Paul N. Addison

EDUCATION

University of Arizona – Tucson, AZ B.A., Mathematics and Philosophy, 2014 M.A., Philosophy, 2015 Graduate Certificate, Statistics, 2020 M.S., Statistics and Data Science, *in progress*

POSITIONS

The Fontana Group, Inc., Tucson, Arizona Analyst: 2018 - present

The University of Arizona, Tucson, Arizona Teaching Assistant: 2013 – 2015 Instructor: 2015 – 2018

The United States Airforce Airfield Systems Technician: 2008 - 2012

RESEARCH AND CONSULTING EXPERIENCE

Mr. Addison studies complex economic problems across multiple industries, including the retail automobile and other complex markets for durable goods. He also consults on high profile matters involving conceptual foundations and calculation of economic damages, quantified assessment of dealership contract compliance, dealer profitability and disruptions thereto, financial behavior, and structural changes in the retail automotive market. He has provided over eight thousand hours of consulting in over a dozen engagements relating to, at least, the following:

- Retail automobile franchising, economics, and marketing
- Automotive dealer franchise terminations
- Retail automotive dealer network analysis
- Customer satisfaction measurements
- Automobile manufacturer's product allocation and retail distribution systems
- Automotive dealer profitability
- Consumer protection and product defects

REPRESENTATIVE CLIENT ENGAGEMENTS

Droesser, et al., v. Ford Motor Company, a Delaware Corporation, Detroit, MI, 2024.

FM So Cal LLC, etc. et al., v. BBB Automotive LLC, etc. et al., Los Angeles, CA, 2024.

Stark Automotive, Inc. D/B/A South Point Hyundai and Genesis of Austion, v. Hyundai Motor America and Genesis Motor America, Austin, TX, 2024.

Allison Klein, and Individual, Isaac Lee, an Individual, and Johnson WU, and Individual, on Behalf of Themselves and All Others Similarly Situated, v. LJUBLJANA inter Auto D.O.O., a

Slovenian Corporation, Dr. Ing. H.c.F. Porsche AG, a German corporation, and Porsche Cars North America, Inc., a Delaware corporation, South Pasadena, CA, 2024.

In Re: Honda Idle Stop Litigation, Los Angeles, CA, 2024.

Lou Bachrodt Chevrolet Co., v. Volkswagen Group of America, Inc., Auburn Hills, Illinois, 2024.

Ronnie's Cycle Sales of Pittsfield, Inc., v. Harley-Davidson Motor Company, Inc., Pittsfield, MA, 2024.

In Re: Chrysler Pacifica Fire Recall Products Liability Litigation, Brighton, MI, 2024.

W.N. Motors, Inc. d/b/a Coastal Nissan, v. Nissan North America, Inc., Norwell, MA, 2023.

William Lessin and Carol Smalley, et al, on behalf of themselves and all others similarly situated, v. Ford Motor Company, a Delaware Corporation, San Diego, CA, 2023.

Universal Auto Group d/b/a Subaru of Glendale, a California Corporation, v. Subaru of America, Inc., a New Jersey Corporation, Los Angeles, CA, 2023-2024.

William D. Berluti, individually and directly, William D. Berluti, derivatively on behalf of 120 Universal Drive Associates, LLC, William D. Berluti, derivatively on behalf of R&W Real Estate, LLC, William D. Berluti, derivatively on behalf of Peterbilt of Connecticut, Inc., William D. Berluti, derivatively on behalf of REO Truck Rental, Inc., William D. Berluti, derivatively on behalf of Truck Center, Inc., v. Richard M. Berluti and Peterbilt of Massachusetts, LLC, Old Saybrook, CT, 2023.

Robert Davis and Dr. Bruce Barton, on behalf of themselves and the Putative Class, v. BMW of North America, LLC, and Bayerische Motoren Werke Aktiengesellschaft T, Newark, NJ, 2023.

Kia Hyundai Vehicle Theft Marketing, Sales Practices, and Products Liability Litigation, Encino, CA, 2023.

In Re: Facebook, Inc. Consumer Privacy Litigation, Los Angeles, CA, 2022.

Aaron Gant, et al. v. Ford Motor Company, Orlando, FL, 2023-2024.

Juliet Murphy, et al., v. Toyota Motor Corporation, et al., Sherman, TX, 2023.

Rusnak/Pasadena, a California Corporation v. Jaguar Land Rover North America, LLC, Las Angeles, CA, 2023.

Ranbir Gujral and Danielle Emerson, on behalf of themselves and the Putative Class, v. BMW Of North America, LLC, and Bayerische Motoren Werke Aktiengesellschaft, Cherry Hill, NJ, 2023.

Action Nissan, Inc. D/b/a Universal Hyundai for Itself and in the Name of the Department of Highway Safety and Motor Vehicle of the State of Florida, for its Use and Benefit v. Hyundai Motor America and Genesis Motor America, LLC, Orlando, FL, 2023.

Yandery Sanchez, Louise Knudson, Andrea Reiher-Odom, Derrick Smith, Amber Witt, and Mark Treston, on behalf of themselves and all others similarly situated, v. Kia Motors America, Inc., Central District of CA, 2023.

Chapman, et al, v. General Motors, LLC., Detroit, MI, 2021-2023.

In Re: Duramax Diesel Litigation, Relating to: Nancy Anderton, et al., v. General Motors LLC, et al., Detroit, MI, 2020-2022.

Fox Hills Auto, Inc. D/b/a Airport Marina Ford v. Ford Motor Company, Central Ford Automotive, Inc., dba Central Ford v. Ford Motor Company and Los Feliz Ford, Inc., dba Star Ford Lincoln v. Ford Motor Company, Los Angeles, CA, 2021-2022.

Kenneth John Williams and Another Applicants v. Toyota Motor Corporation Australia Limited, New South Wales, Australia, 2020-2022.

Gabriel Patlan, Ryan Cornell, and La Della Levy, on behalf of themselves and all others similarly situated v. BMW of North America LLC; Wendy Vazquez, on behalf of herself and all individuals similarly situated v. BMW of North America, LLC; Vikkie Wilkinson, on Behalf of Herself and the Putative Class, v. BMW of North America, LLC and Bayersiche Motoren Werke Aktiengesellschaft, Trenton, NJ. 2020-2023.

James Bledsoe, Paul Chouffet, Martin Rivas, Jeremy Perdue, Michael Erben, Martin Witberg, Marty Ward, Alan Strange, James Forshaw, Matt Langworthy, Natalie Beight, Jordan Hougo, Dawn Roberts, and Marc Ganz, on Behalf of Themselves and All Others Similarly Situated, v FCA US LLC, a Delaware Corporation, and Cummins Inc., an Indiana Corporation, Detroit, MI, 2021.

In the matter of Luxury Cars of Bayside, Inc., v. BMW of North America, LLC, Long Island, NY, 2019-2022.

Clarence Simmons, Franklin Navas, Jorge Arroyave, Joseph Dabbs, Jennifer DeWitt, Anne Erdman, Mark James, Shand Jackson, Mike Tierney, Mark Van Bus Kirk, John Buczynski, Ilja Lopatik, Brian Yarborough, William MacSaveny, Ryan Marshall, Allyson Rogers, Peter Tulenko, and Greg Licktenberg, on behalf of themselves and all others similarly situated v. Ford Motor Company, Miami, FL, 2021.

Braman Motors, Inc., d/b/a Braman BMW, for Itself and in the Name of the Department of Highway Safety and Motor Vehicles of the State of Florida, for its Use and Benefit, and Palm Beach Imports, Inc., d/b/a Braman Motorcars, for Itself and in the Name of the Department of Highway Safety and Motor Vehicles of The State of Florida, for its Use and Benefit, and The Department of Highway Safety and Motor Vehicles of the State of Florida, for the Use and Benefit of Braman Motors, Inc. and Palm Beach Imports, Inc. v. BMW of North America, LLC. Miami, FL, 2021.

Between Barry Rebuck and Ford Motor Company and Ford Motor Company of Canada, Limited and Yonge-Steeles Ford Lincoln Sales Limited Proceeding under the Class Proceedings Act, 1992, Toronto, Ontario, Canada, 2018-2020.

Biljana Capic v. Ford Motor Company of Australia Limited, New South Wales, Australia, 2019-2020.

Consultation for Southern California BMW Dealers, Los Angeles, CA, 2018-2020.