

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

PETER GARVEY, individually and on)	
behalf of a class of similarly situated individuals,)	
)	
<i>Plaintiff,</i>)	Case No. 1:18-cv-7919
)	
v.)	Honorable Jorge L. Alonso
)	
CITIZENS FOR RAUNER, INC.,)	Magistrate Judge M. David Weisman
an Illinois corporation; and BRUCE RAUNER,)	
an individual)	
)	
<i>Defendant.</i>)	
_____)	

DECLARATION OF JOHN SAWIN

I, John Sawin, hereby aver, pursuant to 28 U.S.C. § 1746, that I am fully competent to make this Declaration, that I have personal knowledge of all matters set forth herein unless otherwise indicated, and that I would testify to all such matters if called as a witness in this matter.

1. I am an adult over the age of 18 and a resident of Illinois. I am an attorney with Sawin Law Ltd., of Chicago, Illinois, and am licensed to practice law in the states of Illinois and Florida.

2. I represent the Plaintiff in this action, Peter Garvey, and the putative class, and have done so since I filed this action on Plaintiff's behalf on March 23, 2018. I am designated as Class Counsel under the Class Action Settlement and Release entered into with Defendants.

3. I am fully competent to make this Declaration, and I make this Declaration in support of Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement.

4. The parties have all expended significant resources over the past three years litigating this action.

5. The Settlement Agreement being presented to the Court is the result of extensive, arm's-length negotiations between experienced attorneys who are familiar with class action litigation and with the legal and factual issues in this action.

6. I have concluded that the Settlement Agreement reached in this action is fair, reasonable, and adequate considering the attendant risks of protracted litigation and the significant relief being provided to the putative class. While I believe that the merit of Plaintiff's claims could and would be proven at trial, I recognize the significant risk and inherent uncertainty that continued litigation imposes on Plaintiff and the putative class members, especially given the complex and evolving law concerning the TCPA. Based on the discovery and motion practice that has occurred in this action, together with my years of experience prosecuting complex litigation in courts nationwide, I believe that the settlement reached in this action is in the best interests of Plaintiff and the Class Members.

7. My law firm, Sawin Law Ltd., is a litigation firm based in Chicago, Illinois that focuses on complex litigation, including consumer class action litigation, as well as litigation involving medical devices, pharmaceuticals, and civil rights in state and federal courts throughout the country.

8. I received my B.S. in Economics from the University of Iowa in 1990, and my J.D. from The American University in 1994. I was admitted to practice by The Florida Bar in 1994, and the Illinois Supreme Court in 1995. I am also admitted to practice before the U.S. Circuit Courts of Appeal for the 6th and 7th Circuits, respectively. I have been a member of this Court's General Bar since 1995, and this Court's Trial Bar since 1998. I am also admitted to the bars of seven other U.S. District Courts and have further been admitted to practice *pro hac vice* before an additional eleven other U.S. District Courts.

9. I have previously been appointed as a class counsel in a complex consumer class action. *See, Nelson v. Nissan North America, Inc.* (M.D. Tenn. 2019). I also presently serve as an appointed member of the Plaintiffs' Steering Committee in MDL No. 2875, *In Re: Valsartan Products Liability Litigation*, pending in the District of New Jersey.

10. I have diligently investigated the facts and claims in this action and have dedicated substantial resources to it. My firm has expended significant resources on diligently prosecuting this action since filing it in 2018, including, among other things, briefing Defendant's multiple motions to dismiss; conducting discovery; participating in settlement negotiations that led to the parties reaching this settlement agreement in principle; drafting settlement documents, including participating in communications and negotiations involving, among other things, the claims administration process, the scope of release, and the benefits provided to Class Members.

11. I believe the settlement reached in this action is fair and in the best interests of the class.

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

Executed on May 7, 2021 in Chicago, Illinois.

/s/ John Sawin
John Sawin