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BLOCK & LEVITON LLP
JACOB A. WALKER (271217)
260 Franklin Street, Suite 1860
Boston, MA 02110
(617) 398-5600 phone

*Counsel to Plaintiff Joseph Iuso
and the Putative Class*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Coordination Proceeding Special Title Rule (3.550) <i>Snap Inc. Securities Cases</i>
This Document Relates To: ALL ACTIONS

Case No. JCCP 4960

**DECLARATION OF JOSEPH IUSO IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF
SETTLEMENT AND AWARD OF
ATTORNEYS' FEES AND EXPENSES**

1 I, Joseph Iuso, hereby state the following:

2 1. I am one of two plaintiffs in the above-referenced coordinated action. I have
3 personal knowledge of the facts stated herein, and, if called as a witness, could competently
4 testify thereto.

5 2. I respectfully submit this declaration in support of: (a) final approval of the
6 \$32,812,500 settlement (the "Settlement") in this litigation reached between plaintiffs Chenghsin
7 D. Hsieh and Wei C. Hsieh, and Joseph Iuso (collectively, "Plaintiffs") and Defendants; and (b)
8 approval of lead counsel Block & Leviton LLP, Robbins Geller Rudman & Dowd LLP, and
9 Bottini & Bottini, Inc.'s application of an award for attorneys' fees and expenses.

10 3. I have monitored the prosecution of this litigation and have been actively involved
11 in significant events. I reviewed the complaint prior to it being filed and authorized my counsel
12 to file it on my behalf. I have also had regular discussions with Block & Leviton regarding case
13 strategy in pursuit of the alleged claims and have been actively involved in the litigation
14 including: (i) searching for and collecting records of my transactions in Snap, Inc. common
15 stock; (ii) reviewing pleadings and Court orders; and (iii) discussing the status of settlement
16 negotiations and settlement with my counsel.

17 4. I have evaluated the risks of continued litigation and trial, including the risk of no
18 recovery at all, and, considering that evaluation, have authorized lead counsel to settle this action
19 for \$32,812,500 million. I am also aware that a Settlement of \$154,687,500 was reached in a
20 federal action, *In re Snap Inc. Sec. Litig.*, No. 2:17-cv-03679-SVW-AGR (C.D. Cal.), and that
21 this Settlement will not become effective until the settlement in the Federal Court also becomes
22 final. I believe the Settlement is fair and reasonable, represents an exceptional result, and is in
23 the best interest of the Class.

24 5. While I understand that the determination of attorneys' fees is left up to the Court,
25 I believe counsel's request for the award of one-third of the Settlement Amount in legal fees and
26 expenses in an amount not to exceed \$400,000 is fair and reasonable as the Settlement would not
27 have been possible without the diligent and aggressive prosecutorial efforts of lead counsel.
28

DECLARATION OF JOSEPH IUSO

1 6. I understand the Class has been given notice of the request by both Plaintiffs to
2 seek an award for their efforts in representing the Class. Accordingly, I seek an award of \$5,000
3 in connection with my work representing the Class. This request is based on the significant time
4 and effort I have devoted to the litigation activities described above, time that I would have
5 otherwise spent on other matters. I understand that it is in the Court's discretion to grant my
6 request, in full or in part, or to deny the request.

7
8 I, Joseph Iuso, declare under penalty of perjury under the laws of the State of California
9 that the foregoing is true and correct to the best of my knowledge. Executed on

10 12 / 16 / 2020.

11 

12 _____
13 Joseph Iuso

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.



KATIE WOODS