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13 *Co-Lead Class Counsel*

14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 SAN JOSE DIVISION

17 IN RE ANIMATION WORKERS ANTITRUST  
LITIGATION

Master Docket No. 14-CV-4062-LHK

DECLARATION OF DAVID  
WENTWORTH IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES, EXPENSES, AND  
SERVICE AWARDS

21 THIS DOCUMENT RELATES TO:

22 ALL ACTIONS

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1 I, David Wentworth, declare as follows:

2 1. I am an individual over the age of 18 who resides in Walnut Creek, California. I have  
3 personal knowledge of the matters stated herein and, if called upon, I could and would competently  
4 testify thereto.

5 2. I am a named plaintiff and class representative in *In re Animation Workers Antitrust*  
6 *Litigation*, No. 14-CV-4062-LHK, filed on September 8, 2014, in the United States District Court for  
7 the Northern District of California. I submit this affidavit, on behalf of myself and the settlement  
8 class, in support of Plaintiffs' Motion for Attorneys' Fees, Expenses, and Service Awards.

9 3. As a class representative, I understand that it is my responsibility to be apprised of the  
10 work done by my attorneys on the case and make my own judgment about the fairness of any  
11 settlement proposed by the lawyers. In evaluating the fairness of the settlement, I am required to  
12 consider the interests of all members of the Class. I am free to disagree with my attorneys about the  
13 merits of a settlement and make my views known to the Court.

14 4. I have reviewed the terms of the settlements with Defendants Sony Pictures  
15 Imageworks Inc., Sony Pictures Animation Inc. (collectively, "Sony Pictures), and Blue Sky,  
16 discussed those terms with my attorneys, and I am aware of and approve all terms of the proposed  
17 settlement, as it affects me and the members of the Class. Based upon this reading and my  
18 discussions with counsel, I understand that Sony Pictures has agreed to pay \$13,000,000 into a  
19 Settlement Fund, and Blue Sky agreed to pay \$5,950,000 million into a Settlement Fund, and further  
20 understand that if the settlement is approved, class members nationwide will receive payments from  
21 this Settlement Fund. I understand that the costs of notice and settlement administration, attorneys'  
22 fees, litigation expenses, and participation awards will be deducted from the Settlement Fund, and  
23 that class members who do not opt out will release Sony Pictures, Blue Sky, and related entities from  
24 claims related to this lawsuit.

25 5. I believe that the proposed settlements achieve significant relief for the Class and are  
26 a good result compared to the risks and delay associated with a complex and costly trial. In addition,  
27 I recognize that if a trial were held, there is no guarantee that the Class would succeed on the claim  
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1 presented in this litigation. Thus, the proposed settlements permit an immediate recovery to class  
2 members without the risk, delay, and expense of trial. Based upon my understanding of the class  
3 claims asserted in this litigation, and my understanding of the terms of the settlement agreements, I  
4 believe the proposed settlements are fair, adequate and reasonable, and in the best interests of class  
5 members, and should therefore be granted final approval.

6 6. Over the past nearly two years, I have diligently performed my duty to assist Class  
7 Counsel in prosecuting this case, investing a significant effort to complete specific tasks to benefit  
8 the lawsuit and fulfill my role as a class representative.

9 7. I responded to Defendants' discovery requests by searching my digital and paper files  
10 for responsive documents. This included searching my personal computer and email accounts. I then  
11 worked with my attorneys to harvest those documents and have them produced to Defendants. In  
12 addition, I assisted in preparing and verifying my responses to interrogatories for at least 61 hours  
13 and updated those responses when needed. I also spent time consulting with Class Counsel on  
14 multiple occasions to assist them in understanding my responsive documents. I estimate that I have  
15 spent at least 26 hours communicating with counsel by phone, email and in person about the  
16 document requests, and spent at least 33 hours collecting documents, including searching for  
17 information and documents for the litigation.

18 8. I spent time preparing for my deposition by reviewing documents and meeting with  
19 my attorneys for eight hours. On February 12, 2016, I spent about eight hours at my deposition being  
20 questioned by Defendants. To ensure the accuracy of my deposition transcript, I spent about six  
21 hours reviewing it for errors.

22 9. I have been responsive to Class Counsel's requests for information throughout the  
23 case and remained in regular contact by phone and email to discuss various aspects of the litigation,  
24 including updates on progression of the litigation and material events in the case. I have reviewed  
25 and commented on documents, read case updates, asked questions, and provided information,  
26 assistance and documentation as needed.

27 10. I have also spent approximately 8 hours reviewing the settlements in this case and  
28 discussing the settlements with my attorneys.

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11. In total, I estimate that I have spent at least 150 hours over the past two years, performing my duties on behalf of the class.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 14th day of September, 2016, in San Francisco, California.

  
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DAVID WENTWORTH