

BEFORE THE AMERICAN ARBITRATION ASSOCIATION

KAREN DAVIS-HUDSON and SARAH)	
DIAZ, individually and on behalf of all)	
others similarly situated,)	
)	
Claimants,)	
vs.)	CASE NO. 74-20-1400-0032
)	
23ANDME, INC.,)	
)	
Respondent.)	
)	
)	

DECLARATION OF SARAH DIAZ IN SUPPORT OF CLAIMANTS’ MOTION FOR APPROVAL OF AN AWARD OF ATTORNEYS’ FEES, COSTS AND EXPENSES, AND INCENTIVE AWARDS FOR CLASS REPRESENTATIVES

I, Sarah Diaz, declare as follows:

1. I am a resident of Weston, Florida. I was a named plaintiff in the present arbitration. I make this Declaration in support of Claimants’ Motion for Approval of and Award of Attorneys’ Fees, Costs and Expenses and Incentive Awards For Class Representatives. The statements made in this Declaration are based on my personal knowledge and, if called as a witness, I could and would testify thereto.
2. On or about November 21, 2013, I purchased two Personal Genome Service (the “PGS”) kits from 23andMe for a purchase price of \$193.15.
3. I assisted with my attorneys’ investigation by describing the events surrounding my purchase of the PGS. I also provided my attorneys with relevant documentation for their review.
4. Based on these discussions, my attorneys prepared a Demand for Class Arbitration. I carefully reviewed the Complaint for accuracy and approved it before it was filed.

5. During the course of this litigation, I kept in regular contact with my attorneys. Specifically, I conferred with them regularly by phone and e-mail to discuss the status of the case. We also discussed case strategy, motions that were currently pending, and the prospects of settlement. Furthermore, when appropriate, I informed my attorneys of additional facts for their research and consideration.

6. My attorneys have kept me informed in regards to their efforts to resolve this matter. I discussed the Settlement Agreement with them and gave my approval prior to it being signed.

7. Had this case not settled, I was willing and prepared to take part in discovery. I informed my lawyers that I was available to produce documents and take part in a deposition. I was also prepared to testify at arbitration, if necessary.

8. Based on the interactions and my relationship with my attorneys, I believe they have fairly and adequately represented me and the Class and will continue to do so.

9. I estimate that I spent 22 hours taking these actions for the class's benefit.

The above statements are of my own personal knowledge, and I make such statements under penalty of perjury under the laws of the United States of America. Executed this 6th day of October, 2017.

A handwritten signature in blue ink, consisting of several loops and flourishes, positioned above a horizontal line.