

Third-Party Funding Disclosures in the District of New Jersey,
June 2021–June 2026

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Executive Summary

Third-party litigation finance (TPLF) has grown into a multibillion-dollar industry largely outside the view of courts. In June 2021, the District of New Jersey adopted a TPLF disclosure rule with respect to the existence of third-party funding. Local Civil Rule 7.1.1 requires parties to identify any non-party providing them with non-recourse funding, describe the nature of the funder's financial interest, and disclose whether the funder's approval is required for litigation or settlement decisions. This Federal Judicial Center report examines disclosures filed pursuant to the local rule from June 2021 through June 2026, to inform Advisory Committee on Civil Rules discussions regarding the desirability of a nationwide TPLF disclosure rule.

Overall, Center researchers identified TPLF statements disclosing receipt of third-party funding ("positive TPLF disclosures") in a small number of civil cases (104) in the District of New Jersey during the study period.¹ Treating non-duplicative positive TPLF disclosures filed in a single MDL proceeding as separate observations, the report analyzes 106 positive TPLF disclosures; the bulk of these were identical disclosures filed in related cases (69, or 65% of all TPLF disclosures included in the report). In terms of an estimated filing rate, this translates to about one filing per 1,000 civil cases in the district.

Positive TPLF disclosures were filed primarily in civil rights and patent cases, usually by plaintiffs. Most positive TPLF disclosures stated that funder approval was not required for settlement or litigation decisions. In a few instances, however, the disclosing party indicated that funder approval was necessary for such decisions; these disclosures raise definitional questions about both the scope of the local rule and the relationship of TPLF disclosures to other procedural rules. These findings are more suggestive than conclusive, given the small number of positive TPLF disclosures identified during the study period.

¹ Center researchers gratefully acknowledge the invaluable assistance of the clerk's office in the District of New Jersey, which provided information on TPLF disclosures drawn from the district's CM/ECF system.

Background

At present, there is no federal statute or nationwide procedural rule requiring parties to disclose third-party funding in civil cases. Individual judges have entered standing orders requiring disclosure as a matter of case management,² pretrial orders requiring third-party litigation finance (TPLF) disclosure in MDL proceedings are not uncommon,³ and a few districts have promulgated local rules related to the issue. On June 21, 2021, the District of New Jersey adopted a local rule (L. Civ. R. 7.1.1, Disclosure of Third-Party Litigation Funding) requiring parties to disclose the existence of TPLF.⁴ The Advisory Committee on Civil Rules asked the Federal Judicial Center (Center) to report on the District of New Jersey's experience with its local disclosure rule.

Pursuant to L. Civ. R. 7.1.1, TPLF disclosure in the District of New Jersey is limited to the identity of the funder, whether the funder's approval is necessary for settlement or litigation decisions, and a brief statement of the funder's financial interest. The rule, in full, states the following:

Civ. RULE 7.1.1 DISCLOSURE OF THIRD-PARTY LITIGATION FUNDING

(a) Within 30 days of filing an initial pleading or transfer of the matter to this district, including the removal of a state action, or promptly after learning of the information to be disclosed, all parties, including intervening parties, shall file a statement (separate from any pleading) containing the following information regarding any person or entity that is not a party and is providing funding for some or all of the attorneys' fees and expenses for the litigation on a non-recourse basis in exchange for (1) a contingent financial interest based upon the results of the litigation or (2) a non-monetary result that is not in the nature of a personal or bank loan, or insurance:

1. The identity of the funder(s), including the name, address, and if a legal entity, its place of formation;
2. Whether the funder's approval is necessary for litigation decisions or settlement decisions in the action and if the answer is in the affirmative, the nature of the terms and conditions relating to that approval; and
3. A brief description of the nature of the financial interest.

(b) The parties may seek additional discovery of the terms of any such agreement upon a showing of good cause that the non-party has authority to make material litigation decisions or settlement decisions, the interests of parties or the class (if applicable) are not being promoted or protected, or conflicts of interest exist, or such other disclosure is necessary to any issue in the case.

² See, e.g., Standing Order Regarding Third-Party Litigation Funding Arrangements (Connolly, C.J.), <https://www.ded.uscourts.gov/sites/ded/files/Standing%20Order%20Regarding%20Third-Party%20Litigation%20Funding.pdf>.

³ See, e.g., Pretrial O. #16, *In re Zantac (Ranitidine) Prods. Liab. Litig.*, No. 9:20-md-2924, ECF No. 557 (S.D. Fla. Apr. 3, 2020) (Rosenberg, J.), https://www.flsd.uscourts.gov/sites/flsd/files/20md2924/show_temp_5.pdf.

⁴ *In re Amending of Local Rules* (Order, June 21, 2021), <https://www.njd.uscourts.gov/sites/njd/files/Order7.1.1%28signed%29.pdf>.

(c) Nothing herein precludes the Court from ordering such other relief as may be appropriate.

(d) This Rule shall take effect immediately and apply to all pending cases upon its effective date, with the filing mandated in Paragraph 1 to be made within 45 days of the effective date of this Rule.⁵

A subsequent notice to the bar clarified that parties need not file disclosures in cases in which they are not receiving third-party funding,⁶ but many parties persist in filing such negative disclosures. When this report refers to “positive TPLF disclosures,” it means that a party filed an L. Civ. R. 7.1.1 statement disclosing receipt of third-party funding.

The advisory committee has considered several definitional issues with respect to TPLF and what must be disclosed, with an eye toward heading off unnecessary disputes over disclosure obligations. As of this writing, evidence of disputes over the requirements of L. Civ. R. 7.1.1 is limited. An informal survey of magistrate judges in the district suggests that they generally handle few, if any, disputes arising under the local rule. Moreover, there is little case law in the District of New Jersey about parties’ compliance with their disclosure obligations under the local rule.⁷ In at least one instance, the question was how funders’ involvement as owner of the plaintiff-assignee should be characterized for purposes of the local rule (i.e., do disclosure requirements apply to the assignment of claims to funder-controlled entities?).⁸ Treating TPLF disclosure as analogous to Fed. R. Civ. P. 7.1 corporate disclosures, rather than Fed. R. Civ. P. 26(a) disclosures, also makes enforcement uncertain, because Fed. R. Civ. P. 37(c)(1) sanctions may be unavailable as a result.⁹ In at least one instance, a plaintiff filed a motion for relief, including sanctions, under L. Civ. R. 7.1.1(c) (“appropriate relief”), because defendants had not filed a TPLF disclosure; because the court found the motion moot, the issue is still unresolved.¹⁰

⁵ D.N.J. L. Civ. R. 7.1.1 (effective date June 21, 2021), <https://www.njd.uscourts.gov/sites/njd/files/CompleteLocalRules.pdf#page=27>.

⁶ Notice to the Bar, Clarification of L. Civ. R. 7.1.1, Third-Party Litigation Funding, https://www.njd.uscourts.gov/sites/njd/files/NoticetoBarL.Civ._R.7.1.1clarification.pdf (clarifying that the local rule “requires the filing of a statement only where third-party litigation funding exists”).

⁷ See *MSP Recovery Claims Series, LLC v. Sanofi-Aventis U.S. LLC*, ECF No. 362-1 (Certification of Jorge Lopez), No. 2:18-cv-2211 (D.N.J. May 17, 2023), <https://ecf.njd.uscourts.gov/doc1/119119895465> (denying that plaintiff had received nonrecourse funding in a case where litigation funder was a member of an LLC that was a party).

⁸ See *MSP Recovery Claims Series, LLC v. Sanofi-Aventis U.S. LLC*, No. 2:18-cv-2211, 2024 WL 4100379 (D.N.J. Sept. 6, 2024), at *2 (describing dispute over Civ. L.R. 7.1.1). This issue seems to have been raised in a Zoom scheduling conference. However, note that the *MSP Recovery* court did order discovery into funding documents on, among other things, the question of the real party in interest. See *id.* at *6 (“With respect to the litigation funding documents, the Court finds that these too are responsive . . . and . . . relevant in determining the real party in interest in this litigation and likewise are relevant to Defendant’s defenses of champerty and maintenance.”). The Rule 17(a) real-party-in-interest issue is raised again *infra*.

⁹ See Reporter’s Memo, Advisory Committee on Civil Rules, Agenda Book, April 2026, at 289. It is not clear, as of this writing, whether, in providing for “appropriate relief,” L. Civ. R. 7.1.1(c) authorizes sanctions.

¹⁰ See *Harish v. Arbit*, ECF No. 140 (Order of August 1, 2025), at 2, No. 2:21-cv-11088 (D.N.J. May 11, 2025), <https://ecf.njd.uscourts.gov/doc1/119121601500>. The letter requesting leave to file the motion, and the letter in response, however, are both sealed. *Harish* provides an example of the court ordering *in camera* review of “documents produced in discovery by Defendants reflecting a litigation funding relationship.” See *id.* at 2.

Findings

Center researchers compiled each positive TPLF disclosure filed in the District of New Jersey from the effective date of the local rule, June 21, 2021, through June 30, 2026, a roughly five-year period. For the most part, the list of positive TPLF disclosures is based on information generously provided by the District of New Jersey clerk's office from its CM/ECF system. In reviewing the district's list, however, researchers noted that a few of the cases listed in the appendix of a recent article by Professor Anderson¹¹ were omitted. In the interest of looking at as many positive TPLF disclosures as possible, the list of cases for this report was compiled from both sources, i.e., it includes information on any positive TPLF disclosure identified by either source and confirmed by Center researchers.

Frequency. For the five years in which the local rule has been in effect, positive TPLF disclosures were identified in 104 civil cases in the district. In addition, three positive TPLF disclosures (after eliminating duplicates) were filed on the master docket of *In re Johnson & Johnson Talcum Powder Products Sales Practices, Marketing and Products Liability Litigation* (MDL No. 2738).¹² With only one exception—where the disclosure itself was sealed—Center researchers reviewed each of these 106 positive TPLF disclosures, listed in the Appendix.

In a busy district like New Jersey, 106 positive TPLF disclosures is not a terribly large number. The Administrative Office of the U.S. Courts has not yet published, as of this writing, the number of civil cases commenced in the District of New Jersey for the 12-month period ending June 30, 2026; however, extrapolating from previous years' data (using the figures for the 12-month periods ending June 30 of 2022, 2023, 2024, and 2025),¹³ this likely translates to a rate of positive TPLF disclosure in about one civil case in every thousand commenced in the district during the study period. However, most of these positive TPLF disclosures (69 identical positive disclosures) were filed in related cases in the Daniel's Law litigation¹⁴ in 2024; without those related disclosures, the overall figure would be even lower (4–5 per 10,000). Other than the 2024 spike because of the Daniel's Law litigation, there is simply no trend upward or downward in filings of positive TPLF disclosures. Several positive TPLF disclosures were made immediately

¹¹ See J. Jonas Anderson, *Demystifying Third-Party Litigation Funding*, 94 George Washington L. Rev. 392, at 445–46 (2026) (appendix). That is, Professor Anderson's appendix includes cases not included in the district's list, and vice versa, despite the former's thoughtful search strategy. See *id.* at 414–15 (describing search method).

¹² TPLF disclosures in MDL proceedings may cover multiple claimants represented by the same law firm.

¹³ See Table C-1, U.S. District Courts—Civil Cases Commenced, Terminated, and Pending During the 12-Month period Ending June 30, various years. For the four years of available data, the district averaged more than 17,000 new civil cases *per year*.

¹⁴ In the Appendix, these are the cases brought by plaintiff Atlas Data Privacy Corp. “Daniel’s Law was enacted in response to the tragic death of Daniel Anderl, the son of Judge Esther Salas and Mark Anderl. The law prohibits disclosure of the residential addresses of certain persons covered by the law (“Covered Persons”) on websites controlled by New Jersey state, county, and local government agencies.” State of New Jersey, “Daniel’s Law,” <https://danielslaw.nj.gov>.

after the local rule’s effective date (because it applied to pending cases), and a small number have been made each year since (outside of the Daniel’s Law litigation). According to court records, for example, a total of four positive TPLF disclosures were filed in the first six months of 2026.

Care should be exercised in drawing conclusions from such a small number of observations—especially such a small number of *independent* observations. (The Daniel’s Law cases are not the only related cases, as a review of party names in the case captions in the Appendix shows.) This report draws upon the available information in making provisional statements about TPLF in the District of New Jersey. But it would be rash to draw any sweeping conclusions about TPLF more generally from that information.

Case Types. Because cases in the Daniel’s Law litigation were chiefly classified in the court data as civil rights (other) (Nature of Suit (NOS) 440), most of the positive TPLF disclosures (71, or 67%) were filed in civil rights cases. The next largest group of cases in which positive TPLF disclosures were made was classified as patent (NOS 830): 10 cases (9%). The prevalence of patent cases is not surprising, given the literature on TPLF.¹⁵ Seven positive TPLF disclosures (7%) were filed in other contract actions (NOS 190). No other case type appeared more than three times; the three positive TPLF disclosures in the *Johnson & Johnson* MDL proceeding were coded as health care/pharmaceutical personal injury product liability (NOS 367). It is noteworthy that there were positive TPLF disclosures in a range of case types, including a taxpayer’s suit (NOS 870), an Administrative Procedure Act case (NOS 899), and a *qui tam* action (NOS 376).

Funded Side. Most positive TPLF disclosures were filed by plaintiffs (101, 95%), although five were filed by defendants (including one each by an intervenor-defendant and a defendant-counterclaimant).¹⁶

¹⁵ See, e.g., U.S. Gov’t Accountability Off., GAO-25-107214, Intellectual Property: Information on Third-Party Funding of Patent Litigation 14–15 (2024) (identifying patent litigation as the largest single case type for commercial litigation funding).

¹⁶ Although it is less common, there is commercial TPLF on the defendant side. See Emily Samra, *The Business of Defense: Defense-Side Litigation Financing*, 83 U. Chi. L. Rev. 2299, 2303–04 (2017). However, the defendant positive TPLF disclosures in New Jersey tended to involve preexisting relationships (parent company, insurer) instead of arm’s-length commercial funding. (The sealed TPLF disclosure was filed by a defendant, so the nature of that funding arrangement is unclear.) For example, in both *Delaware Riverkeeper Network v. Army Corps of Engineers* and *Delaware Riverkeeper Network v. Delaware River Basin Commission*, defendant Delaware River Partners, LLC (which intervened on the defense side in the *Army Corps of Engineers* case) disclosed that funding was being provided by Fortress Transportation and Infrastructure Investors LLC, which, through “indirect ownership” was the party’s ultimate parent company. See, e.g., *Delaware Riverkeeper Network v. Army Corps of Engineers*, ECF No. 49 (Delaware River Partners LLC’s Disclosure Statement Pursuant to Rule 7.1.1), at 2, Aug. 5, 2021, 1:20-cv-04824 (D.N.J. Apr. 20, 2020), <https://ecf.njd.uscourts.gov/doc1/119117748052>. In short, some defendant positive TPLF disclosures were arguably not required by the terms of the local rule or were not the types of arrangements that were contemplated by the local rulemakers. The same is true on the plaintiff side, as discussed *infra*.

Contents. Disclosures filed in response to the local rule tend to be terse, a mere three sentences responding to the local rule’s prompts, identifying the funder, typically specifying non-recourse funding, and denying that funder’s approval is necessary for settlement. Because the local rule requires disclosure only of non-recourse funding, it makes sense that most positive TPLF disclosures specified non-recourse funding. The approval point is more interesting; the overriding issue in the TPLF literature is whether third-party funders exercise control over litigation decisions, such as when and whether to settle.¹⁷

Funders. On the plaintiff side, several major commercial third-party funders (or their subsidiaries) were disclosed—for example, Burford Capital, Omni Bridgeway, Longford Capital, Parabellum Capital, Bench Walk Advisors, and Augusta Ventures Ltd. Given the nature of current policy debates over third-party funding, it is noteworthy that funders from outside the United States (i.e., “place of formation” given as the United Kingdom, Canada, and Israel) were disclosed in the study period. The list of funders in the Appendix illustrates the complexity of funding structures, including multiple funds, subsidiaries, and special-purpose vehicles (SPVs).

Not all third-party funding was provided by commercial litigation funders. In *Morrill v. Fulop*, for example, plaintiffs disclosed funding from the Yale Law School Media Freedom and Information Access Clinic,¹⁸ and in *Rachlin v. Baumann*, plaintiffs disclosed funding from the Firearms Policy Foundation, Inc.¹⁹ It appears that in both instances the funders expected reimbursement from any attorney fees awarded by the court, but neither is an investor in the asset value of the underlying claims. Similar non-investors include a union providing initial support for individual plaintiffs in *Newark Teachers Union Local 481 v. City of Newark Board of Education*²⁰ and a pro bono law firm (Institute for Justice) backing the plaintiffs in *Lovaglio v. Baston*.²¹ In *Eastern Appliances Inc. v. Brother Appliances*, plaintiffs disclosed that a third-party warehouse provider LLC was backing its litigation in order to protect the LLC’s own commercial interests.²² Insurance companies were disclosed as third-party funders in two cases discussed

¹⁷ See, e.g., Seth Katsuya Endo, *Preventive Transparency in Third-Party Litigation Funding*, 120 Nw. L. Rev. 501 (2025).

¹⁸ See *Morrill v. Fulop*, ECF No. 12 (Plaintiff’s Rule 7.1.1 Disclosure Statement), at 2, Jan. 1, 2024, 2:23-cv-23197 (D.N.J. Dec. 18, 2023), <https://ecf.njd.uscourts.gov/doc1/119120813156>.

¹⁹ See *Rachlin v. Baumann*, ECF No. 6 (Notice of Disclosure of Third-Party Litigation Funding Pursuant to Local Civ. Rule 7.1.1), at 1, Sept. 21, 2021, 3:21-cv-15343 (D.N.J. Aug. 16, 2021), <https://ecf.njd.uscourts.gov/doc1/119117928545>.

²⁰ *Newark Teachers Union Local 481 v. City of Newark Bd. of Educ.*, ECF No. 24 (L.Civ. R. 7.1.1 Third Party Litigation Funding Disclosure), at 1, Dec. 28, 2022, 2:22-cv-00271 (D.N.J. filed Jan. 20, 2022), <https://ecf.njd.uscourts.gov/doc1/119119384284> (“The NTU funded an initial total retainer of Six Thousand Dollars (\$6,000.00) - \$2,000.00 on behalf of each individual Plaintiff to be reimbursed out of any settlement and/or recovery.”). Given that the union local was also a party, the terms of the local rule probably did not apply here.

²¹ *Lovaglio v. Baston*, ECF No. 9 (Rule 7.1.1 Third-Party Litigation Funding Disclosure), at 2, Dec. 1, 2023, 3:23-cv-21803 (D.N.J. Nov. 2, 2023), <https://ecf.njd.uscourts.gov/doc1/119120668321> (“The Institute is providing that funding as part of its mission to secure greater constitutional protections for all New Jersey residents.”).

²² See *Eastern Appliances Inc. v. Brother Appliances*, ECF No. 3 (Rule 7.1.1 Disclosure Statement), at 1, Dec. 12, 2022, 2:22-cv-07228 (D.N.J. Dec. 12, 2022), <https://ecf.njd.uscourts.gov/doc1/119119342749> (“Frontier is funding the litigation in order to protect its interest in the ‘Appliances 4 Less’ Distribution Network.”).

infra. It is not for this report to determine whether these third-party interests satisfy the local rule’s definition of “(1) a contingent financial interest based upon the results of the litigation or (2) a non-monetary result that is not in the nature of a personal or bank loan, or insurance.” But rulemakers considering how to frame possible disclosure obligations may be interested to learn that these types of funding arrangements are disclosed under the district’s local rule.

Funded entity. One issue that arises in the TPLF policy debate is whether third-party funding is provided to a party or to a law firm. In a handful of disclosures, a law firm rather than a party (client) is identified as the recipient of third-party funding. In *Pogona, LLC v. Merck, Sharp & Dohme LLC*, for example, the disclosure states that the plaintiff “does not receive any funds directly.”²³ In *United Healthcare Services v. Celgene Corp.*, the disclosure states that the funding is non-recourse “receivables financing provided” to the law firm and that the party is “not in privity” with the funder.²⁴ Many disclosures do not make clear whether funding is received by a law firm or a party. This may be a drafting issue: L. Civ. R. 7.1.1 requires the funder’s identity, whether approval is required, and the nature of the financial interest but not explicitly the identity of the funder’s counterparty—although identifying the counterparty is arguably part of describing the nature of the financial interest.

Control. A handful of TPLF statements disclosed that a third-party funder had approval rights over settlement or litigation decisions. However, the third-party funders in these cases were not commercial litigation funders but rather insurance companies,²⁵ an interest group,²⁶ a business competitor,²⁷ and a strategic investor.²⁸ These examples indicate that control plays out differently in some disclosure cases, where the issue is less about investors, otherwise strangers to the underlying litigation, and more about identifying the real party in interest under Fed. R.

²³ *Pogona, LLC v. Merck Sharp & Dohme*, ECF No. 29 (Plaintiff *Pogona, LLC*’s Rule 7.1.1 Disclosure Statement), at 2, Feb. 18, 2026, 2:25-cv-15294 (D.N.J. Sept. 5, 2025), <https://ecf.njd.uscourts.gov/doc1/119123598338>.

²⁴ *United Healthcare Services Inc. v. Celgene Corp.*, ECF No. 98 (Plaintiff’s Local Rule 7.1.1 Statement), at 2, August 27, 2021, 2:20-cv-18531 (D.N.J. filed Dec. 8, 2020), <https://ecf.njd.uscourts.gov/doc1/119117834581>.

²⁵ See *The Urology Clinic, P.C. v. Sharp Elecs. Corp.*, ECF No. 13 (Plaintiff’s Local Rule 7.1.1 Disclosure of Third Party Litigation Funding), at 1, Mar. 3, 2022, No. 2:21-cv-18053 (D.N.J. filed Oct. 4, 2021), <https://ecf.njd.uscourts.gov/doc1/119118466851> (disclosing that insurer is subrogee and “retains some control on decisions pertaining to litigation and settlement in this suit”); *Campoverde v. Pringle*, ECF No. 2 (Local rule 7.1.1 Statement of Third-Party Litigation Funding), at 2, Feb. 2, 2026, 2:25-cv-18097 (D.N.J. Dec. 2, 2025), <https://ecf.njd.uscourts.gov/doc1/119123536249> (disclosing that “approval is necessary for litigation decisions or settlement decisions in the action pursuant to the terms of the insurance policy”).

²⁶ See *Rachlin*, Notice of Disclosure, at 1 (disclosing that the Firearms Policy Foundation’s “approval is necessary for litigation decisions in the action”).

²⁷ See *Eastern Appliances*, Rule 7.1.1 Disclosure, at 1 (“Frontier’s approval is necessary for litigation decisions or settlement decisions in this action, pursuant to an informal arrangement between Frontier and Eastern. There is no written agreement governing the arrangement.”).

²⁸ This one is complex. One plaintiff in the action, *RareGen*, had arrangements with two separate funders, the latter of which was disclosed to “control[] the litigation.” *Sandoz Inc. v. United Therapeutics Inc.*, ECF No. 314 (Disclosure Regarding Third-Party Litigation Funding), at 2, Aug. 5, 2021, 2:19-cv-10170 (D.N.J. April 16, 2019), <https://ecf.njd.uscourts.gov/doc1/119117748517>. Moreover, plaintiff *RareGen* was, per the terms of the agreement, “not . . . entitled to any proceeds resulting from, or bear any financial or other liability for, this litigation.” *Id.*

Civ. P. 17(a).²⁹ This plays out in the assignment context, where the funded-assignee is often the named plaintiff—most prominently in the many related Daniel’s Law litigation cases during the study period³⁰ but also in the cases brought by WinView, Inc., against online gambling platforms, in which the original plaintiff requested that defendants “stipulate to the substitution of WinView IP Holdings, LLC [assignee] into the case.”³¹ In short, both Fed. R. Civ. P. 17(a) and 25(c) are more relevant to the discussion of TPLF in a rulemaking context than they may at first appear.

The takeaway point, perhaps, is one that has been raised in past meetings of the advisory committee. There are various ways in which investors may seek a return from litigation, just as there are different goals that third parties seek through supporting litigation. The operation of L. Civ. R. 7.1.1 in the District of New Jersey shows that, even if disclosures are made in a relatively small number of civil cases, funding arrangements take many forms; this is relevant in any consideration of national rulemaking.

²⁹ *Cf. Nimitz Techs. LLC v. CNET Media, Inc.*, No. 21-1247, 2023 WL 8187441, at *3 (D. Del. Nov. 27, 2023) (concluding that non-parties were perpetrating an elaborate fraud on the court, concealing “real parties in interest in the patents in these cases, including a foreign government” from “the PTO, defendants, or the Court”).

³⁰ *See, e.g., Atlas Data Privacy Corp. v. We Inform, LLC*, 758 F. Supp. 3d 322, 332–33 (D.N.J. 2024) (involving challenge to privacy lawsuits brought by assignee of privacy rights, which was receiving TPLF).

³¹ *WinView Inc. v. DraftKings Inc.*, ECF No. 72 (Local Rule 7.1.1 Disclosure Statement), at 2 n.1, Jan. 21, 2025, 3:21-cv-13405 (D.N.J. July 7, 2021), <https://ecf.njd.uscourts.gov/doc1/119122128050>.

Appendix: Positive TPLF Disclosures

Year	Case Caption	Docket Number	Funder
2021	Delaware Riverkeeper Network v. Army Corps of Engineers	1:20-cv-04824	Fortress Transportation and Infrastructure Investors LLC
2021	Delaware Riverkeeper Network v. Delaware River Basin Comm'n	1:21-cv-01108	Fortress Transportation and Infrastructure Investors LLC
2021	Absorption Pharms., LLC v. Reckitt Benckiser, LLC	2:17-cv-12872	Omni Bridgeway (Fund 1) LLC
2021	Sandoz Inc. v. United Therapeutics Corp.	2:19-cv-10170	Henderson SPV, LLC and PBM RG Holdings, LLC
2021	Pedoto v. Seton Hall Univ.	2:20-cv-15831	Legalist Fund III, LP
2021	United Healthcare Servs., Inc. v. Celgene Corp.	2:20-cv-18531	PBNHPM Finance LLC
2021	Evolve Interactive LLC v. LG Elecs. USA, Inc.	2:21-cv-18412	Endpoint IP LLC
2021	Wurth USA, Inc. v. Thompson	2:21-cv-19877	Winzer Corporation
2021	Intervet, Inc. v. Mileutis Ltd.	3:15-cv-01371	[under seal]
2021	In re Johnson & Johnson Talcum Powder Products Marketing, Sales Prac. and Prods. Liab. Litig. (MDL No. 2738) (Morelli)	3:16-md-2738	TR Global Funding II, LLC & TR Global Funding II Follow-On, LLC
2021	In re Johnson & Johnson Talcum Powder Products Marketing, Sales Prac. and Prods. Liab. Litig. (MDL No. 2738) (Potts)	3:16-md-2738	Virage Capital Management, LP
2021	In re Johnson & Johnson Talcum Powder Products Marketing, Sales Prac. and Prods. Liab. Litig. (MDL No. 2738) (Segal)	3:16-md-2738	Segal Law Firm co-counsel (identity withheld via privilege claim)
2021	Rachlin v. Baumann	3:21-cv-15343	Firearms Policy Foundation, Inc.
2022	Guy A. Shaked Investments, LLC v. Ontel Prods. Corp.	1:20-cv-09901	Mossco Capital Inc. (Canada)
2022	The Urology Clinic, PC v. Sharp Elecs. Corp.	2:21-cv-18053	Great American Insurance Group (“GAIG”)
2022	Newark Teachers Union Local 481 v. City of Newark Bd. of Educ.	2:22-cv-00271	Newark Teachers Union Local 481
2022	Hulse v. Aucta Pharms., Inc.	2:22-cv-04628	Legalist Fund III, LP

2022	Eastern Appliances Inc. v. Brother Appliances	2:22-cv-07228	Frontier Investment Group LLC
2023	Microspherix LLC v. Merck Sharp & Dohme Corp.	1:17-cv-03984	Law Finance Group and Zepata SPV, LLC
2023	Rochester Drug Coop. Inc. v. Eli Lilly & Co. [In re Insulin Pricing]	2:20-cv-03426	Legalist Fund III, LP
2023	Jawbone Innovations, Inc. v. Sony Elecs. Inc.	2:23-cv-01161	Longford Capital Fund III, LP
2023	Local No. 1 Health Fund v. Eli Lilly & Co. [In re Insulin Pricing]	2:23-cv-21160	Legalist Fund III, LP
2023	M. Cohen and Sons, Inc. v. Platte River Ins. Co.	3:20-cv-02149	Bench Walk 23R, L.P.
2023	Royzenshteyn v. Onyx Enters. Canada Inc.	3:22-cv-07514	VF Asset Holdings, LLC
2023	Lovaglio v. Baston	3:23-cv-21803	Institute for Justice
2024	Atlas Data Privacy Corp. v. Blackbaud, Inc.	1:24-cv-03993	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Whitepages, Inc.	1:24-cv-03998	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Hiya, Inc.	1:24-cv-04000	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. We Inform, LLC	1:24-cv-04037	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Infomatics, LLC	1:24-cv-04041	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. The People Searchers, LLC	1:24-cv-04045	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Corporate Real Estate Exchange, Inc.	1:24-cv-04073	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. DM Group, Inc.	1:24-cv-04075	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Carco Group Inc.	1:24-cv-04077	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Deluxe Corp.	1:24-cv-04080	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Twilio Inc.	1:24-cv-04095	Atlas Litigation Support LLC (Parabellum Capital LLC)

2024	Atlas Data Privacy Corp. v. Delvepoint, LLC	1:24-cv-04096	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Quantarium Alliance, LLC	1:24-cv-04098	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Yardi Systems, Inc.	1:24-cv-04103	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. 6Sense Insights, Inc.	1:24-cv-04104	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Lightbox Parents, LP	1:24-cv-04105	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Search Quarry, LLC	1:24-cv-04106	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Acxiom LLC	1:24-cv-04107	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Digital Safety Prods., Inc.	1:24-cv-04141	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Civil Data Research	1:24-cv-04143	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Scalable Commerce, LLC	1:24-cv-04160	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Epsilon Data Mgt., LLC	1:24-cv-04168	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. People Data Labs, Inc.	1:24-cv-04171	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Labels & Lists, Inc.	1:24-cv-04174	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Claritas, LLC	1:24-cv-04175	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Innovis Data Solutions Inc.	1:24-cv-04176	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Accurate Append, Inc.	1:24-cv-04178	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Data Axle, Inc.	1:24-cv-04181	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Remine Inc.	1:24-cv-04182	Atlas Litigation Support LLC (Parabellum Capital LLC)

2024	Atlas Data Privacy Corp. v. Lusha Systems, Inc.	1:24-cv-04184	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Teltech Systems, Inc.	1:24-cv-04217	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Peopleconnect, Inc.	1:24-cv-04227	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. CoreLogic, Inc.	1:24-cv-04230	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Black Knight Techs., LLC	1:24-cv-04233	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Zillow, Inc.	1:24-cv-04256	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Equimine, Inc.	1:24-cv-04261	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Thomson Reuters Corp.	1:24-cv-04269	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Choreograph, LLC	1:24-cv-04271	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Transunion, LLC	1:24-cv-04288	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Melissa Data Corp.	1:24-cv-04292	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Equifax Inc.	1:24-cv-04298	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Spokeo, Inc.	1:24-cv-04299	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Restoration of America	1:24-cv-04324	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. i360, LLC	1:24-cv-04345	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Telniyx LLC	1:24-cv-04354	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. GoHunt, LLC	1:24-cv-04380	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Accuzip, Inc.	1:24-cv-04383	Atlas Litigation Support LLC (Parabellum Capital LLC)

2024	Atlas Data Privacy Corp. v. Synaptic Tech., LLC	1:24-cv-04385	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Joy Rockefeller Enterprises, Inc.	1:24-cv-04389	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Fortnoff Financial, LLC	1:24-cv-04390	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. MyHeritage, Ltd.	1:24-cv-04392	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. E-Merges.com Inc.	1:24-cv-04434	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Wiland, Inc.	1:24-cv-04442	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Atdata, LLC	1:24-cv-04447	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Precisely Holdings, LLC	1:24-cv-04571	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Nuwber, Inc.	1:24-cv-04609	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Rocketreach LLC	1:24-cv-04664	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Outside Interactive, Inc.	1:24-cv-04696	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Valiassis Digital Corp.	1:24-cv-04770	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. The Lifetime Value Co. LLC	1:24-cv-04850	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Belles Camp Comms. Inc.	1:24-cv-04949	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. First Am. Fin. Corp.	1:24-cv-05334	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. PropertyRadar, Inc.	1:24-cv-05600	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. The Alesco Group, LLC	1:24-cv-05656	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. SearchBug, Inc.	1:24-cv-05658	Atlas Litigation Support LLC (Parabellum Capital LLC)

2024	Atlas Data Privacy Corp. v. Amerilist, Inc.	1:24-cv-05775	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. LexisNexis Risk Mgt., LLC	1:24-cv-06160	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. US Data Corp.	1:24-cv-07324	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	Atlas Data Privacy Corp. v. Smarty, LLC	1:24-cv-08075	Atlas Litigation Support LLC (Parabellum Capital LLC)
2024	PBF Holding Co. LLC v. United States	2:23-cv-21546	Ryan Excise Tax Service, LLC
2024	Morrill v. Fulop	2:23-cv-23197	Yale Law School Media Freedom and Information Access Clinic; Weissman & Mintz (counsel as funders)
2024	Seward v. Ludden	3:24-cv-06295	PHDS 1 LLC
2025	United States ex rel. Bolinger v. 24th St., Inc.	3:18-cv-15446	JADEA, LLC
2025	WinView Inc. v. DraftKings Inc.	3:21-cv-13405	WIN IP Finance, LLC
2025	WinView Inc. v. FanDuel, Inc.	3:21-cv-13807	WIN IP Finance, LLC
2025	WinView IP Holdings, LLC v. DraftKings Inc.	3:25-cv-01143	WIN IP Finance, LLC
2025	WinView IP Holdings, LLC v. FanDuel Inc.	3:25-cv-01146	WIN IP Finance, LLC
2026	OOVEE, Ltd. v. S3D Interactive, Inc.	2:25-cv-14932	Augusta Ventures Ltd. (UK)
2026	Pogona, LLC v. Merck Sharp & Dohme LLC	2:25-cv-15294	Subsidiary of Burford Capital Limited (Guernsey)
2026	Campoverde v. Pringle	2:25-cv-18097	United Financial Casualty Co.
2026	Bullpup Scientific Ltd. v. Becton, Dickinson & Co.	2:26-cv-00839	LitiVest Fund 1, Limited Partnership (Israel)