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8 *Attorneys for Plaintiff*

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
13

14 JAMES KNAPP, individually and on behalf of
all others similarly situated,

15 Plaintiff,

16 v.

17 ART.COM, Inc., a California corporation; and
18 DOES 1 through 50, inclusive,

19 Defendants.
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CASE NO.: 3:16-cv-00768-WHO

[Honorable William H. Orrick]

**DECLARATION OF DAVID TJEN IN
SUPPORT OF PLAINTIFF'S RENEWED
MOTION FOR ATTORNEYS' FEES AND
COSTS**

Date: October 3, 2018
Time: 2:00 pm
Courtroom: 2

Complaint filed: February 16, 2016
Trial Date: January 8, 2018

DECLARATION OF DAVID TJEN

I, David Tjen, hereby declare:

1 I am the Director of Analytics for Defendant Art.com, Inc. ("Art.com"). As such, I
2 have personal knowledge of the facts set forth below based on data maintained by Art.com in the
3 ordinary course of its business.

4 2. As a result of the settlement of this action, Art.com caused to be distributed via
5 email vouchers in the maximum amount of \$10 that could be used towards purchases on various e-
6 commerce platforms operated by Art.com.

7 3. As of August 12, 2018, such vouchers have been used in 14,567 transactions on
8 these platforms, with an aggregate value of \$622,523.

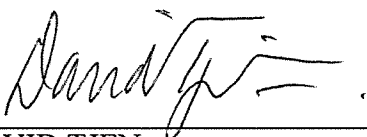
9 4. As of August 12, 2018, the total value of the redeemed vouchers applied in these
10 transactions is \$142,940.

11 5. In connection with the settlement of this action, Art.com incurred \$75,000 in
12 outside costs to provide notice, distribute the vouchers, and otherwise administer the settlement.

13 6. Also in connection with the settlement of this action, Art.com has implemented
14 changes to its business practices and implemented compliance training as set forth in the
15 settlement agreement.

16 I declare under penalty of perjury under the laws of the United States of America and the
17 State of California that the foregoing is true and correct.

18 Executed on August 14, 2018 at Emeryville, California.

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21 DAVID TJEN
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