

EXHIBIT 14

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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In re PAYMENT CARD INTERCHANGE)	
FEE AND MERCHANT DISCOUNT)	No. 05-MD-01720 (JG) (JO)
ANTITRUST LITIGATION)	
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DECLARATION OF MICHAEL SCHUMANN

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

1. My name is Michael Schumann. My wife, Suzanne, and I co-founded Traditions Classic Home Furnishings in 1987 in St. Paul, Minnesota. As its Secretary and Treasurer, a position I have held since Traditions’ inception, I run and manage the “back-office” functions of the business.

2. Traditions is a successful mid-to-high-end home-furnishings retailer, with stores in St. Paul, Minneapolis, and Naples, Florida, providing a broad range of fine furniture, accessories, and interior-design services to our customers. In addition to servicing its own end-user customers, Traditions also does a significant amount of business with independent interior designers.

3. Traditions Home Furnishings 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.

4. Accepting payment cards is and has been one of Traditions’ most significant costs of doing business. For many years Traditions has been very aggressive

in trying to minimize its card-acceptance fees by shopping different acquirers and attempting to reduce costs by volunteering to renegotiate the rates for key entered transactions in return for accepting additional fraud risks associated with these types of transactions. Prior to the initiation of this litigation it had become apparent to us that a small business like Traditions was powerless to reduce the interchange fees or negotiate changes in the rules that were imposed on it by Visa, MasterCard, and the banks that then governed the Visa and MasterCard networks.

5. In 2005, after receiving notice of a proposed settlement in the *In re Visa Check* litigation, I came to the conclusion that the only effective solution to reducing interchange fees on credit-card transactions was to proceed with antitrust litigation against Visa, MasterCard, and their member banks. On my own initiative, I started researching law firms that had significant antitrust and class-action litigation experience and had the financial resources to take on this kind of case. During this investigation I found an article written by David Balto, who was then a partner at Robins, Kaplan, Miller & Ciresi L.L.P., which discussed the *In re Visa Check* litigation and other issues surrounding Visa and MasterCard's interchange-fee structure. I contacted Mr. Balto, who subsequently introduced me to K. Craig Wildfang, another partner at Robins Kaplan, which resulted in lengthy discussions of the Visa / MasterCard payment-card systems, how they affected Traditions, and what potential legal remedies were available to restrain the ever increasing costs of credit card acceptance.

6. After extensive consultations with our attorneys at Robins Kaplan during the spring of 2005, Suzanne and I agreed that Traditions should participate in this

litigation as one of the initial five class representatives and retained Robins Kaplan as our legal representatives.

7. From the inception of this litigation, I have personally been intimately involved in all aspects of the case, including participating in strategy sessions, both in person and via teleconference, with the attorneys and other class representatives involved in the case. In addition, I have had numerous discussions about the case and issues associated with credit-card interchange with other merchants, and other individuals involved in the banking and merchant-processing industries. I have also had extensive discussions about the issues in this case with a variety of journalists covering the litigation, including writers for the *New York Times*, *Wall Street Journal* and various trade publications.

8. As part of my activities as a class representative in this case, I also spent a significant amount of time on Capitol Hill during the deliberations over the Durbin Amendment, discussing the issues associated with this case with various members of Congress and their staff members.

9. Over the last 8 years, my best estimate is that I have spent on average 20 hours per month on activities related to my role as a class representative. At certain times—such as during the negotiation of the final settlement agreement—my involvement was much more significant.

10. Traditions responded to Defendants' discovery requests. During the course of this litigation, Traditions produced 1,440 documents, totaling 6,157 pages. This number understates the burden on Traditions, however. Given the fact that we are


a small business with a very limited staff, most of this discovery was a result of my personal efforts manually reviewing our paper and electronic files. Many of these files were kept in our home in St. Paul and had never been accessed before we were asked to produce them in litigation.

11. Traditions also expended significant time and effort in connection with deposition discovery. I sat for two depositions personally, and my wife Suzanne was deposed once. For each of these depositions, we provided a day's worth of testimony in addition to spending a full day for preparation.

12. To date, Traditions has incurred approximately \$8,418.49 in out-of-pocket expenses in connection with its participation as a class representative. A summary of these expenses is attached hereto as Schedule A. We expect to incur significant (for a small business of our size) additional out-of-pocket expenses until this litigation reaches its ultimate conclusion.

I swear under penalty of perjury that the foregoing is true and correct.

Date: 4/8/13



Michael Schumann

**Schedule A
Traditions Ltd. Expenses**

Desc: Federal Court Hearing – Islip NY – Jan. 27, 2006

Date	Check #	Description	Amount
1/26/06	Visa	Subway Fare	\$20.00
1/26/06	Visa	Subway Fare	\$20.00
1/29/06	Visa	Subway Fare	\$20.00
1/29/06	Visa	Parking	\$48.00
1/29/06	Visa	Crown Plaza - NY	\$721.35
1/27/06	Visa	Dinner	\$132.00
1/28/06	Visa	Dinner	\$41.40
1/29/06	Cash	Lunch	\$5.94
1/26/06	Visa	Dinner	\$180.52
1/29/06	Visa	Lunch	\$31.25
12/3/06	Visa	MSP - JFK - MSP Tickets (Sun Country	\$642.15
1/26/06	Cash	Taxi	\$8.00
1/28/06	Cash	Dinner	\$12.38
		TOTAL	\$1,882.99

Desc: Status Conference - Brooklyn Federal Court – Aug. 8, 2006

Date	Check #	Description	Amount
8/4/06	Visa	MSP - JFK Tickets	\$366.90
8/4/06	Visa	Return Tickets	\$366.90
8/13/06	Visa	Car Rental	\$282.63
8/13/06	Visa	Gas	\$9.35
		TOTAL	\$1,025.78

Desc: Mike Schumann Deposition, Mpls – Nov. 14-15, 2007

Date	Check #	Description	Amount
11/2/07	Visa	RSW - MSP Ticket (AirTran)	\$129.80
11/13/07	Visa	MSP - RSW Ticket (Sun Country)	\$106.12
		TOTAL	\$235.92

Desc: D.C. Lobbying – Apr.29 – May 1, 2009

Date	Check #	Description	Amount
4/29-30/09	Visa	MetroRail Fares	\$22.75
5/6/09	Visa	Hertz Car Rental	\$80.93
4/24/09	Visa	Fuel	\$18.35
5/6/09	Visa	Fuel	\$15.05
5/4/09	Visa	Fuel	\$20.35
5/3/09	Visa	Fuel	\$26.60
5/3/09	Visa	Dinner	\$25.69
4/25/09	Visa	Dinner	\$145.27
4/28/09	Visa	Fuel	\$22.90
5/3/09	Visa	Fuel	\$26.30
5/3/09	Visa	Motel 6	\$55.99
4/29/09	Cash	Parking	\$4.50
5/2/09	Cash	Lunch	\$6.15
5/1/09	Visa	Dinner	\$49.90
5/1/09	Cash	Lunch	\$3.50
4/30/09	Cash	Lunch	\$11.10
4/24/09	Cash	Lunch	\$10.47
4/30/09 & 5/1/09	Visa	Parking	\$9.00
4/28/09	Visa	Dinner	\$13.03
4/29/09	Cash	Lunch	\$7.65
5/3/09	Cash	Toll	\$3.90
5/4/09	Cash	Toll	\$4.75
5/3/09	Cash	Lunch	\$5.29
		TOTAL	\$589.42

Desc: Plaintiffs Meeting in DC - Jan. 7, 2010

Date	Check #	Description	Amount
12/23/09	Visa	RSW - DCA Ticket (AA)	\$121.20
12/23/09	Visa	IAD - RSW Ticket (AirTran)	\$95.20
1/12/10	Visa	Airport Parking	\$44.45
1/11/10	Cash	Lunch	\$9.30
1/8/10	Cash	Lunch	\$18.14
1/8/13	Visa	Dinner	\$62.29
1/11/10	Visa	MetroRail Fare	\$4.50
1/11/10	Visa	MetroRail Fare	\$4.80
1/7/10	Visa	MetroRail Fare	\$4.25
1/6/10	Visa	Gas	\$32.95
		TOTAL	\$397.08

Desc: Plaintiffs Meeting in DC - May 26, 2011

Date	Check #	Description	Amount
5/22/11	Visa	Hotel - Hyatt Regency Crystal City	\$133.46
5/22/11	Visa	MSP-DCA-MSP Air Fare (Sun Country	\$266.62
5/26/11	Cash	Taxi	\$7.50
5/25-26/11	Cash	Metro Fare	\$9.25
5/25/11	Cash	Breakfast	\$2.63
5/25/11	Cash	Lunch	\$8.45
5/27/11	Cash	Lunch	\$3.04
		TOTAL	\$430.95

Desc: NY Settlement Conference - Dec. 2-3, 2011

Date	Check #	Description	Amount
12/3/11	Visa	Mariott Hotel Brooklyn	\$762.06
12/1/11	Visa	NY Subway	\$2.50
12/1/11	Visa	DC Metro Fare	\$5.25
11/28/11	Visa	Delta Airlines Change Fee	\$50.00
11/21/11	Visa	JFK - RSW Ticket (Jet Blue)	\$159.70
11/21/11	Visa	DC - NYC Bus Ticket	\$11.50
7/10/11	Visa	RSW - DCA Ticket (Delta)	\$179.30
12/3/11	Cash	Dinner	\$8.71
12/1/11	Cash	Breakfast	\$4.82
		TOTAL	\$1,183.84

Desc: DC Meeting to Discuss Mediator's Proposal - Jan. 5, 2012

Date	Check #	Description	Amount
1/5/12	Visa	Parking	\$23.00
1/6/12	Visa	Subway Fare	\$2.40
12/30/11	Visa	MSP - DCA Tickets	\$266.62
1/5/12	Visa	Dinner	\$18.37
1/5/12	Cash	Tolls	\$2.25
1/3/12	Visa	Lunch	\$72.85
1/5/12	Cash	Lunch	\$2.63
1/5/12	Cash	Tolls	\$3.00
1/11/12	Cash	Bus Fare	\$3.50
1/3/12	Cash	Parking	\$2.50
		TOTAL	\$397.12

Desc: NY Settlement Meeting – Jun. 21-22, 2012

Date	Check #	Description	Amount
6/22/12	Visa	Mariott Hotel - NY Visa/MC	\$300.71
6/21/12	Visa	Kimberly Hotel - NY Visa/MC	\$684.02
6/25/12	Visa	IAD-MSP Ticket	\$129.80
6/18/12	Visa	RSW-EWR Ticket	\$163.60
6/21/12	Visa	NYC - WAS Megabus Ticket	\$19.50
6/22/12	Visa	NYC - WAS Megabus Ticket	\$23.50
4/26/12	Visa	RSW-DFW Tickets (Forfeited)	\$130.60
6/25/12	Visa	Light Rail / Bus Fare	\$1.75
6/21/12	Cash	Taxi	\$15.00
	Misc Cash	Visa/MC Meeting Meals	\$51.37
6/23/12	Cash	Tolls	\$2.25
6/23/12	Visa	Parking	\$3.50
6/21/12	Visa	Subway Fare	\$2.80
6/19/12	Visa	Subway Fare	\$10.00
6/19/12	Visa	EWR - Penn Stn Train Fare	\$12.50
6/24/12	Visa	Fuel	\$50.57
		TOTAL	\$1,601.47

Desc: NY Settlement Preliminary Approval Hearing - Nov. 9, 2012

Date	Check #	Description	Amount
11/5/12	Visa	RSW - JFK Ticket (Mike)	\$122.80
11/7/12	Visa	BWI - RSW Ticket (Mike)	\$98.10
11/8/12	Visa	Condor Hotel - Brooklyn	\$266.27
11/9/12	Cash	Lunch	\$8.65
11/8/12	Cash	Bus Fare	\$2.25
11/8/12	Cash	Bus / Subway Fare Card	\$10.70
11/9/12	Cash	Tolls	\$13.00
11/9/12	Cash	Tolls	\$4.00
11/9/12	Cash	Tolls	\$4.00
11/9/12	Cash	Tolls	\$5.15
11/9/12	Cash	Tolls	\$4.00
11/9/12	Cash	Tolls	\$3.00
11/9/12	Cash	Lunch	\$3.49
11/9/12	Cash	Dinner	\$52.21
11/10/12	Cash	Lunch	\$3.12
11/10/12	Visa	Dinner	\$40.18
11/11/12	Visa	Parking	\$33.00
		TOTAL	\$673.92