

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JAE LEE, on behalf of himself and all others
similarly situated,

Plaintiff,

v.

TARO PHARMACEUTICALS U.S.A., INC.,

Defendant.

Case No. 7:23-cv-03834-CS

**DECLARATION OF JAE LEE IN SUPPORT OF PLAINTIFF'S MOTION FOR
AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND
SERVICE AWARDS TO CLASS REPRESENTATIVE**

I, Jae Lee, declare:

1. I am an adult resident of the state of New York.
2. I am the named plaintiff in the above-captioned action and have knowledge of the facts set forth in this declaration. If called as a witness to testify, I could and would be competent to testify to these facts.
3. I am making this declaration in support of Plaintiff's Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Service Awards to Class Representatives.
4. I am a member of the Settlement Class. I received a letter from Taro Pharmaceuticals U.S.A., Inc. stating my Private Information may have been impacted in the Data Incident.
5. I understand that, as a Settlement Class Representative, I am obligated to protect the interests of all Settlement Class Members.

6. My lawyers kept me informed of the progress of the case through email and telephone calls.

7. I searched for documents and emails related to my relationship with Defendant.

8. I was prepared to take on the responsibilities of a class representative, including being deposed and testifying at trial.

9. I communicated with my attorneys before and after the settlement of this case.

10. I have reviewed the Settlement Agreement and exhibits. I approve the Settlement Agreement because I believe it is fair, adequate, and reasonable and in the best interests of the Class.

11. I have not been offered any preferential treatment to settle this dispute. I understand that, under the proposed Settlement Agreement, Class Counsel may seek a service award. I understand that the Court will have to approve any service award and that there is no assurance that I will receive a service award.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 4th day of April, 2024, at White Plains, New York.

Jae Lee

Jae Lee