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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA—WESTERN DIVISION

ALI ASGHARI, DANIEL TRAN,  
YUNG KIM, ARA  
DERSARKISSIAN, and KATRINA  
NOBLE individually, and on behalf  
of a class of similarly situated  
individuals,

Plaintiffs,

vs.

VOLKSWAGEN GROUP OF  
AMERICA, INC., VOLKSWAGEN  
AG, AND AUDI AG,

Defendants.

Case No. CV13-02529-MMM-(JEMx)

Hon. Margaret M. Morrow

CLASS ACTION

**DECLARATION OF ALI ASGHARI  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR FINAL APPROVAL  
OF CLASS ACTION  
SETTLEMENT; AND FOR AN  
AWARD OF ATTORNEYS' FEES,  
COSTS, AND EXPENSES, AND  
ENHANCEMENT AWARDS TO  
CLASS REPRESENTATIVES**

Date: May 4, 2015  
Time: 10:00 am  
Place: Courtroom 780

### DECLARATION OF ALI ASGHARI

I, Ali Asghari, declare as follows:

1. I am over eighteen years old and unless the context indicates otherwise, I have personal knowledge of the following facts, and if called as a witness, I could and would testify competently to them. I am one of the named Plaintiffs in the above-captioned action. I make this declaration in support of the Motion for Final Approval of Class Action Settlement; and the Motion for an Award of Attorneys' Fees, Costs, and Expenses, and Enhancement Awards to Class Representatives.

2. This declaration is based on my personal knowledge and, if called as a witness, I could and would testify competently thereto.

3. I am named as a Class Representative in this case, and I am generally familiar with the work involved in prosecuting the class action against the above-captioned Defendants ("Volkswagen") relating to oil consumption in the 2009-2011 Audi vehicles equipped with the CAEB engine.

4. On December 29, 2009, I leased a new 2010 Audi A5 from Audi dealer, Atlantic Imports, Inc., d.b.a. Atlantic Audi West, in West Islip, New York.

5. I provided my attorneys with relevant and helpful information for this lawsuit regarding my experience with my Audi, including information about my purchase of the vehicle, the problems I experienced with the vehicle, my repair orders and related attempts to have the vehicle repaired at Audi dealerships. I have provided documents relating to the problems with my vehicle, and made myself available for telephonic meetings with my attorneys to discuss my vehicle's oil consumption issues.

6. I did not take lightly the decision to file a class action lawsuit against Volkswagen. I understood that I was to represent a nationwide class of vehicle owners, and to protect the interests of all members of that class. I

understood my involvement in this action may be time consuming, and that there would be risks involved in bringing such a case. However, I believed this situation needed to be remedied and I was willing to step forward and serve as a class representative.

7. In deciding to litigate my claims as part of this class action, I agreed to pursue not only my claims, but the claims of all similarly situated class members, and if necessary, to put the interests of the class of other consumers ahead of my interests. I also agreed to actively participate in the lawsuit and to assume the risks of serving as a named plaintiff in this case.

8. I have been in regular contact with my attorneys throughout my involvement in the prosecution of this case and have been kept apprised of key developments in the litigation. I am generally familiar with the factual and legal issues in this case through my communications with my attorneys. I have also been informed about the terms of the proposed settlement which is before the Court.

9. After reviewing and discussing the terms of the proposed settlement with my attorneys and considering the issues in the case, I have concluded that the proposed settlement obtained on behalf of the Class is fair and reasonable to the Class members in light of the circumstances.

10. I believe that I have fairly represented the absent Class members and herein request that the Court finally approve this settlement.

11. I am not aware of any conflicts of interest that prevent me from being confirmed as Class Representative in this lawsuit. I am not related in any way to my attorneys or to any other member of the firm that is representing me. I have no business dealings or other involvement beyond this lawsuit and this representation. I have not been promised any money or inducement to serve as Class Representative in this action.


12. I request that the Court should award me a fair and reasonable

service award to compensate me for the work that I have performed in my role as Class Representative, as well as the disruption to my business and personal life that has resulted from my service as a Class Representative.

13. As Class Representative, I actively participated in the litigation and have always maintained the best interests of the Class while performing my Class Representative duties.

14. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on \_\_\_\_\_ in \_\_\_\_\_.

  
\_\_\_\_\_  
Ali Asghari

Feb. 27, 2015  
Los Angeles, CA.