE CONSOLIDATED ACTION)	
)	
)	
DOMINUS MULTIMANAGER FUND, LTD., Individually and on Behalf of all Others Similarly Situated,)	Index No. 652906/2022
)	<u>CLASS ACTION</u>
Plaintiff,)	Part 53: Justice Andrew S. Borrok
)	
v.)	
)	
INFINITY Q CAPITAL MANAGEMENT LLC, et al.,)	
)	
Defendants.)	
)	

**AFFIRMATION OF MICHAEL E. CRDIEN ON BEHALF OF CRIDEN & LOVE, P.A.
IN SUPPORT OF APPLICATION FOR AWARD OF
ATTORNEYS' FEES AND EXPENSES**

I, MICHAEL E. CRIDEN, hereby affirm as follows:

1. I am a partner with the law firm of Criden & Love, P.A. (“C&L” or the “Firm”). I submit this affirmation in support of my Firm’s application for an award of attorneys’ fees, expenses, and charges in connection with the above-captioned actions (the “Actions”).

2. The Firm serves as counsel (“Plaintiff’s Counsel”) on behalf of Plaintiff Andrea Hunter (“Andrea Hunter” or “Plaintiff”), in *Infinity Q Diversified Alpha Fund Securities Litigation*, Index No. 651295/2021.

3. The information contained in this affirmation is taken from time and expense records prepared and maintained by the Firm in the ordinary course of business. The information was prepared by my staff and reviewed by me. The purpose of the review was to confirm the accuracy of, and the necessity for, the time and expenses committed to the Actions. I believe the time (reflected in the Firm’s lodestar) and the expenses for which payment is sought were reasonable and necessary to prosecute the Actions. I also believe the expenses are of a type normally charged to a fee-paying client in the private legal marketplace.

4. The hours spent on the Actions by the Firm as set forth in Exhibit A, totals 270.5, and the lodestar, based on current billing rates, totals \$168,725. The hourly rates are the usual and customary rates set by the Firm for each timekeeper.

5. The Firm seeks an award of \$375.26 in expenses and charges. The expenses and charges are summarized in Exhibit B and described below:

- (a) **Online Research: \$375.26.** PACER, Westlaw, and other online services, billed at cost, used to obtain EC filings, legal research, and court filings.

6. The expenses set forth in Exhibit B are reflected in the accounting records of the Firm. The accounting records were prepared from expense vouchers, check records, and other source materials and are an accurate record of the expenses incurred.

7. Biographical information about the Firm is set forth in Exhibit C.

I affirm under penalty of perjury under the laws of the United States of America that to the best of my knowledge, the foregoing is true and correct.

Executed this 20th day of December 2022 at Miami, Florida.



MICHAEL E. CRIDEN

PRINTING SPECIFICATIONS STATEMENT

1. Pursuant to 22 N.Y.C.R.R. §202.70(g), Rule 17, the undersigned counsel certifies that the foregoing affirmation was prepared on a computer using Microsoft Word. A proportionally spaced typeface was used as follows:

Name of Typeface: Times New Roman
Point Size: 12
Line Spacing: Double

2. The total number of words in the affirmation, inclusive of point headings and footnotes and exclusive of the caption, signature block, and this Certification, is 360 words.

DATED: December 20, 2022

Respectfully submitted,

CRIDEN & LOVE, P.A.

s/ Michael E. Criden
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Counsel for Plaintiff Andrea Hunter

EXHIBIT A

EXHIBIT A**CRIDEN & LOVE, P.A.**

PROFESSIONAL	STATUS	HOURLY RATE	TOTAL HOURS	TOTAL LODESTAR AT HOURLY RATES
Michael E. Criden	P	\$850	117.5	\$99,875
Lindsey C. Grossman	P	\$450	153	\$68,850
TOTALS:			270.5	\$168,725

EXHIBIT B

EXHIBIT B**CRIDEN & LOVE, P.A.**

CATEGORY	AMOUNT
Online Research	\$375.26
TOTAL	\$375.26

EXHIBIT C

CRIDEN & LOVE, P.A.
ATTORNEYS AT LAW

CRIDEN & LOVE, P.A. is a litigation firm of experienced trial lawyers that devotes a substantial amount of its practice to class action litigation. Specifically, the Firm focuses on antitrust class action litigation, consumer protection class action litigation, securities litigation and complex commercial litigation. A brief biography on the attorneys in the Firm is set forth below.

Michael E. Criden graduated with honors from the University of Miami School of Law and was admitted to the Florida Bar in 1987. Mr. Criden has over thirty years of experience in class action litigation, including consumer fraud, antitrust and securities matters.

Below is a list of just some of the cases that Mr. Criden is currently involved in: *In re Vascepa Antitrust Litigation Indirect Purchaser Plaintiffs*, No. 21-cv-12061 (D.N.J.); *Mogollon v. The Bank of New York Mellon*, Case No. 19-cv-3070 (N.D. Tex.); *Surgical Instrument Service Company, Inc. v. Intuitive Surgical, Inc.*, Case No. 3:21-cv-03496 (N.D. Cal.); *Koza v. Mutual Fund Series Trust, et al.*, Case No. 20-CA-004929 (Lee County, Florida); *In re Infinity Q Diversified Alpha Fund Securities Litigation*, Case No. 651295/2021 (Supreme Court of New York); *Baron, et al. v. Syniverse Corp.*, Case No. 8:21-cv-02349 (M.D. Fla.); *Fadi Dahhan, et al. v. OvaScience, Inc., et al.*, Case No. 17-cv-10511 (D. Mass.); *In re: Foreign Exchange Benchmark Rates Antitrust Litigation*, Case No. 13-cv-07789 (S.D.N.Y.); *In re: LIBOR-Based Financial Instruments Antitrust Litigation*, MDL No. 2262 (S.D.N.Y.); and *In re: Disposable Contact Lens Antitrust Litigation*, Case No. 15-md-02626 (M.D. Fla.).

* * *

Criden & Love has served as Lead Counsel or in a leadership capacity in various cases including: *Leonard Sokolow v. LJM Funds Management, Ltd.*, Case No. 18-CH-11880 (Cook County, Ill.); *Juan Carlos Macias, et al. v. TD Bank, N.A.* Case No. 16-03420 (D.N.J.); *Jesse*

Aronstein et al. v. Massachusetts Mutual Life Insurance Co. et al, Case No. 15-cv-12864 (D. Mass.); and *Vista Healthplan, Inc. v. Cephalon, Inc.*, Case No. 06-cv-01833 (E.D. Pa.) (“Provigil Antitrust Litigation”).

* * *

Kevin B. Love graduated *magna cum laude* from Boston University School of Law. After graduation, Mr. Love clerked for The Honorable Emmett R. Cox of the Eleventh Circuit Court of Appeals. Mr. Love then spent a year teaching Constitutional Law and Legal Writing at the University of Miami School of Law. Mr. Love began his practice with the law firm of Stearns, Weaver, Miller, Weissler, Alhadeff & Sitterson, and later became a shareholder in 1997. Mr. Love’s practice currently focuses on securities, consumer-fraud and antitrust class actions.

Mr. Love, as Lead Counsel in *Vista Healthplan, Inc. v. Bristol-Myers Squibb Co. and American Bioscience*, Case No. 01-1295 (D.D.C.), an antitrust class action, recovered \$15,000,000 in a settlement for a class of third-party payors. Additionally, Mr. Love, as Lead Counsel, recovered \$9,708,000 in *Johnson v. National Western Life Ins. Co.*, No. 01-032012-CP (Mich. Cir. Ct.), a consumer-fraud class action wherein it was alleged that National Western was selling inferior annuity products to the elderly. In addition, as Co-Lead Counsel in *DDAVP Indirect Purchaser Litigation*, No. 05-2237 (CLB) (S.D.N.Y.), Mr. Love was able to secure a \$4.75 million settlement.

Mr. Love has been instrumental in recovering additional millions of dollars in several antitrust and consumer fraud cases. *See, e.g., Best v. Wilmington Trust Company*, Case No. 99-889-Civ-Jordan (S.D. Fla.) (\$3,225,000); and *Gregersen v. One International Associates Limited Partnership*, C.A. No. 17274 (Del. Ch.) (\$2,000,000). Mr. Love also was Lead Counsel for Third-Party Payors in *In re Remeron Antitrust End-Payor Antitrust Litigation*, responsible for allocating a \$36 million settlement fund with several State Attorneys General who represented consumers

and state agencies. *See also In re: Ovcon Indirect Purchaser Litigation*, Case No. 05-2327 (D.D.C.) (Lead Counsel); *In re: Puerto Rican Cabotage Antitrust Litigation* (Steering Committee); *In re: Bananas Antitrust Litigation*, No.: 05-21962 (S.D. Fla.) (Executive Committee); and *In re: Insurance Brokerage Antitrust Litigation*, MDL No. 1663 (D.N.J.) (Steering Committee).

Mr. Love served as Co-Lead Counsel in *Vista Healthplan, Inc. v. Cephalon, Inc.*, 06-1833 (E.D. Pa.) (“*Provigil Antitrust Litigation*”). In addition, in January 2009, the Securities and Exchange Commission appointed Mr. Love to be the Distribution Agent for the K.W. Brown SEC Fair Funds Disgorgement Fund (\$6,500,000). Previously, in May 2005, Mr. Love was appointed by the SEC to be the Distribution Agent for the Spear & Jackson SEC Disgorgement Fund (\$7,500,000). And, in February 2007, Mr. Love was appointed by the SEC as the Distribution Agent for the SEC Grabarnick Disgorgement Fund.

* * *

Lindsey C. Grossman graduated *cum laude* from the University of Miami School of Law in 2013. During law school, Lindsey served on the International & Comparative Law Review. She also served as a judicial intern for the Honorable Edwin G. Torres in the United States District Court for the Southern District of Florida. Ms. Grossman’s practice currently focuses on securities, consumer-fraud and antitrust class actions.

Below is a list of just some of the cases that Ms. Grossman is currently involved in: *Mogollon v. The Bank of New York Mellon*, Case No. 19-cv-3070 (N.D. Tex.); *Koza v. Mutual Fund Series Trust, et al.*, Case No. 20-CA-004929 (Lee County, Florida); *In re Infinity Q Diversified Alpha Fund Securities Litigation*, Case No. 651295/2021 (Supreme Court of New York); *Fadi Dahhan, et al. v. OvaScience, Inc., et al.*, Case No. 17-cv-10511 (D. Mass.); *In re: Foreign Exchange Benchmark Rates Antitrust Litigation*, Case No. 13-cv-07789 (S.D.N.Y.); and *In re: Disposable Contact Lens Antitrust Litigation*, Case No. 15-md-02626 (M.D. Fla.).