

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.)
)
)

**REPLY DECLARATION OF PATRICK J. SHEEHAN 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, Patrick J. Sheehan, declare as follows:

1. I am an attorney at law licensed to practice in the State of Massachusetts and New York. I am a partner in the firm of Whatley Kallas, LLP, Counsel for Claimants Karen Davis-Hudson and Sarah Diaz (“Claimants”). I make this reply 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. Based on information provided by 23andMe in response to his claim, Objector Henry Townser paid \$99 on April 18, 2011. Yet he represented in his objection he paid \$299 for his PGS.

3. Based on that false information, Objector Townser claims a significant number of class members paid well over \$99 for the PGS. Yet according to information provided by 23andMe in response to this assertion, 519,670 units of the PGS were sold during the class period. Of those, 447,706, or over 86% of the units sold, were sold for \$99 or less.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on November 3, 2017 at Boston, Massachusetts.



Patrick J. Sheehan