

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 JAMES H. MCFERRIN IN SUPPORT OF CLAIMANTS' MOTION
FOR ENTRY OF ORDER FINALLY APPROVING CLASS ACTION SETTLEMENT
AND MOTION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES AND
INCENTIVE AWARDS FOR CLASS REPRESENTATIVES**

I, James H. McFerrin, declare as follows:

1. I am an attorney at law licensed to practice in the State of Alabama. I am the owner of the McFerrin Law Firm, LLC, Counsel for Claimants Karen Davis-Hudson and Sarah Diaz ("Claimants"). I make this declaration in support of Claimants' Motion for Entry of Order Finally Approving Class Action Settlement and Motion for Payment of Attorneys' Fees, Cost and Expenses and Incentive Awards for Class Representatives.

2. If called upon as a witness, I would be competent to testify that the following facts are true and correct. The following is based on my personal recollection of events in this proceeding.

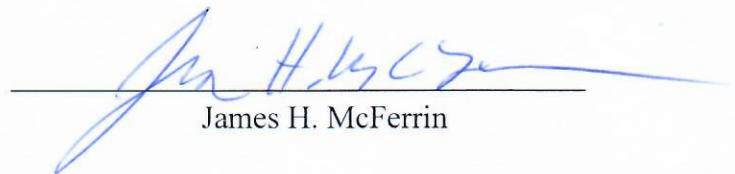
3. I have been actively involved in the litigation of this action since its inception in January 2014. I have been the primary point of contact for Claimant Karen Davis-Hudson throughout the course of this Arbitration. I was involved in many aspects of this Arbitration, including, *inter alia*, the pre-suit investigation, filing the initial Demand for Class Arbitration,

filing the First Amended Demand for Class Arbitration, settlement negotiations, and working with co-counsel in preparing the preliminary and final approval settlement papers.

4. I have reviewed my billing records and, in summary, I have expended approximately 44 hours working on this case through October 6, 2017. Multiplying the above hours by my standard hourly rate of \$450 results in a lodestar of \$19,800. I have not incurred any expenses in connection with this Arbitration.

5. A modest service award of \$10,000 for Karen Davis-Hudson is justified because of her willingness to step forward and represent the class in this Arbitration. As indicated in her Declaration submitted concurrently herewith, Ms. Davis-Hudson reviewed relevant pleadings and kept in communication with her counsel throughout the litigation. She was also willing to provide testimony as needed.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 9, 2017 at Birmingham, Alabama.


James H. McFerrin