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**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

Al Otro Lado, Inc., *et al.*,

Plaintiffs,

v.

Elaine C. Duke, *et al.*,

Defendants.

No. 2:17-cv-5111-JFW (JPRx)
 Hon. John F. Walter (Courtroom 7A)

**DECLARATION OF MANUEL A.
 ABASCAL IN SUPPORT OF
 PLAINTIFFS' MOTION FOR
 CLASS CERTIFICATION**

Hearing Date: December 11, 2017
 Hearing Time: 1:30 p.m.

Pre-Trial Conf.: July 20, 2018
 Trial: July 31, 2018

DECLARATION OF MANUEL A. ABASCAL

I, Manuel A. Abascal, declare as follows:

1. I am a partner in the law firm of Latham & Watkins LLP, and am admitted to practice before this Court. I am counsel of record for Plaintiffs Al Otro Lado, Inc., Abigail Doe, Beatrice Doe, Carolina Doe, Dinora Doe, Ingrid Doe and Jose Doe (collectively, "Plaintiffs"). I submit this declaration in support of Plaintiffs' Motion for Class Certification and to address the adequacy of class representation by Latham & Watkins LLP ("Latham") and co-counsel appearing in this litigation. This declaration is based on my own personal knowledge, and if called as a witness, I could and would testify competently to the information set forth herein.

2. Latham is an international law firm with a robust and diverse litigation practice. The Latham attorneys involved in this case have a breadth of experience working on large-scale litigations, including class actions and actions involving federal government agencies. They have the requisite skills and background to represent adequately the proposed class in this action.

3. The team of Latham attorneys working on this case includes myself, Wayne Flick, James Moon, Robin Kelley, Faraz Mohammadi, and Natasha Bronn-Schrier. I am a 1992 graduate of Yale Law School. Prior to joining Latham in 2000, I was an Assistant U.S. Attorney for the Central District of California for five years and served as a law clerk to the Honorable Pamela Ann Rymer of the Ninth Circuit U.S. Court of Appeals. At Latham, I am a litigation partner in the White Collar Defense and Investigations practice group. I have been involved in numerous large-scale commercial litigations, including class actions, and have represented parties in investigations and litigations involving various government agencies.

4. Wayne Flick is a litigation partner in the Complex Commercial Litigation practice group. He is a 1990 graduate of Boston University School of

1 Law. Mr. Flick has extensive experience in large-scale, commercial litigations,
2 including nation-wide class actions and actions brought by the U.S. Department of
3 Justice. He has significant state and federal appellate experience and has testified
4 before the U.S. House of Representatives Committee on the Judiciary.

5 5. James Moon is a senior litigation associate in the Securities Litigation
6 and Professional Liability practice group. He is a 2009 graduate of the University
7 of Chicago Law School. Mr. Moon has experience in a broad range of complex
8 commercial litigation, with particular emphasis on securities and class action
9 matters. He has extensive experience prosecuting and defending actions in federal
10 and state court from pre-litigation through appeal.

11 6. Robin Kelly is a litigation associate in the Complex Commercial
12 Litigation practice group. She is a 2012 graduate of Harvard Law School.

13 7. Faraz Mohammadi is a litigation associate in the White Collar
14 Defense and Investigations practice group. He is a 2013 graduate of the UCLA
15 School of Law.

16 8. Natasha Bronn-Schrier is a litigation associate in the White Collar
17 Defense and Investigations practice group. She is a 2013 graduate of Columbia
18 Law School.

19 9. The case team also includes junior litigation associates and staff in
20 Latham's Los Angeles and San Diego offices, including associates and paralegals
21 who speak Spanish fluently.

22 10. Latham has the resources to adequately represent a border-wide class,
23 with offices located across the country, including in Southern California and in
24 Houston, Texas. The firm and its attorneys, who have already committed
25 substantial time and resources to this action, are fully capable of representing the
26 proposed class.

27 11. I am aware of no conflicts of interest between myself, Latham, and
28 any members of the proposed class.

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

3 Executed this 13th day of November 2017 at Los Angeles, California.

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/s/ Manuel A. Abascal
Manuel A. Abascal