

EXHIBIT 4

PIERCE GORE
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EDUCATION

1986 J.D. and M.B.A. degrees from Vanderbilt University

RELEVANT LEGAL EXPERIENCE

1997-1999 Associate attorney-Lieff, Cabraser, Heimann & Bernstein LLP

Responsible for briefing, depositions, and voluminous document discovery in consumer fraud and product liability class action and MDL cases:

Edsaco, Ltd. LCHB served as Co-Lead Counsel in class action suits arising from an alleged fraudulent scheme by Scorpion Technologies, Inc., certain of its officers, accountants, underwriters and business affiliates to inflate the company's earnings through reported fictitious sales. A federal jury returned a \$170.7 million verdict against Edsaco. The jury found that Edsaco aided Scorpion in setting up phony European companies as part of a scheme in which Scorpion reported fictitious sales of computer software to these companies, thereby inflating its earnings.

Sulzer Orthopedics, Inc. In 2000, Sulzer recalled 30,000 units of its Inter-Op Acetabular Shell Hip Implant, followed with a notification of failures of its Natural Knee II Tibial Baseplate Knee Implant. In federal litigation (MDL 1410), LCHB played a significant role in negotiating a settlement with Sulzer valued at more than \$1 billion.

Multi-state Tobacco Litigation LCHB represented the Attorneys' General of Massachusetts, Illinois, Louisiana, Indiana, Rhode Island and New Hampshire and 18 cities and counties in California, including the City and County of San Francisco, the City of Los Angeles and the City of San Jose, in litigation against Philip Morris, R.J. Reynolds and other cigarette manufacturers.

2000-2002 Partner-Lieff, Cabraser, Heimann & Bernstein LLP

Opened LCHB's Nashville office and began collaborating with national group of attorneys prosecuting consumer fraud class actions against insurance companies. Litigated and settled the following class actions:

The Progressive Corp. Prosecuted four cases in state and federal courts in Florida, Ohio and Illinois, all alleging that Progressive and its agents employed a deceptive and unlawful scheme to sell identical auto insurance at multiple prices, in violation of state consumer protection statutes and common law. All four cases were resolved in a settlement that obtained for Progressive policyholders monetary and injunctive relief valued at more than \$500 million.

2002-2010 Sole practitioner

Worked with attorneys in Mississippi, Ohio, Florida, Illinois and Tennessee prosecuting consumer fraud class actions against insurance companies. Litigated and settled the following class actions:

Safeco Insurance Company Prosecuted cases in state and federal court, alleging that Safeco and its agents employed a deceptive and unlawful scheme to sell identical auto insurance at multiple prices, in violation of state consumer protection statutes and common law. Both cases were resolved in a settlement that obtained for Safeco policyholders monetary and injunctive relief valued at more than \$100 million.

Travelers Insurance Company Prosecuted multi-state class action alleging that Travelers and its agents employed a deceptive and unlawful scheme to sell identical auto insurance at multiple prices, in violation of state consumer protection statutes and common law. The case resulted in a settlement that obtained for Travelers policyholders monetary and injunctive relief valued at more than \$50 million.

Auto Owners Insurance Company Prosecuted a multi-state class action alleging that Auto Owners and its agents employed a deceptive and unlawful scheme to sell identical auto insurance at multiple prices, in violation of state consumer protection statutes and common law. The case resulted in a settlement that obtained for Auto Owners policyholders monetary and injunctive relief valued at more than \$30 million.

Travelers Property Casualty Insurance Company Over five years, prosecuted an extensively litigated multi-state consumer fraud class action, alleging that Travelers and its agents employed a deceptive and unlawful scheme to sell identical homeowners insurance at multiple prices, in violation of state consumer protection statutes and common law. In 2009, a federal court in Ohio certified an Ohio litigation class of Travelers policyholders. The multi-state settlement that followed obtained for Travelers policyholders monetary and injunctive relief valued at more than \$25 million.

Since 2002, I have traveled weekly or monthly to Florida, Illinois, Ohio, Tennessee, Mississippi and Illinois to work with my co-counsel. I have taken more than 200 depositions, made dozens of appearances in state and federal court, conducted extensive document discovery, and prevailed in extraordinarily contentious litigation against the largest firms in the insurance defense bar. My work has been profitable for my colleagues and me, and has won the praise of at least one federal court judge. (Please see Stanich v. Travelers, U.S. District Court, N.D. Ohio, Case No. 1:06-cv-00962-KMO, Docket No. 194, Order and Opinion approving attorneys' fees).

Writing samples and references upon request.

PERSONAL

Responsible for fund-raising for Congressional, Senate and Presidential campaigns of Al Gore. Senior Warden at St. Luke's Episcopal Church in Los Gatos. Married since 2004.