

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

DYLAN MARTIN, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

LINDENWOOD UNIVERSITY,

Defendant.

Civil Action No. 4:20-cv-01128-RLW

Hon. Ronnie L. White

**DECLARATION OF DYLAN MARTIN IN SUPPORT OF PLAINTIFF'S UNOPPOSED
MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND
UNOPPOSED MOTION FOR ATTORNEYS' FEES, COSTS, EXPENSES, AND
INCENTIVE AWARD**

I, Dylan Martin, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an adult over the age of 18 and a resident of the State of Missouri. I am the Class Representative in the lawsuit entitled *Martin v. Lindenwood University*, Case No. 4:20-cv-01128-RLW, currently pending in the United States District Court for the Eastern District of Missouri. I make this Declaration in support of (i) the Motion for Final Approval of Settlement, and (ii) the Motion for Attorneys' Fees, Costs, Expenses, and Incentive Award. 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 was enrolled as a student at Lindenwood University and registered for in-person classes for the Spring 2020 semester.

3. I paid approximately \$8,175 in tuition and fees to Lindenwood University for the Spring 2020 semester.

4. I assisted with the litigation of this case by detailing my Spring 2020 course schedule, tuition and fee payments, and experience with the transition to remote learning.

Specifically, I described to my lawyers my experience as a student of Lindenwood University during the Spring 2020 semester. I also provided my lawyers with documentation 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 also coordinated with my lawyers to search for documents that we anticipated that Lindenwood University would request in formal discovery, such as copies of my Spring 2020 billing statement and course schedule. I have devoted at least 25 hours to this matter thus far, and I was prepared to testify at deposition and trial, if necessary.

8. My lawyers have kept me well informed regarding the efforts to resolve this matter. They promptly communicated settlement offers to me and coordinated with me in advance of, and during, 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.

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

Executed this 7 day of March, 2022 at Eldon, Missouri.


Dylan Martin