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The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

SEAN WILSON, individually and on behalf of  
all others similarly situated,

No. 18-cv-5276-RSL

*Plaintiff,*

**DECLARATION OF SEAN WILSON  
IN SUPPORT OF REQUEST FOR CLASS  
REPRESENTATIVE INCENTIVE  
AWARD**

v.

HUUUGE, INC., a Delaware corporation,

*Defendant.*

1 Pursuant to 28 U.S.C. § 1746, I, Sean Wilson, declare as follows:

2 1. I am a citizen of the state of Washington and I am one of the two Class  
3 Representatives in the above-referenced lawsuit.

4 2. I am submitting this declaration in support of my request for a \$10,000 incentive  
5 award. I understand that under the Settlement, the Class Representatives are permitted to seek  
6 incentive awards. I understand that the Court will have to approve any incentive awards, that  
7 there is no assurance that I will receive an incentive payment, and that the Court may approve of  
8 the Settlement but deny any incentive awards.

9 3. For over two-and-a-half years, I have actively represented the Class.

10 4. I have made substantial personal sacrifices for the benefit of the Class. For  
11 example, as a result of my participation in this litigation, now anyone who Googles my name  
12 will see pages and pages of websites talking about my involvement in this lawsuit.

13 5. Over the years, I have spent dozens of hours fulfilling my role as a class  
14 representative. For example:

- 15 • I have remained in regular communication with my attorneys, including  
16 exchanging emails, participating in phone calls, timely responding to requests for  
17 information, and reviewing and signing papers.
- 18 • I closely reviewed the terms of the Settlement, discussed it with my attorneys, and  
19 signed it. I approved the Settlement because I believe it is fair and in the best  
20 interests of the Class.

21 6. All of the time I have contributed toward the successful prosecution of this case  
22 came at the expense of time I could have spent working or being with friends or family.

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24 I declare under penalty of perjury that the above and foregoing is true and correct.

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Executed on this 14th day of December, 2020 in Washington.

/s/  \_\_\_\_\_