

Exhibit I

**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 HAL
GOLDMAN, OF GENERIC DEPOT
3, INC. D/B/A PRESCRIPTION
DEPOT**

DECLARATION OF HAL GOLDMAN
OF GENERIC DEPOT 3, INC. D/B/A PRESCRIPTION DEPOT

I, Hal Goldman, being of full age, do hereby declare and say:

1. I am the owner of Class Plaintiff Generic Depot 3, Inc. d/b/a Prescription Depot (“Generic Depot”), which I founded in August 2009 in Tamarac, Florida. I submit this declaration in support of Equitable Relief Class Plaintiffs’ petition for service awards in connection with services rendered in the above-entitled actions.

2. Generic Depot was one of the original named class representatives in the Rule 23(b)(2) MDL, *In re Payment Card Interchange Fee & Merchant Discount Antitrust Litig.*, No. 05-md-01720 (E.D.N.Y.).

3. Generic Depot filed its complaint in this litigation on February 8, 2017, in the United States District Court for the Eastern District of New York.

4. Since that time, Generic Depot has worked closely with Equitable Relief Class Counsel (“Class Counsel”) for nearly a decade in the prosecution of this longstanding and complex MDL action, including participating in extensive discovery efforts.

5. On June 15, 2017, Defendants served their First Set of Interrogatories on each of the named Class Plaintiffs, which called for detailed review and analysis by Generic Depot. The interrogatories called for years’ worth of information regarding every aspect of Generic Depot’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. Generic Depot undertook significant efforts to provide detailed answers to these interrogatories. On August 7, 2017, Generic Depot provided its responses.

6. In addition, on February 7, 2020, Bank Defendants served their First Set of Contention Interrogatories. This set included nine interrogatories. On March 23, 2020, Generic Depot provided its responses.

7. 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 also pertained to information spanning the course of many years and responding to them was very challenging. It took Generic Depot significant time and effort to respond to these requests. On August 7, 2017, Generic Depot provided its responses. Generic Depot made a supplemental production of documents on November 9, 2023.

8. I personally worked with Class Counsel to identify documents that were likely to be response to Defendants' document requests and interrogatories.

9. I spent many hours reviewing and collecting information to respond to Defendants' Interrogatories.

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

11. I also spent a substantial amount of time preparing for and attending my deposition, which was held on April 4, 2018, from approximately 9:30 a.m. to 4:45 p.m. in Miami, Florida. To prepare, I had several meetings with Class Counsel prior to the deposition.

12. Over the last 9 years or so, I spent countless hours with Class Counsel either in in-person meetings or over the phone reviewing and discussing pleadings, discovery issues,

proposed settlement terms, mediation discussions, as well as receiving regular status updates regarding this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 18 day of June 2026 in Parkland, Florida.



HAL GOLDMAN
GENERIC DEPOT 3, INC. D/B/A
PRESCRIPTION DEPOT
EQUITABLE RELIEF CLASS PLAINTIFF