

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

BRIANA WRIGHT, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

SOUTHERN NEW HAMPSHIRE
UNIVERSITY,

Defendant.

Civil Action No. 1:20-cv-00609-LM

Hon. Landya B. McCafferty

**DECLARATION OF BRIANA WRIGHT IN SUPPORT OF PLAINTIFF’S MOTION
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND MOTION FOR
ATTORNEYS’ FEES, COSTS, EXPENSES, AND INCENTIVE AWARD**

I, Briana Wright, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an adult over the age of 18 and a resident of the State of New Hampshire. I am the Class Representative in the lawsuit entitled *Wright v. Southern New Hampshire University*, Case No. 1:20-cv-00609-LM, currently pending in the United States District Court for the District of New Hampshire. I make this Declaration in support of (i) the Motion for Final Approval of Settlement, and (ii) the Motion for Attorneys’ Fees, Costs, Expenses, and Incentive Award. The statements made in this Declaration are based on my personal knowledge and, if called as a witness, I could and would testify thereto.

2. I was enrolled as a student in the “campus experience” program at Southern New Hampshire University (“SNHU”) for the Spring 2020 Semester.

3. I paid approximately \$15,378 in tuition and fees to SNHU for the Spring 2020 Semester.

4. I assisted with the litigation of this case by detailing my Spring 2020 course schedule, tuition and fee payments, and experience with the transition to remote learning.

Specifically, I described to my lawyers my relationship as a student of SNHU during the Spring 2020 Semester. I also provided my lawyers with documentation confirming the same.

5. I also worked with my attorneys to prepare the First Amended Class Action Complaint. I carefully reviewed the First Amended Class Action Complaint for accuracy and approved it before it was filed.

6. During the course of this litigation, I kept in regular contact with my lawyers. Specifically, I conferred with them regularly by phone and e-mail to discuss the status of the case. We also discussed case strategy, motions, anticipated document and deposition discovery, and the prospects of settlement. Furthermore, when appropriate, I informed my attorneys of additional facts for their research and consideration.

7. I also coordinated with my lawyers to search for documents that we anticipated that SNHU would request in formal discovery, such as copies of my Spring 2020 billing statement, course schedule, and course syllabi. I was also prepared to testify at deposition and trial, if necessary.

8. My lawyers have kept me well informed in regard to the efforts to resolve this matter. They promptly communicated settlement offers to me and coordinated with me in advance of mediation. I also discussed the Class Action Settlement Agreement with them and gave my approval prior to signing it.

9. Based on the interactions and my relationship with my attorneys, I believe they have fairly and adequately represented me and the Settlement Class and will continue to do so.

10. Throughout this litigation, I understood that, as a Class Representative, I have an obligation to protect the interests of other Settlement Class Members and not act just for my own personal benefit. I do not have any conflicts with other Settlement Class Members. I have done

my best to protect the interests of other Settlement Class Members and will continue to fairly and adequately represent the Settlement Class to the best of my ability.

I declare under penalty of perjury that the above and foregoing is true and accurate.

Executed this 11 day of June, 2021 at Concord, New Hampshire.

Briana Wright
Briana Wright (Jun 11, 2021 14:27 EDT)

Briana Wright


2021.06.11 TO SIGN Wright Declaration (Corrected)

Final Audit Report

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