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

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

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17 In re TAHOE RESOURCES, INC. SECURITIES
LITIGATION
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19 This Document Relates to: All Actions
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Case No. 2:17-cv-01868-RFB-NJK
**DECLARATION OF ALEXANDRA
GADZO, ESQ.**

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1 I, Alexandra Gadzo, declare as follows:

2 1. I am a member in good standing of the bar of the State of California. I am the
3 principal of Gadzo Law P.C. I submit this declaration in support of U.S. Plaintiff's Counsel's
4 Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and an Award to U.S.
5 Plaintiff. I have personal knowledge of the facts set forth herein and would testify thereto if called.

6 2. I served as the estate attorney for Kevin Nguyen and Tiffany Huynh.

7 3. It is my understanding that before his passing, Mr. Nguyen served as the Lead
8 Plaintiff in the above-captioned federal securities class action (the "Tahoe Action").

9 4. Due to the nature of Mr. Nguyen's estate plan, there was no need to open a probate
10 proceeding. However, because of his position as Lead Plaintiff in this case, a need arose to open a
11 probate estate for Mr. Nguyen upon his death, and for his wife to be formally appointed as
12 executor. This was so that she could be substituted for Mr. Nguyen as the Lead Plaintiff in this
13 case with the consent of all parties.

14 5. In order to allow for Ms. Huynh to continue her husband's work as Lead Plaintiff, I
15 represented Ms. Huynh as the Petitioner in the probate action entitled *In re Estate of Kevin*
16 *Nguyen, Also Known as Kevin Duc-Hai Nguyen*, No. PES-22-305371 (Cal. Sup. Ct. 2022)
17 ("Nguyen Probate Action"). My work on this began in May 2022.

18 6. In the Nguyen Probate Action, on May 24, 2022, I filed two separate Petitions for
19 Probate on behalf of Ms. Huynh. Given that the probate court usually takes longer to appoint an
20 executor than a special administrator, Ms. Huynh sought the appointment of both roles.

21 7. Thus, the first Petition for Probate requested that Mr. Nguyen's will and codicils be
22 admitted for probate and, because time was of the essence, that the court appoint Ms. Huynh as the
23 special administrator of the Nguyen Estate.

24 8. The second Petition for Probate requested that Mr. Nguyen's will and codicils be
25 admitted for probate and that the court appoint Ms. Huynh as the executor of the Nguyen Estate.

26 9. On July 12, 2022, the court in the Nguyen Probate Action held a hearing during
27 which I advocated that Ms. Huynh be appointed as the special administrator of the Nguyen Estate.
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1 As a result, that day, the court issued Letters of Special Administration appointing Ms. Huynh as
2 the special administrator until July 20, 2022, pursuant to which she was granted full authority to
3 administer the estate.

4 10. Then, on July 21, 2022, the court in the Nguyen Probate Action issued Letters
5 Testamentary appointing Ms. Huynh as the executor of the Nguyen Estate.

6 11. Overall, my firm devoted a total of 107.82 hours representing Ms. Huynh in the
7 Nguyen Probate Action. My firm also incurred \$621.70 in court costs, filing fees, and other
8 expenses as a result of my representation of Ms. Huynh in the Nguyen Probate Action. A true and
9 correct summary of my firm's billing and expense records is attached hereto as Exhibit A.

10 12. On December 2, 2022, Faruqi & Faruqi, LLP sent a check in the amount of
11 \$37,349.80 to Gadzo Law, P.C. to pay for my full fees and costs incurred in representing Ms.
12 Huynh in the Nguyen Probate Action through that point in time.

13 13. As of this date, probate has not yet been closed and I understand that I will be asked
14 to perform the necessary task of closing the estate once the settlement in this case has been finally
15 approved by the Court and Ms. Huynh has discharged her duties as Lead Plaintiff. I estimate that
16 continued cooperation for the Litigation and closing probate will cost \$17,000.00 in firm time and
17 court fees.

18 I declare under penalty of perjury that the foregoing is true and correct to the best of my
19 knowledge.

20 Executed this 13th day of December 2023 at Los Altos, CA.

21 *Alexandra Gadzo*

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Alexandra Gadzo