

# **EXHIBIT 7**

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6 jeff@blockesq.com

7 Co-Lead Counsel

8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 IN RE TEZOS SECURITIES LITIGATION

11 This document relates to:  
12 ALL ACTIONS.

Master File No. 17-cv-06779-RS

**CLASS ACTION**

**DECLARATION OF JAMES TAYLOR-  
COPELAND IN SUPPORT OF LEAD  
COUNSEL'S MOTION FOR AN  
AWARD OF ATTORNEYS' FEES AND  
LITIGATION EXPENSES AND  
CHARGES**

**FILED ON BEHALF OF TAYLOR-  
COPELAND LAW**

Date: August 27, 2020  
Time: 1:30 p.m.  
Courtroom: 3, 17th floor  
Judge: Hon. Richard Seeborg

1 I, James Taylor-Copeland., pursuant to 28 U.S.C. § 1746, hereby declare as follows:

2 1. I am admitted to practice law before the courts of California and the United States  
3 District Court for the Northern District of California. I am the founding partner of the law firm  
4 Taylor-Copeland Law (“State Lead Counsel”), counsel of record for State Plaintiff Andrew  
5 Baker, along with the law firm of Robbins Geller Rudman & Dowd LLP. I respectfully submit  
6 this declaration in support of Lead Counsel’s Motion for an Award of Attorneys’ Fees and  
7 Reimbursement of Litigation Expenses.

8 2. I have personally participated in, overseen, and monitored the prosecution of the  
9 case captioned *Baker v. Dynamic Ledger Solutions Inc. et al.*, Superior Court of California,  
10 County of San Francisco, Case No. CGC-17562144 (“State Action”). Thus, if called upon, I can  
11 testify to the matters set forth herein.

12 3. As State Lead Counsel, my firm was involved in all aspects of the State Action  
13 and its settlement as set forth in the Declaration of James Taylor-Copeland in Support of Lead  
14 Plaintiff’s Motion for Final Approval of Class Action Settlement and Plan of Allocation.

15 4. I billed the following aggregate hours to this matter as of the date of filing, with  
16 fees applied at the firms current billing rates:

Timekeeper	Type	Hours	Hourly Rate	Total
James Taylor-Copeland	P	763.8	\$775	\$591,945
<b>Total</b>				<b>\$591,945</b>

21 P = Partner; A = Associate; PL = Paralegal

22 5. Taylor-Copeland Law directly seeks payment of the following expenses and  
23 charges directly related to the litigation of the State Action (which have been summarized in  
24 categories):

Category	Expense
Filing Fees	\$1,589.65
Travel (Flights, Lodging, Meals)	\$3,146.10

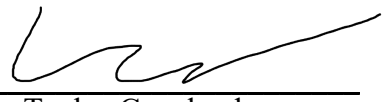
Total Expenses

\$4,735.75

6. Attached as Exhibit A is a true and correct copy of Taylor-Copeland Law's firm resume.

7. Attached as Exhibit B is a summary chart describing the work described in Paragraph 4, above.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 27th day of July 2020, at San Diego, California .

By:   
James Taylor-Copeland  
**Taylor-Copeland Law**  
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*State Lead Counsel and Counsel to  
State Plaintiff Andrew Baker*

# **EXHIBIT A**

# Taylor-Copeland Law

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## FIRM RESUME

Taylor-Copeland Law was one of the first firms in the country to focus on blockchain and cryptocurrency litigation and is at the forefront of this rapidly developing area of law. It is focused on representing aggrieved investors and cryptocurrency users seeking to recover financial losses in what is often described as the “wild west.”

The last three years have seen the explosive growth of blockchain technology and the value of cryptocurrencies. A blockchain is a decentralized digital ledger (such as Bitcoin or Ethereum) on which transactions (or other information) are recorded and added in chronological order. It allows participants to keep track of digital currency transactions (or information exchanges) without central record keeping. There are now hundreds of different cryptocurrencies worth more than \$200 billion—up from just \$20 billion three years ago. These currencies use encryption techniques to regulate the generation of units of currency and facilitate and verify the transfer of funds without the need for an intermediary, like a bank.

Taking advantage of this rapid growth, many blockchain and cryptocurrency startups have attempted to skirt fundraising regulations by raising funds through initial coin offerings (ICOs). In an ICO, tokens are sold to consumers in exchange for legal tender or other cryptocurrencies (most often Bitcoin and Ethereum). These tokens generally give the purchaser various rights on the blockchain network and resemble the shares of a company sold to investors in an initial public offering. Unfortunately, these ICOs have become a magnet for unscrupulous practices and fraud.

Taylor-Copeland Law focuses on helping aggrieved ICO investors, and in October 2017, Taylor-Copeland Law filed *Baker v. Dynamic Ledger Solutions Inc.*, the first suit to allege that an ICO violated U.S. securities laws. Since then Taylor-Copeland Law has helped aggrieved ICO investors recover millions of dollars in confidential settlements and is currently prosecuting several additional securities class actions on behalf of aggrieved ICO investors.

## **Professional Experience**

James Taylor-Copeland began his legal career working in the litigation and dispute

resolution department of the large international firm Clifford Chance US LLP in Washington, D.C. James' practice as a litigator involved all aspects of civil litigation, including significant experience with multi-district litigation and cross-border issues. In 2015, James left Clifford Chance US LLP and joined Mintz Levin Cohn Ferris Glovsky and Popeo PC in San Diego, California, where he was a member of the firm's Institutional Investor Class Action Recovery group. In 2017, James founded Taylor-Copeland Law to focus on blockchain and cryptocurrency litigation.

### **Bar Admissions**

California, U.S. District Court, Northern District of California, U.S. District Court, Central District of California, U.S. District Court, Southern District of California, U.S. District Court, Eastern District of California.

### **Education**

James obtained his Juris Doctorate from Georgetown University Law Center and an undergraduate degree in economics from Indiana University.

### **REPRESENTATIVE MATTERS**

#### *In re Ripple Labs, Inc. Litigation.*

U.S. Dist. Ct. – Northern District of California – Case No. 4:18-cv-06753

- Appointed co-lead counsel in securities class action alleging that Ripple Labs and its subsidiary XRP II violated state and federal securities laws by selling unregistered XRP token securities
- Obtained favorable ruling on Defendants' Motion to Dismiss allowing most claims to proceed

#### *John Hastings v. Unikrn, Inc., et al.*

Washington Superior Court – King County – Case No. 18-2-20303-6

- Securities class action alleging that Unikrn, Inc. violated the registration provisions of the Securities Act by offering unregistered UKG securities to the general public
- Defeated defendants' motion to compel arbitration in decision affirmed by the Court of Appeals

#### *Jacob Zowie Thomas Rensel et. al. v. Centra Tech, Inc., et al.*

U.S. Dist. Ct. – Southern District of Florida – Case No. 1:17-cv-24500

- Appointed co-lead counsel in class action alleging that defendants violated the registration provisions of the Securities Act through the unregistered offer and sale of CTR Tokens to the general public
- Obtained \$3.1 million default judgment against defendant Centra Tech on behalf of

the largest investor in the Centra ICO

*Tezos ICO Cases: Baker v. Dynamic Ledger Solutions, Inc. et al.*

California Superior Court – County of San Francisco – Case No. CGC-17562144

- First case alleging that sale of pre-functional digital tokens through an initial coin offering (ICO) violated U.S. securities laws

*Kevin Ogar v. OC Throwdown, et al.*

California Superior Court – County of Orange – Case No. 30-2016-00828804

- Obtained \$22.3 million judgment on behalf of plaintiff who was permanently paralyzed at a fitness and weightlifting competition

*MediVas LLC, et al. v. Marubeni Corporation*

California Superior Court – County of San Diego – Case No. 37-2010-00090830

- Negotiated favorable settlement for Marubeni Corporation mid-way through a two-week jury trial in case involving hundred million dollar claims and multi-million-dollar cross-claims

*CrossFit, Inc. v. National Strength and Conditioning Association*

U.S. Dist. Ct. – Southern District of California – Case No. 14-cv-1911

- Obtained favorable summary judgment ruling in Lanham Act action arising from manipulation of data in an article published in competitor's scientific journal
- Obtained significant monetary and evidentiary sanctions against defendant based on discovery abuses

*Tatung Company, Ltd. v. Shu Tze Hsu, et al.*

U.S. Dist. Ct. – Central District of California – Case No. SACV13-01743

- Obtained favorable summary judgment ruling and negotiated favorable settlement for client in civil RICO action arising out of a complex scheme to conceal assets



# **EXHIBIT B**

**In re Tezos Securities Litigation**  
 Time and Billing by Category  
 Inception through July 24, 2020  
 TAYLOR-COPELAND LAW

Timekeeper	Position	A	B	C	D	E	F	G	H	I	J	Total	Hourly Rate	Lodestar
James Taylor-Copeland	Partner	162.3	8.5	39.3	30.8	20.8	270.0	64.8	113.5	39.3	14.8	763.8	\$ 775	\$ 591,945
<b>Grand Total</b>		<b>162.3</b>	<b>8.5</b>	<b>39.3</b>	<b>30.8</b>	<b>20.8</b>	<b>270.0</b>	<b>64.8</b>	<b>113.5</b>	<b>39.3</b>	<b>14.8</b>	<b>763.8</b>	<b>\$ 775.00</b>	<b>\$ 591,945</b>
<b>% of Total Hours</b>		<b>21.2%</b>	<b>1.1%</b>	<b>5.1%</b>	<b>4.0%</b>	<b>2.7%</b>	<b>35.3%</b>	<b>8.5%</b>	<b>14.9%</b>	<b>5.1%</b>	<b>1.9%</b>			
<b>Lodestar</b>		<b>\$ 125,744</b>	<b>\$ 6,588</b>	<b>\$ 30,419</b>	<b>\$ 23,831</b>	<b>\$ 16,081</b>	<b>\$ 209,250</b>	<b>\$ 50,181</b>	<b>\$ 87,963</b>	<b>\$ 30,419</b>	<b>\$ 11,470</b>	<b>\$ 591,945</b>		
<b>% of Lodestar</b>		<b>21.2%</b>	<b>1.1%</b>	<b>5.1%</b>	<b>4.0%</b>	<b>2.7%</b>	<b>35.3%</b>	<b>8.5%</b>	<b>14.9%</b>	<b>5.1%</b>	<b>1.9%</b>			

Category Key	
A	= Investigation, Research, Complaints
B	= TRO / Preliminary Injunction / Service
C	= Leadership / Intervention Motions
D	= Case Management, Client Updates
E	= Ongoing Research
F	= Non-Discovery Motions and Briefing
G	= Discovery Negotiations, Disputes, Briefing
H	= Discovery / Document Review
I	= Settlement Negotiations
J	= Settlement Approval, Class Member Communications