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**ELECTRONICALLY
FILED**
*Superior Court of California,
County of San Francisco*
04/10/2017
Clerk of the Court
BY: SANDRA SCHIRO
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

IN RE KING DIGITAL ENTERTAINMENT
plc SHAREHOLDER LITIGATION

Lead Case No. CGC-15-544770
CLASS ACTION

This Document Relates To:
ALL ACTIONS

**DECLARATION OF SEAN DEBOTTE IN
SUPPORT OF CLASS
REPRESENTATIVES' MOTION FOR
FINAL APPROVAL OF SETTLEMENT**

Date: May 18, 2017
Time: 9:00 a.m.
Dept: 304
Judge: The Honorable Curtis E.A. Karnow

Action Filed: March 17, 2015

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I, SEAN DEBOTTE, declare as follows:

1. I respectfully submit this declaration in support of final approval of the settlement of the above-captioned action for \$18,500,000 (the "Settlement"). I also submit this declaration in support of my request for reimbursement of \$2,500 for time spent in carrying out my responsibilities to the Class. I have personal knowledge of the statements herein, and if called as a witness, could competently testify thereto.

2. After consultation with legal counsel, I made the decision to become involved in this action as a named Plaintiff and understood my responsibility to serve the best interests of the Class.

3. In order to fulfill my responsibilities as a named Plaintiff, I was in regular communication with the attorneys at Scott+Scott, Attorneys at Law, LLP ("Scott+Scott"), co-lead counsel for plaintiffs in this action. Through my active and continuous involvement, I closely supervised, carefully monitored, and was actively involved in the material aspects of the prosecution of this action. I received periodic status reports on case developments, and participated in regular discussion with attorneys from Scott+Scott concerning the prosecution of the action, the strengths and risks of the claims, and potential settlement. In particular, throughout the course of the Action, I: (a) communicated regularly with Scott+Scott attorneys regarding the posture and progress of the case; (b) reviewed significant pleadings and briefs filed in the action; (c) reviewed the Court's orders and discussed them with counsel; (d) reviewed Defendants' discovery requests and collected responsive documents that were produced to Defendants; (e) consulted with counsel regarding the mediation and settlement negotiations; and (f) evaluated and approved the proposed Settlement.

4. In addition to the above, on March 1, 2016, I was deposed in this case. In the weeks prior to my deposition, I spend several hours preparing to give testimony by reviewing documents and having conversations with counsel. On February 29, 2016, I traveled to San Francisco, California from my home in Toronto, Canada. Upon arrival, I met with my counsel

1 for several hours in anticipation of the deposition. Following my deposition, I carefully reviewed
2 the transcript and discussed it with counsel.

3 5. I authorized Plaintiffs' counsel to settle this action. In making the determination
4 that the settlement represented a fair, reasonable, and adequate result for the Class, I weighed the
5 substantial benefits to the Class against the significant risks and uncertainties of continued
6 litigation. After doing so, I believe that the Settlement represents a highly favorable recovery,
7 and believe that final approval of the Settlement is in the best interest of the Class.

8 6. I understand the Court may make an award of reasonable costs and expenses
9 directly relating to the representation of the Class to any representative serving on behalf of the
10 Class. I understand that the Court has discretion to grant in full or in part, or to deny my request
11 for reimbursement. I was promised and expected no reimbursement for serving as a
12 representative plaintiff in this action, but due to my participating in a multi-million dollar
13 recovery for the Class, I believe the modest reimbursement is warranted.

14 7. I am requesting the amount of \$2,500 in connection with my representation of the
15 Class. This request is based on the conservative estimate that I devoted approximately 30-40
16 hours to the litigation activities described above. The hours spent on this case was time that I
17 would have otherwise devoted to professional or personal activities.

18 8. I understand that after the settlement funds are distributed to class members, that if
19 there is any remaining balance in the Settlement Fund which cannot be feasibly distributed to
20 class members, that such balance will be donated to Bay Area Legal Aid. I have no connection to
21 the Bay Area Legal Aid, be it personal, professional, or otherwise.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct. Executed this 4 th day of April, 2017 at 3, pm

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27 SEAN DEBOTTE
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DECLARATION OF SERVICE BY MAIL & EMAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Diego, over the age of 18 years, and not a party to or interested party in the within action; that declarant’s business address is 655 West Broadway, Suite 1900, San Diego, California 92101.

2. That on April 10, 2017, declarant served the DECLARATION OF SEAN DEBOTTE IN SUPPORT OF CLASS REPRESENTATIVES’ MOTION FOR FINAL APPROVAL OF SETTLEMENT by depositing a true copy thereof in a United States mailbox at San Diego, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

4. Also, on April 10, 2017, declarant served the DECLARATION OF SEAN DEBOTTE IN SUPPORT OF CLASS REPRESENTATIVES’ MOTION FOR FINAL APPROVAL OF SETTLEMENT via electronic mail on all parties listed on the attached Service List.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 10, 2017, at San Diego, California.



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KING DIGITAL

Service List - 4/10/2017 (15-0032)

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