

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AKILAH HUGHES,

Plaintiff,

-against-

CARL BENJAMIN,
a/k/a Sargon of Akkad, et al.,

Defendants.

Civ. Action No. 17-cv-6493 (RJS)

**DECLARATION OF KRISTIN GRANT IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANT'S MOTION FOR ATTORNEY'S FEES AND COSTS**

Kristin Grant, pursuant to 28 U.S.C. § 1746 hereby declares as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The evidence set out in the foregoing Declaration is based on my personal knowledge.
2. I am the attorney for Plaintiff and I submit this Declaration in support of Plaintiff's opposition to Defendant's motion for attorney's fees and costs.
3. On April 10, 2018, I spoke to Defendant's counsel Wesley Mullen, Esq via telephone and provided Plaintiff's initial offer of \$46,000 to settle this lawsuit. Defendant's counsel confirmed that Defendant will not accept the offer and will not provide a counteroffer. Defendant filed its motion to dismiss ten days later on April 20, 2018.
4. Attached hereto as Exhibit A is a true and correct webpage printout showing Defendant's Gofundme campaign, which is available at <https://www.gofundme.com/f/sargon-of-akkad-legal-fund> (last accessed March 3, 2020).

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



Executed on March 4, 2020

Kristin Grant