

# EXHIBIT 1

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14 *Attorneys for Plaintiffs and Proposed Settlement Class Counsel*

15  
16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN JOSE DIVISION

19 In re YAHOO! INC. CUSTOMER DATA )  
20 BREACH SECURITY LITIGATION )

No. 16-md-02752-LHK

DECLARATION OF STUART A.  
DAVIDSON IN SUPPORT OF PLAINTIFFS'  
OMNIBUS RESPONSE IN OPPOSITION TO  
OBJECTIONS TO PROPOSED  
SETTLEMENT

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1 I, Stuart A. Davidson, declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of the States of  
3 Florida and Minnesota and am admitted *pro hac vice* in this Court. I am a member of the law firm  
4 Robbins Geller Rudman & Dowd LLP, and serve as a Member of the Plaintiffs' Executive  
5 Committee as appointed by this Court. I have personal knowledge of the matter stated herein and,  
6 if called upon, I could and would competently testify thereto I make this declaration pursuant to  
7 28 U.S.C. §1746.

8 2. The foregoing exhibits are true and correct copies of the same and are being  
9 submitted in connection with Plaintiffs' Omnibus Response in Opposition to Objections to  
10 Proposed Settlement:

- 11 **Exhibit A** Texas Department of Criminal Justice Offender Search, Offender  
12 Information Details for Leonard Deshawn Scott.  
13 **Exhibit B** Texas Department of Public Safety Sex Offender Registry Entry for  
14 Leonard Deshawn Scott.  
15 **Exhibit C** Email from R. Bowman to Class and Defendants' Counsel dated Feb.  
16 6, 2020.

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

19 Executed this 19th day of March, 2020, at Boca Raton, Florida.

20 s/ Stuart A. Davidson  
21 STUART A. DAVIDSON

# EXHIBIT A



[Return to Search Results](#)

## Offender Information Details

**SID Number:** 07011685

**TDCJ Number:** 02158187

**Name:** SCOTT,LEONARD DESHAWN

**Race:** B

**Gender:** M

**DOB:** 1985-09-06

**Maximum Sentence Date:** 2057-01-10

**Current Facility:** [EASTHAM](#)

**Projected Release Date:** [2057-01-10](#)

**Parole Eligibility Date:** [2037-01-11](#)

**Offender Visitation Eligible:** [YES](#)

*Information provided is updated once daily during weekdays and multiple times per day on visitation days.  
Because this information is subject to change, family members and friends are encouraged to call the unit prior to traveling for a visit.*

### SPECIAL INFORMATION FOR SCHEDULED RELEASE:

**Scheduled Release Date:**

Offender is not scheduled for release at this time.

**Scheduled Release Type:**

Will be determined when release date is scheduled.

**Scheduled Release Location:**

Will be determined when release date is scheduled.

[Parole Review Information](#)

**Offense History:**

Offense Date	Offense	Sentence Date	County	Case No.	Sentence (YY-MM-DD)
2005-07-01	UNAUTH ABSEN FROM CORR FAC	2005-12-16	DALLAS	F-0521912-RS	180 Days
2002-12-28	EVADING ARREST USING VEH	2005-08-03	DALLAS	D-0257899-JA	180 Days
2002-12-28	UUMV	2005-08-03	DALLAS	F-0257900-IS	180 Days
2006-07-10	ROBBERY	2007-09-10	DALLAS	F-0668104-U	10-00-00
2006-03-19	AGG SEX ASLT CHILD U/14	2007-09-10	DALLAS	F-0600987-U	5-00-00
2006-04-23	AGG SEX ASLT	2017-09-01	DALLAS	F-14-45581-Q	40-00-00

[Return to Search Results](#)

*The Texas Department of Criminal Justice updates this information regularly to ensure that it is complete and accurate, however this information can change quickly. Therefore, the information on this site may not reflect the true current location, status, scheduled termination date, or other information regarding an offender.*

*For questions and comments, you may contact the Texas Department of Criminal Justice, at (936) 295-6371 or [webadmin@tdcj.texas.gov](mailto:webadmin@tdcj.texas.gov). This information is made available to the public and law enforcement in the interest of public safety. Any unauthorized use of this information is forbidden and subject to criminal prosecution.*

[New Offender Search](#)

Texas Department of Criminal Justice | PO Box 99 | Huntsville, Texas 77342-0099 | (936) 295-6371

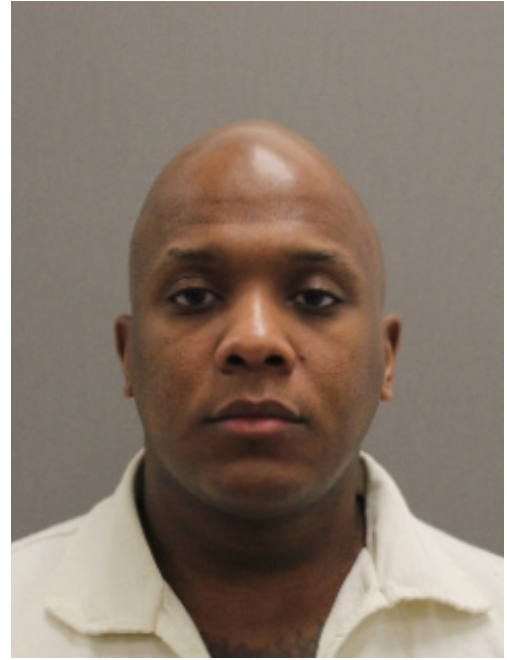
# EXHIBIT B

## SCOTT,LEONARD

 records.txdps.state.tx.us/SexOffenderRegistry/Search/Rapsheet

Photo Reported  
10/25/2017

<b>SID</b>	07011685
<b>Risk Level</b>	HIGH
<b>Ending Registration Date (Projected)</b>	LIFETIME
<b>Verification Requirement</b>	ANNUALLY
<b>Sex</b>	Male
<b>Race</b>	Black
<b>Ethnicity</b>	Non-Hispanic
<b>Height</b>	6'2"
<b>Weight</b>	200 lbs
<b>Hair Color</b>	BLACK
<b>Eye Color</b>	BROWN
<b>Shoe Size</b>	UNKNOWN
<b>Shoe Width</b>	UNKNOWN



## Name(s)

SCOTT,LEONARD (PRIMARY)

SCOTT,LEONARD DESHAWN

SCOTT,LEONARD DESHON



## Birth Date(s)

09/06/1985 (PRIMARY)

## Notices

DPS Cannot guarantee the records you obtain through this site relate to the person about whom you are seeking information. Searches based on names, dates of birth and other alphanumeric identifiers are not always accurate. The only way to positively link someone to a criminal record is through fingerprint verification.

The registry contains information as reported by the law enforcement agency that served as the offender's last Texas registration authority. Registrants who leave the state will have their last reported state/country of intended residence reflected in the address portion of their record. Registration information will remain on the web site until the duty to register has expired or other relief allowed by statute is granted. (Art. 62.101 and 62.251 Tx CCP)

<b>Date</b>	<b>Event Type</b>	<b>Agency</b>
07/06/2018	Change of Status	DALLAS POLICE DEPARTMENT
09/01/2016	Verification	DALLAS POLICE DEPARTMENT
02/18/2016	Registration	DEPT OF CRIMINAL JUSTICE HUNTSVILLE

## Reported Information

(INCARCERATED)  
Incarcerated (Texas)

### Address

## Offense: AGGRAVATED SEXUAL ASSAULT OF A CHILD

<b>Statute</b>	TEXAS PENAL CODE 22.021(a)(2)(B)
<b>Victim Sex</b>	Female

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**Victim Age** 16

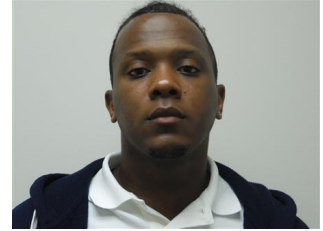
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**Disposition Date** 09/10/2007

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**JUDGMENT** 5YPAROLE/MANDATORY SUPERVISION

Photo Reported - 03/14/2016



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Photo Reported - 02/18/2016



# EXHIBIT C

[REDACTED]

[REDACTED]

**From:** Ryan Bowman <rbowman430@gmail.com>  
**Sent:** Thursday, February 6, 2020 1:51 PM  
**To:** Daniel Robinson <d Robinson@robinsonfirm.com>; amortimer@huntonak.com;  
jyanchunis@forthepeople.com  
**Cc:** Ryan Bowman <rbowman430@gmail.com>  
**Subject:** IN RE: YAHOO! INC. Objections of Ryan Bowman

Dear Counsel,

Attached you will find my courtesy email copy of my objections to the Yahoo Inc. Customer Data Breach.

In the event, you wish to depose me, please be advised that I ask that it be limited to one (1) hour and to matters before the court. Any additional questions outside the scope I ask for your questions before hand, otherwise, I will object to the question during deposition. In the event, you require a deposition and request me to fly to California or any other state other then Pennsylvania, I am requesting the cost of the flight and hotel be at the expense of the counsel.

Furthermore, against my better judgement (emphasis added), if counsel wishes, in good faith, I am open to negotiation an incentive fee pursuant to Rule 23 in return for my withdrawal of my objections. These objections will be filed with the settlement administrator via email and regular U.S. Postal Mail as well as the court and all of counsel. Finally, in the event the objections are not sustained by the Honorable Court, I do plan on appealing to Circuit Court.

If you need to speak with me, it is best to contact me via [email-rbowman430@gmail.com](mailto:rbowman430@gmail.com) or by text at 484-629-5454.

Yours Truly,

Ryan Bowman, *Pro Se*  
EMT  
OIF Veteran 09-11