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16 on behalf of himself and all others similarly situated

17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
18 **FOR THE COUNTY OF RIVERSIDE**

19 KIRILOSE MANSOUR, individually on )  
20 behalf of himself and all others similarly )  
21 situated, )

22 Plaintiff, )

23 vs. )

24 BUMBLE TRADING, INC., a Delaware )  
25 corporation; and DOES 1-10, inclusive, and )  
26 each of them, )

27 Defendants. )  
28 \_\_\_\_\_ )

**CASE NO.:** RIC1810011

**DECLARATION OF KIRILOSE  
MANSOUR IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT**

**DECLARATION OF KIRILOSE MANSOUR**

I, Kirilose Mansour, declare:

1. I am the named plaintiff in this action. I have personal knowledge of the following facts and, if called upon as a witness, could and would competently testify thereto, except as to those matters which are explicitly set forth as based upon my information and belief and, as to such matters, I am informed and believe they are true and correct.
2. I am writing this declaration in support of Plaintiff's Motion for Preliminary Approval in the above-captioned action.
3. My attorneys have informed me of the responsibilities of a class representative. I understand these responsibilities and am willing and prepared to put the interest of the class members before my own. Throughout this case, I believe that I served as an adequate class representative.
4. I knew that by filing the class action complaint, I might have an obligation for some or all of Defendant's legal costs if the case was not successfully litigated. Even knowing the pitfalls, I was not scared to stand up for what I believe is right, however, I was concerned about the possibility of losing and having a judgment filed against me for costs if we lost the case.
5. During the pendency of the litigation, I spent considerable time searching for documentation relating to the class action and also reviewing documents and settlement papers. I worked extensively to audit duties and hours worked to assist with the lawsuit. I had many conversations with the attorneys at The Soliman Firm and The Law Offices of Todd M. Friedman, P.C, including with Todd Friedman, Adrian Bacon, and several staff members regarding the case and the strength of the claims we alleged in the Complaint.
6. I stayed in touch with my attorneys, by phone and email on a regular basis, and was fully aware of all significant developments in the case as I took the duty and privilege of acting as a Class Representative in this case very seriously. Throughout the life of this case, I have had several dozen calls with my attorneys and have exchanged several dozens of emails as well. I worked with my attorneys throughout the case, assisting in discovery that was served on me, and assisting in drafting the complaint by providing information and documentation to support the claims. I sat for a deposition and provided written testimony as needed. I also regularly discussed the case with my attorneys when they had questions, and also participated

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in the mediation, by speaking with my attorneys about the status of settlement discussions. I was therefore very much involved in the settlement process, consulting with my attorneys on the facts and terms relevant to the settlement, and reviewing and signing the settlement documents once we reached a deal.

7. For the past two years, I was intimately involved with the class action lawsuit performing the duties discussed above. While I didn't keep accurate time records, I was in regular contact with my attorneys regarding the status of the case and ways in which I could help move the case towards settlement. I expended considerable time on the issues presented during the litigation and in the settlement process. I estimate that I spent between twenty (20) and thirty (30) hours working on this case.

8. While I truly believe I was doing the right thing in pursuing this case on behalf of the Class who now stand to receive substantial monetary payments as a result of this case and settlement, I believe that the requested enhancement of \$10,000 from the Settlement is fair compensation for the work I performed and the risk I undertook.

9. I have agreed to a class settlement in this case with Defendant. I have reviewed the Complaint, the Settlement Agreement, and other related materials, and have discussed their contents with my attorneys.

10. I believe that the settlement achieved is a fair result for the Class, and is fair and reasonable, considering the potential risks of going forward with litigation, especially in light of some of the defenses that Defendant has raised with regards to its defenses to certifying the case as a class action, and its arguments regarding the freedom of association under the Constitution. While I disagree with these defenses, I recognize that the Court or a Jury may find them compelling. In determining that this Settlement is fair and reasonable, I considered these defenses, and listened to the advice of my counsel, in giving them due weight.

11. The settlement achieved was for a total sum of approximately \$67 million, comprised of the Super Swipe component and the claims made components. In light of the serious risks of going forward with this case, the chance that we did not win on class certification, the likelihood of appeals, the potential for lengthy delay, and the ultimate uncertainty of

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recovery through litigation of the claims brought under the Unruh Civil Rights Act, I believe the settlement is fair and reasonable and represents a fair result for Class Members.

12.I understand that by settling this case, both Parties were able to avoid costly and time consuming additional litigation and trial. I understand that there are approximately two million Settlement Class Members who will receive benefits from this Settlement.

13.To my knowledge, I have no interest that is not in line with the class members. My goal in bringing this case was to ensure that Defendant was made aware of the requirements under the law, and that I could achieve a fair result for the Class Members who I believed were affected by the policies and practices that affected me. I believe that both of these goals have been achieved by this settlement, and I am proud to have been a part of it.

14.I respectfully request the Court approve the Motion for Preliminary Approval.

I declare under penalty of perjury under the laws of California and the United States that the foregoing is true and correct, and that this declaration was executed on December 7, 2020.

  
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Kirilose Mansour