

4. I have never been disciplined by any bar association, or sanctioned by any court for improper conduct of any kind.
5. I am counsel of record in the above-captioned matter for class member and objector Sarah McDonald.
6. I make this declaration in support of her Opposition to Plaintiffs' Motion to Compel Limited Discovery from Objector Sarah McDonald.
7. My legal practice over the past two decades has focused primarily on federal civil appeals in complex litigation and class actions. *See, e.g., Omnicare, Inc. v. Laborers Dist. Council Constr. Indus. Pension Fund*, 575 U.S. 175 (2015); *Matrixx Initiatives, Inc. v. Siracusano*, 563 U.S. 27 (2011); *Dura Pharmaceuticals, Inc., v. Broudo*, 544 U.S. 336 (2005); *Local 703, I.B. of T. Grocery & Food Employees Welfare Fund v. Regions Financial Corp.*, 762 F.3d 1248 (11th Cir. 2014); *Plumbers' Union Local No. 12 Pension Fund v. Nomura Asset Acceptance Corp.*, 632 F.3d 762 (1st Cir. 2011); *In re Constar International Inc. Securities Litig.*, 585 F.3d 774 (3d Cir. 2009).
8. I have published a number of articles on a variety of subjects relating to class actions, securities litigation, civil rights, and civil liberties, as is reflected on my short-form c.v., a true and correct copy of which is attached as Exhibit A.
9. I also have devoted a substantial portion of my practice to pro bono work in matters in which I do not expect to be paid.
10. In recent years I have from time to time pressed objections to class-action settlements or fee awards, either as a class member and objector myself, or as counsel for objectors.
11. Those objections often have been sustained as meritorious. *See, e.g., Johnson v. NPAS Solutions, LLC*, 975 F.3d 1244 (11th Cir. 2020); *Muransky v. Godiva Chocolatier*, 979

F.3d 917 (11th Cir. 2020) (en banc); *Chieftain Royalty Co. v. Enervest Energy Institutional Fund XIII-A, L.P.*, 888 F.3d 455 (10th Cir. 2017); *Lee v. Buth-Na-Bodhaige, Inc.*, 2019 IL App (5th) 180033, 143 N.E.3d 645 (Ill. App. 5th Dist. 2019).

12. Among my primary goals in pressing objections is to improve the quality of class-action practice, in service of the interests of class members and of the public.
13. None of my objections have been found to be frivolous, and none have been made for improper purposes.
14. I have never pressed an objection in order to extract a payment in return for the objection's withdrawal, nor have I ever sought or accepted payment for forgoing an appeal or for the dismissal of appeal from an order overruling an objection.
15. Although I am aware that some class-action plaintiffs' counsel seek to pay objectors to withdraw objections or to forgo or dismiss appeals, I have never requested or accepted such a payment.
16. I will not request or accept any payment in in this case in return for withdrawing McDonald's objection, for forgoing an appeal, or for dismissing any appeal.
17. I am, moreover, willing to be bound by a court order absolutely prohibiting any such payment in this case.
18. Attached as Exhibits B through H to this declaration is are true and correct copies of the opening pages from each of seven volumes of trial transcript from *Krakauer v. Dish Network, LLC*, No. 1:14CV333 (M.D.N.C.), showing the names of attorneys who appeared and examined witness during the trial of that case. I would be happy to provide complete copies of each volume, if the Court desires them.

19. Attached as Exhibit I to this declaration is a true and correct copy of the docket for *Engen v. Grocery Delivery E-Services USA Inc.*, No. 0:19-cv-02433-ECT-TNL (D. Mn.), as downloaded from PACER on May 1, 2021.
20. Attached as Exhibit J to this declaration is a true and correct copy of the docket for *Murray v Grocery Delivery E-Services USA Inc.*, 1:19-cv-12608-WGY, as downloaded from PACER on May 1, 2021.
21. Attached as Exhibit K to this declaration is a true and correct copy of the docket for *Tippet v. Grocery Delivery E-Services USA Inc.*, 1:20-cv-05271-PKC, as downloaded from PACER on May 1, 2021.
22. Attached as Exhibit L to this declaration is a true and correct copy of the docket for *Engen v. Grocery Delivery E-Services*, No. 20-1923 (8th Cir.), as downloaded from PACER on May 3, 2021.
23. Attached as Exhibit M to this declaration is a true and correct copy of the docket for *Murray v. Grocery Delivery E-Services USA*, No. 20-1492 (1st Cir.), as downloaded from PACER on May 3, 2021.
24. Attached as Exhibit N to this declaration is a true and correct copy of the Google Finance stock-market data HelloFresh SE, ticker symbol ETR:HFG, for March 26, 202, as downloaded on March 28, 2021, from:

<https://www.google.com/finance/quote/HFG:ETR>
25. Attached as Exhibit O to this declaration is a true and correct copy of the Google Finance stock-market data for HelloFresh SE, ticker symbol ETR:HFG, for May 3, 2021, as downloaded on May 3, 2021, from:

<https://www.google.com/finance/quote/HFG:ETR>.

26. Attached as Exhibit P to this declaration is a true and correct copy of a HelloFresh press release, dated March 2, 2021, as downloaded on March 26, 2021, from:

https://assets.ctfassets.net/irplh84t0tdt/20yO8JUvE1bbmrR5UeKRph/dd6571fea0ddb3cfb15a8eebcf9d12f7/Press_release_HelloFresh_FY_2020_results.pdf

27. Attached as Exhibit Q to this declaration is a true and correct copy of a HelloFresh press release, dated May 4, 2021, as downloaded on that date from:

https://assets.ctfassets.net/irplh84t0tdt/5qIUt9XdMsIzcQilcmazJx/247fe1b1db52afcebbd3727dee760e4/Press_Release_HelloFresh_Q1_Financial_Results.pdf

28. Attached as Exhibit R to this declaration is a true and correct copy of a BBC News story, *HelloFresh sees meal kit demand surge as shift to online continues* as downloaded on May 4, 2021, from: <https://www.bbc.com/news/business-56977643>

29. Attached as Exhibit S to this declaration is a true and correct copy of the Third Stipulation Regarding the Class Definition (sans exhibits), DE264 from the PACER docket for *Krakauer v. Dish Network, L.L.C.*, No. 1:14-cv-00333-CCE-JEP (M.D.N.D. Dec. 23, 2016).

30. Attached as Exhibit T to this declaration is a true and correct copy of the Second Order Modifying Class Definition, DE271 from the PACER docket for *Krakauer v. Dish Network, L.L.C.*, No. 1:14-cv-00333-CCE-JEP (M.D.N.D. Dec. 29, 2016).

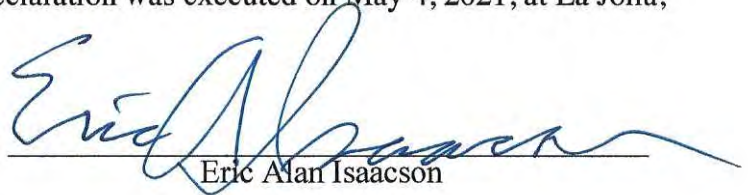
31. Attached as Exhibit U to this declaration is a true and correct copy of the Federal Trade Commission's informational web page, *Cell Phones and The Do Not Call Registry*, as downloaded on May 4, 2021, from:

<https://www.consumer.ftc.gov/articles/0133-cell-phones-and-do-not-call-registry>

32. Attached as Exhibit V to this declaration is a true and correct copy of the first two pages of *SSRN Paper Submission Process*, as downloaded on May 4, 2021, from:

https://www.ssrn.com/sites/en/assets/Image/SSRN_PAPERSUBMISSION_10August2018.pdf

I declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on May 4, 2021, at La Jolla, California.


Eric Alan Isaacson