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10 Attorneys for Plaintiff KIRILOSE MANSOUR,  
on behalf of himself and all others similarly situated

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12 **SUPERIOR COURT OF CALIFORNIA**  
13 **COUNTY OF RIVERSIDE**

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

15  
16 Plaintiff,

17 vs.

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

20 Defendants.,  
21

Case No.: RIC1810011

*Assigned for All Purposes to the Honorable  
Sunshine S. Sykes*

CLASS ACTION

**DECLARATION OF KIRILOSE  
MANSOUR IN SUPPORT OF  
PLAINTIFF'S MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT AND MOTION FOR  
ATTORNEYS FEES AND COSTS**

**Date: October 7, 2021**

**Time: 8:30 a.m.**

**Dept: 06**

**Honorable Sunshine S. Sykes**

**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 final approval attorney’s fees and incentive award in the above-captioned action.
3. My attorneys informed me at the beginning of this litigation 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. I worked with my attorneys throughout the case, assisting in informal discovery that was requested of me, and assisting in drafting the complaint. I also participated in a deposition, regularly discussed the case with my attorneys when they had questions, and also participated in the mediation by speaking with my attorneys about the status of settlement discussions.
4. My best estimate is that I spent approximately 25-30 hours of my time in connection with this case to date. The activities I have performed have included, but have not been limited to: obtaining legal counsel, numerous telephone conversations with my attorneys, numerous emails with my attorneys, gathering documents relating to the practices of Defendant for my attorneys, preparing for opposing the Motion for Summary Judgment and supporting the Motion for Class Certification, reviewing documents with my attorneys and assisting them in developing the claims in this case, being actively involved in the settlement process to ensure a fair result for the Class as a whole, and spending time carefully reviewing the Settlement, and other case related documents on my own and with my attorneys to make sure that Settlement and the other work my attorneys performed are in the best interests of the Class.
5. I also understand that my attorneys have submitted an application to this Court for an Incentive Award to compensate me for my unique contributions to the success of this action in the amount of \$10,000. I believe this amount is fair and reasonable compensation for my efforts in this case and the risks I have taken in pursuing a fair recovery for the Class. Before I filed this case, my counsel advised me of the possibility that, if the case was lost, I could have been ordered to pay Defendant’s costs, which easily could have totaled tens of thousands of dollars

1 by the end, if not even more. While this posed a significant risk to me, I believed it was worth  
2 it to bring this Class Action on behalf of myself and others.

3 6. With regards to any adverse consequences, there is now a public record-this publicly filed  
4 lawsuit-that I served as a class representative in a consumer class action lawsuit against  
5 Defendant and my identity has been numerously published across the internet on various  
6 websites in light of the broad notice plan that was sent out.

7 7. I have not received any benefits from prosecuting this action, and the only benefits I expect to  
8 receive are any incentive award granted by the Court and my pro rata share of the Common  
9 Fund.

10 8. I have not incurred any significant expenses in bringing this action, as my attorneys agreed to  
11 pay all Court and procedural costs on my behalf as part of our retainer.

12 9. I have no individual claims in this lawsuit separate and apart from the Class Claims which  
13 have been resolved, though I was required to execute a 1542 Waiver of all individuals claims  
14 I may have had, even if unknown.

15 10. I have not been named as a class representative in any other lawsuit.

16 11. I expect to receive two pro rata shares from the Common Fund, the same as any Settlement  
17 Class Member who filed a Claim and opted not to receive Super Swipes. My understanding is  
18 that based off the claims rate thus far, this would be somewhere between \$150 to \$300, though  
19 will likely be significantly less with more claims being filed.

20 12. I have agreed to a class settlement in this case with Defendant. I have reviewed the Complaint,  
21 the Settlement Agreement, and other related materials, and have discussed their contents with  
22 my attorneys. I believe that the settlement achieved is an outstanding result for the Class, and  
23 is fair and reasonable, considering the potential risks of going forward with litigation, especially  
24 in light of some of the defenses that Defendant has. In determining that this Settlement is fair  
25 and reasonable, my attorneys advised me that about the substantial risks of not having class  
26 certification approved. In light of the serious risks of going forward with this case, the chance  
27 that we did not win on class certification, the chance that we lost at the summary judgment  
28 stage, the likelihood of appeals, the potential for lengthy delay, and the ultimate uncertainty of  
recovery through litigation of the claims brought under California consumer laws, I believe the  
settlement is fair and reasonable and represents an outstanding result for Class Members.

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13. I understand that by settling this case, both Parties were able to avoid costly and time consuming additional litigation and trial.

14. For these reasons, I believe the Incentive Award requested is fair and reasonable. I respectfully request the Court approve the Motion for Final Approval, and the requested Incentive Award.

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 September 1, 2021.

Executed on September 1, 2021 at Riverside, California.



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**KIRILOSE MANSOUR**  
Declarant