HRISTINA B. BARTLETT

Principal

Direct: 213 896 4542
Mobile: 310 770 9889
hristina.bartlett@analysisgroup.com

333 South Hope Street
27th Floor
Los Angeles, CA 90071

Ms. Bartlett specializes in the analysis of damages, valuation, and class certification issues in complex litigation and arbitration, with particular expertise in privacy and data security, health care, and financial disputes. She has more than two decades of experience applying financial, accounting, and statistical analyses to questions in health care, insurance, labor and employment, privacy and data security, finance, intellectual property, and commercial disputes. Her work frequently involves the analysis of large and complex financial, transactional, and claims datasets.

Ms. Bartlett is an experienced expert witness; she has served as an expert in dozens of matters and has testified at deposition, trial, and arbitration. She has worked on more than three dozen class actions across a range of industries, addressing damages and economic issues relevant to class certification. In her privacy and cybersecurity work, she has evaluated unjust enrichment, restitution, compensatory and statutory damages, ascertainability, and the feasibility of assessing economic harm and damages on a class-wide basis. In health care matters, she has analyzed medical claims data, provider billing practices, insurance claim denials, health care payment rates, and quality of services. Her work includes calculating damages in health care disputes, including in false claims act matters and out-of-network disputes. She has evaluated the reasonable value of medical services and assessed the financial implications of billing, coding, and medical necessity issues. In finance and securities matters, she has conducted accounting and forensic investigations, solvency assessments, analyses of financial transactions and payment records, and evaluations of investments, investment fees, and investment suitability.

Ms. Bartlett's writing has been published by the American Bar Association and Law360. She 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

- **Edward Lewis and Patricia Castillo v. Magnite, Inc.**
  United States District Court, Central District of California, Los Angeles Division
  Submitted an affirmative expert report addressing, among other things, the feasibility of measuring the existence and extent of alleged economic harm to class members using common evidence and a common methodology on a class-wide basis.

- **ECure v. California Physicians' Service d/b/a Blue Shield of California**
  Superior Court of the State of California, County of Alameda
  Testified in deposition on the market value of services at issue (April 2026).

- **Steve Rabin et al. v. Google LLC**
  United States District Court, Northern District of California, San Jose Division
  Submitted an expert report responding to plaintiffs' class-wide damages methodology and the feasibility of assessing "duress" claims on a class-wide basis. Submitted an expert report responding to plaintiffs' damages calculations. Testified in depositions (January 2025 and March 2026).

- **Emily Cherkin, et al. v. PowerSchool Holdings, Inc.**
  United States District Court, Northern District of California, San Francisco Division
  Submitted an affirmative expert report evaluating whether the existence and extent of economic harm can be assessed on a class-wide basis and rebuttal expert reports responding to plaintiffs' experts' proposed methodology for calculating harm and class-wide damages.

- **Anesthesia Dynamics, LLC et al. v. Aetna Network Servies, LLC**
  American Arbitration Association
  Submitted an expert report quantifying plaintiffs' damages.

- **Airlines for America v. City and County of San Francisco**
  United States District Court for the Northern District of California
  Submitted an expert report quantifying plaintiff's damages and reasonable rates of return. Testified in deposition (November 2025).

- **Molina Healthcare of California v. Ghada Kassab, M.D., et al.**
  Superior Court of the State of California, San Diego County
  Submitted a declaration detailing the evolution of defendants' billing practices over time based on analysis of claims data.

- **Apex Tool Group, LLC v. Cyderes, LLC and Fishtech Group, LLC**
  State Court of North Carolina, Mecklenburg County, General Court of Justice, Superior Court Division
  Submitted an expert report on plaintiff's lost profits and excess costs from defendants' alleged wrongful acts. Testified in deposition (April 2025).

- **DigitalBridge Group, Inc., et al. v. XL Specialty Insurance Company, et al.**
  Superior Court of the State of California, Los Angeles County
  Testified in deposition on the amount of prejudgment interest associated with plaintiffs' unreimbursed insurance claims (March 2025).

- **McGriff Insurance Services, LLC v. Carson Schilling; McGriff Insurance Services, LLC v. Joshua W. James**
  United States District Court, Middle District of North Carolina
  Submitted an expert report on plaintiff's lost profits from defendant's alleged wrongful acts.

- **Hexadyne Corporation v. Mason Electric Company**
  Superior Court of the State of California, Los Angeles County
  Testified in deposition on the damages from the defendant's alleged wrongful acts (November 2024).

- **Confidential International Arbitration under the 2021 Rules of Arbitration of the International Chamber of Commerce**
  Submitted an expert report on the additional profit a company would have recorded if it sold its unused share of metallurgical coke from a captive coke producer. Testified in arbitration (October 2024).

- **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**

  United States District Court, Middle District of North Carolina

  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 defendant's failure to pay severance benefits. Testified in arbitration (December 2023).

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

  JAMS Arbitration

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

- **Confidential data privacy class action**

  United States District Court, Northern District of California, San Jose Division

  Served as a 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 methods for calculating unjust enrichment and compensatory damages.

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

  United States 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 (December 2022).

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

  United States District Court, Northern District of California

  Submitted two expert reports 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.

- **Brown et al. v. Google LLC**

  United States District Court, Northern District of California, San Jose Division

  Served as a 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 without user consent. Assisted with rebutting plaintiffs' expert's proposed class-wide damages method for calculating unjust enrichment and compensatory damages.

- **Jennifer Bennett et al. v. Quest Diagnostics, Inc.**
  United States District Court, District of New Jersey
  Served as a consulting expert on a case involving allegations that defendant charged patients inflated rates for laboratory tests not covered by insurance.

- **Calhoun et al. v. Google LLC**
  United States District Court, Northern District of California, San Jose Division
  Served as a 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 without user consent. Assisted with rebutting plaintiffs' expert's proposed class-wide damages method for calculating unjust enrichment and compensatory damages.

- **Advanced Orthopedic Center, Inc. v. Regal Medical Group, Inc.**
  Superior Court of California, Los Angeles County
  Testified in trial on whether plaintiff suffered economic damages (March 2022).

- **Omaya Ismail v. eCivis, et al.**
  Superior Court of California, Los Angeles County
  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 (June 2021).

- **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 (May 2021).

- **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.**
  United States District Court, Central District of California
  Submitted affirmative and rebuttal reports regarding the reasonable value of plaintiff's services and damages.

- **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 codefendant.

SELECTED CONSULTING EXPERIENCE

- **Commercial Litigation and 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 codefendant.
- 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 defense counsel on issues related to damages in a national class action alleging that 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 codefendant.

- **Data Privacy and Security**
  - Retained as a consulting expert on damages and class certification in a privacy class action involving an mHealth app and allegations about interception of alleged health care data through a software development kit (SDK).
  - Retained as a consulting expert on damages in a data breach matter involving a consumer products company.
  - Retained as a consulting expert on statutory penalties in a privacy matter involving alleged biometric data.
  - Retained as a consulting expert on statutory penalties in privacy matters involving location and browsing data.
  - Retained as a consulting expert on class certification issues and damages in a data breach case involving a cloud-based technology company.
  - Retained as a consulting expert on class certification issues and damages in a Canadian privacy case against a large technology company.

- **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 involving 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 sample 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 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

"Establishing Causation and Measuring Economic Harm in Data Breach Litigation," *ABA Antitrust Law Section* (September 2026)

"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

"Cybersecurity and Arbitration," with Keri Pearlson, Mark Morril, Andrew Erber, and Randa Adra, New York Arbitration Week (November 18, 2025)

"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)

"Hot Topics in Group Health Plan Administration," with Bret Busacker and Thomas Senter, The

Knowledge Group (June 8, 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