

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
GREENBELT DIVISION

DANIEL METAGUE, on behalf of himself and  
all others similarly situated,

Plaintiff,

v.

WOODBOLT DISTRIBUTION, LLC, d/b/a  
NUTRABOLT,

Defendant.

Case No: 8:20-cv-02186-PX

**DECLARATION OF D. AARON RIHN IN SUPPORT OF PLAINTIFF'S UNOPPOSED  
MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

I, D. Aaron Rihn, make the following declaration based on my personal knowledge of the facts herein and, if called as a witness, could competently testify to such fact:

1. I am one of the attorneys of record for Plaintiff Daniel Metague, on behalf of himself and all others similarly situated.

2. I submit this Declaration in Support of the Unopposed Motion for Preliminary Approval of Class Settlement.

3. With respect to the standing of counsel in this case, I have significant experience in class action litigation. I have served and continue to serve as counsel in a number of other class action and collective action cases across the county, including, but not limited to: *Bland v. CALFRAC*, 2:12-cv-1407 (W.D. Pa.); *Decker v. U.S. Well Services, LLC*, 2:16-cv-755 (W.D. Pa.); *Smith v. RGIS*, 2:16-cv-841 (W.D. Pa.); *Gordon v. Maxim Healthcare Services, Inc.*, 2:13-cv-7175 (E.D. Pa.); *Morel Then v. Great Arrow Builders, LLC*, 2:20-cv-00800 (W.D. Pa.); *Allen v. Waste Pro*,

8:17-cv-02254-T-36CPT (M.D.Fla.); *McDonald v. Franklin County, Ohio*, 2:13-cv-00503 (S.D. Ohio); and *Erby v. Allstate Insurance Co.*, 2:18-04944 (E.D. Pa.).

4. Based upon my experience, I am confident that this settlement is fair and reasonable both standing on its own and when viewed against similar class action lawsuits.

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

Executed on this 20th day of January 2023.

ROBERT PEIRCE & ASSOCIATES, P.C.

/s/ D. Aaron Rihn

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# **ROBERT PEIRCE & ASSOCIATES, P.C.**

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The firm has effectively litigated numerous class actions against oil and gas companies, insurance companies, the Pennsylvania Department of Public Welfare, correctional facilities and others. Capitalizing on the mass tort and complex litigation, the firm has become involved in pharmaceutical litigation. The firm has represented and continues to represent clients injured by CPAP machines, Vioxx, Actos, Cook IVC filters, hernia mesh, proton pump inhibitors (PPI), defective replacement knees and hips, testosterone replacement drugs, Onglyza, Kombiglyze and many others.

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