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13  
 14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 15 COUNTY OF LOS ANGELES

16 Coordination Proceeding )  
 Special Title Rule (3.550) )  
 17 SNAP INC. SECURITIES CASES )  
 18 \_\_\_\_\_ )  
 19 This Document Relates To: )  
 20 ALL ACTIONS. )  
 21 \_\_\_\_\_ )

Case No. JCCP 4960  
 DECLARATION OF WEI C. HSIEH AND  
 CHENGHSIN D. HSIEH IN SUPPORT OF  
 PLAINTIFFS' MOTION FOR FINAL  
 APPROVAL OF SETTLEMENT AND  
 AWARD OF ATTORNEYS' FEES AND  
 EXPENSES

Judge: Honorable Elihu M. Berle  
 Dept: 6  
 Date: February 25, 2021  
 Time: 9:00 a.m.

Coordinated Actions:  
*Hsieh, et al. v. Snap Inc., et al.*, No. BC669394,  
 CA Super. Ct., Cnty. of Los Angeles  
*Iuso v. Snap Inc., et al.*, No. 17CIV03710, CA  
 Super. Ct., Cnty. of San Mateo

1 We, Wei C. Hsieh and Chenghsin D. Hsieh, declare as follows:

2 1. We are Plaintiffs in the above-captioned class action. We respectfully submit this  
3 declaration in support of Plaintiffs' Motions for Final Approval of Class Action Settlement and Award  
4 of Attorneys' Fees and Expenses. We have personal knowledge of the facts set forth in this  
5 declaration and, if called upon as a witness, could and would competently testify to these facts.

6 2. We have monitored the prosecution of this litigation and have been actively involved  
7 in significant events since we became named plaintiffs in the action in 2017. We have also had regular  
8 correspondence and discussions with counsel regarding case strategy and discovery in pursuit of the  
9 alleged claims and actively engaged in the litigation, including: (a) searching for and collecting  
10 records of my transactions in Snap stock; (b) reviewing pleadings and Court orders; and (c) discussing  
11 the mediation efforts and settlement negotiations and the documentation of the settlement.

12 3. We have evaluated the risks of continued litigation and trial with counsel, including  
13 the risk of no recovery at all, and, in light of that evaluation, authorized Class Counsel to settle this  
14 action for \$32,812,500.00. We believe that the settlement is fair and reasonable, represents an  
15 exceptional result, and is in the best interest of the Class.

16 4. While we understand that the determination of attorneys' fees is left up to the Court,  
17 we believe counsel's request for the award of legal fees and expenses in an amount not to exceed one  
18 third of the settlement amount is fair and reasonable as the Settlement would not have been possible  
19 without the diligent and aggressive prosecutorial efforts of lead counsel.

20 5. We understand that the Class has been given notice of the request by Plaintiffs to seek  
21 an award for their efforts in representing the Class. Accordingly, we seek an award of \$5,000 in  
22 connection with our work in representing the Class. This request is based on the significant time and  
23 effort we have devoted to the litigation activities described above, time that we would have otherwise  
24 spent on other matters. We understand that it is in the Court's discretion to grant our request, in full  
25 or in part, or to deny the request.

26 6. Finally, we understand that after the settlement funds are distributed to Class members,  
27 if there is any remaining balance in the Settlement Fund that cannot be feasibly distributed to us and  
28

1 the other Class members, such balance will be donated to Bay Area Legal Aid. We have no connection  
2 to Bay Area Legal Aid, be it personal, professional or otherwise.

3 We declare under penalty of perjury that the foregoing is true and correct. Executed this 22  
4 day of December, 2020, at Sacramento, California.

*Wei C. Hsieh*

WEI C. HSIEH

*Chenghsin D. Hsieh*

CHENGHSIN D. HSIEH

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1 **PROOF OF SERVICE**

2 I, Katie Woods, declare:

3 I am employed in San Diego County, State of California. I am over the age of 18 years and not  
4 a party to the within action. My business address is Robbins Geller Rudman & Dowd LLP, 655 West  
5 Broadway, Suite 1900, San Diego, CA 92101.

6 On this date, I served:

- 7 • **NOTICE OF MOTION AND MOTION FOR: (1) FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND APPROVAL OF PLAN OF ALLOCATION; AND (2) AN AWARD OF ATTORNEYS' FEES AND EXPENSES AND AWARD TO PLAINTIFFS PURSUANT TO 15 u.s.c. §77z-1(a)(4)**
- 8
- 9 • **PLAINTIFFS' COUNSEL'S MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES AND AWARD TO PLAINTIFFS PURSUANT TO 15 U.S.C. §77z-1(a)(4)**
- 10
- 11 • **PLAINTIFFS' MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND APPROVAL OF PLAN OF ALLOCATION**
- 12
- 13 • **DECLARATION OF THEODORE J. PINTAR IN SUPPORT OF MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES AND AWARD TO PLAINTIFFS PURSUANT TO 15 U.S.C. §77z-1(a)(4)**
- 14
- 15 • **DECLARATION OF JAMES I. JACONETTE FILED ON BEHALF OF ROBBINS GELLER RUDMAN & DOWD LLP IN SUPPORT OF APPLICATION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES**
- 16
- 17
- 18 • **DECLARATION OF JACOB A. WALKER FILED ON BEHALF OF BLOCK & LEVITON LLP IN SUPPORT OF APPLICATION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES**
- 19
- 20 • **DECLARATION OF FRANCIS A. BOTTINI JR. FILED ON BEHALF OF BOTTINI & BOTTINI, INC. IN SUPPORT OF APPLICATION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES**
- 21
- 22 • **DECLARATION OF JOSEPH IUSO IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF SETTLEMENT AND AWARD OF ATTORNEYS' FEES AND EXPENSES**
- 23
- 24 • **DECLARATION OF WEI C. HSIESH AND CHENGSHIN D. HSIESH IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF SETTLEMENT AND AWARD OF ATTORNEYS' FEES AND EXPENSES**
- 25
- 26 • **DECLARATION OF LUIGGY SEGURA REGARDING (A) DISSEMINATION OF POSTCARD NOTICE, NOTICE AND CLAIM FORM; (B) ESTABLISHMENT OF CALL CENTER SERVICES AND SETTLEMENT WEBSITE; (C) POSTING OF NOTICE AND CLAIM FORM ON SETTLEMENT WEBSITE; (D)**
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**PUBLICATION/TRANSMISSION OF SUMMARY NOTICE; AND (E) REPORT ON REQUESTS FOR EXCLUSION RECEIVED TO DATE**

[X] By electronic transmission via Case Anywhere LLC to all parties on the electronic service list maintained for this case:

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I am readily familiar with Robbin Geller Rudman & Dowd LLP's practice for collection and processing of documents for delivery according to instructions indicated above. In the ordinary course of business, documents would be handled accordingly.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 24th day of December, 2020, at San Diego, California.



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KATIE WOODS