

1 Joseph R. Saveri (State Bar No. 130064)
 Steven N. Williams (State Bar No. 175489)
 2 Kevin Rayhill (State Bar No. 267496)
 Elissa A. Buchanan (State Bar No. 249996)
 3 **JOSEPH SAVERI LAW FIRM, LLP**
 4 601 California Street, Suite 1000
 San Francisco, CA 94108
 5 Telephone: (415) 500-6800
 Facsimile: (415) 395-9940
 6 Email: jsaveri@saverilawfirm.com
 swilliams@saverilawfirm.com
 7 krayhill@saverilawfirm.com
 eabuchanan@saverilawfirm.com
 8

9 Daniel H. Charest (admitted *pro hac vice*)
BURNS CHAREST LLP
 10 900 Jackson Street, Suite 500
 Dallas, TX 75202
 11 Telephone: (469) 904-4550
 Facsimile: (469) 444-5002
 12 Email: dcharest@burnscharest.com
 13

Patrick D. Murphree (admitted *pro hac vice*)
 Harry R. Yelton (admitted *pro hac vice*)
BURNS CHAREST LLP
 365 Canal Street, Suite 1170
 New Orleans, LA 70130
 Telephone: (504) 799-2845
 Facsimile: (504) 881-1765
 Email: pmurphree@burnscharest.com
 ryelton@burnscharest.com

14 *Attorneys for Plaintiff and the Proposed Class*

15
 16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA

18 **JANE DOE**, individually and on behalf of all others
 19 similarly situated,

20 *Plaintiff,*

21 v.

22 **YOUTUBE, INC.,**

23 *Defendant.*
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Civil Case No. 4:20-CV-07493-YGR

**SUPPLEMENTAL DECLARATION OF
 STEVEN N. WILLIAMS IN SUPPORT OF
 PLAINTIFF'S CLASS MOTION FOR
 FINAL APPROVAL OF CLASS ACTION
 SETTLEMENT**

Date: May 12, 2023
 Time: 10:00 a.m.
 Judge: Hon. Yvonne Gonzalez Rogers
 Location: Courtroom 1 4th Floor

1 I, Steven N. Williams, declare and state as follows:

2 1. I am an attorney in good standing with the State Bar of California and admitted to
3 practice in the Northern District of California. I am a partner of the Joseph Saveri Law Firm, LLP.
4 (“JSLF”), Plaintiff’s counsel of record. Our firm is one of the two firms appointed by the Court as
5 Settlement Class Counsel. I have been principally responsible for the action since its inception. Unless
6 otherwise indicated, I have personal knowledge of the facts set forth herein. If called as a witness, I
7 could and would testify competently to them. I make this declaration pursuant to 28 U.S.C. § 1746.

8 2. This Declaration is submitted in further support of the Plaintiff’s motion for final
9 approval of the settlement between the Class and Defendant YouTube Inc., in settlement of this class
10 action lawsuit against it and now pending before the Court for final approval.

11 3. Since the last declaration that I submitted, CAFA notice has been completed.

12 4. Our firm and co-counsel continue to work with the Claims Administrator to ensure the
13 best possible distribution of settlement proceeds to class members. We also receive and respond to
14 inquiries from class members about the settlement.

15 5. Attached hereto as Exhibit 1 is an updated summary chart indicating the amount of time
16 spent by the attorneys and other professional staff at JSLF who were involved in this litigation and the
17 lodestar calculation based on JSLF’s billing rates for the period from inception through May 10, 2023.
18 The schedule was prepared from contemporaneous, daily time records regularly prepared and
19 maintained by JSLF. An updated form of billing statement showing the full time entries is attached for
20 the Court’s review as Exhibit 2. The total amount for JSLF at current rates is \$516,630.50. The total
21 lodestar for both firms is \$836,003.00 based on 1296.64 hours billed. For purposes of a lodestar cross-
22 check, the requested attorneys fees of \$1,416,163.44, represent a 1.7 multiplier.

23 6. JSLF’s hourly rates for the firm’s attorneys, paralegals and law clerks included in Exhibit
24 2 are the usual, customary rates we charge.

25 7. Exhibit 3 is an updated chart outlining the itemized costs and expenses JSLF advanced
26 the Class. JSLF has incurred a total of \$32,073.57 in costs and expenses incurred to date in connection
27 with the prosecution of this litigation. These costs were incurred on behalf of the Class by JSLF on a
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1 contingent basis and have not been reimbursed. The expenses incurred in this action are reflected in
2 JSLF's books and records. These books and records are prepared from expense vouchers, check records
3 and other source materials and represent an accurate recordation of the expenses incurred.

4 8. I have reviewed the time and expenses reported by JSLF in this case which are included
5 in this declaration. I affirm that they are true and accurate.

6 **Notice Plan**

7 9. I understand that KCC has fully complied with the notice plan ordered by the Court in
8 its preliminary approval order. (ECF No. 63). The implementation and results of the notice program are
9 summarized in the accompanying Declaration of Monica Murray.

10 10. The Class's notice and plan has been carried out. No class members have opted out of
11 the settlements or objected to the settlement.

12 **Final Approval Is Proper Under the Procedural Guidance for Class Action Settlements**

13 11. Pursuant to the Northern District of California's Procedural Guidance for Class Action
14 Settlements, the Class will file with the Court information about class members' responses. As ordered
15 by the Court in its order granting preliminary approval for the present settlements, and in line with the
16 Northern District of California's Procedural Guidance for Class Action Settlements, Class members had
17 35 days to object or opt-out after the filing date of instant motions for final approval and for attorneys'
18 fees and reimbursement of costs and expenses. (ECF No. 65). No class members have opted out or
19 objected to the settlement, an exceptional result.

20 12. The Claims Administrator completed CAFA notice on YouTube's behalf on January 12,
21 2023. and the requirements of the statute have been satisfied. 28 U.S.C. § 1715.

22 I declare under penalty of perjury that the foregoing is true and correct. Executed on May 10,
23 2023.

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25 By: /s/ Steven N. Williams
26 Steven N. Williams
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