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10 Attorneys for Defendant
11 BUMBLE TRADING, INC.

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF RIVERSIDE

14 KIRILOSE MANSOUR, individually on behalf
15 of himself and all others similarly situated,

16 Plaintiff,

17 vs.

18 BUMBLE TRADING, INC, a Delaware
19 corporation; and DOES 1-10, inclusive, and each
20 of them,

21 Defendants.

Case No. RIC1810011
(Assigned to the Honorable Sunshine S. Sykes)

**DECLARATION OF CAROLINE ELLIS
ROCHE IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: May 18, 2021
Time: 8:30 a.m.
Dept.: 06

Complaint Filed: May 29, 2018

1 I, Caroline Ellis Roche, declare:

2 1. I am the Chief of Staff of Bumble Trading, Inc. (“Bumble”), the defendant in a
3 putative class action case brought by Plaintiff Kirilose Mansour (“Mansour”). I make this declaration
4 in support of Mansour’s Motion for Preliminary Approval of Class Action Settlement. I have
5 personal knowledge of the facts set forth herein, and if called as a witness, I could and would testify
6 competently thereto.

7 2. I have been employed at Bumble since 2014 and have been Chief of Staff of Bumble
8 since 2018. As Chief of Staff, I have overall responsibility for overseeing strategic business
9 initiatives in partnership with the executive leadership team. In my role, I am personally familiar
10 with the corporate structure of Bumble and its related companies and the role each plays with respect
11 to the Bumble dating app, a dating app that serves millions of users in several countries worldwide.
12 I have reviewed the complaint filed by Mansour and understand that Mansour claims that Bumble’s
13 “Women Message First” feature discriminates against men, a claim Bumble vigorously disputes.

14 3. As Chief of Staff, I am familiar with each of the companies related to Bumble that
15 have a role in implementing the Bumble dating app’s “Women Message First” feature. The specific
16 related companies involved with implementing the Bumble dating app and its “Women Message
17 First” feature and their roles are as follows:


18 a. **Bumble Inc.** Bumble Inc. is the ultimate parent of Bumble. Bumble Inc. is
19 involved in marketing decisions for its subsidiaries, including Bumble.
20 Among those marketing decisions is the decision to market “Women Message
21 First”. In addition, Bumble Inc., together with Bumble Holding Limited and
22 Bumble Trading LLC, are parties to the Bumble dating app’s terms and
23 conditions entered into with Bumble’s users.

24 b. **Bumble Trading LLC.** Bumble Trading LLC is responsible for decision
25 making and marketing the Bumble dating app in the United States, including
26 its “Women Message First” feature. In addition, Bumble Trading LLC,
27 together with Bumble Holding Limited and Bumble Inc., are parties to the
28 Bumble dating app’s terms and conditions entered into with Bumble’s users.

- 1 c. **Bumble Holding Limited.** Bumble Holding Limited owns rights to
2 Bumble’s trademarks, domain names, user data and other data for the Bumble
3 dating app, including rights to the “Women Message First” feature. Bumble
4 Holding Limited is also involved in decision making regarding the use of the
5 “Women Message First” feature. In addition, Bumble Holding Limited,
6 together with Bumble Inc. and Bumble Trading LLC, are parties to the
7 Bumble dating app’s terms and conditions entered into with Bumble’s users.
- 8 d. **Bumble IP Holdco LLC.** Bumble IP Holdco LLC owns intellectual
9 property related to the Bumble dating app, including intellectual property that
10 protects the “Women Message First” feature and creates its functionality,
11 specifically, the ability for women and not men to message first.
- 12 e. **Badoo Trading Limited.** Badoo Trading Limited provides services to
13 Bumble IP Holdco related to the technology that operates the Bumble dating
14 app, including providing the functionality for the “Women Message First”
15 feature, specifically, the ability for women and not men to message first.
- 16 f. **Badoo Limited.** Badoo Limited creates and implements the backend
17 technology used for matching and messaging, including implementation of the
18 “Women Message First” feature, specifically, the ability for women and not
19 men to message first. Badoo Limited is also involved in the decision making
20 regarding the use of the “Women Message First” feature.

21 4. I also have reviewed data provided by Bumble’s information technology department.
22 That data indicates that Bumble’s sole contact information for 464,000 class members who are
23 former Bumble users consists of telephone numbers. Bumble has the ability to contact all other
24 current and former Bumble dating app users either through push notifications or by email.

25 I declare under penalty of perjury that the foregoing is true and correct. Executed this ____
26 day of May 2021, at Austin, Texas.

27 

28 _____
Caroline Ellis Roche

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the age of 18
3 and not a party to the within action; my business address is 1999 Avenue of the Stars, 9th Floor,
4 Los Angeles, California 90067.

5 On May 10, 2021, I served the foregoing document(s) described as **DECLARATION
6 OF CAROLINE ELLIS ROCHE IN SUPPORT OF MOTION FOR PRELIMINARY
7 APPROVAL OF CLASS ACTION SETTLEMENT** on the interested parties in this action by
8 placing a true copy thereof enclosed in sealed envelopes addressed as follows:

9 Todd M. Friedman, Esq.
10 Adrian R. Bacon, Esq.
11 Thomas E. Wheeler, Esq.
12 LAW OFFICES OF TODD M. FRIEDMAN, P.C.
13 21550 Oxnard Street, Suite 780
14 Woodland Hills, CA 91367
15 Email: tfriedman@toddfllaw.com
16 abacon@toddfllaw.com
17 twheeler@toddfllaw.com

18 Steven S. Soliman, Esq.
19 THE SOLIMAN FIRM
20 245 Fischer Avenue, Ste. D-1
21 Costa Mesa, CA 92626
22 Email: ssoliman@thesolimanfirm.com

- 23 (BY MAIL) The envelope was mailed with postage thereon fully prepaid. I am readily
24 familiar with the firm’s practice of collection and processing correspondence for mailing.
25 Under that practice it would be deposited with U.S. postal service on that same day with
26 postage thereon fully prepaid at Los Angeles, California in the ordinary course of
27 business. I am aware that on motion of the party served, service is presumed invalid if
28 postal cancellation date or postage meter date is more than one day after date of deposit
for mailing in affidavit.
- BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a true copy of the
document to be sent to the persons at the corresponding electronic address as indicated
above on the above-mentioned date.
- (BY OVERNIGHT MAIL) I am readily familiar with the firm’s practice of collection
and processing correspondence for mailing with an overnight courier service. Under that
practice it would be deposited with said overnight courier service on that same day with
delivery charges thereon billed to sender’s account, at Los Angeles, California in the
ordinary course of business. The envelope was sealed and placed for collection and
mailing on that date following ordinary business practices.

I declare under penalty of perjury under the laws of the State of California that the above
is true and correct.

Executed on May 10, 2021, at Los Angeles, California.



Thomas Wheeler