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*Class Counsel*

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

VISHAL SHAH, and JAYDEN KIM, on behalf  
of themselves and all others similarly situated,

Plaintiff,

v.

FANDOM, INC.,

Defendant.

Case No. 3:24-cv-01062-RFL

**DECLARATION OF VISHAL SHAH IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR ATTORNEYS' FEES, COSTS,  
EXPENSES, AND SERVICE AWARDS**

Date: May 19, 2026  
Time: 1:30 p.m.  
Ctrm: 15, 18<sup>th</sup> Floor (And Via Zoom)  
Judge: Hon. Rita F. Lin

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

2 1. I am an adult over the age of 18 and a resident of the State of California. I am a  
3 Class Representative in the lawsuit entitled *Shah et al. v. Fandom, Inc*, Case No. 3:24-cv-01062-  
4 RFL, currently pending in the Northern District of California. I make this Declaration in support of  
5 Plaintiffs' Motion for Attorneys' Fees, Costs, Expenses, and Service Awards.

6 2. The statements made in this Declaration are based on my personal knowledge and,  
7 if called as a witness, I could and would testify competently thereto under oath.

8 3. I have visited the gamespot.com website multiple times, including as long ago as  
9 June 2023. When I visited the website, without my knowledge, Defendant installed trackers on my  
10 browser that were operated by third parties. These trackers recorded my IP address and other  
11 information, which was used to identify me and target advertisements at me.

12 4. I assisted with the litigation of this case by detailing my dealings with Defendant  
13 and remaining engaged in the litigation at every step, often devoting time for phone calls with my  
14 attorneys to discuss case strategy.

15 5. I also worked with my attorneys to prepare the First Amended Class Action  
16 Complaint. I carefully reviewed the Class Action Complaint and the First Amended Class Action  
17 Complaint and approved both before they were filed.

18 6. During the course of this litigation, I kept in regular contact with my lawyers.  
19 Specifically, I conferred with them regularly by phone and e-mail to discuss the status of the case.  
20 This includes calls discussing case strategy and the prospects of settlement. Further, prior to  
21 bringing a claim in this case, I provided Class Counsel with browser traffic from my computer to  
22 support my allegations. I also had my computer imaged in conjunction with the mediation, which  
23 prevented me from using my computer for several hours or more while a technician imaged my  
24 device. Lastly, I was prepared to sit for a deposition and to testify at trial had this matter not  
25 settled.

26 7. Based on my interactions and my relationship with my attorneys, I believe they have  
27 fairly and adequately represented me and the Settlement Class and will continue to do so.  
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8. 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 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 foregoing is true and correct to the best of my knowledge. Executed on 02/24, 2026 in Buena Park ca.

  
DocuSign (Feb 24, 2026 15:24:47 PST)  
Vishal Shah