

# **EXHIBIT 10**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

IN RE PAYMENT CARD INTERCHANGE  
FEE AND MERCHANT DISCOUNT  
ANTITRUST LITIGATION

MDL No. 1720  
Case No. 1:05-md-1720-JG-JO

This document refers to: All Actions

**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 Home Furnishings in 1987 in St. Paul, Minnesota. I have served as Secretary and Treasurer and generally run and manage the “back-office” responsibilities of our business since it began.

2. Traditions Home Furnishings is a successful furniture business with stores in St. Paul, Minneapolis, and Naples, Florida. Traditions works with both designers and individuals to furnish homes with unique, fashionable, and quality goods.

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. I submit this supplemental declaration to respond to an unfair implication raised by NACS and others that Traditions signed the settlement agreement only in exchange for the promise of receiving an incentive award. This implication is false and offensive. My company was an original plaintiff in this action and I have always worked hard to do what I thought was best for the class. I undertook the case and later agreed to serve as a class representative without any promise

that I would receive an incentive award if the case settled. There has been no “quid pro quo” for my participation and efforts.

5. I have always understood that the decision whether to award incentive payments to class representatives, and the amount of any such awards, lies solely within the discretion of the District Court.

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

Date: 5/14/13

  
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Michael Schumann