

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

GRACE MURRAY, AMANDA ENGEN, :
STEPHEN BAUER, JEANNE TIPPETT, :
ROBIN TUBESING, NIKOLE SIMECEK, :
MICHELLE MCOSKER, JACQUELINE : Case No. 1:19-cv-12608-WGY
GROFF, and HEATHER HALL, on behalf of :
themselves and others similarly situated, :

Plaintiffs, :

v. :

GROCERY DELIVERY E-SERVICES USA
INC. DBA HELLO FRESH

Defendant.

**AFFIDAVIT OF STACEY P. SLAUGHTER IN SUPPORT OF PLAINTIFFS’ MOTION
FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

I, Stacey P. Slaughter, declare as follows:

1. I make this affidavit in support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement to state my opinion that the settlement represents an excellent result for the Settlement Class and to advise the Court of my adequacy to be appointed as class counsel. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called on to do so.

2. I am a partner in the law firm Robins Kaplan LLP, counsel for Plaintiffs in this matter. I am admitted to practice before this Court and am a member in good standing of the bars in the States of Minnesota and the State of New York. I have 20 years of experience in complex commercial, consumer, financial, and antitrust litigation.

3. Robins Kaplan is a national law firm dedicated to trial work, with national recognition for its plaintiff-side litigation.

4. I have had leadership roles in numerous complex and class action litigation cases, including the following:

- *Dahl v. Bain Capital Partners, LLC*, No. 07-cv-12388 (D. Mass.), played a key leadership role representing investors in a class action, antitrust suit against private equity firms for a conspiracy to suppress the buyout price for public companies, which settled for \$590.5 million.
- *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.*, MDL No. 1720 (E.D.N.Y.), litigated on behalf of class plaintiffs, who paid excessive interchange fees to Visa and MasterCard in violation of antitrust laws.
- *In re LIBOR-Based Financial Instruments Antitrust Litigation*, MDL No. 2262 (S.D.N.Y.), represent direct action plaintiffs in antitrust action concerning the fixing of the BBA LIBOR benchmark.
- *In re ICE Libor Antitrust Litigation*, 19-cv-439 (S.D.N.Y.), serves as co-lead counsel for class plaintiffs in consolidated antitrust action concerning the fixing of ICE LIBOR benchmark.
- *The Federal Home Loan Bank of Pittsburgh v. JP Morgan Chase & Co, et al.*, No. GD-09-016892 (Allegheny Ct., Penn.), represented an institutional investor to recover approximately \$30 million for toxic, residential mortgage-backed securities.
- *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices & Products Liability Litig.*, MDL No. 2777 (N.D. CA.), served on Plaintiffs' Steering Committee, to help secure a settlement in a multidistrict class action against an automotive manufacturer and parts suppliers - totaling \$307.5 million in cash payments to class members, plus emissions modifications and extended vehicle warranties - by alleging unfair, unlawful, and fraudulent marketing and sales of Ecodiesel vehicles.
- *In re Equifax Inc., Consumer Data Security Breach Litig.*, MDL No. 2800 (N.D. GA.), appointed to Plaintiffs' Steering Committee on behalf of a financial institution class in an action against a major credit reporting agency stemming from data breach.
- *In re Cattle Antitrust Litigation*, MDL No. 1222 (D. Minn.), appointed as lead liaison counsel on behalf of class plaintiffs in antitrust action concerning the fixing of fed cattle prices.

5. In light of the risks inherent in class action litigation, as well as my experience litigating class action cases, it is my opinion that the pending settlement is an excellent result for consumers and members of the class. The settlement is well within the range of other TCPA settlements on a dollars-per-class-member basis.

PURSUANT TO 28 U.S.C. § 1746, I DECLARE SIGNED UNDER PENALTY OF PERJURY OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED at Minneapolis, Minnesota, this 6th day of November, 2020.

/s/ Stacey P. Slaughter, Admitted Pro Hac Vice
Stacey P. Slaughter, Admitted Pro Hac Vice