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ELECTRONICALLY  
**FILED**  
Superior Court of California,  
County of San Francisco  
**05/01/2019**  
Clerk of the Court  
BY: ERNALYN BURA  
Deputy Clerk

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18 *Attorneys for Prospective Intervenor R.A. Feuer*

19 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

20 **COUNTY OF SAN FRANCISCO**

21 IN RE WELLS FARGO & COMPANY )  
22 AUTO INSURANCE DERIVATIVE )  
23 LITIGATION )

Lead Case No. CGC-17-561118

**DECLARATION OF RICHARD  
GREENFIELD IN SUPPORT OF EX  
PARTE APPLICATION TO  
CONTINUE HEARING DATE ON  
PLAINTIFFS' MOTION FOR  
PRELIMINARY APPROVAL**

24 This Document Relates To: )  
25 ALL ACTIONS )  
26 WELLS FARGO & COMPANY, )

27 Nominal Defendant, )

JUDGE: Hon. Teri Jackson  
DEPT: 613  
HEARING DATE: May 3, 2019  
TIME: 10:00 A.M.

28 R.A. FEUER, )  
Plaintiff/Intervenor. )

1 I, Richard D. Greenfield declare as follows:

2 1. I am a partner with Greenfield & Goodman, LLC one of the firms representing  
3 Prospective Intervenor R.A. Feuer ("Mr. Feuer"). I am the attorney principally responsible  
4 for representing Mr. Feuer in a shareholder derivative action styled *R.A. Feuer, derivatively*  
5 *on behalf of Wells Fargo & Co. v. John D. Baker, et al*, C.A. No. 3:18-cv-02866, pending in the  
6 United States District Court for the Northern District of California. I am an attorney duly  
7 licensed to practice before all the courts in the States of New York, Pennsylvania and  
8 Maryland. I am in good standing in each such jurisdiction. I will be filing an application to  
9 appear *pro hac vice* in this action. I submit this declaration in support of Mr. Feuer's *ex*  
10 *parte* application to continue the hearing date on Plaintiffs' Motion for Preliminary  
11 Approval so that it can be heard concurrently with Mr. Feuer's Motion to Intervene. I have  
12 personal knowledge of the facts stated below and, if called upon, I could and would  
13 competently testify thereto.

14 2. Good cause exists to continue the hearing on Plaintiffs' Motion for  
15 Preliminary Approval so that it can be heard concurrently with Mr. Feuer's Motion to  
16 Intervene. I will be out of the country from May 1 -19, 2019 and therefore unavailable to  
17 attend the May 10, 2019 preliminary approval hearing.

18 3. Although Plaintiffs filed their Motion for Preliminary Approval on April 16,  
19 2019, it did not appear on the public docket until April 22, 2019. Even then, the Stipulation  
20 of Settlement and Exhibits thereto, including the proposed corporate therapeutics  
21 constituting the only consideration for the proposed settlement, were not available on the  
22 public docket. I have repeatedly requested a full set of the settlement papers from counsel  
23 for Wells Fargo, but a set of the papers was not provided to me until after the close of  
24 business on April 23, 2019.

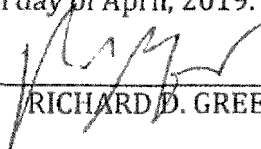
25 4. Mr. Feuer moved to intervene in this action on April 29, 2019, as soon as  
26 possibly feasible after he became aware of the pending Motion for Preliminary Approval  
27 and was able to obtain the Stipulation of Settlement and related exhibits.

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5. On April 29, 2019, counsel for Mr. Feuer provided notice of the subject *ex parte* hearing to all interested parties by way of electronic transmission to File & ServeXpress, which also described the nature of the relief to be sought.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 29th day of April, 2019.

  
\_\_\_\_\_  
RICHARD D. GREENFIELD