

Kevin Osborne, State Bar No. 261367 (kevin@eko.law)  
Julie Erickson, State Bar No. 293111 (julie@eko.law)  
Elizabeth Kramer, State Bar No. 293129 (elizabeth@eko.law)  
**Erickson Kramer Osborne LLP**  
44 Tehama Street  
San Francisco, CA 94105  
Phone: 415-635-0631  
Fax: 415-599-8088

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SIDDHARTH MEHTA, KEVIN QIAN, and  
MICHAEL FURTADO, individually and on  
behalf of other similarly situated individuals,

Plaintiffs,

vs.

ROBINHOOD FINANCIAL LLC;  
ROBINHOOD SECURITIES, LLC; and DOES  
1-10

Defendants.

Case No.: 21-CV-01013-SVK

DECLARATION OF KEVIN QIAN

Date: May 16, 2023  
Time: 10:00 a.m.  
Courtroom: 6, 4<sup>th</sup> Floor  
Judge: Hon. Susan van Keulen

DECLARATION OF KEVIN QIAN

1 I, Kevin Qian, hereby declare as follows:

2 1. I am a named plaintiff in this case.

3 2. I have been actively involved in this case since February 2021. I estimate the total  
4 amount of time I have dedicated to the case in that time is 17 hours.

5 3. In the last two years, I have collected approximately 100 pages of documents and other  
6 evidence at my attorney's request, including bank statements, tax records, correspondence with  
7 Robinhood customer service, and my own calculations and spreadsheets confirming my losses.  
8 Compiling, reviewing, and sending these documents took me approximately 5 hours.

9 4. I have had regular correspondence with my attorneys about this case. I have had  
10 approximately 10 phone calls, where we discussed the progress in the case, the motions that were  
11 filed, discovery, and mediation. I have also exchanged approximately 15 emails with my attorneys.  
12 I estimate that the time spent corresponding with my attorneys on phone call and by email is  
13 approximately 7 hours.

14 5. I have also followed this case in the news and on online forums where it was discussed  
15 so I could stay informed about the case's progress. I estimate I spent approximately 5 hours  
16 following news regarding this case.

17 6. Many of the documents and information I shared in this case included sensitive  
18 personal information, such as information about my personal finances and the login information I  
19 used for my financial accounts.

20 7. I was also required to keep devices that I used to access my Robinhood account and  
21 the Internet that could be used as evidence in the case, including my old cell phone, computer, and  
22 router. I was told these devices may be subject to an inspection, although the case settled before  
23 the inspection ever took place.

24 8. This case was mentioned on several high-profile news sites, including CNET,  
25 Bloomberg, and Barron's, and my name and association with this case were publicized in those  
26 articles. It was also discussed on local television news programs, which were then available online.  
27 Multiple people knew I was involved in the case and I was concerned that being a plaintiff in such  
28

DECLARATION OF KEVIN QIAN

1 a publicized case, where it was revealed that I had a financial account hacked, could potentially  
2 affect my personal or professional reputation.

3  
4 I declare under the penalty of perjury under the laws of the United States that the foregoing  
5 is true and correct. I executed this document in New York City.

6  
7 Dated this 3/15/2023.

8 DocuSigned by:

*Kevin Qian*

7298DF3462C24F2...  
Kevin Qian

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
  
DECLARATION OF KEVIN QIAN