

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Yvonne Becker, Christopher Nobles,
Rosa Ramirez, Valerie Seyler and
Jannien Weiner,

Plaintiffs,

vs.

Wells Fargo & Co.; Employee Benefit
Review Committee; Wells Fargo Bank,
National Association, and John and
Jane Does 1-20,

Defendants.

Case No. 0:20-cv-2016 (KMM/BRT)

**DECLARATION OF VALERIE SEYLER IN SUPPORT OF FINAL
APPROVAL OF SETTLEMENT, AWARD OF ATTORNEYS' FEES,
EXPENSE REIMBURSEMENT, AND CASE CONTRIBUTION AWARDS**

I, Valerie Seyler, declare and state as follows:

1. I am a named Plaintiff and one of the Court-appointed class representatives in this action.

2. I have personal knowledge of the matters set forth in this Declaration, which I submit in support of Plaintiffs' Motion for Final Approval of Class Action Settlement and Certification of Settlement Class and Plaintiffs' Motion for Attorneys' Fees, Expense Reimbursements and Class Contribution Awards.

3. I was employed by Wells Fargo & Co. ("Wells Fargo") from June 2014 to March 2000. While employed by Wells Fargo, I participated in the Wells Fargo & Co. 401(k) Plan ("Plan") and invested in certain funds at issue in this action.

4. I understand that this case is a class action brought on behalf of participants in the Plan during the Class Period of March 13, 2014 to the present, to recover losses that the Plan has sustained as a result of, *inter alia*, the excessive fees and under performance related to certain Plan investment funds.

5. I agreed to be a named Plaintiff in this action and to act as a class representative of the certified class. I understood that this would entail having my name in the publicly-filed complaint, ongoing engagement with my lawyers (Class Counsel), and acting at all times in the best interest of the class. I agreed to and did participate in discovery, including my deposition. I understood that I may need to testify at trial and was prepared to do so.

6. I have been directly involved in monitoring and overseeing the prosecution of this action from the filing of the second amended complaint to the present. Since I became involved in the case, I have been in regular communication with my attorneys (Class Counsel) and have actively contributed to the case. Among other things, I have provided Plan-related information and documents to my counsel during the investigation of the potential claims in this action; reviewed the allegations in the second amended complaint and information in other documents filed in the course of this litigation; and communicated regularly with my counsel, including participating in phone and Zoom meetings, as well as corresponding by email, in order to stay informed about the case, including with regard to the mediation and settlement.

7. Additionally, I assisted Class counsel in discovery-related matters, including by being deposed by defense counsel, as well as responding to Defendants' First Requests

for Production of Documents, Defendants' Second Amended Second Requests for Production of Documents, Defendants' Third Requests for Production of Documents, Defendants' Amended First Set of Interrogatories, and Defendants' Second Set of Interrogatories.

8. Based on my involvement throughout the prosecution and resolution of this case, I strongly support the settlement and believe that it provides an excellent recovery for the class, especially in view of the substantial risks I and the rest of the class faced in establishing liability and damages.

9. I have evaluated and fully support my lawyers' request for attorneys' fees to be paid from the settlement fund, as well as reimbursement of their expenses, which I believe are reasonable.

10. In conclusion, as a named Plaintiff and class representative, I have been actively involved in the prosecution of this action and strongly endorse the settlement as fair, reasonable, and adequate and believe that it represents a significant recovery for the class. I further strongly support the approval of my attorneys' application for fees and expenses, and my request for a case contribution based on my time and efforts to advance the claims of the class in this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 6/13, 2022.

Valerie Seyler
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