

# **Exhibit 4**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

ALICE RADEN and BOBBIE  
MOORE, individually and on behalf of  
the settlement classes,

Plaintiffs,

v.

MARTHA STEWART LIVING  
OMNIMEDIA, INC., a Delaware  
corporation, and MEREDITH  
CORPORATION, an Iowa corporation.

Defendants.

Case No.: 4:16-cv-12808

Hon. Linda V. Parker

**DECLARATION OF BOBBIE MOORE IN SUPPORT OF MOTION FOR  
ATTORNEYS' FEES AND INCENTIVE AWARDS AND MOTION FOR  
FINAL APPROVAL OF THE PARTIES' CLASS ACTION SETTLEMENT**

I, Bobbie Moore, 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 Michigan. I am one of the Class Representatives in the lawsuit captioned *Raden, et al v. Martha Stewart Omnimedia Inc., et al.*, Case No. 4:16-cv-12808-LVP-APP, currently pending in the United States District Court for the Eastern District of Michigan. I make this Declaration in support of (i) the Motion for Attorneys' Fees, Expenses, and Incentive Awards, and (ii) the Motion for Final Approval of Class Action Settlement. 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 purchased a subscription to *Martha Stewart Living* magazine from Defendants, which started in May of 2015.

3. I assisted with my attorneys' investigation in this case by detailing my magazine subscription purchase history. Specifically, I described how I subscribed to *Martha Stewart Living* magazine and how much I paid. I also informed my counsel that I did not agree in writing or otherwise to allow Defendants to sell or disclose my personal reading information, that I did not receive notice of such disclosures, and that I was unaware of such disclosures entirely.

4. I also worked with my attorneys to prepare the Class Action Complaint and Demand for Jury Trial. I carefully reviewed the Class Action Complaint and Demand for Jury Trial for accuracy and approved it before it was filed on July 31, 2016. From that point on, I have preserved any documents related to my *Martha Stewart Living* subscription.

5. During the course of this litigation, I kept in regular contact with my attorneys. Specifically, I conferred with my counsel via telephone and email multiples times throughout the litigation of my claims to discuss the status of the case, pending motions, case strategy, and the prospects of settlement.

6. My lawyers have kept me informed in regard to their efforts to resolve this matter. I discussed the Class Action Settlement Agreement with them, reviewed it, and gave my approval prior to signing it.

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

8. Throughout the litigation of my claims, I understood that, as a Class Representative, I have an obligation to protect the interests of other class members and not act just for my own personal benefit. I do not have any conflicts with other members of the Settlement Classes. I have done my best to protect the interests of other members of the Settlement Classes and will continue to fairly and adequately represent the Settlement Classes to the best of my ability.

9. I estimate that I spent approximately 15 hours working with my lawyers on this case.

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

Executed on Junr 3 2019 at Rockford Mi.

*Bobbie Moore*

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Bobbie Moore