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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 GEOFFREY M.
JOHNSON REGARDING CY PRES
DONATION TO BAY AREA LEGAL AID**

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

Action Filed: March 17, 2015

1 I, GEOFFREY M. JOHNSON, declare as follows:

2 1. I am a member of the law firm Scott+Scott, Attorneys at Law, LLP,
3 (“Scott+Scott”), Court-appointed Class Counsel and counsel for record for Plaintiffs in this
4 action. I am a member of the Ohio bar in good standing and I have been admitted *pro hac vice* in
5 this action. I submit this Declaration in support of the cy pres donation to Bay Area Legal Aid. I
6 have personal knowledge of the issues described herein, and if called upon, I could and would
7 testify competently thereto.

8 2. As set forth in ¶5.9 of the Stipulation of Settlement, and as set forth in the Notice
9 of Proposed Settlement of Class Action, to the extent that, after the distribution(s) to Class
10 Members, there is a balance remaining in the Net Settlement Fund which is too small to distribute
11 to Class Members, Class Counsel will file a motion with the Court to donate the remaining
12 money in the Net Settlement Fund to Bay Area Legal Aid (the “Cy Pres Award”).

13 3. In connection with the Cy Pres Award, I inquired with every attorney at the firm to
14 confirm that there was no connection, personal, professional or otherwise with Bay Area Legal
15 Aid. As a result of my inquiry, I was able to determine that none of the attorneys at Scott+Scott
16 have ever worked for, or served on the Board of Directors at Bay Area Legal Aid.

17 4. The only attorney at Scott+Scott with any sort of connection to Bay Area Legal
18 Aid is Sylvia Sokol, an attorney in Scott+Scott’s New York City Office. Ms. Sokol made a small
19 donation to Bay Area Legal Aid in approximately 1999, when she was an associate at Morrison &
20 Foerster LLP in that firm’s San Francisco Office. Ms. Sokol never made an appearance in this
21 action, was not involved in the litigation, did not bill any time to the case, and was not involved in
22 the decision to designate Bay Area Legal Aid as the cy pres recipient.

23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct.

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26 Dated: April 10, 2017



GEOFFREY M. JOHNSON

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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 GEOFFREY M. JOHNSON REGARDING CY PRES DONATION TO BAY AREA LEGAL AID 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 GEOFFREY M. JOHNSON REGARDING CY PRES DONATION TO BAY AREA LEGAL AID 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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Service List - 4/10/2017 (15-0032)

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