

**IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
DUPAGE COUNTY, ILLINOIS**

Candice Adams
e-filed in the 18th Judicial Circuit Court
DuPage County
ENVELOPE: 18810095
2022LA000308
FILEDATE: 7/25/2022 3:52 PM
Date Submitted: 7/25/2022 3:52 PM
Date Accepted: 7/26/2022 8:58 AM
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ALEXANDER CLARKE, MILTON
CITCHENS, ANDREW GARCIA, EBONY
JONES, KYLE SWERDLOW, MARLA
WALKER, and RYAN WEBB, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

LEMONADE, INC., LEMONADE
INSURANCE COMPANY, LEMONADE
INSURANCE AGENCY, LLC,
LEMONDADE, LTD., AND LEMONADE
LIFE INSURANCE AGENCY, LLC

Defendants.

Case No. 2022LA000308

**DECLARATION OF ANDREW GARCIA IN SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR ATTORNEYS' FEES, COSTS, EXPENSES, AND
INCENTIVE AWARD**

I, Andrew Garcia, hereby declare as follows:

1. I am an adult over the age of 18 and a resident of the State of California. I am a Class Representative in the lawsuit entitled *Clarke et al. v. Lemonade, Inc. et al.*, Case No. 2022LA000308, currently pending in the Circuit Court of DuPage County. I make this Declaration in support of the Motion for Attorneys' Fees, Costs, Expenses, and Incentive Awards. The statements made in this Declaration are based on my personal knowledge and, if called as a witness, I could and would testify thereto.

2. I am a Lemonade insurance policyholder and submitted an insurance claim to Lemonade during the Class Period.

3. When I submitted my claim, I was required to record and submit a video as part of the insurances claims process.

4. I assisted with the litigation of this case by detailing claims experience with Lemonade and my experience with the Lemonade mobile application. I also provided my lawyers with information regarding the same.

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

6. During the course of this litigation, I kept in regular contact with my lawyers. Specifically, I conferred with them regularly by phone and e-mail to discuss the status of the case. We also discussed case strategy, anticipated motions, anticipated document and deposition discovery, and the prospects of settlement. Furthermore, when appropriate, I informed my attorneys of additional facts for their research and consideration.

7. I was prepared to testify at deposition and trial, if necessary.

8. My lawyers have kept me well informed in regard to the efforts to resolve this matter. They promptly communicated settlement offer to me and coordinated with me in advance of mediation. I also discussed the Class Action Settlement Agreement with them and gave my approval prior to signing it.


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

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

adequately represent the Settlement Class to the best of my ability.

11. The above statements are of my own personal knowledge, and I make such statements under penalty of perjury under the laws of Illinois and the United States of America.

Executed 7/13/2022 at Whittier, California.

DocuSigned by:

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Andrew Garcia