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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF SAN FRANCISCO

12 In re KING DIGITAL ENTERTAINMENT plc) Lead Case No. CGC-15-544770  
13 SHAREHOLDER LITIGATION )  
14 ) CLASS ACTION  
15 This Document Relates To: )  
16 ) DECLARATION OF GERARD T. TAYLOR  
ALL ACTIONS. ) IN SUPPORT OF CLASS  
REPRESENTATIVES' MOTION FOR FINAL  
APPROVAL OF SETTLEMENT

17 DATE: May 18, 2017  
18 TIME: 9:00 a.m.  
19 DEPT: 304  
20 JUDGE: The Honorable Curtis E.A. Karnow

21 Date Action Filed: 03/17/15

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

1 I, GERARD T. TAYLOR, declare as follows:

2 1. I am a member of the Board of Trustees of the City of Taylor Police and Fire Pension  
3 Plan, and I respectfully submit this declaration in support of final approval of the settlement of the  
4 above-captioned action for \$18,500,000 (the "Settlement"). I also submit this declaration in support of  
5 my request for reimbursement of \$2,500 for time spent in carrying out my responsibilities to the Class.  
6 I have personal knowledge of the statements herein, and if called as a witness, could competently testify  
7 thereto.

8 2. In order to fulfill my responsibilities as the class representative for the City of Taylor  
9 Police and Fire Pension Plan, a named Plaintiff in this lawsuit, I was in regular communication with the  
10 attorneys at Robbins Geller Rudman & Dowd LLP ("Robbins Geller"), co-lead counsel for plaintiffs in  
11 this action, and Vanoverbeke Michaud & Timmony, P.C.. Through my involvement I supervised,  
12 carefully monitored, and was actively involved in the material aspects of the prosecution of this action. I  
13 received periodic status reports on case developments, and participated in regular discussion with  
14 attorneys from Robbins Geller and Vanoverbeke Michaud & Timmony concerning the prosecution of  
15 the action, the strengths and risks of the claims, and potential settlement. Among other tasks I  
16 performed, I: (a) communicated regularly with my counsel regarding the status of the case;  
17 (b) reviewed significant pleadings and briefs filed in the action; (c) reviewed the Court's orders and  
18 discussed them with counsel; (d) reviewed Defendants' document requests and caused the collection of  
19 responsive documents that were produced to Defendants; (e) reviewed Defendants' interrogatories,  
20 conferred with my counsel regarding the same, participated in the preparation of answers to the  
21 interrogatories, and reviewed and approved the responses and certified the same; (f) prepared for my  
22 deposition with counsel and provided testimony at my deposition; (g) consulted with counsel regarding  
23 the mediation and settlement negotiations; and (h) reviewed and approved the proposed Settlement.

24 3. I was deposed in this case on February 26, 2016 in San Francisco. Mine was the first  
25 class representative deposition in this case. In the weeks prior to my deposition, I spent several hours  
26 preparing to give testimony by reviewing documents and having conversations with counsel. I live in  
27 Michigan, therefore in advance of my deposition I traveled by airline to San Francisco. While in San

1 Francisco, I continued to prepare for my deposition with my counsel. Following my deposition, I  
2 carefully reviewed the transcript and discussed it with counsel.

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

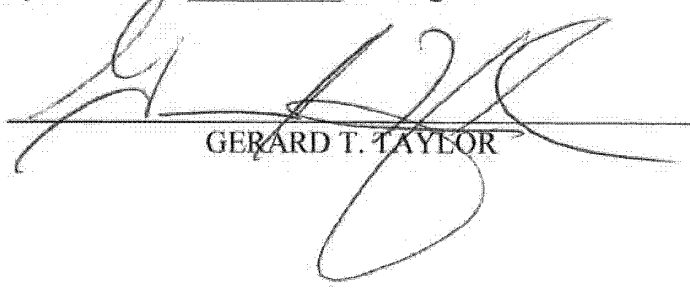
8 5. I understand the Court may make an award of reasonable costs and expenses directly  
9 relating to the representation of the Class to any representative serving on behalf of the Class. I  
10 understand that the Court has discretion to grant in full or in part, or to deny my request for  
11 reimbursement. There was no promise by anyone that I would be reimbursed for my time and expense  
12 in serving as a class representative, nor did I ever have an expectation I would be compensated. I  
13 understand that such compensation is not out of the ordinary and that the Class has been given notice of  
14 the request by the class representatives to seek reimbursement for time and expense. I am an  
15 investment advisor in my own company, and before that I was a senior vice president of investments at  
16 A.G. Edwards & Sons for eleven years.

17 6. I am requesting the amount of \$2,500 in connection with my representation of the Class.  
18 This request is based on the conservative estimate that I devoted over 75 hours to the  
19 litigation activities described above. The hours spent on this case was time that I would have otherwise  
20 devoted to professional or personal activities.

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

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 5<sup>TH</sup> day of April, 2017, at SOUTHGATE Michigan.



GERARD T. TAYLOR

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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 GERARD T. TAYLOR 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 GERARD T. TAYLOR 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.

  
\_\_\_\_\_  
JACLYN STARK

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KING DIGITAL

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