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*Attorneys for Plaintiffs Carrie Anderson, Brian McCrudden and Jeffrey Schwedock
and the Proposed Class*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JAMES COTTLE AND FREDERICK
SCHOENEMAN, on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

PLAID INC., a Delaware corporation,

Defendant.

Case No.: 4:20-cv-03056

**DECLARATION OF JASON S. HARTLEY
IN SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
CASES SHOULD BE RELATED**

CLASS ACTION

1 I, Jason S. Hartley, declare as follows:

2 1. I am a member of the bar of this court and am a partner with Hartley LLP, counsel
3 for Plaintiffs Carrie Anderson, Brian McCrudden and Jeffrey Schwedock's (the Anderson
4 Plaintiffs) in the *Anderson v. Plaid, Inc.* action, Case No. 3:20-cv-4480 (N.D. Cal.). I make this
5 declaration in support of the Anderson Plaintiffs' Administrative Motion to Consider Whether
6 Cases Should Be Related. I have personal knowledge of the facts stated herein and, if called as a
7 witness, I could and would competently testify thereto.

8 2. Attached hereto as Exhibit A is a true and correct copy of the complaint in *Cottle*
9 *v. Plaid, Inc.*, No. 4:20-cv-3056.

10 3. Attached hereto as Exhibit B is a true and correct copy of the complaint in
11 *Anderson, et al. v. Plaid, Inc.*, No. 3:20-cv-04480.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct. Executed this 17th day of July, 2020 at San Diego, California.

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15 /s/Jason S. Hartley
16 Jason S. Hartley
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