

CANADA

**PROVINCE OF QUEBEC
DISTRICT OF MONTREAL**

**SUPERIOR COURT
(Class Action)**

NO: 500-06-000754-156

STEVE ABIHSIRA

Plaintiff

-vs-

**STUBHUB, INC.
EBAY, INC.
VIVID SEATS, LLC.
SEATGEEK, INC.
FANXCHANGE LIMITED
TICKETNETWORK, INC.
UBERSEAT**

Settling Respondents

SWORN STATEMENT

I the undersigned, Judith S.H. Hom, **Judith S.H. Hom, Ph.D., Esq.**, having my professional address at 360 Third Street, Suite 400, San Francisco CA 94107 do solemnly declare that:

1. I am currently Deputy General Counsel—Litigation for StubHub Inc. and have been working for the company since February 15, 2021;
2. I confirm that as concerns StubHub Inc., the Transaction has been duly implemented and executed;
3. On December 28, 2021, I am informed that counsel for StubHub Inc. sent to Collectiva, the Detailed List provided for in the Transaction Agreement, as appears from Appendix A;
4. On January 1, 2022 (Reparation Date for Events in Quebec), 50,505 Eligible Quebec Members received a US \$25 credit;
5. The criteria that were applied as per the agreement were:
 - Quebec residents (user's address in Quebec);
 - Purchased at least one ticket for an event located in Quebec;
 - Was not refunded in full

- Purchase made between August 28th, 2012 and October 18, 2019;
 - And only one credit per user.
6. In March 2022, StubHub noticed that the credits were incorrectly issued in US denomination and on March 11, 2022, the unused US \$25 credits were converted to CAD \$ 24.29 credits as per the Transaction Agreement;
 7. The March 11, 2022 Credits were issued with a March 12, 2025 expiration date;
 8. The total value of the Credits issued to Eligible Quebec Members is CAD \$ 1,226,766.45;
 9. On August 25, 2022, we received from the Claims Administrator the list of 4,172 Eligible International Members who have validly submitted a Claim and who were approved to receive a Credit;
 10. On September 21, 2022, (Reparation Date for International Events), 4,172 Eligible International Members received a CAD \$ 24.29 credit;
 11. The total value of the Credits issued to Eligible International Members is CAD \$ 101,337.88;
 12. The Notice of the Approval of the Transaction has been communicated to Eligible Quebec Members in accordance with Schedules C – *Avis d'Approbation de la Transaction* and Schedule D – *Notice of Approval of the Transaction*, as appropriate;
 13. On September 18, 2020, I am informed that counsel for StubHub Inc. made the following payments representing Class Counsel Fees as per paragraphs 66 and 67 of the Transaction Agreement, the portion of the Claims Administration expenses to be paid by the Settling Respondents as per paragraphs 32 and 33 of the Transaction Agreement and the interest accumulated thereon as at that date, as appears from Appendix B:

To LPC Avocats: CAD \$ 741,841.48

To LCM Avocats: CAD \$ 312,398.39;

14. I make this affidavit to render account of the implementation and execution of the of the Transaction as it concerns StubHub Inc. and for no other purpose;

AND I HAVE SIGNED

Solemnly affirmed before me at San
Francisco, USA
This September 27, 2022



PLEASE SEE ATTACHED
NOTARY CERTIFICATE

CALIFORNIA ACKNOWLEDGMENT

CIVIL CODE § 1189



A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of San Francisco

}

On 09/27/2022 before me, Jyotsna Koirala, Notary Public

Date

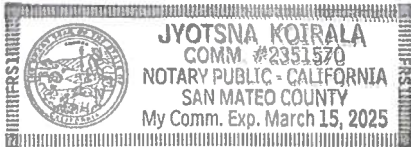
Here Insert Name and Title of the Officer

personally appeared Judith S.H. Hom
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature Jyotsna Koirala
Signature of Notary Public

Place Notary Seal and/or Stamp Above

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: Sworn Statement

Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

Signer's Name: _____

Corporate Officer – Title(s): _____

Corporate Officer – Title(s): _____

Partner – Limited General

Partner – Limited General

Individual Attorney in Fact

Individual Attorney in Fact

Trustee Guardian or Conservator

Trustee Guardian or Conservator

Other: _____

Other: _____

Signer is Representing: _____

Signer is Representing: _____

APPENDIX A

Pare, Francois-David

De: Hamel, Helen <helen.hamel@nortonrosefulbright.com>
Envoyé: 28 décembre 2021 18:05
À: philippe.belanger@collectiva.ca; sandra.isaza@collectiva.ca; anna.vetere@collectiva.ca
Cc: Pare, Francois-David
Objet: Re: Detailed List for the Defendant StubHub



Hamel, Helen sent you a secure message

[Access message](#)

*** Privileged and confidential ***


Hi,


Please find attached the Detailed List for the Defendant StubHub, as defined in the Transaction Agreement dated January 24, 2020.

Do not hesitate to reach out to me if need be.

Happy Holidays!

Secured by **Kiteworks**

 Attachments expire on Jan 11, 2022

 **1 file**
Abihsira_Intl event data_final_2021_12_22 (1)(CAN_DMS_143300436.1).xlsx.nrl

 **1 spreadsheet**

Abihisira_Intl event data_final_2021_12_22 (1)(CAN_DMS_143300436.1).xlsx

This message requires that you sign in to access the message and any file attachments.

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APPENDIX B

Wire Activity - Detail Report

Anna Trougakos , NORTON ROSE FULBRIGHT
Report Creation Date: Sep 18, 2020 04:44:48 PM ET

Value Date Range: From Sep 18, 2020 To Sep 18, 2020
Debit Account(s): All Status: All
Amount Range: From 741841.48 To 741841.48
Payment Currency: All

Payment Currency: CAD

Template Name:

Template Description:

Value Date: Sep 18, 2020

Debit Account: 00003-00001-1613132-CAD-TSM-Trust Account Amount Charged: 741,841.48 CAD

Credit Information: 00002-42861-428610074918-CAD-LPC AVOCAT INC.

Amount Sent: CAD

Exchange Rate: 0.0

Bank: THE BANK OF NOVA SCOTIA
5800 CAVENDISH BLVD.
COTE ST LUC
QUEBEC
Canada

Beneficiary: LPC AVOCAT INC.
276 ST JACQUES STREET SUITE 801
MONTREAL PQ CA

Payment Method: Credit Account no advice

Comments:

Payment Details: IMPLEMENTATION OF A SETTLEMENT
APPROVED BY THE COURT

Foreign Exchange
Contract No:

Intermediary
Bank:

Bank to Bank
Details:

Status: Pending at Bank

Bank Ref.#: 4026202211

Approved by: Isabelle El-Masri

Created by: Anna Trougakos, Sep 18, 2020 at 03:49 PM ET

Last Modified by:

Released by: Isabelle El-Masri, Sep 18, 2020 at 04:12 PM ET

Total payment amount: 741,841.48

Number of wire payments: 1

Wire Activity - Detail Report

Anna Trougakos , NORTON ROSE FULBRIGHT
Report Creation Date: Sep 18, 2020 04:42:59 PM ET

Value Date Range: From Sep 18, 2020 To Sep 18, 2020
Debit Account(s): All Status: All
Amount Range: From 312398.39 To 312398.39
Payment Currency: All

Payment Currency: CAD

Template Name:

Template Description:

Value Date: Sep 18, 2020

Debit Account: 00003-00001-1613132-CAD-TSM-Trust Account Amount Charged: 312,398.39 CAD

Credit Information: 00815-30500-0815305000900951-CAD-LCM AVOCATS EN FIDEICOMMIS

Amount Sent: CAD

Exchange Rate: 0.0

Bank: CAISSE CENTRALE DESJARDINS
1 COMPLEXE DESJARDINS
MONTREAL
QUEBEC
Canada

Beneficiary: LCM AVOCATS EN FIDEICOMMIS
600 BLVD. DE MAISONNEUVE WEST
SUITE 2700
MONTREAL PQ CA

Payment Method: Credit Account no advice

Comments:

Payment Details: IMPLEMENTATION OF A SETTLEMENT
APPROVED BY THE COURT

Foreign Exchange
Contract No:

Intermediary
Bank:

Bank to Bank
Details:

Status: Pending at Bank

Bank Ref.#: 4026202267

Approved by: Isabelle El-Masri

Created by: Anna Trougakos, Sep 18, 2020 at 04:00 PM ET

Last Modified by: Anna Trougakos , Sep 18, 2020 at 04:32 PM ET

Released by: Isabelle El-Masri, Sep 18, 2020 at 04:35 PM ET

Total payment amount: 312,398.39

Number of wire payments: 1

NO.: 500-06-000754-156

SUPERIOR COURT
(Class Action)
DISTRICT OF MONTRÉAL

STEVE ABIHSIRA

Plaintiff

- v. -

STUBHUB, INC.
EBAY, INC.
VIVID SEATS, LLC.
SEATGEEK, INC.
FANXCHANGE LIMITED
TICKETNETWORK, INC.
UBERSEAT

Respondents

SWORN STATEMENT OF
JUDY HOM WITH APPENDIX A & B

ORIGINAL

BO-0042

1000303404

Mtre. François-David Paré
NORTON ROSE FULLBRIGHT CANADA LLP
BARRISTERS & SOLICITORS

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Montréal, Quebec H3B 1R1
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