

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**TIMOTHY NELLIS, JANEL DRANES )  
LUCY SOUSA, DAVID CASTILLO, )  
and EDWARD CAMARENA on behalf )  
of themselves and all other similarly )  
situated, )**

**Case No. 1:20-cv-02486**

**Plaintiffs, )**

**Judge Robert M. Dow Jr.**

**v. )**

**VIVID SEATS LLC, a Delaware )  
Corporation, )**

**Defendant. )**

**DECLARATION OF NICHOLAS A. COULSON IN SUPPORT OF PLAINTIFFS’  
MOTION FOR AWARD OF ATTORNEYS’ FEES, EXPENSES, AND INCENTIVE  
AWARDS FROM CLASS SETTLEMENT FUND**

I, Nicholas A. Coulson, declare as follows:

1. I am an attorney licensed to practice in the State of Michigan with a State Bar of Michigan Identification No. 78001. I have been licensed to practice law in the State of Michigan since 2013. Since that time I have been continually licensed to practice. I have never been disciplined, suspended, or disbarred. I am a member of this Court’s general bar. I am also licensed to practice in the United States District Courts for the Eastern District of Michigan, the Western District of Michigan, the Western District of New York, the Eastern District of Wisconsin, the Western District of Wisconsin, the District of Colorado, the United States Courts of Appeals for the Third Circuit and the United States Courts of Appeals for the Fifth Circuit.

2. Except as otherwise stated, I have personal knowledge of the facts stated below and, if called as a witness at the time of any proceeding, could and would testify thereto. I make this declaration in support of Plaintiffs’ Motion for Award of Attorneys’ Fees, Expenses, and Incentive Awards from Class Settlement Fund. It is not intended to address the history of this

litigation, my professional qualifications, or those of my law firm, each of which are set forth in my prior declaration in support of preliminary approval.

3. Angeion Group, the Settlement Administrator, provided varying estimates of the costs of settlement administration in this case. The total estimate for the costliest scenario Angeion deemed likely to occur is \$356,506.

4. At present, my firm has incurred at least 316.5 hours in the prosecution of this case. This time includes an extensive pre-filing investigation (including interviews with ticket buyers, brokers, and sellers), drafting the complaint, developing strategy to defeat Defendant's anticipated motion to compel arbitration, engaging Defendant in settlement discussions, preparing for and conducting mediation and protracted negotiations through the mediator, drafting and negotiating the Settlement Agreement as well as all corresponding exhibits, drafting the motion for preliminary approval and related documents, as well as interviewing, selecting, and overseeing the settlement administrator to present, and other similar tasks. The hours expended were as follows- 231.4 by Nicholas A. Coulson, 65.0 by Steven D. Liddle, 9.6 by Albert J. Ascutto, and 10.5 by Matthew Z. Robb.

5. The costs incurred by my firm for Judge Andersen's mediation services through JAMS were \$8,087.

6. The retainer agreements entered into between the named Plaintiffs and my law firm provide for a one-third contingency fee.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this May 29, 2021 at Birmingham, Michigan.

DATED: May 29, 2021

s/ Nicholas A. Coulson  
Steven D. Liddle  
Nicholas A. Coulson  
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*Attorneys for Plaintiffs and the Putative  
Class*