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9
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TICKETMASTER

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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
others similarly situated,

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18 Plaintiffs,

19 vs.

20 TICKETMASTER, a Delaware Corporation,

21 Defendant.
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CASE NO. BC 304565

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

**DECLARATION OF DAVID HAN IN
FURTHER SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL SETTLEMENT
APPROVAL**

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

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

1 **DECLARATION OF DAVID HAN**

2 I, DAVID HAN, declare and state as follows:

3 I have personal knowledge of the facts described below, and if called upon, I could and would
4 testify competently to them under oath.

5 1. I am a Director, Product Management for Ticketmaster. In my role, I am responsible
6 for managing the consumer purchasing experience on Ticketmaster's website. I also have been
7 serving as the project lead for the development of technology needed to implement the settlement of
8 the Schlesinger litigation.

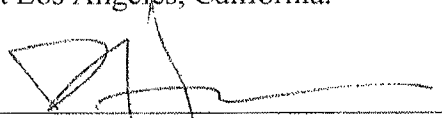
9 2. One of my responsibilities for implementing the settlement terms has been to manage
10 the delivery of a dedicated website to help facilitate the distribution of free concert tickets to
11 settlement class members (the "Ticket Microsite"). Specifically, the Ticket Microsite is being
12 established to notify settlement class members as new tickets become available so they have the
13 opportunity to use the Ticket Codes they will receive as part of their settlement benefits to acquire
14 concert tickets at no cost.

15 3. The actual redemption of Ticket Codes will not occur over the Ticket Microsite.
16 Instead, there will be a link on the Ticket Microsite associated with each event for which tickets
17 become available that will take settlement class members to the applicable event page on
18 www.ticketmaster.com (the "Website"). Once on the Website, settlement class members can go
19 through an ordinary ticket purchase to attempt to secure available tickets. However, rather than paying
20 for their tickets at the end of the process, they will be able to enter their Ticket Codes (which will
21 reside on their My Account page on Ticketmaster's website). Thus, no "bots" or other computerized
22 programs can be used to obtain tickets over the Microsite.

23 4. Unless a settlement class member chooses to allow another person to use his or her log-
24 in information and access his or her My Account page on the Website, only settlement class members
25 using their own log in information and their own Ticket Codes can obtain free tickets through the
26 settlement. Thus, without express permission from a settlement class member, the Ticket Codes will
27 remain proprietary to each settlement class member and can only be used by that settlement class
28 member to obtain free tickets.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 facts are true and correct.

3 Executed this 14 day of December 2014, at Los Angeles, California.

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6 David Han

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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,
5 CA 90067-2121. My email address is riveraal@gtlaw.com.

6 On December 22, 2014, pursuant to Judge Kenneth R. Freeman's Order Authorizing Electronic
7 Service dated February 28, 2013, I served a true copy of the document(s) described as:
8 **DECLARATION OF DAVID HAN TICKETMASTER'S IN FURTHER SUPPORT OF**
9 **PLAINTIFFS' MOTION FOR FINAL SETTLEMENT APPROVAL** in this action by transmitting
10 the document(s) to Case Anywhere pursuant to the terms in the aforementioned Order.

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19 **(BY CASE ANYWHERE)** I caused the above document(s) to be electronically served on the
20 interested parties identified above by using www.caseanywhere.com and the e-mail addresses
21 maintained by www.caseanywhere.com for this case. Said transmission(s) were verified as
22 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 December 22, 2014, at Los Angeles, California.

26 _____
27 Ana Rivera
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