

EXHIBIT D

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AGUSTIN CACURRI, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

SONY INTERACTIVE ENTERTAINMENT
LLC,

Defendant.

Case No. 3:21-cv-03447-AMO

**DECLARATION OF
CHRISTOPHER B. HOCKETT**

I, Christopher B. Hockett, declare as follows:

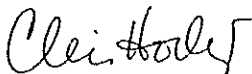
1. I am the principal at Hockett ADR Services, a provider of mediation and arbitration services. As further described below, I served in this case both as a Court-appointed Early Neutral Evaluator and as a mediator. I have personal knowledge of the matters stated below.
2. My background is in complex commercial litigation. Previously I was a partner at Davis Polk & Wardwell LLP, where I headed the firm's global antitrust practice. Over my 35-year practice career, I served as lead counsel in more than three dozen jurisdictions around the United States and handled trials, appellate arguments, and many class actions and mediations. In 2013-14, I served as the elected Chair of the ABA Section of Antitrust Law, a worldwide professional association. I teach advanced courses on antitrust and digital platforms at Berkeley Law and University of Virginia School of Law, as well as an upper-level negotiations course at Berkeley Law. For the last several years, I have also co-chaired an intensive Federal Judicial Center antitrust training program for federal judges that alternates between Berkeley and the University of Chicago.
3. I have been on the panel of the Northern District of California's ADR Program since 2019, and am also a member of the ADR Local Rules Committee. For eight years I have served as a Court-appointed Special Master in a Northern District class action regarding the constitutionality of health care services in the California state prison system. In October 2024, I received the Award for Excellence in Ethics in Complex Litigation presented by the Center For Litigation and Courts at UC Law San Francisco.
4. On November 16, 2023, the Court appointed me as an Early Neutral Evaluator in this case under ADR Local Rule 5. On January 24, 2024, I conducted an Early Neutral Evaluation (ENE) by Zoom, with parties and counsel participating. The parties submitted briefs and binders of supporting factual materials in advance, and presented detailed oral arguments at the ENE session. In accordance with the applicable ADR Local Rules, all ENE proceedings were conducted in joint session, which lasted approximately four hours. At the end of the ENE session, I presented my evaluation of the case to

both sides. I performed this service for the Court and parties as a volunteer member of the ENE panel, and received no compensation.

5. In August of 2024, counsel jointly reached out to retain me as a paid private mediator. An initial mediation date was scheduled, and both sides again submitted extensive statements and supporting materials ahead of time.
6. In September 2024, I convened the parties and counsel by Zoom for a series of joint mediation sessions:
 - a. September 3: First session (3 hours)
 - b. September 6: Second session (1.5 hours)
 - c. September 10: Third session (1.5 hours)
7. In between and after the above Zoom sessions I had many email communications and more than a dozen telephone calls with counsel on both sides to discuss and convey offers and counteroffers. I have not attempted to add up the total time of these calls, but estimate that they amounted to several hours. The last of the telephone calls took place on the afternoon of Sunday, September 15, 2024, when a settlement was finally agreed to, subject to formal documentation.
8. Without breaching or waiving the confidentiality that must attend ADR proceedings, I can attest that I observed only serious, arm's-length, good faith settlement negotiations during the September 2024 mediation process that culminated in the settlement.

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

Executed this 6th day of August 2025.



Christopher B. Hockett