

EXHIBIT 7

1 Patrice L. Bishop (182256)
pbishop@ssbla.com
2 STULL, STULL & BRODY
8383 Wilshire Blvd., Suite 800
3 Beverly Hills, CA 90211
Tel: (323) 456-8638
4 Fax: (323) 456-8601

5 ***Local Counsel for Plaintiffs
and the Putative Class***
6

7 UNITED STATES DISTRICT COURT
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 GREGORY COFFENG, MARK GLASER
and JORDAN WILSON, individually and on
10 behalf of all others similarly situated,

11 Plaintiffs,

12 v.

13 VOLKSWAGEN GROUP OF AMERICA,
14 INC.,

15 Defendant.
16

Case No. 17-cv-01825-JD

**DECLARATION OF JORDAN WILSON
IN SUPPORT OF THE MOTION FOR
FINAL APPROVAL**

DATE: March 26, 2020
TIME: 10:00 a.m.
JUDGE: Hon. James Donato
CRTRM: 11, 19th Floor

17
18
19
20
21
22
23
24
25
26
27
28

1 Jordan Wilson declares pursuant to 28 U.S.C. § 1746 under the penalties of perjury
2 as follows:

3 1. I participated in this class action as a named representative to validate my rights as
4 a consumer and those of other individuals similarly situated. In particular, Volkswagen / Audi
5 represented that their vehicles had certain engine characteristics that their vehicles did not in fact
6 possess as demonstrated by the premature failure primary engine coolant (“water”) pump.
7 Replacement of the water pump is expensive with an average repair cost of between
8 approximately \$900.00 to \$1,200.00. I have been informed the make and model of the class
9 vehicle affects the cost of water pump replacement due to whether the engine is mounted
10 transversely or longitudinally in the vehicle.

11 2. I did not receive any promise of compensation for my participation in this class
12 action although I was informed that I could apply for a service award if the case was successful. I
13 did not base my decision to participate as a class representative on the basis of a future contingent
14 service award.

15 3. I fully understood my responsibilities in this proceeding and acted to protect the
16 rights of the entire class by diligent participation including numerous emails and telephone
17 conferences with Class Counsel. In doing so, I placed interests of the class over my individual
18 interests and did not resolve any of my claims independent of the class. I also attempted to
19 understand the legal principles and the nature of the water pump defect involved in the case by
20 reviewing documents such as the initial and amended class action complaint and motion to dismiss

21 4. Other activities performed include filling out a multiple page informational
22 questionnaire, locating, reviewing and transmitting vehicle documents demonstrating purchase,
23 ownership, maintenance and repair. I also regularly communicated with counsel concerning the
24 status of the proceeding.

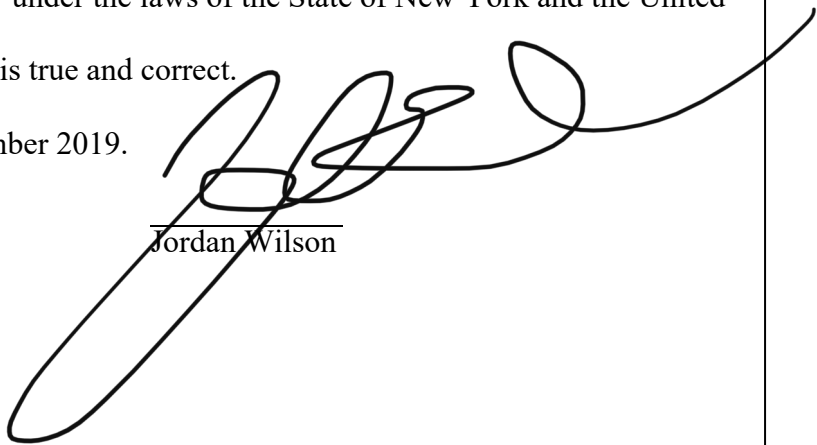
25 5. With respect to the settlement, I reviewed and consulted with counsel on the
26 various terms of the agreement as they were being negotiated and carefully reviewed the final
27 settlement.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

6. I estimate that since the date I became involved with this proceeding in late 2017, I spent approximately ten to twelve hours gathering vehicle materials, communicating with class counsel, reviewing legal filings including both complaints, motion to dismiss materials and other important case documents including the settlement agreement.

I declare under penalty of perjury under the laws of the State of New York and the United States of America that the above is true and correct.

Executed this nd day of December 2019.

A large, stylized handwritten signature in black ink, appearing to read 'Jordan Wilson', is written over the printed name and extends across the right side of the page.

Jordan Wilson