

**IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
DUPAGE COUNTY, ILLINOIS, LAW DIVISION**

JOHN SHANKULA; JASON INGMAN; and
COURTNEY HANSCOM, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

TICKETSONSALE.COM, LLC, a Delaware
limited liability company; TICKET
FULFILLMENT SERVICES LP, a Delaware
limited partnership; and DOES 1-10 inclusive,

Defendants.

Case No.: 2022LA000282

Judge Angelo J. Kappas

Declaration of John Shankula in Support of
Motion for Attorneys' Fees, Costs, and Service
Awards

DECLARATION OF JOHN SHANKULA

I, JOHN SHANKULA, declare:

1. I am one of the named Plaintiffs in the above-captioned action against Defendants Ticketsonsale.com. LLC ("TOS") and Ticket Fulfillment Services LP ("TFS") (jointly, "Defendants"). If called as a witness, I would competently testify to the matters herein from personal knowledge.
2. I am over eighteen years of age and a resident of California.
3. I have been appointed by the Court as one of the Class Representatives in this action for settlement purposes.
4. I am filing this declaration of Plaintiffs' Motion for Attorneys' Fees, Costs, and Service Awards.
5. Through my attorneys, I filed a lawsuit against Defendants, on or about March 23, 2021, in the United States District Court for the Southern District of California.


6. I brought that lawsuit because I believe it involves an important consumer rights issue and to hold Defendants accountable for their representations about their refund policy.
7. Before filing that lawsuit, I had discussions with my attorneys about the facts of the case and provided supporting documents. I also reviewed the complaint and kept in contact with my attorneys about important aspect of the case.
8. On November 22, 2021, I agreed to voluntarily dismiss the lawsuit against Defendants without prejudice so that it could be re-filed in Illinois where I understand one of the Defendants is located. The lawsuit was later re-filed in the present Court on or about March 23, 2022.
9. I understand that a private mediation was held before the Hon. Wayne R. Andersen (Ret.) of JAMS on August 26, 2021, but a settlement was not reached with Defendants until much later after further negotiations. I made myself available in the event that I needed to be contacted by my attorneys during that mediation.
10. I reviewed both a draft and final version of the settlement agreement and discussed it with my attorneys. I signed the settlement agreement on July 13, 2022.
11. I have participated throughout the litigation against Defendants with the belief that I was helping other persons similarly situated.
12. I recognize that I took on certain risks in filing the lawsuit, including the risk that I might have to pay some of the Defendant's costs if the lawsuit was lost, and possible publicity about the lawsuit.
13. In addition to speaking with my attorneys for a consultation and provided supporting documentation, I exchanged several emails regarding my experiences with the ticket purchase and request for a refund for a performance that was initially rescheduled before I filed the lawsuit in federal court in California, which performance was later cancelled. I also reviewed and approved the updated version of the Complaint before it was filed in this Court. I have been kept informed of the progress of the litigation against Defendants. Before submitting this declaration, I submitted a declaration in support of preliminary

approval of the proposed class action settlement.

14. I understand that my attorneys have requested that I be awarded a service award of up to five thousand dollars (\$5,000) to be paid from the Cash Fund. I understand that any such award must be approved by the Court.

15. I support Kazerouni Law Group, APC's and the Law Offices of Todd M. Friedman, P.C.'s request for attorneys' fees and costs, totaling \$1,366,667.00, i.e., one-third of the available Cash Fund.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on 10/12/2022.

By: 
John Shankula