

# **EXHIBIT 5**

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12 *Attorneys for Lead Plaintiff Tiffany Huynh, as executor for the estate of Kevin Nguyen*

13  
14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16  
17 Case No. 2:17-cv-01868-RFB-NJK

18 In re TAHOE RESOURCES, INC. SECURITIES  
LITIGATION

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23 **DECLARATION OF TIFFANY HUYNH**

24 This Document Relates to: All Actions  
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1 I, Tiffany Huynh, Lead Plaintiff and executor for the estate of Kevin Nguyen,  
2 declare as follows:

3 1. I am the Court-appointed Lead Plaintiff in the above-captioned securities class  
4 action (the "Action"). I have personal knowledge of the statements herein and, if called as a  
5 witness, could and would competently testify thereto.

6 2. I respectfully submit this declaration in support of Lead Counsel's motion for an  
7 award of attorneys' fees and expenses, and my request for an award of \$10,000 for my reasonable  
8 costs and expenses directly related to the representation of the Class in this Action.

9 3. On April 1, 2022, I sought an order from this Court substituting me for my deceased  
10 husband, Kevin Nguyen, who previously served as Lead Plaintiff in this action but sadly passed  
11 away on January 29, 2022. I was designated to serve as the sole executor of his estate.

12 4. It is my understanding that the defendants in this action opposed substitution  
13 because I had not been formally appointed executor by the probate court. As a result, a probate  
14 action was opened and I was formally appointed executor on July 20, 2022.

15 5. On September 14, 2022, this Court appointed me Lead Plaintiff.

16 6. I have taken my role as Lead Plaintiff seriously, dedicating my personal time and  
17 energy to overseeing this Action for over one and a half years.

18 7. In fulfilling my responsibility to all members of the proposed Class, I performed  
19 various duties in furtherance of the litigation of the Action, including:

- 20 a. Engaging in frequent telephone and email communications and meeting  
21 personally with Lead Counsel about the Action;
  - 22 b. Reviewing documents filed and/or prepared in the probate action, which was  
23 initiated solely so that I could be appointed executor and be substituted as Lead  
24 Plaintiff in this Action with the consent of all parties; and
  - 25 c. Reviewing documents filed and/or prepared in the Action, including the motions  
26 for substitution as lead plaintiff, mediation documents, and the motion for  
27 preliminary approval of the Class Action Settlement.
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1           8.       Additionally, I authorized Lead Counsel to enter into the settlement of this Action  
2 for \$19,500,000. Prior to providing that authorization, I learned about the risks and uncertainties  
3 posed by further litigation with guidance from Lead Counsel. I then weighed these considerations  
4 against the benefits provided by the settlement, along with advice from my attorneys, and  
5 determined that the settlement is a fair, reasonable, and adequate result for the Settlement Class  
6 under these circumstances.

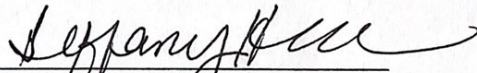
7           9.       I understand that, in cases such as this, a Court may award a reasonable sum for the  
8 time a class representative has devoted to representing the Settlement Class.

9           10.       While it is difficult to provide the Court with an hourly rate for our time because I  
10 am currently retired, I believe that a total of \$10,000 is reasonable for the time my husband and I  
11 spent on this litigation. I conservatively estimate that I have devoted at least 15 hours to this  
12 litigation, as described above, and I understand that my husband devoted many more hours to this  
13 litigation during the years he served as Lead Plaintiff and gave his deposition. This is time that we  
14 otherwise would have devoted to our personal lives or other business or investment endeavors.

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

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18 Dated: December 14, 2023

  
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Tiffany Huynh, Lead Plaintiff

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