

Exhibit 7:
Declaration of John V. Ferris

1 ANDREW R. MUEHLBAUER, ESQ.
Nevada Bar No. 10161
2 MUEHLBAUER LAW OFFICE, LTD.
7915 West Sahara Avenue, Suite 104
3 Las Vegas, Nevada 89117
Telephone: 702.330.4505
4 Facsimile: 702.825.0141
Email: andrew@mlolegal.com
5

6 POMERANTZ LLP
Jeremy A. Lieberman (*pro hac vice*)
Murielle J. Steven Walsh (*pro hac vice*)
7 Emily C. Finestone (*pro hac vice*)
600 Third Avenue, 20th Floor
8 New York, New York 10016
Tel: (212) 661-1100
9 Fax: (917) 463-1044
Email: jalieberman@pomlaw.com
10 mjsteven@pomlaw.com
efinestone@pomlaw.com
11

12 *Attorneys for Class Representatives John V. and JoAnn M. Ferris*

13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 JOHN V. FERRIS and JOANN M. FERRIS,
16 Individually and on Behalf of All Others
Similarly Situated,

17 Plaintiffs,

18 v.

19 WYNN RESORTS LIMITED, et al.,

20 Defendants.
21
22
23
24
25
26
27

Case No. 2:18-CV-00479-CDS-BNW

**DECLARATION OF JOHN V. FERRIS
IN SUPPORT OF (I) FINAL APPROVAL
OF CLASS ACTION SETTLEMENT
AND (II) LEAD COUNSEL'S MOTION
FOR ATTORNEYS' FEES, LITIGATION
EXPENSES, AND COMPENSATORY
AWARDS**

28 {00639085;5 }

DECLARATION OF JOHN V. FERRIS

1 I, John V. Ferris, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the
2 following is true and correct:

3 1. I submit this declaration in support of (I) final approval of the class action
4 settlement in the above-captioned action (the “Action”), and (II) Lead Counsel’s motion for
5 attorneys’ fees, litigation expenses, and compensatory awards to Plaintiffs, including a
6 compensatory award to me in the amount of \$ 30,000 (thirty thousand dollars) for time spent
7 directly related to my representation of the Class.

8 2. On December 4, 2018, I, along with my wife, JoAnn M. Ferris, was appointed lead
9 plaintiff (the “Lead Plaintiffs”) in this Action. On March 1, 2023, the Court appointed me, along
10 with my wife and Jeffrey Larsen, as class representatives (the “Class Representatives”) in this
11 Action. At all times, I have diligently pursued the effective prosecution of this Action and actively
12 monitored its progress.

13 3. I retained the Pomerantz Firm to represent myself and the Class, and throughout
14 the Action, I have remained in regular contact with Lead Counsel, who have provided me with
15 periodic updates regarding all aspects of the case. Among other things, I reviewed complaints
16 filed in the action, significant court rulings in the case, and actively cooperated in discovery by
17 searching for and producing documents responsive to Defendants’ Wynn Resorts, Ltd. and
18 Matthew O. Maddox’s First Requests for Production to Plaintiffs John V. Ferris, JoAnn Ferris,
19 and Jeffrey Larsen, responding to Defendants’ First and Second Sets of Interrogatories, and
20 providing deposition testimony.

21 4. I provided testimony in my deposition on September 9, 2022. My deposition lasted
22 nearly 5 hours. In connection that that deposition, I spent many hours reviewing documents,
23 preparing for the deposition with Lead Counsel, and attending the deposition. I also accompanied
24 my wife to her deposition. In addition, I reviewed my deposition testimony for accuracy.

25 5. In addition, I submitted a declaration in support of the motion for class certification.

1 6. Further, I had several calls with Lead Counsel about the range of possible monetary
2 outcomes for the Action and the risks of proceeding to trial, and granted Lead Counsel settlement
3 authority to settle the Action in the range that they did.

4 7. I have spent approximately 200 hours prosecuting this case. I estimate that my
5 hourly compensation for my time is \$200 per hour.


6 8. In light of the foregoing, I respectfully request that the Court approve an award to
7 me in the amount of \$30,000 (thirty thousand dollars) to compensate me for the time I expended,
8 and the risks I took on, as a Lead Plaintiff and Class Representative in this Action.

9 9. I am very satisfied with the representation I received in this Action. I support Lead
10 Counsel’s application for attorneys’ fees and believe that the request fee is reasonable in light of
11 the expertise of my counsel, the amount of work they performed on my behalf and on behalf of
12 the Class towards the successful resolution of this Action, the large out-of-pocket expenses they
13 incurred, and the fact that Plaintiffs’ Counsel took on considerable risk over a six-year period, with
14 no guarantee of any recovery.

15 10. I also support reimbursement of attorneys’ expenses as requested by Lead Counsel,
16 as I believe these expenses have been reasonably incurred while prosecuting this Action on behalf
17 of the Class.

18 11. In sum, I respectfully request that the Court approve the Settlement, award me
19 \$30,000 (thirty thousand dollars), approve Lead Counsel’s requested attorneys’ fees, and award
20 Lead Counsel full reimbursement of expenses.

21 Executed this 13 day of December, 2024



John V. Ferris

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2024, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Murielle J. Steven Walsh
Murielle J. Steven Walsh