

Exhibit H

**UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF NEW YORK**

IN RE PAYMENT CARD INTERCHANGE FEE AND
MERCHANT DISCOUNT ANTITRUST LITIGATION

MDL No. 1720

Docket No. 05-md-01720 (BMC-JAM)

This Document Relates To:

BARRY'S CUT RATE STORES INC.; DDMB, INC.
d/b/a EMPORIUM ARCADE BAR; DDMB 2, LLC d/b/a
EMPORIUM LOGAN SQUARE; BOSS DENTAL
CARE; RUNCENTRAL, LLC; CMP CONSULTING
SERV., INC.; TOWN KITCHEN, LLC d/b/a TOWN
KITCHEN & BAR; GENERIC DEPOT 3, INC. d/b/a
PRESCRIPTION DEPOT; and PUREONE, LLC d/b/a
SALON PURE,

Plaintiffs,

v.

VISA, INC.; MASTERCARD INCORPORATED;
MASTERCARD INTERNATIONAL INCORPORATED;
BANK OF AMERICA, N.A.; BA MERCHANT
SERVICES LLC (f/k/a DEFENDANT NATIONAL
PROCESSING, INC.); BANK OF AMERICA
CORPORATION; BARCLAYS BANK PLC;
BARCLAYS BANK DELAWARE; BARCLAYS
FINANCIAL CORP.; CAPITAL ONE BANK, (USA),
N.A.; CAPITAL ONE F.S.B.; CAPITAL ONE
FINANCIAL CORPORATION; CHASE BANK USA,
N.A.; CHASE MANHATTAN BANK USA, N.A.;
CHASE PAYMENTECH SOLUTIONS, LLC;
JPMORGAN CHASE BANK, N.A.; JPMORGAN
CHASE & CO.; CITIBANK (SOUTH DAKOTA), N.A.;
CITIBANK N.A.; CITIGROUP, INC.; CITICORP; and
WELLS FARGO & COMPANY,

Defendants.

**DECLARATION OF ARTHUR
BOSS, JR. OF BOSS DENTAL CARE**

DECLARATION OF ARTHUR BOSS, JR., OF BOSS DENTAL CARE

I, Arthur Boss, Jr., declare and state as follows pursuant to 28 U.S.C. § 1746:

1. I founded Boss Dental Care in 1985 in Corpus Christi, Texas. I submit this declaration in support of Equitable Relief Class Plaintiffs' petition for service awards in connection with services rendered in this case.
2. Boss Dental Care was one of the original named class representatives in the amended complaint filed on behalf of the Rule 23(b)(2) Class in *In re Payment Card Interchange Fee & Merchant Discount Antitrust Litig.*, No. 05-md-01720 (E.D.N.Y.), after the case was remanded by the Court of Appeals in 2016.
3. Boss Dental Care and the other proposed class representatives filed their amended complaint in this Court on February 8, 2017.
4. Since that time, Boss Dental Care has worked closely with Equitable Relief Class Counsel for nearly a decade in prosecuting this longstanding and complex MDL action, including participating in extensive discovery efforts.
5. In particular, I frequently discussed the status of the litigation and Boss Dental Care's discovery efforts with attorneys at Hilliard Shadowen LLP.
6. On June 15, 2017, Defendants served their First Set of Interrogatories on each of the named Class Plaintiffs, which included 59 interrogatories and subparts that called for detailed review and analysis by Boss Dental Care. The interrogatories called for years' worth of information regarding every aspect of Boss Dental Care's payment card 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 mechanism accepted, and other similarly detailed requests. Boss Dental Care undertook significant efforts to provide detailed answers to these interrogatories. On August 7, 2017, Boss Dental Care provided its responses.

7. In addition, on February 7, 2020, the various banks that are defendants in this case served their First Set of Contention Interrogatories. This set included nine interrogatories. On March 23, 2020, Boss Dental Care provided its responses.

8. On June 15, 2017, Defendants served their First Set of Requests for Production and Inspection of Documents on each of the named Class Plaintiffs. This included 87 requests for production of documents. These requests covered information spanning many years, and responding to them was very challenging. It took Boss Dental Care significant time and effort to respond to these requests. On August 7, 2017, Boss Dental Care provided its responses. Boss Dental Care also made a supplemental production of documents on November 9, 2023.

9. I personally worked with the lawyers at Hilliard Shadowen to identify documents that were likely to be responsive to Defendants' document requests and interrogatories.

10. I spent considerable time and effort gathering materials responsive to Defendants' document requests. Boss Dental Care is a small business with limited staff. For this litigation, Boss Dental Care produced thousands of pages of documents. Our production required me to search through our electronic files and email systems using keywords, and to conduct a manual review of hard-copy documents.

11. Responding to the Defendants' interrogatories required a similarly significant effort.

12. I also spent a substantial amount of time preparing for and attending my deposition, which was held in Corpus Christi on April 20, 2018, from approximately 9:00 a.m. to 4:15 p.m. To prepare, I had several meetings with the Hilliard Shadowen lawyers.

13. Over the last approximately nine years, I also spent significant time with Hilliard Shadowen lawyers—in person, over the phone, or in detailed written communications—reviewing and discussing pleadings, settlement terms, class certification, and the mediations, as well as receiving regular status updates regarding the case.

14. Based on my review and consideration of the Amended Settlement Agreement and my discussions with the Hilliard Shadowen lawyers, it is my opinion that the Amended Settlement Agreement is an excellent result for the Equitable Relief Class.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this 1st day of July 2026 in Corpus Christi, Texas.

A handwritten signature in black ink, appearing to read 'Arthur Boss, Jr.', written over a horizontal line.

**Arthur Boss, Jr.
Boss Dental Care
Class Representative**