

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF OHIO**  
**EASTERN DIVISION**

ADELA BAI, Individually and On Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

TCP INTERNATIONAL HOLDINGS LTD.,  
KAREL ROBERT DEN DAAS, ELLIS YAN,  
and BRIAN CATLETT,

Defendants.

Case No. 1:16-cv-00102

JUDGE: Hon. Donald C. Nugent

**DECLARATION OF ROLAND WILLIS IN SUPPORT OF LEAD PLAINTIFFS’  
MOTION FOR FINAL APPROVAL OF THE SETTLEMENT, LEAD COUNSELS’  
MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND REIMBURSEMENT  
OF EXPENSES AND LEAD PLAINTIFFS’ APPLICATION FOR AN AWARD OF  
REIMBURSEMENT**

I, ROLAND WILLIS, hereby declare as follows:

1. I, Lead Plaintiff, Roland L. Willis, hereby submit this declaration in support of (1) the proposed Settlement of this Action; (2) my application for an award of reimbursement for time spent directly related to my representation of the Class; and (3) Lead Counsel’s motion for attorneys’ fees and reimbursement of expenses.

2. On March 18, 2016, I was appointed as a Lead Plaintiff in this action. Throughout this litigation, I was in regular contact with Lead Counsel. I received and reviewed numerous pleadings, including the original Complaint, the Motion to Serve as Lead Plaintiff, mediation papers and draft Settlement papers.

3. I was involved in communications with counsel throughout the settlement process and I was aware of the involvement of former Wayne Andersen as a mediator. I support the proposed Settlement of this Litigation for \$1.1 million. I believe this is an

excellent result achieved by counsel when considering the strengths of the case in light of all the risks and expense of continued litigation.

4. I have been employed throughout this Litigation as a professional poker player. I have 19 years of investing experience. As Lead Plaintiff, I had the time and opportunity to oversee the litigation.

5. As a Lead Plaintiff, I was involved in the following activities during the course of the litigation: reviewing pleadings, motions, and other documents; receiving periodic status reports on the progress of the litigation; searching for and producing documents to my counsel; and communicating with counsel concerning the status of the case, including discussions about the settlement.

6. As a result of my participation in this action, as described above, I have spent a significant number of hours related to my representation of the Class. Accordingly, I have spent a significant amount of time as a direct result of my participation in the Action and overseeing Lead Counsel, and I respectfully request reimbursement of the same.

7. Finally, I support the requested award of attorneys' fees in the amount of 30% of the Settlement fund. I believe that the requested fee is reasonable in light of the expertise of my counsel, the amount of work performed by counsel towards the successful resolution of this litigation, and the fact that counsel took on a large amount of risk, with no guarantee of any recovery.

8. In sum, I respectfully request that the court approve the Settlement; reimburse my reasonable time and expenses in the amount of \$5,000; and approve Lead Counsel's fee request for 30% of the Settlement amount and reimbursement of expenses.

I declare under the penalty of perjury under the laws of the New York that the foregoing is true and correct. Executed this \_\_\_\_ day of December, 2017, at \_\_\_\_\_(city), \_\_\_\_\_ (state).

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ROLAND WILLIS