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- 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.

I, Ara Dersarkissian, declare as follows:

- 2. On or about May 13, 2010, I leased a new 2010 Audi A5 from an authorized Audi dealer in California.
- 3. On several occasions, since the time of lease inception, I have had to take the vehicle to the dealer to have the engine oil topped off.
- 4. On several other occasions, I have had to pay out of pocket to purchase and add supplement oil on my own between scheduled oil changes.
- 5. At all times I have driven my vehicle in a foreseeable manner and in the manner in which it was intended to be used.
- 6. In or around February 2013, I consulted with attorney, Hovanes Margarian, at The Margarian Law Firm (formerly The Law Offices of Hovanes Margarian) about the prospect of litigating my claims, on behalf of myself and other consumers, against the above-captioned Defendants ("Volkswagen") and about my responsibilities as both a Plaintiff and a Class Representative.
- 7. After retaining Hovanes Margarian to represent me in connection with my dispute against Volkswagen, I worked with my lawyer to put together a demand letter under California's Consumers Legal Remedies Act ("CLRA"). We sent the letter to Volkswagen on or about February 25, 2013.
- 8. Following the letter, I began working with my attorney to put together a class action lawsuit. We discussed the various legal theories I could pursue against Volkswagen.
- 9. My attorney provided me with copies of his drafts of the Complaint for review and discussion, and ultimately, my case was filed on September 30, 2013.

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- 10. I gave serious consideration to the decision to file a class action lawsuit against Volkswagen. My attorney explained to me and I understood that I was to represent a nationwide class of vehicle owners, and that it would be my duty to protect the interests of all members of that class, and when necessary, uphold their interests higher than my own individual interest. I was advised of the risks associated with filing such a lawsuit and of the time commitment I needed to make to see it to completion. Having weighed the totality of factors, I felt compelled to step forward as a class representative and seek a remedy on behalf of me and the class.
- 11. Throughout the litigation, my attorncy and I regularly communicated regarding the status of the case. I was always available and willing and did in fact offer my input and assisted my attorney in gathering the evidence necessary to prosecute the class claims.
- During the settlement negotiation process my attorney and I discussed possible alternatives and I was engaged in the decision making and the evaluation of the terms of the final settlement agreement. The final settlement terms are fair and appropriate for the class members who will finally receive a proper remedy.
- 13. I believe that I have fairly represented the absent class members and herein request that the Court approve this settlement, confirm me as a class representative, and grant the request for attorneys' fees and cost in this case.
- 14. I am not aware of any conflicts of interest that prevent me from being confirmed as a class representative in this lawsuit. I am not related in any way to my attorney 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.
- 15. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on	- FEBRUARY 26, 2015	in Los Andeles, CA
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