

Exhibit K

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 CARLOS
PEREZ OF CMP CONSULTING
SERVICES, INC.**

DECLARATION OF CARLOS PEREZ OF CMP CONSULTING SERVICES, INC.

I, Carlos Perez, being of full age, do hereby declare and say:

1. I am the founder of Class Plaintiff CMP Consulting Services, Inc., which I started in 1998 in Miami, 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. CMP Consulting Services, Inc. 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. CMP Consulting Services, Inc. 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, CMP Consulting Services, Inc. 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 CMP Consulting Services, Inc.'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 CMP Consulting Services, Inc. The interrogatories called for years' worth of information regarding every aspect of CMP Consulting Services, Inc.'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. CMP Consulting undertook

significant efforts to provide detailed answers to these interrogatories. On August 7, 2017, CMP Consulting Services, Inc. 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, CMP Consulting Services, Inc. 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 CMP Consulting Services, Inc. significant time and effort to respond to these requests. On August 7, 2017, CMP Consulting Services, Inc. provided its responses. CMP Consulting Services, Inc. made a supplemental production of documents on November 9, 2023.

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

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

11. I spent considerable time and effort gathering materials responsive to Defendants' document requests. CMP Consulting Services, Inc. is a small business with limited staff. For this litigation, CMP Consulting Services, Inc. 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.

12. I also spent a substantial amount of time preparing for and attending my deposition, which was held on April 12, 2018, from approximately 9:30 a.m. to 2:30 p.m. in Miami, Florida. To prepare, I had several meetings and telephone calls with Class Counsel.

13. Over the last 9 years or so, I also 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 28th day of June 2026 in Coral Gables, Florida.



CARLOS PEREZ
OWNER
CMP CONSULTING SERVICES, INC.
EQUITABLE RELIEF CLASS REPRESENTATIVE