

Exhibit J

**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,

**DECLARATION OF BRITTANY
OWEN OF PUREONE, LLC D/B/
A SALON PURE**

**DECLARATION OF BRITTANY OWEN
OF PUREONE, LLC D/B/A SALON PURE**

I, Brittany Owen, being of full age, do hereby declare and say:

1. I am the owner of Class Plaintiff PureOne, LLC d/b/a Salon Pure ("PureOne"). 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. PureOne 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. PureOne 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, PureOne 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. I frequently discussed the status of the litigation and PureOne's discovery efforts with Class Counsel.
6. 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 PureOne. The interrogatories called for years' worth of information regarding every aspect of PureOne'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. PureOne undertook significant efforts to provide detailed answers to these interrogatories. On August 7, 2017, PureOne provided its responses.

7. In addition, on February 7, 2020, Bank Defendants served their First Set of Contention Interrogatories. This set included nine interrogatories. On March 23, 2020, PureOne 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 also pertained to information spanning the course of many years and responding to them was very challenging. It took PureOne significant time and effort to respond to these requests. On August 7, 2017, PureOne provided its responses. PureOne made a supplemental production of documents on November 9, 2023.

9. My business manager at the time, Heather Boyd Smith, worked with Class Counsel to identify documents that were likely to be response to Defendants' document requests and interrogatories.

10. Ms. Smith spent many hours reviewing and collecting information to respond to Defendants' Interrogatories.

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

12. Ms. Smith also spent a substantial amount of time preparing for and attending her deposition, which was held on April 30, 2018, from approximately 9:00 a.m. to 4:30 p.m. in Atlanta, Georgia. To prepare, she had several meetings and telephone calls with Class Counsel.

13. Over the last 9 years or so, we spent countless hours with Class Counsel either in in-person meetings or over the phone reviewing and discussing pleadings, 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 29th day of June 2026 in Flowery Branch, Georgia.



BRITTANY OWEN
OWNER

PUREONE, LLC D/B/A SALON PURE
EQUITABLE RELIEF CLASS PLAINTIFF