

The Honorable Robert S. Lasnik

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

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

*Plaintiff,*

v.

HUUUGE, INC., a Delaware corporation,

*Defendant.*

No. 18-cv-5276-RSL

**DECLARATION OF TODD LOGAN**

1 Pursuant to 28 U.S.C. § 1746, I, Todd Logan, declare and state as follows:

2 1. I am an attorney at Edelson PC.

3 2. This declaration is based upon my personal knowledge unless otherwise  
4 indicated. If called upon to testify as to the matters stated herein, I could and would competently  
5 do so.

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7 \* \* \*

8  
9 3. In 2014, Edelson PC began investigating the social casino industry’s business  
10 practices as potentially illegal under various state consumer and gambling laws.

11 4. The results of that investigation revealed, in Edelson PC’s view, that social casino  
12 companies—who had by then largely been bought out by multinational gambling corporations—  
13 were violating a host of state consumer and gambling laws, including laws requiring the return of  
14 monies lost at illegal gambling.

15 5. Based on their investigation, in 2015 Edelson PC began filing lawsuits against  
16 social casino companies, in courts nationwide, alleging claims under state gambling laws.

17 6. To date, Edelson PC has filed twelve such class action lawsuits, yet—as of the  
18 date the settlement was announced in *Kater v. Churchill Down*, No. 15-cv-612 MJP (W.D.  
19 Wash.)—not a single other law firm in the country had filed a similar case. In other words,  
20 Edelson PC has for the last five years been the only law firm in the country willing to fight for  
21 consumer victims of the social casino industry.

22 7. During that time, Edelson PC has devoted a substantial amount of its relatively  
23 limited time, energy, and resources toward the successful prosecution of lawsuits over social  
24 casino games.

25 8. Of the time, energy, and resources (the “Efforts”) referenced above, only a  
26 relatively modest fraction is reflected within the motion practice and settlement documents in the  
27 above-captioned cases.

1           9.       Paragraphs 10-20 below describe some of the Efforts Edelson PC has expended,  
2 since 2015, that aided the prosecution and settlement in these cases but may not be completely (if  
3 at all) reflected on the Court’s docket.

4           10.      Two weeks after the Ninth Circuit’s mandate issued in *Kater*, Huuuge’s industry  
5 peers dispatched their litigation attorneys to the Washington State Gambling Commission’s  
6 (“WSGC”) session in Tacoma to present a “Petition for a Declaratory Order” asking the  
7 Commission to declare that other social casino games “do not constitute gambling within the  
8 meaning of the Washington Gambling Act, RCW 9.46.0237.” At each of the three public  
9 hearings that followed—in July 2018 (in Tacoma) (a hearing in which Huuuge’s counsel from  
10 Davis Wright Tremaine appeared on behalf of another social casino company), August 2018 (in  
11 Pasco), and October 2018 (in Olympia)—Edelson PC attorneys appeared before the  
12 Commission, and presented live argument at both the Tacoma and Pasco hearings. Edelson PC  
13 supplemented these appearances with a formal letter to the Commission (ahead of the Tacoma  
14 hearing) and, on the Commission’s request, with an eighteen-page comment for the  
15 Commission’s consideration (between the Tacoma and Pasco hearings). The WGSC ultimately  
16 declined to enter a Declaratory Order.

17           11.      Even after the initial declaratory order proceedings, Edelson PC continued to  
18 represent the interests of the Class in additional flare-ups before the WSGC, including in similar  
19 declaratory order proceedings initiated by The Stars Group.

20           12.      Starting in early 2019, the International Social Gaming Association (“ISGA”)  
21 provided legislators draft legislation that would amend Washington’s gambling statutes with the  
22 effect (and specific intent) of gutting these lawsuits.

23           13.      In response, Edelson PC engaged the lobbying firm Peggen & Mara Political  
24 Consulting LLP—experts in Washington tribal and gambling laws—to help Edelson PC (i) stay  
25 on top of all administrative and legislative developments in the Washington gaming industry; (ii)  
26 understand the intricacies of Washington’s specific legislative process, including the nuances  
27 of—and procedures for—bill drafting; (iii) understand who the relevant lawmakers and

1 stakeholders in Washington’s gaming industry were, what those lawmakers and stakeholders  
2 cared about, and how Edelson PC could educate those lawmakers and stakeholders about social  
3 casinos; and (iv) work with legislative groups, task forces, and other interested parties in in  
4 Washington’s gaming industry, including the Washington Indian Gaming Association  
5 (“WIGA”).

6 14. Edelson PC then used this information and expertise to amplify the Class’s  
7 interests and concerns. Edelson PC drafted memos and prepared handouts for a variety of  
8 stakeholders, including State Senators and Representatives, the Washington Indian Gaming  
9 Association, the Washington Trial Attorneys’ Association, the Public Interest Research Group,  
10 and other organizations dedicated to remedying problem gambling.

11 15. Edelson PC attorneys also flew to Washington multiple times and personally met  
12 with lawmakers in the Washington Senate and House, met with officials in the Executive branch,  
13 and provided in-person testimony to the Washington Legislature.

14 16. For example, in January 2019—after Edelson PC got wind that the ISGA was  
15 planning to gut Washington’s gambling statutes (in what would become the failed H.B. 2041 and  
16 S.B. 5886)—Edelson PC attorneys met in-person with Representative Shelley Kloba, then-  
17 Representative (and now Senator) Derek Stanford, Lieutenant Governor Cyrus Habib, and  
18 several other government officials.

19 17. On January 28, 2020, Edelson PC attorneys met with Senator Stanford at the State  
20 Capital—following Edelson PC’s written and in-person testimony before the House Civil Rights  
21 & Judiciary Committee in (successful) opposition to H.B. 2720.

22 18. On March 21, 2019, Class Counsel sent formal correspondence to Senator Mark  
23 Mullet ahead of a planned work session before the Senate and Financial Institutions, Economic  
24 and Trade Committee about social casinos—to which Huuuge’s industry peers had been invited,  
25 but Edelson PC had not.

26 19. In August 2019, Edelson PC attorneys travelled to Anacortes—on Swinomish  
27 Tribe land—to speak at a monthly WIGA meeting, in opposition to the ISGA-backed bills.



1 of all such expenses, and stand ready to submit them for the Court’s review, preferably *in*  
2 *camera*, should the Court choose to review them.

3 30. The largest expense incurred by Edelson PC has been the costs of internet  
4 advertising expenses related to identifying and engaging with Class Members and conducting a  
5 website-based “opt-out” campaign, in the amount of \$41,797.44.

6 31. Edelson PC also paid Phillips ADR \$20,912.50 in connection with the mediation  
7 before Judge Phillips (ret.) that ultimately led to a settlement in this case.

8 32. The remaining \$6,574.54 in expenses Edelson PC incurred are the sorts of routine  
9 litigation expenses incurred over 2.5 years of litigating a complex class action lawsuit, including  
10 court filing fees, work-related transportation, lodging, and meal costs, and postage fees.

11  
12 I declare under penalty of perjury that the above and foregoing is true and correct.

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14 Executed on this 14th day of December, 2020 at Honolulu, Hawaii.

15 /s/ Todd Logan  
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