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*Class Counsel*

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

DEBORAH JORDAN, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

WP COMPANY LLC, d/b/a THE  
WASHINGTON POST,

Defendant.

Case No. 3:20-cv-05218-WHO

**DECLARATION OF DEBORAH  
JORDAN IN SUPPORT OF  
PLAINTIFF'S MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT AND MOTION FOR  
ATTORNEYS' FEES, COSTS,  
EXPENSES, AND AN INCENTIVE  
AWARD**

Date: November 17, 2021  
Time: 2:00 p.m.  
Courtroom: 2, 17<sup>th</sup> Floor  
Judge: Hon. William H. Orrick

1 I, Deborah Jordan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

2 1. I am an adult over the age of 18 and a citizen of the State of California. I am a Class  
3 Representative in the lawsuit entitled *Jordan v. WP Company LLC*, Case No. 3:20-cv-05218-  
4 WHO, currently pending in the United States District Court for the Northern District of California.  
5 I make this Declaration in support of (i) the Motion for Final Approval of Class Action Settlement,  
6 and (ii) the Motion for Attorneys' Fees, Reimbursement of Costs and Expenses, and An Incentive  
7 Award to the Class Representative. The statements made in this Declaration are based on my  
8 personal knowledge and, if called as a witness, I could and would testify thereto.

9 2. In or around 2018, I signed up for a monthly digital WaPo Subscription from  
10 Defendant's website while in California. Subsequently, on or around June 29, 2018, Defendant  
11 automatically converted my free trial into a paid subscription and began charging monthly fees to  
12 my Payment Method at the rate of \$10.00 per month. Between June 29, 2018, and January 9, 2019,  
13 Defendant charged monthly subscription and/or renewal fees to my Payment Method on eight  
14 occasions, charging a total of \$80.00 in unauthorized fees to my Payment Method, which I paid  
15 when the associated funds were automatically withdrawn from my account.

16 3. I assisted with the litigation of this case by detailing my WaPo Subscription account  
17 history and the associated subscription and/or renewal fees that I had been charged. Specifically, I  
18 described to my lawyers my relationship as a subscriber with Defendant, the nature of the charges  
19 Defendant posted to my Payment Method, my experience with Defendant's sign-up process and the  
20 associated disclosures, and a history of the charges I paid. I also provided my lawyers with  
21 documentation as to these items.

22 4. I worked with my attorneys to prepare the Class Action Complaint. I carefully  
23 reviewed the Class Action Complaint for accuracy and approved it before it was filed.

24 5. During the course of this litigation, I kept in regular contact with my lawyers.  
25 Specifically, I conferred with them regularly by phone and e-mail to discuss the status of the case.  
26 We also discussed case strategy, anticipated motions, forthcoming discovery issues, mediation, and  
27 the prospects of settlement. Furthermore, when appropriate, I informed my lawyers of additional  
28 facts for their research and consideration.

1           6. I also coordinated with my lawyers to search for documents that Defendant was  
2 likely to request in written discovery, including but not limited to copies of the acknowledgment  
3 email I received from Defendant upon enrolling in my WaPo Subscription, the email I sent  
4 Defendant requesting cancellation, and billing records reflecting the dates on which I was charged  
5 renewal fees in connection with my WaPo Subscription and the amounts of those charges. I was  
6 also prepared to testify at deposition and trial, if necessary.

7           7. My lawyers have kept me well informed regarding their efforts to resolve this  
8 matter. I was fully informed and involved regarding the parties' mediation and settlement efforts.  
9 I carefully reviewed the Settlement Agreement and discussed the material terms with my attorneys  
10 prior to signing.

11           8. Based on the interactions and my relationship with my attorneys, I believe they have  
12 fairly and adequately represented me and the Settlement Class and will continue to do so.

13           9. Throughout this litigation, I understood that, as a Class Representative, I have an  
14 obligation to protect the interests of other Settlement Class Members and not act just for my own  
15 personal benefit. I do not have any conflicts with other Settlement Class Members. I have done  
16 my best to protect the interests of other Settlement Class Members and will continue to fairly and  
17 adequately represent the Settlement Class to the best of my ability.

18           10. I estimate that I spent approximately 30 hours working with my lawyers on this  
19 case.

20           I declare under penalty of perjury that the above and foregoing is true and accurate.

21 Executed this 1st day of September, 2021, at San Francisco, CA.

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24 Deborah Jordan (Sep 1, 2021 13:50 PDT)

25 Deborah Jordan  
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