

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**MICHAEL McPHERSON, on behalf of )  
himself and on behalf of a class of )  
persons and entities similarly situated in )  
the State of Alabama, )**

**Plaintiff, )**

**Case No.: 2:11-cv-342**

**v. )**

**GROUPON, INC., )**

**Defendant. )**

**CORPORATE/CONFLICT DISCLOSURE STATEMENT**

COMES NOW Plaintiff Michael McPherson, by and through his undersigned counsel of record, and in accordance with the order of this Court, makes the following disclosure concerning parent companies, subsidiaries, partners, limited liability entity members and managers, trustees (but not trust beneficiaries), affiliates, or similar entities reportable under the provisions of the Middle District of Alabama’s General Order No. 3047:

1. This party is an individual and there are no reportable relationships concerning Plaintiff.

Respectfully submitted this 13<sup>th</sup> day of May, 2011.

/s/ R. Brent Irby  
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R. Brent Irby

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**CERTIFICATE OF SERVICE**

This is to certify that on May 13, 2011, a true and correct copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system. A true and correct copy of the foregoing is also being sent via U.S. Mail as follows:

Groupon, Inc.  
c/o CT Corporation System  
208 South LaSalle Street  
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Chicago, Illinois 60604-1101

/s/ R. Brent Irby  
COUNSEL