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7 *Attorneys for Plaintiffs and the Class*

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF LOS ANGELES, CENTRAL CIVIL WEST**

10 COLIN HIGGINS PRODUCTIONS, LTD.,

11 Plaintiff,

12 vs.

13 UNIVERSAL CITY STUDIOS, LLC, and  
14 DOES 1-100,

15 Defendant.

CASE NO. BC499180 (related to BC499179,  
BC499181, BC499182, BC500040, and  
BC540146)

**CLASS ACTION**

**DECLARATION OF JENNIFER LEE  
PRYOR IN SUPPORT OF PLAINTIFFS'  
MOTIONS FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT AND  
ATTORNEYS' FEES, COSTS AND  
INCENTIVE AWARDS**

Assigned to the Honorable Hon. Elihu M.  
Berle (Dept. CCW-323)

[Complaint Filed: January 16, 2013]

Date: December 11, 2015  
Time: 10:00 a.m.  
Dept.: 323

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1 I, Jennifer Lee Pryor, hereby declare:

2 1. I am the President and Chief Executive Officer of Indigo Inc. (“Indigo”), one of the  
3 named plaintiffs and class representatives in the above-entitled class action lawsuit.

4 2. I submit this declaration in support of the Plaintiffs’ Motion for Final Approval of  
5 Class Action Settlement and Motion for Attorneys’ Fees, Costs and Incentive Awards. I am  
6 personally familiar with the facts set forth in this declaration. If called as a witness I could and  
7 would competently testify to the matters stated herein.

8 3. Plaintiff Indigo decided to prosecute this class action lawsuit in order to recoup  
9 unpaid home video profit participations on behalf of other Universal City Studios, LLC  
10 (“Universal”) profit participants without any promise of recovery or compensation. It is my  
11 understanding that this lawsuit could not have been prosecuted or settled unless Indigo or other  
12 profit participants decided to serve as class representatives. In deciding to serve as a class  
13 representative in this case, I understood that there was a potential of Indigo’s name being disclosed  
14 in the media, and negative impact on Indigo’s business relationship with Universal and its related  
15 entities. Indigo chose to serve as a class representative in this lawsuit despite these risks.

16 4. Indigo has fulfilled its duties as a class representative, which required a significant  
17 dedication of time and effort during the course of this litigation. These efforts required dedicating  
18 numerous hours to litigation related activities, including but not limited to: (1) responding to and  
19 reviewing written discovery; (2) searching for and producing responsive documents relating to this  
20 litigation; (3) preparing for and sitting for my deposition by Universal; (4) reviewing and  
21 approving relevant documents including the operative Complaints and the Settlement Agreement;  
22 and (5) staying informed and communicating with my attorneys regarding the status and progress  
23 of this case. These activities required dedication of time and resources that could have been spent  
24 on other activities.

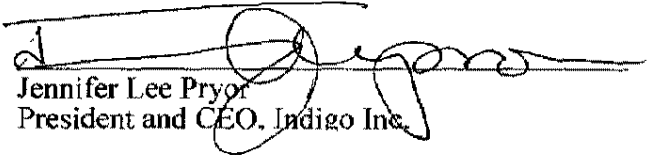
25 5. I believe that the \$10,000 class representative incentive award permitted by the  
26 Settlement and requested in Plaintiffs’ Motion for Attorneys’ Fees, Costs and Incentive Awards is  
27 fair compensation for Indigo’s service as a class representative in this case, and Indigo’s efforts in  
28 helping secure the Settlement on behalf of the Class members.

1 6. My attorneys in this case assisted myself and Indigo in each facet of this litigation,  
2 and I am satisfied with their representation of Indigo and the Class in this case. I believe that the  
3 Settlement in this case provides fair, reasonable and adequate relief to the members of the Class. I  
4 fully support the class action Settlement in this lawsuit and believe the Settlement should be  
5 approved by the Court.

6 7. Myself and Indigo have no interest or involvement in the governance or work of  
7 the Motion Picture & Television Fund.

8 I declare under penalty of perjury under the laws of the State of California that the  
9 foregoing is true and correct.

10 Executed on October 8<sup>th</sup>, 2015, at Quincy, California.

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12   
13 Jennifer Lee Pryor  
14 President and CEO, Indigo Inc.

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