

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

MONIQUE BELL, TREE ANDERSON, and  
MELISSA CONKLIN individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

CVS PHARMACY, INC.,

Defendant.

Case No. 1:21-cv-06850-PK

Hon. Peggy Kuo

**DECLARATION OF ADRIAN GUCOVSKI IN SUPPORT OF UNOPPOSED  
MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

I, Adrian Gucovschi, declare as follows:

1. I am a member of the bar of this Court and an attorney at Gucovschi Rozenshteyn PLLC, counsel for Plaintiffs in this action and court-appointed Class Counsel for purposes of the proposed Class Action Settlement. I make this declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement (the "Motion"). I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would competently testify under oath concerning the matters set forth in this declaration.

2. Attached as **Exhibit 1** is a true and correct copy of Gucovschi Rozenshteyn PLLC's firm resume.

3. I have been actively involved in this litigation from its inception. Among other things, I along with Plaintiffs' co-counsel from Bursor & Fisher, P.A. assisted in all of the pleadings and motion practice in this case, including investigating Plaintiffs' claims; researching and preparing the original and amended class action complaints (ECF Nos. 1, 54); researching

and preparing Plaintiff Bell's opposition to Defendant's letters seeking a pre-motion conference regarding its anticipated motion for judgment on the pleadings (ECF Nos. 26, 28); requesting adjournment of the Court's Initial Scheduling Conference (ECF Nos. 27, 29); and researching and preparing Plaintiff Monique Bell's opposition to Defendant's motion for judgment on the pleadings (ECF Nos. 37, 42-45).

4. In addition, I have been involved in all phases of the substantial discovery that took place in this case, including attending the Court's May 10, 2022, in-person hearing before Judge Peggy Kuo to discuss the Parties' anticipated motion for judgment on the pleadings and discovery schedule. I also participated in the Parties informal and written discovery exchanges following the Court's Confidentiality Order (ECF No. 40).

5. Furthermore, I actively participated in the Parties settlement discussions throughout the lawsuit, consulted frequently with co-counsel regarding this topic, and attended all of the preliminary conferences leading up to the full-day mediation on September 28, 2022, before The Honorable Frank Maas (Ret.) of JAMS New York.

6. After the Parties accepted the mediator's proposal on October 4, 2022, I continued to work on all material matters related to the preparation and execution of the class action settlement, the motion for preliminary approval, the fee petition, and this motion for final approval.

I declare under penalty of perjury that the foregoing is true and correct. Executed in New York, New York on January 25, 2024.

/s/ Adrian Gucovschi  
Adrian Gucovschi





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## **FIRM RESUME**

Headquartered in New York, NY, Gucovski Rozenshteyn PLLC (“GR Firm”) represents consumers in state and federal courts nationwide. Our firm spearheads and prosecutes novel cases aimed at redressing injuries suffered by large and diverse groups of people. In the past two years alone, GR Firm has filed over 18 consumer protection class actions and prevailed in every single motion to dismiss—creating important precedent along the way.

Indeed, GR Firm was the first firm to file class action lawsuits against retail companies alleging deceptive marketing of their lidocaine products. With co-counsel, our firm has prevailed in 3 out of 3 motions to dismiss. *See Stevens v. Walgreen Co.*, No. 21-CV-10603 (JPO), 2022 U.S. Dist. LEXIS 152744 (S.D.N.Y. Aug. 24, 2022); *Rodriguez v. Walmart Inc.*, No. 22-CV-2991 (JPO), 2023 U.S. Dist. LEXIS 53253 (S.D.N.Y. Mar. 28, 2023); *Ary v. Target Corp.*, No. 22-cv-02625-HSG, 2023 U.S. Dist. LEXIS 49633 (N.D. Cal. Mar. 23, 2023).

Notably, GR Firm was also among the first firms to file a class action related to the CARES Act forbearance programs. *See Dutcher v. Newrez LLC*, No. 21-2062, 2022 U.S. Dist. LEXIS 194706 (E.D. Pa. Oct. 20, 2022) (granting final approval of a \$750,000 nationwide class action settlement and appointing GR Firm as class counsel in a lawsuit alleging violations of the Fair Debt Collection Practices Act (“FDCPA”) on behalf of CARES Act forbearance mortgagees.).



### **Biography of Adrian Gucovschi**

Adrian Gucovschi is the founding partner of GR Firm. He is a member in good standing of the New York State Bar and the United States District Courts for the Southern and Eastern District of New York. He received a Bachelor of Arts from Yeshiva University and a Juris Doctor, *cum laude*, from Fordham University School of Law. Before founding GR Firm, Mr. Gucovschi worked at various firms where he prosecuted, and subsequently defended, billion-dollar lawsuits brought by multiple institutional investors and banks arising from the 2008 mortgage-backed securities economic disaster. In early 2021, Mr. Gucovschi partnered with Benjamin A. Rozenshteyn to advance the firm's class action work. Mr. Rozenshteyn received a Bachelor of Arts from Yeshiva University, *magna cum laude*, an Executive Education degree in business analytics from Harvard Business School, and a Juris Doctor from Benjamin N. Cardozo School of Law. Mr. Rozenshteyn is a member in good standing of the New York State Bar.