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12 *Attorneys for Lead Plaintiff Tiffany Huynh,  
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14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16  
17 In re TAHOE RESOURCES, INC.  
SECURITIES LITIGATION

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

**DECLARATION OF JAMES M.  
WILSON, JR. IN SUPPORT OF  
MOTION TO SEAL EXHIBIT A TO  
THE DECLARATION OF  
ALEXANDRA GADZO, ESQ. AND  
FOR APPROVAL OF LIMITED  
REDACTIONS**

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22 This Document Relates to: All Actions

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1 I, James M. Wilson, Jr., declare as follows:

2 1. I am a member in good standing of the bar of the State of New York and am  
3 admitted *pro hac vice* in this Court. I am a partner in the law firm of Faruqi & Faruqi, LLP (the  
4 “Faruqi Firm” or “U.S. Plaintiff’s Counsel”), which represents U.S. Plaintiff Tiffany Huynh (“U.S.  
5 Plaintiff” or “Ms. Huynh”) and the putative U.S. Settlement Class in the above-captioned securities  
6 class action pending in this Court (the “U.S. Action” or “this Action”).<sup>1</sup> I have personal  
7 knowledge of the following facts, and if called upon, I could and would competently testify that  
8 the following facts are true and correct to the best of my knowledge.

9 2. I make this declaration to demonstrate why U.S. Plaintiff has good cause for  
10 declining to serve an unsealed copy of Exhibit A to the Declaration of Alexandra Gadzo, Esq. on  
11 Defendants Tahoe Resources, Inc., Mark Sadler, Ronald W. Clayton, C. Kevin McArthur, and  
12 Edie Hofmeister.

13 3. Under District of Nevada Local Rule IA 10-5(c), “An attorney or pro se party who  
14 files a document under seal must include with the document either (i) a certificate of service  
15 certifying that the sealed document was served on the opposing attorneys or pro se parties, or (ii)  
16 an affidavit showing good cause why the document has not been served on the opposing attorneys  
17 or pro se parties.”

18 4. Good cause exists under LR IA 10-5(c) not to serve Defendants in the Action with  
19 an unredacted copy of Exhibit A.

20 5. As explained in the accompanying motion to seal, the redacted portions of Exhibit  
21 A contain information protected by the attorney-client and attorney work-product privileges, as  
22 well as sensitive information about non-parties to this litigation and should therefore remain  
23 confidential.

24 6. A redacted copy of Exhibit A will be served on Defendants electronically via  
25 CM/ECF on December 14, 2023.

26 <sup>1</sup> Unless otherwise noted, all capitalized terms have the meaning ascribed to them in the  
27 Joint Stipulation and Agreement of Global Settlement of Two Related Securities Class Actions  
28 Pending in Different Jurisdictions dated May 25, 2023 (“Stipulation” or “Stip.”). ECF No. 252.

