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16 Class Counsel

17 UNITED STATES DISTRICT COURT
 18 SOUTHERN DISTRICT OF CALIFORNIA

19 SONNY LOW, J.R. EVERETT and
 20 JOHN BROWN, on Behalf of
 Themselves and All Others Similarly
 21 Situated,

22 Plaintiffs,

23 vs.

24 TRUMP UNIVERSITY, LLC, a New
 York Limited Liability Company and
 25 DONALD J. TRUMP,

26 Defendants.

No. 3:10-cv-0940-GPC(WVG)

CLASS ACTION

DECLARATION OF AMBER L. ECK
 IN SUPPORT OF JOINT MOTION
 FOR FINAL APPROVAL OF CLASS
 ACTION SETTLEMENT

DATE: March 30, 2017

TIME: 1:00 p.m.

CTRM: 2D

JUDGE: Hon. Gonzalo P. Curiel

27 [Caption continued on following page.]

28

1 ART COHEN, Individually and on
2 Behalf of All Others Similarly Situated,

3 Plaintiff,

4 vs.

5 DONALD J. TRUMP,

6 Defendant.

) No. 3:13-cv-02519-GPC-WVG
) CLASS ACTION

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1 I, Amber L. Eck, declare as follows:

2 1. I am a member of the law firm Zeldes Haeggquist & Eck, LLP, one of
3 Class Counsel in the above-captioned actions. I am duly licensed to practice before
4 all state and federal courts in California. The facts stated in this declaration are true
5 and based upon my own personal knowledge and, if called to testify to them, I would
6 competently do so.

7 2. I submit this declaration in support of the Final Approval of the Class
8 Action Settlement.

9 3. I have spoken to Sherri Simpson at least two dozen times since she first
10 contacted me in or about July 2010, including numerous phone conversations
11 throughout 2015 and 2016. Not once during these many phone conversations did Ms.
12 Simpson ever ask any questions, or express any confusion, about the opt-out process
13 or what would happen in the event of a settlement. Nor did she ever give any
14 indication that she wanted to opt out of the class action or bring an individual fraud (or
15 any other kind of) claim. In fact, we discussed the possibility of her serving as a
16 plaintiff or a trial witness in the *Low* class action. Since the settlement was
17 announced, I have received no communications from Sherri Simpson regarding the
18 settlement or asking about how she could opt out.

19 4. I have communicated with Harold Doe at least a dozen times by phone
20 and email since he first contacted me in 2012. Not once did I ever promise that he
21 would get at least three times his damages or that seniors would get six times their
22 damages in the event of a settlement.

23 I declare under penalty of perjury under the laws of the United States of
24 America that the foregoing is true and correct. Executed this 23rd day of March,
25 2017, at San Diego, California.

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AMBER L. ECK

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CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2017, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 23, 2017.

s/ Rachel L. Jensen
RACHEL L. JENSEN

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Mailing Information for a Case 3:10-cv-00940-GPC-WVG Low v. Trump University, LLC et al

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Manual Notice List

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- (No manual recipients)

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