

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<p>CARLOS VAZQUEZ, on behalf of himself and others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>GROUPON, INC., YMCA of the USA and DOES 1 through 100, Defendants.</p>	<p>Civil No. 11-cv-00495 EGS</p> <p><b>DECLARATION OF CHARLES J. LADUCA IN SUPPORT OF PLAINTIFF'S MOTION FOR APPOINTMENT OF INTERIM CLASS COUNSEL</b></p>
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Declarant, Charles J. LaDuca, pursuant to 28 U.S.C. § 1746, states and alleges as follows:

1. I am an attorney with the law firm of Cuneo Gilbert & LaDuca, LLP and one of the attorneys representing Named Plaintiff, Carlos Vazquez, on behalf of himself and all others similarly situated, in this case. Also representing Plaintiff and those similarly situated are Clayton Halunen of Halunen & Associates; Charles Schaffer of Levin, Fishbein, Sedran & Berman; and Michael McShane of Audet & Partners, LLP (“Putative Class Counsel”).

2. Plaintiff asks this Court to appoint these attorneys as interim counsel for the class. This declaration and the attached exhibits set forth the qualifications and experience of the above-referenced firms and their attorneys to serve as interim class counsel, pursuant to Fed. R. Civ. P. 23(g)(3).

3. Cuneo Gilbert & LaDuca has been involved with this case since approximately late 2010, when it began investigating the practices of Defendant Groupon as they relate

to this litigation. Cuneo Gilbert & LaDuca has worked closely with Putative Class Counsel to identify and research possible legal claims against Defendant Groupon, and develop a theory of this case.

4. I and the other Putative Class Counsel have extensive understanding of the applicable law and considerable experience in the prosecution of complex class actions.

5. During the last several months, Cuneo Gilbert & LaDuca (together with other counsel of record) has devoted the personnel and financial resources necessary to research, review and analyze documents in this case, draft the complaint, respond to media inquiries, and engage in motion practice before this Court and the Judicial Panel on Multidistrict Litigation. We intend to continue to devote the necessary resources to prosecute this case to a speedy and successful resolution, including trial and appeal.

6. Attached to this Declaration as **Exhibit A** is a true and correct copy of Motion of Plaintiffs Anthony Ferreira and Sarah Gosling to Transfer Actions to the Northern District of California Pursuant to 28 U.S.C §1407 for Consolidated Pretrial Proceedings.

7. Attached to this Declaration as **Exhibit B** is a true and correct copy of Plaintiffs Johnson, Vazquez. Christensen and Bates' Memorandum of Law in Opposition to Transfer Pursuant to 28 U.S.C. § 1407, or in the Alternative Transfer to the Northern District of Illinois.

8. Attached to this Declaration as **Exhibit C** is a true and correct copy of Response of Defendants Groupon, Inc.; Nordstrom, Inc.; Fun Time, LLC dba Wheel Fun Rentals; Whirly West, Inc. dba Whirlyball; and YMCA of the USA, to Motion of Plaintiffs

Anthony Ferreira and Sarah Gosling For Transfer Of Actions Pursuant To 28 U.S.C.  
§ 1407.

9. Attached to this Declaration as **Exhibit D** is a true and correct PDF copy of an e-mail sent to my co-counsel Clayton Halunen by Samuel Isaacson on March 25, 2011.

10. Attached to this Declaration as **Exhibit E** is a true and correct firm resume for Cuneo, Gilbert & LaDuca, LLP.

11. Attached to this Declaration as **Exhibit F** is a true and correct firm resume for Halunen & Associates.

12. Attached to this Declaration as **Exhibit G** is a true and correct firm resume for Levin, Fishbein, Sedran & Berman.

13. Attached to this Declaration as **Exhibit H** is a true and correct firm resume for Audet & Partners, LLP.

I declare under penalty of perjury that the foregoing is true and correct.

April 7, 2011

Dated

s/ Charles J. LaDuca

CHARLES J. LADUCA