

HRISTINA BOJADZIEVA BARTLETT

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Ms. Bartlett has over 18 years of experience applying financial, accounting, and statistical analyses to finance, insurance, labor and employment, privacy, intellectual property, class action, and commercial dispute matters, with deep experience in damages calculation, valuation, and health care. She has been retained as an expert in numerous cases and has testified at deposition and trial. Ms. Bartlett's work has involved calculation of lost profits, lost wages, and lost earnings capacity; accounting investigations; liquidity and solvency analyses; and valuation of companies and joint ventures. Her class certification experience spans various practice areas, including data privacy, labor and employment, health care, and securities. Ms. Bartlett is a CFA charterholder and holds the American Institute of Certified Public Accountants' Accredited in Business Valuation (ABV) credential.

EDUCATION

M.B.A. Finance and accounting (*top 2%*), UCLA Anderson School of Management
B.A. Economics (*magna cum laude*), Smith College

PROFESSIONAL EXPERIENCE

2005–Present Analysis Group, Los Angeles, CA and Washington, DC

SELECT EXPERT ASSIGNMENTS

▪ **McGriff Insurance Services, Inc., f/k/a BB&T Insurance Services, Inc. v. Whitney Suplick, Andrew Fox, Charles Cook, Alex Gibson, and Alliant Insurance Services, Inc.**

Ninth Judicial Circuit Court of Florida, Orange County

Submitted an expert report on plaintiff's lost profits from defendant's alleged wrongful acts.
Testified in deposition (February 2024).

▪ **McGriff Insurance Services, Inc. v. Christopher Wilson**

Superior Court of North Carolina, Forsyth County

Submitted an expert report on plaintiff's lost profits from defendant's alleged wrongful acts.
Testified in deposition (February 2024).

▪ **Jamie McLeod v. 1LIFE Healthcare, Inc.**

JAMS Arbitration

Submitted an expert report on plaintiff's economic losses from alleged wrongful termination and failure to pay severance benefits. Testified in arbitration (December 2024).

▪ **Michael Mostov v. Snowflake, Inc.**

JAMS Arbitration

Submitted an expert report on plaintiff's economic losses from alleged wrongful termination.

▪ **Confidential data privacy case**

US District Court, Northern District of California, San Jose Division

Consulting expert on a case involving allegations that the defendant shared user data with third parties without user consent and profited from this data sharing. Assisted with rebutting plaintiffs' experts' proposed class-wide damages method for calculating unjust enrichment and compensatory damages.

▪ **McGriff Insurance Services, Inc. v. Ryan Hudson, et al.**

Superior Court of North Carolina, Forsyth County

Disclosed as an expert to opine on plaintiff's lost profits from defendants' alleged wrongful acts.

▪ **National Fire and Marine Insurance Company v. Glen Health & Home Management, Inc., et al.**

US District Court, Northern District of Illinois

Submitted an expert report on the solvency of Glen Health & Home Management and affiliated companies.

▪ **Niloufar Ghafouri v. Sussan Daftary, et al.**

Superior Court of California, Los Angeles County, Central District

Testified in deposition on the amount paid for plaintiff's medical services and whether that amount was reasonable.

▪ **Jon Hart, et al. v. TWC Product and Technology, LLC**

US District Court, Northern District of California

Retained as a testifying expert in a privacy class action to opine on whether damages could be reliably calculated on a class-wide basis and whether there is a class-wide methodology for allocating damages to individual class members. Submitted two expert reports.

▪ **Confidential data privacy case**

US District Court, Northern District of California, San Jose Division

Consulting expert on a case involving allegations that defendant collected user data while users browsed the internet using a specific browser and used this data to personalize ad content without user consent. Assisted with rebutting plaintiffs' experts' proposed class-wide damages method for calculating unjust enrichment and compensatory damages.

▪ **Confidential data privacy case**

US District Court, Northern District of California, San Jose Division

Consulting expert on a case involving allegations that defendant collected user data while users browsed the internet in private browsing mode and used this data to personalize ad content without user consent. Assisted with rebutting plaintiffs' experts' proposed class-wide damages method for calculating unjust enrichment and compensatory damages.

▪ **Omayya Ismail v. eCivis, et al.**

Superior Court of California

Provided deposition testimony on plaintiff's damages from defendant's alleged defrauding of minority investors. Submitted declaration on circumstances under which minority shareholders could be damaged by ownership dilution caused by unnecessary or excessive issuance of new shares.

▪ **Advanced Orthopedic Center, Inc. v. Regal Medical Group, Inc.**

Superior Court of California, Los Angeles County

Testified in trial on whether plaintiff suffered damages.

- **Jonathan Nissanoff, M.D. v. Regal Medical Group, Inc.**
Superior Court of California, Los Angeles County
Testified in trial regarding the reasonableness of plaintiff's damage claims.
- **Alexander Ramlie, et al. v. Hannah Ashby**
Superior Court of California, Los Angeles County
Submitted a declaration describing defendant's use of company funds for personal use and quantifying the amount that plaintiff was damaged by defendant's embezzlement of corporate funds.
- **Santa Barbara Cottage Hospital v. Global Excel Management Inc., et al.**
US District Court, Central District of California
Submitted affirmative and rebuttal reports regarding the reasonable value of plaintiff's services and damages.
- **Katie Feeney v. United States of America**
US District Court, Eastern District of California
Prepared report on plaintiff's lost earning capacity and the appropriate discount rate for the plaintiff's life care plan.
- **Eight related lawsuits from Providence Hospitals (Mission, St. Jude, and St. Joseph) against Heritage Provider Network, including St. Jude Hospital d/b/a St. Jude Medical Center v. Heritage Provider Network, et al.**
Superior Court of California, Orange County
Retained by counsel for Heritage Provider Network as the damages expert.
- **The Regents of the University of California v. Heritage Provider Network**
JAMS Arbitration
Retained as the damages expert to opine on plaintiffs' damages from defendants' alleged wrongful acts. Case is ongoing.
- **DaVita Healthcare Partners v. Bakersfield Family Medical Group, et al.**
JAMS Arbitration
Retained as the damages expert to opine on DaVita's damages from respondents' alleged wrongful acts. Designed the sampling protocol with an opposing expert. Case is ongoing.
- **Regents of the University of California v. Beacon Health Options Inc.**
US District Court, Central District of California
Retained as an expert to rebut the opposing expert's report on the reasonable value of plaintiff's services.
- **Evelyn Rorem v. HCR Manor Care LLC, et al.**
Superior Court of California, Alameda County
Retained as the damages expert in a medical malpractice lawsuit involving a dispute over the present value of life care plan expenses.
- **Crown Automobile Co., Inc. v. Mercedes-Benz USA, LLC**
Tenth Judicial Circuit Court of Alabama, Jefferson County, Birmingham Division
Retained as a consulting expert to analyze financial statements of automotive dealerships and determine the profitability, solvency, and overall financial performance of each dealership.

▪ **10PD Inc. v. Carlos Nieto, et al.**

Superior Court of California, Los Angeles County, West District

Retained as a consulting expert in a financial fraud and conversion case to analyze bank accounts and transactions and determine the amount of money plaintiffs lost due to embezzlement by co-defendant.

▪ **Samuelian, et al. v. Life Generations Healthcare**

Judicate West

Retained as a consulting expert to assist counsel with evaluating the financial performance of a chain of nursing homes.

SELECTED CONSULTING EXPERIENCE

Commercial Litigation and Damages

- As consulting expert, assisted counsel for defendants in several national privacy class actions with evaluation and rebuttal of plaintiffs' allegations regarding class-wide damages.
- Assisted counsel and supported the damages expert with the calculation of damages in a case involving the merger of two social game developers.
- Assisted counsel and supported the damages expert with the calculation of damages in a case involving an alleged breach of a clause in the merger and acquisition agreement between the parties.
- Retained as a consulting expert in a financial fraud and conversion case to analyze bank accounts and transactions and determine the amount of money plaintiffs lost due to alleged embezzlement by co-defendant.
- Retained as a consulting expert to analyze financial statements of automotive dealerships and determine the profitability, solvency, and overall financial performance of each dealership.
- As consulting expert, assisted counsel for defendant on issues related to damages in a national class action alleging defendant charged excess fees.
- Assisted experts with the calculation of plaintiffs' damages from defendants' alleged wrongful conduct in dozens of other cases.
- Assisted experts in automotive projects involving automotive manufacturers' decisions to add automotive franchises in an existing market or terminate automotive franchises. The analyses included estimating the effect that a new dealership may have on the profits, operations, and viability of existing dealerships, and calculating the effects of decreased competition in the sales locality.
- Assisted with the preparation of quantitative probabilistic analyses to determine the extent to which alleged defective products were purchased by municipal customers in California.
- Analyzed financial statements and opined on the profitability and solvency of numerous automotive dealerships in a consulting engagement with a large luxury car manufacturer.
- Conducted an accounting investigation in a financial fraud and conversion matter involving a multinational financial services organization to determine the amount of money plaintiffs lost due to embezzlement by the co-defendant.

Health Care and Insurance

- Retained as the consulting expert on numerous cases to assist counsel with their evaluation of allegations regarding underpayment for medical services in out-of-network situations and development of calculations for settlement purposes.
- Led a team that evaluated the alleged underpayment for tens of thousands of claims for dialysis services and calculated damages for settlement purposes.

- Led teams that conducted analyses of denials in the claims adjudication process.
- Retained as the consulting expert in a case pertaining to allegations about the quality of services provided by and profitability and payer mix of a chain of long-term care facilities.
- Supported experts in numerous health care insurance cases involving analyses of medical claim payment issues, provider billing practices, and the reasonable value of provider services. Providers included hospitals, physicians, dialysis centers, and substance abuse treatment centers.
- Supported medical billing and coding experts in their evaluation of allegations regarding upcoding or improper billing practices.
- Supported medical practitioners in their evaluation of allegations that medical service providers provided medically unnecessary services to patients.
- Developed sampling protocols for the selection of samples of medical claims to be examined by the parties in their evaluation of case allegations.
- Extrapolated findings from review of samples claims.
- Supported a damages expert in health care insurance cases involving calculation of lost profits from allegedly stolen patients.

Labor and Employment

- Assisted an expert with the assessment of age discrimination claims and calculation of damages.
- Assisted an expert with the assessment of liability and damages in a wage-and-hour dispute involving employees who claimed their job functions qualified them as non-exempt employees.
- Assisted an expert with the calculation of damages in a case against two former employees and their new employer in which the plaintiff alleged that the employees breached non-compete agreements by stealing confidential information.
- Assisted an expert with the calculation of damages in a wrongful termination case.

Intellectual Property

- Assisted clients and experts in assessing intellectual property (e.g., patent, trademark, and trade secret) damages in numerous cases by analyzing public and internal financial data, sales data, and intellectual property license agreements, and calculating reasonable royalty rate, lost profit, cost savings, and unjust enrichment damages.

Securities

- In a Section 36(b) case, assisted an affiliate in analyzing whether a mutual fund advisor's investments to enhance the quality of its portfolio management services were a reasonable way to increase the value of the advisor's services.
- Assisted an affiliate with the analysis of whether a securities lending agent and portfolio manager of a public employee retirement plan breached the agent's fiduciary duty by purchasing certain investments for the client's portfolio.
- Assisted an affiliate with the analysis of whether a mutual fund advisor charged excessive fees for over 60 mutual funds, and whether the mutual fund advisor benefited from economies of scale and fall-out benefits.
- Assisted an affiliate in the evaluation of alleged misrepresentations and omissions in the underwriting of residential mortgage-backed securities (RMBS) in numerous cases. The work included analysis of the risk characteristics of the collateral loan pool of over two dozen RMBS to representations made in offering documents to ascertain whether security underwriters, issuers, and sponsors satisfied industry standards of fiduciary duty and care.
- Assisted with the assessment of damages exposure for a custodian bank that acted as an indenture trustee for a billion-dollar Ponzi scheme. Provided consulting support for settlement negotiations

- with the receiver appointed by the Securities and Exchange Commission and class action plaintiffs.
- Assisted with the calculation of damages resulting from the plaintiffs' inability to restructure real estate loans as a result of disruption to the plaintiffs' business caused by illegal execution of a search warrant and seizure of company property.
- Assisted an expert with an analysis of the factors that led to the restatement of the company's receivables and pre-tax income, the impact of the restatements on the company's cash flows over the long term, and the effect of the restatement on the company's stock price.
- Assisted with the examination of investment suitability regarding a major banking institution's purchase of debt securities issued by a structured investment vehicle that later defaulted.
- Assisted client with calculation of investor losses in an alleged Ponzi scheme.
- Assisted with the evaluation of claims related to securities fraud and misrepresentation in Bank of America's acquisition of Merrill Lynch, as well as dissemination and materiality of information related to executive compensation expenses and financial asset write-downs of collateralized debt obligations, credit default swaps, mortgage-backed securities, private equity investments, and goodwill.
- Led numerous stock price analyses, including evaluations of market reaction to news, investor trading patterns, loss causation analyses, and investor knowledge studies. Assisted with the evaluation of liability and damages in Rule 10b-5 and Sections 11 and 12 claims.
- Helped clients analyze exposure and assess investor losses associated with various types of investments, including investments in structured investment vehicles, asset-backed securities, notes of varying maturities, and structured fixed-income securities.

Valuation

- Assisted a damages expert with the calculation of the value of a minority ownership interest in several privately held companies involved in the ownership and management of commercial real estate.
- Replicated and critiqued a valuation of a 50 percent interest in a privately-owned S corporation prepared by a panel of three court-appointed appraisers pursuant to California Corporations Code Section 2000. The valued company was engaged in public procurement, municipal finance, and outsourced staffing for public and government agencies.
- Assisted a damages expert with the valuation and assessment of the viability of a proposed joint venture for training services between a public defense company and a small private company.
- Valued an automotive dealership group that owns and operates over 15 automotive dealerships.
- Assisted with the valuation of a private firm providing call center solutions in a commercial dispute over the value at which the firm was sold.
- Assisted an affiliate with an assessment of the financial viability of a contemplated luxury resort that was intended to be funded, in large part, using funds from a planned private and municipal bond offering.
- Supported counsel's investigation of the directors and officers of a large multinational consulting company. Supported an affiliated expert's damages analysis that included a valuation of the consulting company and its respective business units.
- Assisted with multiple valuation analyses, including valuations of a planned hotel and resort development, a perfume company, and a call-management software developer.

PUBLICATIONS

“When it Comes to the Price Transparency Rule, Not All Data is Created Equal,” with Mark Gustafson and Phil Hall-Partyka, *ABA Health eSource*, Vol. 17, No. 11 (August 2021)

“4 Considerations for Residential Mass Appraisal Valuation,” with Niall MacMenamin, *Law360* (May 23, 2016)

PANELS AND PRESENTATIONS

“Hot Topics in Group Health Plan Administration,” with Bret Busacker and Thomas Senter, The Knowledge Group (June 8, 2021)

“Consulting Pracademia: Avoidance or Collaboration?” with seven co-panelists, including William Passmore, David Coghlan, and Frederick Miller, Academy of Management Annual Conference (July 30, 2021)

AWARDS AND HONORS

Harold M. Williams Fellow (Top 2 percent of class), UCLA Anderson School of Management

J. Fred Weston Award for Excellence in Finance, UCLA Anderson School of Management

Phi Beta Kappa Honor Society