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8 *Attorneys for Plaintiffs*
9 *Eli Silva and Ashley Gardiner*

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN JOSE DIVISION**

12 WENDOVER PRODUCTIONS, LLC, a Limited
13 Liability Company; BUSINESSING, LLC, a
14 Limited Liability Company; THE
15 CHARISMATIC VOICE, LLC, a Limited
16 Liability Company; CLEARVISION MEDIA,
INC.; and GEAR LIVE MEDIA, LLC, a Limited
Liability Company,

17 Plaintiffs,

18 v.

19 PAYPAL, INC.,

20 Defendant.

21 CAMERON KING, *individually and on behalf of*
22 *all others similarly situated,*

23 Plaintiff,

24 v.

25 PAYPAL HOLDINGS, INC. and PAYPAL,
26 INC.,

27 Defendants.

Case No.: 5:24-cv-9470-BLF

**DECLARATION OF ADAM E. POLK IN
SUPPORT OF UNOPPOSED
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED**

Case No.: 5:25-cv-00581-NC

1 KARIN BAUER, ANGELA STURGES, and
2 CHRISTIE SHINN, individually and on behalf of
3 all others similarly situated,

4 Plaintiffs,

5 v.

6 PAYPAL, INC. and PAYPAL HOLDINGS,
7 INC.,

8 Defendants.

Case No.: 5:25-cv-00580-SVK

9 BENJAMIN KAYNE, individually and on behalf
10 of all others similarly situated,

11 Plaintiff,

12 v.

13 PAYPAL HOLDINGS, INC. and PAYPAL,
14 INC.,

15 Defendants.

Case No.: 5:25-cv-00668-NC

16
17 I, Adam E. Polk, declare as follows:

18 1. I am a partner of Girard Sharp LLP and counsel for Plaintiffs Eli Silva and Ashley
19 Gardiner. I submit this declaration in support of the accompanying Unopposed Administrative
20 Motion to Consider whether cases should be related. I have personal knowledge of the facts stated
21 herein and, if called upon to do so, could and would testify competently thereto.

22 2. A stipulation pursuant to Local Rule 7-11 for Plaintiffs' Administrative Motion to
23 Relate could not be obtained because Defendants do not join in the motion and have not yet been
24 served in each of the related cases.

25 3. I have conferred with all parties to this litigation in connection with this
26 administrative motion to relate, including Defendants. Counsel for Plaintiffs each agree that the
27 above-captioned cases are related under Civil Local Rule 3-12. Counsel for Defendants agree not to
28

1 oppose this administrative motion.

2 I declare under penalty of perjury under the laws of the United States that the foregoing is true
3 and correct. Executed January 21, 2025 in San Francisco, California.

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/s/ Adam E. Polk

Adam E. Polk

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