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Attorneys for Plaintiffs David Evans, Patrick Lenahen, Adam Smotkin, Oswaldo Herrera, and the Proposed Classes

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,

Defendants.

Case No. 4:20-cv-03056-DMR

**DECLARATION OF JON A. TOSTRUD
IN SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
CASES SHOULD BE RELATED**

CLASS ACTION

1 I, Jon A. Tostrud, declare as follows:

2 1. I am a member of the bar of this court and am a partner with Tostrud Law Group,
3 P.C., counsel for Plaintiffs David Evans, Patrick Lenahen, Adam Smotkin, and Oswaldo Herrera
4 (the Evans Plaintiffs) in *Evans, et al. v. Plaid, Inc.*, No. 3:20-cv-04804-JSC (N.D. Cal.). I make
5 this declaration in support of the Evans 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 *Evans,*
11 *et al. v. Plaid, Inc.*, No. 3:20-cv-04804.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct.
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15 Executed this 22nd day of July, 2020 at Los Angeles, California.
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17 /s/ Jon A. Tostrud
18 Jon A. Tostrud
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