

1 KENNETH E. PAYSON (Admitted *Pro Hac Vice*)
kennethpayson@dwt.com
2 LAUREN B. RAINWATER (Admitted *Pro Hac Vice*)
laurenrainwater@dwt.com
3 DAVIS WRIGHT TREMAINE LLP
1201 Third Avenue, Suite 2200
4 Seattle, Washington 98101-3045
Tel: (206) 622-3150
5 Fax: (206) 757-7700

6 SEAN M. SULLIVAN (State Bar No. 229104)
seansullivan@dwt.com
7 DAVIS WRIGHT TREMAINE LLP
865 S. Figueroa Street, Suite 2400
8 Los Angeles, California 90017-2566
Tel: (213) 633-6800
9 Fax: (213) 633-6899

10 Attorneys for Defendants
TVI, Inc. d/b/a/ SAVERS and APOGEE RETAIL,
11 LLC

12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA

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SEAN HARTRANFT, on behalf of
himself and all others similarly situated,

Plaintiff,

vs.

TVI, INC. d/b/a SAVERS, APOGEE
RETAIL, LLC,

Defendants.

) Case No. 8:15-cv-01091-CJC-DFM
) [Assigned to Hon. Cormac J. Carney]
) **DECLARATION OF SCOTT ESTES**
) **IN SUPPORT OF UNOPPOSED**
) **MOTION FOR PRELIMINARY**
) **APPROVAL OF CLASS ACTION**
) **SETTLEMENT AND**
) **CERTIFICATION OF**
) **SETTLEMENT CLASS**
) Action filed: July 8, 2015

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I, Scott Estes, declare as follows:

1. **Identity of Declarant.** I am Vice President of Operations, Finance and Analytics for TVI, Inc. In my role as Vice President of Operations, Finance and Analytics for TVI, Inc., I am familiar with TVI, Inc.’s business, including the location of its thrift stores, price of goods sold in those stores, and the geographic focus of the calls placed to solicit donation of household goods and clothing for Epilepsy Foundation of America (“EFA”). I have personal knowledge of the facts stated in this Declaration.

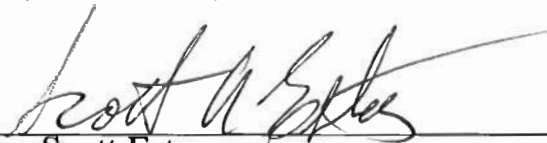
2. **TVI’s Business.** TVI does business through the Savers family of thrift stores. The family comprises 145 Savers and Value Village stores in the United States spread across the following states: AK, AR, AZ, CA, CT, HI, ID, IL, KS, MA, MD, MN, MO, ND, NH, NM, NV, NY, OH, OR, PA, RI, SD, TX, UT, VA, WA, and WI.

3. **Geographic Focus of Calls Placed.** These thrift stores are located in the geographical areas in which the EFA donation-solicitation calls were placed to allow the pickup of clothing and goods donated in response to such calls.

4. **Price of Goods Sold.** The price of an item sold in TVI’s stores is generally less than \$5.00 typically with about 95% of items selling for less than \$10.00.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 1st day of March, 2019, at Bellevue, WA.



Scott Estes