

The Honorable Robert S. Lasnik

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

ADRIENNE BENSON and MARY  
SIMONSON, individually and on behalf of all  
others similarly situated,

*Plaintiffs,*

v.

DOUBLEDOWN INTERACTIVE, LLC, a  
Washington limited liability company,  
INTERNATIONAL GAME TECHNOLOGY, a  
Nevada corporation, and IGT, a Nevada  
corporation,

*Defendants.*

No. 18-cv-525-RSL

**DECLARATION OF TODD LOGAN  
IN SUPPORT OF MOTION FOR  
FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT  
AGREEMENT**

1 1. Pursuant to 28 U.S.C. § 1746, I declare and state as follows:

2 2. I am a Partner at Edelson PC, which has been retained to represent Plaintiffs in  
3 the above-captioned matter. I am entering this declaration in support of Plaintiffs' Motion for  
4 Final Approval of Class Action Settlement Agreement.

5 3. I have personal knowledge of the matters stated herein and, if called upon, I could  
6 and would competently testify thereto.

7 \* \* \*

8 4. I understand from the Settlement Administrator that the data provided by the  
9 Platform Providers (Amazon, Apple, Meta, and Google) was sufficient to calculate the Lifetime  
10 Spending Amount for the Class from April 1, 2014 (i.e., within a four-year statute of limitations  
11 period) through June 30, 2022 (the date the Parties used during settlement negotiations), and the  
12 all-time Total Lifetime Spending Amount for all released claims (through November 14, 2022).

13 5. I reviewed DoubleDown Interactive's Quarterly SEC filings and calculated the  
14 At-Issue Adjusted Claims Rate, defined as the approximate Lifetime Spending Amount for the  
15 Class during the four-year statute of limitations period beginning April 1, 2014, through the date  
16 that the Court granted preliminary approval (November 14, 2022). To achieve this, I calculated  
17 the Spending Amount from July 1 to November 14, 2022 by taking DoubleDown's total revenue  
18 for the third quarter of 2022 (July 1 through September 30, 2022) (\$78,800,000.00), plus the total  
19 revenue for half of the fourth quarter, representing revenue from October 1 to November 14,  
20 2022 (\$38,100,000.00), and multiplied that by the percentage of total revenue generated in the  
21 United States (87.85%) for a total of \$102,696,650.00. I then added this to the previously  
22 calculated Lifetime Spending Amount for the Class from April 1, 2014 through June 30, 2022  
23 (\$2,090,068,158.51) for a total of \$2,192,764,808.51.

24 6. The timely submitted claims are associated with at least \$594,423,645.63 million  
25 in Lifetime Spending Amount. *See* Baessler Decl. ¶ 25. The Lifetime Spending Amount for the  
26 Class from April 1, 2014, to November 14, 2022, was approximately \$2,192,764,808.51. The  
27 former dollar figure divided by the latter produces an At-Issue Adjusted Claims Rate of 27.11%.

\* \* \*

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2 7. In response to subpoenas Edelson PC served on Apple, Google, and Facebook  
3 (the “Platforms”) in April 2020, the Platforms produced transaction data for purchases of virtual  
4 chips in DoubleDown Casino by United States-based users. The Platform Providers ultimately  
5 provided Class Counsel with sufficient data to effectuate the Notice Plan.

6 8. In response to discovery requests Edelson PC served on Defendants throughout  
7 the litigation, Defendants produced transaction data for purchases of virtual chips in  
8 DoubleDown Casino by all U.S.-based users. Defendants also produced tens of thousands of  
9 internal company documents and communications about their business structure, strategies, and  
10 practices. In all, the Parties exchanged approximately 325,000 pages of documents in discovery.

11 9. Between March and August 2021, Defendants took (and Class Counsel defended)  
12 the depositions of Adrienne Benson, Mary Simonson, and six other members of the proposed  
13 Class (Patrick Bailey, Sandra Logan, Deborah Raymond, Jan Saari, Olivia Werner, and  
14 Catherine Witt).

15 10. During the same period, Class Counsel took Rule 30(b)(6) depositions of  
16 DoubleDown, International Game Technology, and IGT, as well as depositions of four other  
17 DoubleDown employees (Alex Entrikin, Jude Cooper, Julie Frederick, and Leslie Keddie) and  
18 two of Defendants’ proposed expert witnesses (Dr. Marc Potenza and Dr. Daniel Sahl).

19 11. During this period, the Parties engaged in near-constant correspondence and  
20 conferral efforts, including telephonically, regarding discovery and other litigation issues.

21 \* \* \*

22 12. Though Edelson PC engaged in intermittent settlement talks with Defendants over  
23 the course of litigation, including in September 2021 at Court-ordered settlement conferences,  
24 settlement talks renewed in earnest in June 2022. The Parties agreed to schedule a  
25 videoconference mediation session on July 28, 2022 with Niki Mendoza of Phillips ADR.  
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