

EXHIBIT 8

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

IN RE PAYMENT CARD
INTERCHANGE FEE AND
MERCHANT DISCOUNT
ANTITRUST LITIGATION

MDL No. 1720
Case No. I :05-md-1720-JG-JO

[REDACTED]

DECLARATION OF MICHAEL SCHUMANN
OF TRADITIONS LTD.

I, Michael Schumann, being of full age, do hereby declare and say:

1. I along with my wife, Suzanne, co-founded Class Plaintiff Traditions Ltd. ("Traditions") in 1987 in St. Paul, Minnesota. I serve as Secretary and Treasurer and generally run and manage the "back-office" responsibilities of our business. I submit this declaration in support of Class Plaintiffs' petition for service awards in connection with services rendered in the above-entitled action.

2. Traditions was one of the original named class representatives in *Photos Etc. v. Visa U.S.A., Inc. et al.*, the first of the cases challenging the fixing of interchange fees to be consolidated into MDL 1720, which was filed on June 22, 2005 in the United States Court for the District of Connecticut.

3. Since that time, Traditions has worked closely with Robins Kaplan LLP and the other Co-Lead Counsel for more than 13 years in the prosecution of this action, starting from the beginning through the pendency of the appeal in the Second Circuit, the remand back to the District Court and every step since, including participating in extensive discovery efforts.

4. I frequently discussed the status of the litigation and Traditions's discovery efforts with K. Craig Wildfang and with Ryan Marth of Robins Kaplan.

5. Following the remand from the Second Circuit, Defendants served supplemental discovery requests on each of the named Class Plaintiffs. On October 20, 2017, the Defendants served their Second Set of Interrogatories on each of the named Class Plaintiffs. Thirty-five interrogatories, several of which were multi-part, called for detailed review and analysis by Traditions. The interrogatories called for years' worth of information regarding every aspect of Traditions's payment acceptance. The interrogatories requested details of every program considered to enhance customer loyalty, all fees incurred, all plans or considerations regarding surcharges, discounts, the total costs incurred related to every type and brand of payment accepted and other similarly detailed requests. Traditions undertook significant efforts to provide detailed answers to these interrogatories. On December 4, 2017, Traditions provided its responses.

6. On September 11, 2017, Defendants served their Second Set of Requests for Production and Inspection of Documents to Each of the Putative Rule 23(b)(3) Class Plaintiffs. This set included 110 individual requests, each of which sought information going back to at least 2006, while a significant portion of the requests sought information extending back to 2000. Responding to these requests was very challenging. It took Traditions significant time and effort to respond to these requests.

7. Suzanne and I personally worked with attorneys at Robins Kaplan to identify documents that were likely to be responsive to Defendants' document requests and interrogatories.

8. We spent considerable time and effort gathering materials responsive to Defendants' document requests. We are a small business with very limited staff. During this second round of litigation, Traditions produced 7,172 documents. Our production required Suzanne and me to search through our electronic files and email systems using key words, and conduct a manual review of hard copy documents, which resulted in substantial production of additional documents. I gave the attorneys and staff at Robins Kaplan access to my work PC, from which I understand that they performed additional work to produce documents.

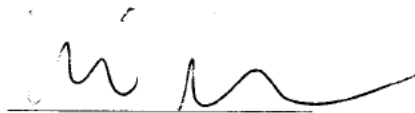
9. For document production, I estimate that I spent approximately [REDACTED] collecting and producing documents and responding to attorney inquiries. I estimate I spent approximately [REDACTED] reviewing and collecting information to respond to the Defendants' interrogatories. I also spent [REDACTED] preparing for deposition, which was scheduled for July 10, 2018, but which ultimately did not occur, as the parties had agreed to terms on a new settlement.

10. As I stated in Paragraphs 16-17 of my declaration of July 11, 2014 [ECF No. 6385-8], it is difficult to assign a value to an hour of a small-business owner's time. Nonetheless, in connection with that previous declaration, I endeavored to calculate the value of my time and arrived at an hourly value of [REDACTED]. The assumptions that went into that calculation are similar today to what they were in 2014. I therefore feel that [REDACTED] is a fair, if not conservative, estimate of the value of my time.

11. Discovery represents only a fraction of the time I spent on this case. I spent approximately [REDACTED] reviewing pleadings, settlement drafts, and other documents and providing substantive input to Co-Lead Counsel. Traditions has requested and received regular status updates regarding the case in this second phase. I regularly spoke with the attorneys prosecuting the litigation and provided reports regarding the litigation to others at Traditions. I estimate that I spent [REDACTED] on client conference calls and meetings with Mr. Wildfang. I estimate I spent approximately [REDACTED] reviewing, researching, and reading articles on the significant antitrust issues surrounding Defendants' market power.

12. Traditions is not seeking reimbursement for its out-of-pocket expenses, incurred since the time of my prior declaration. As I stated in my prior declaration and enumerated in Schedule C to that declaration, Traditions's expenses through 2014 were [REDACTED].

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 4th day of June, 2019, at St. Paul, Minnesota.



Michael Schumann