EXHIBIT 3

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EDUCATION

University of Miami School of Law
Coral Gables, Florida
Juris Doctor, June 1983

Boston University
Boston, Massachusetts
Bachelor of Arts, May 1978

LEGAL EXPERIENCE

Class action experience includes:

- Co-lead counsel *Coffeng, et al. v. Volkswagenwerk Aktiengesellschaft, et al.*, United States District Court for the District of Northern California, Civil Action No. 3:17-cv-01825-JD

- Executive committee *Salcedo v. Subaru of America, Inc., et al.*, United States District Court, District of New Jersey Civil Action No. 1:17-cv-08173 JHR

- Executive committee *In Re Volkswagen Timing Chain Product Liability Litigation,* United States District Court, District of New Jersey Civil Action No. 2:16-cv-2765 JLL

- Lead counsel *Fisher, et al. v. Mitsubishi Electric Corporation, et al*., United States District Court, District of Connecticut Civil Action No. 3:09-CV-1899 RNC

- Lead counsel *Diveroli, et al. v. Volkswagenwerk Aktiengesellschaft, et al.,* United States District Court, District of Massachusetts Civil Action No. 07-cv-10196 JLT later consolidated into *In re Volkswagen,* MDL 1790

- Other class action proceedings involve defective consumer products including automobiles, automotive products and electronic goods

Non-class action experience includes:

- Thirty-five years of experience involving complex products liability litigation with an emphasis on automotive defects and crashworthiness proceedings

- In excess of fifteen (15) personal injury cases resulting in verdicts or settlements of more than one million dollars

- Representation of gas turbine helicopter engine manufacturer in aviation accidents involving loss of aircraft and personal injury

- Expert witness in subject matter area of automotive products liability in legal malpractice proceedings

- Qualified and testified at trial as an expert witness in the subject matter area of Porsche 911 engine design and repair procedures in Massachusetts District Court

- Co-authored papers presented at Massachusetts Continuing Legal Education products liability seminars

- Prepared course materials presented by past American Association of Justice (formerly ATLA) President at the 34th Annual Advocacy Institute

Automotive experience

- Factory-trained Volvo, Honda, BMW, Mercedes-Benz and Porsche automotive technician and service manager

- Extensive knowledge of vehicle-component design and manufacture together with assembly, test and repair procedures

- Extensive experience in automotive engine blueprinting and race preparation including designing, machining / fabricating automotive components

- Extensive motor vehicle modification and race preparation experience including turbo charging, internal engine components as well as other components including transmissions and suspension systems

- Ability to read and interpret design drawings, schematics and test protocols employing SAE and DIN standards

- Crew member of NASCAR Craftsman Truck Series and NASCAR Busch Series race teams; crew chief for SCCA Porsche 916 race team responsible for engine build and crew member on SCCA Trans-Am Pro Series team

Miscellaneous

- Professional memberships include Society of Automotive Engineers, Association for the Advancement of Automotive Medicine, Center for Auto Safety and Insurance Institute for Highway Safety

- Familiarity with National Highway Traffic Safety Administration investigation procedures, testing protocol and data bases