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TICKETMASTER

11
12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF LOS ANGELES**

14
15 CURT SCHLESINGER, PETER LO RE,
ADAM RUSSELL, JAMES ROTH, MARYAM
16 AGHCHARY, on behalf of themselves and all
17 others similarly situated,

18 Plaintiffs,

19 vs.

20 TICKETMASTER, a Delaware Corporation,

21 Defendant.

CASE NO. BC 304565

Assigned for all purposes to Hon. Kenneth R.
Freeman – Dept. 310

DECLARATION OF SHAWN MOON IN
SUPPORT OF TICKETMASTER'S
MEMORANDUM IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF THE PROPOSED
CLASS ACTION SETTLEMENT AGREEMENT

DATE: January 13, 2015
TIME: 10:00 a.m.
DEPT: 310

Date Action Filed: October 21, 2003
Trial Date: Vacated

1 **DECLARATION OF SHAWN MOON**

2 I, SHAWN MOON, declare and state as follows:

3 1. I am the Director, Database Solutions at Live Nation, Inc. ("Live Nation"). I have
4 personal knowledge of the following facts, and would testify competently thereto under oath if
5 necessary. I am submitting this declaration in support of Ticketmaster's Memorandum in Support of
6 Motion for Final Approval of the Proposed Class Action Settlement Agreement.

7 2. In my position as Director, Database Solutions at Live Nation, I have access to
8 databases with information about all tickets purchased over Ticketmaster's website,
9 www.ticketmaster.com (the "Website"), from October 21, 1999 through February 27, 2013 (the "Class
10 Period"). I have supervised several queries that were run against those databases to determine the
11 number of transactions, types of transactions, number of ticket purchasers and tickets purchased by
12 class members over the Class Period.

13 3. During the Class Period, 57,477,583 purchasers paid an Order Processing Fee ("OPF")
14 for online purchases that were not fully refunded. The average OPF paid by the 57,477,583 class
15 members was \$3.16 per order. The average class member made on average 3.15 transactions over the
16 Website during the Class Period.

17 4. There were 4,891,787 purchasers who made at least one purchase transaction over the
18 Class Period involving a payment to Ticketmaster for arranging expedited delivery of their tickets via
19 UPS. Those purchasers made 7,916,090 transactions over the Class Period involving tickets shipped
20 via UPS. On average, such purchasers paid \$15.17 per transaction for the expedited shipping services
21 and engaged in 1.62 transactions over the Class Period.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct.

24 Executed this 18 day of November, 2014, at King County, WA

25 
26 _____
27 Shawn Moon
28

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am employed in the aforesaid county, State of California; I am over the age of 18 years and not
4 a party to the within action; my business address is 1840 Century Park East, Suite 1900, Los Angeles,
CA 90067-2121. My email address is riveraal@gtlaw.com.

5 On November 21, 2014, pursuant to Judge Kenneth R. Freeman's Order Authorizing Electronic
6 Service dated February 28, 2013, I served a true copy of the document(s) described as:

7 **DECLARATION OF SHAWN MOON IN SUPPORT OF TICKETMASTER'S**
8 **MEMORANDUM IN SUPPORT OF MOTION FOR FINAL APPROVAL OF THE PROPOSED**
9 **CLASS ACTION SETTLEMENT AGREEMENT** in this action by transmitting the document(s) to
Case Anywhere pursuant to the terms in the aforementioned Order.

9 Robert J. Stein, III, Esq.
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Counsel for Plaintiffs

20 **(BY CASE ANYWHERE)** I caused the above document(s) to be electronically served on the
21 interested parties identified above by using www.caseanywhere.com and the e-mail addresses
22 maintained by www.caseanywhere.com for this case. Said transmission(s) were verified as
complete and without error.

23 **(STATE)** I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct.

25 Executed on November 21, 2014, at Los Angeles, California.

26 _____
27 Ana Rivera
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