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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

IN RE GOOGLE INC. GMAIL LITIGATION

Master Docket No.: 13-MD-02430-LHK

THIS DOCUMENT RELATES TO:  
 ALL ACTIONS

**DECLARATION OF PROPOSED CLASS  
 COUNSEL C. LANCE GOULD IN  
 SUPPORT OF PLAINTIFFS'  
 CONSOLIDATED MOTION FOR CLASS  
 CERTIFICATION**

Date: January 16, 2014  
 Time: 1:30 p.m.  
 Judge: Hon. Lucy H. Koh  
 Place: Courtroom 8—4<sup>th</sup> Floor

Trial Date: October 20, 2014

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**DECLARATION OF PROPOSED CLASS COUNSEL C. LANCE GOULD IN SUPPORT  
 OF PLAINTIFFS' CONSOLIDATED MOTION FOR CLASS CERTIFICATION**  
 5:13-MD-002430-LHK

1 I, C. LANCE GOULD, declare that:

2 1. I am a shareholder of the law firm of Beasley, Allen, Crow, Methvin, Portis &  
 3 Miles, P.C. I have been licensed to practice law in the State of Alabama since 1997. I am also  
 4 admitted to practice before the Supreme Court of Alabama, the United States District Court for  
 5 the Northern District of Alabama, the United States District Court for the Middle District of  
 6 Alabama, the United States District Court for the Southern District of Alabama, the United States  
 7 Court of Appeals, Eleventh Circuit, the United States District Court for the Eastern District of  
 8 Arkansas, the United States District Court for the Western District of Arkansas, the United States  
 9 District Court for the Northern District of Florida, the United States District Court for the Central  
 10 District of Illinois, the United States District Court for the Southern District of Illinois, the United  
 11 States District Court for the Western District of Michigan, the United States District Court for the  
 12 Eastern District of Tennessee, the United States District Court for the Eastern District of Texas, and  
 13 the United States District Court for the Western District of Texas.

14 2. I have practiced exclusively in litigation matters with an emphasis on complex  
 15 litigation, which has led to my involvement in class action and/or collective action matters.  
 16 Some of the class actions and collective actions I have been involved in include: *Danny and*  
 17 *Irma Thomas v. Southern Pioneer Life Insurance Company*, in the Circuit Court of Greene  
 18 County, Arkansas, Civil Action No. 2009-257; *Dolores Dillon, et al. v. MS. Life Insurance*  
 19 *Company, n/k/a America Bankers Life Assurance Company of Florida*, in the Circuit Court of  
 20 Montgomery County, AL, Civil Action No. 08-CV-900291; *Wimbreth Joy Chism, et al. v. The*  
 21 *Pantry, Inc. d/b/a Kangaroo Express*, in the United States District Court for the Northern District  
 22 of Alabama, Civil Action No. 7:09-cv-02194; *Larry Clairday, Jr., et al. v. Tire Kingdom, Inc., et*  
 23 *al.*, in the United States District Court for the Southern District of Georgia, Civil Action No.  
 24 2:07-CV-00020; *Edith Brown, et al. v. Dollar General Stores, Ltd., et al.*, in the United States  
 25 District Court for the Northern District of Alabama, Civil Action No. 7:02-CV-673; *Cynthia*  
 26 *Richter v. Dolgencorp, Inc., et al.*, in the United States District Court for the Northern District of  
 27 Alabama, Civil Case No. 7:06-CV-01537; and *Tameka D. Bonner, et al. v. Statewide Healthcare,*  
 28 *Inc.*, in the United States District Court for the Middle District of Georgia, Civil Action No.

**DECLARATION OF PROPOSED CLASS COUNSEL C. LANCE GOULD IN SUPPORT  
 OF PLAINTIFFS' CONSOLIDATED MOTION FOR CLASS CERTIFICATION**

1 4:04-CV-121.

2 3. I have been involved in this litigation prior to the establishment of the MDL.  
3 Shortly after the MDL was established, I was appointed to the Plaintiffs' Executive Committee  
4 in this MDL. Since my appointment, I have worked with Lead Counsel and other members of  
5 the Plaintiffs' Executive Committee in some of the briefing presented to the court, and on  
6 various aspects of discovery. The Court is aware of the work product that has been presented on  
7 behalf of Plaintiffs in this MDL, and I defer to this Court's judgment regarding the quality of  
8 representation by counsel in the MDL to date.

9 4. I have worked directly with Brent Scott and Matthew Knowles in this action.  
10 These plaintiffs have participated actively in this litigation to this point, assisting in the  
11 preparation of documents including complaints and declarations, putting together documents  
12 and information necessary in anticipation of written discovery requests, and communicating  
13 with me and co-counsel in a timely fashion as is necessary. It is my firm belief that they are  
14 willing and able to continue participating actively in this litigation toward the common goal of  
15 fair and reasonable class relief, and stopping Google's alleged violations of state and federal  
16 privacy laws.

17 I declare under penalty of perjury under the laws of the State of Alabama that the  
18 foregoing is true and correct, and that I have personal knowledge of the matters stated in this  
19 declaration. If called as a witness, I could and would and testify competently as to those  
20 matters.

21 Executed on this 24th day of October, 2013 at Montgomery, Alabama.

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23 /s/ C. Lance Gould  
24 C. LANCE GOULD  
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