

# EXHIBIT 6

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

_____	:	
In re PAYMENT CARD INTERCHANGE	:	MDL No. 1720(JG)(JO)
FEE AND MERCHANT DISCOUNT	:	
ANTITRUST LITIGATION	:	
_____	:	
This Document Relates To:	:	DECLARATION OF JARED OPPER IN
	:	SUPPORT OF PLAINTIFFS' MOTION FOR
	:	FEES, COSTS AND SERVICE AWARDS
ALL ACTIONS.	:	
_____	:	
	:	[REDACTED]

I, Jared Oppper, declare as follows:

1. I am the Vice President of class representative Discount Optics, Inc., which has served as a representative of the class throughout the entire litigation.

2. Discount Optics' work as a Class Representative continued unabated through the pendency of the appeal in the Second Circuit, the remand back to the District Court and every step since, including participating in extensive discovery efforts.

3. Following the remand, Discount Optics was served by defendants with extensive discovery – beyond even the discovery served during the first period of the litigation. On October 20, 2017 Defendants served their Second Set of Interrogatories on each of the named plaintiffs. Thirty five interrogatories, several of which were multi-part, called for detailed review and analysis by Discount Optics. The interrogatories called for years' worth of information regarding every aspect of Discount Optics 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. Discount Optics undertook significant efforts to

provide detailed answers to these interrogatories. On December 4, 2017 Discount Optics provided its responses. One issue that stood out for Discount Optics is that many of the discovery requests were not tailored to our business model, which necessitated significant extra work on my part and the part of others at Discount Optics.

4. On September 11, 2017, Defendants served their Second Set of Requests for Production and Inspection of Documents to Each of the Putative Rule 23(b)(3) Class Plaintiffs. This set included 110 individual requests, each of which sought information going back to at least 2006, while a significant portion of the requests sought information extending back to 2000. Responding to these requests was very challenging. It took Discount Optics significant time and effort to respond to these requests.

5. I and others at Discount Optics spent considerable time and effort gathering materials responsive to defendants' document requests. I searched through our electronic files and email systems using key words and also conducted a review of hard copy documents, which resulted in a large production of additional documents. In this second round of discovery, Discount Optics produced 4250 pages of documents.

6. On April 17, 2018 I provided a deposition in this matter. This was at least the third deposition of a Discount Optics executive. The deposition lasted a full day and I spent considerable time preparing for this deposition by reviewing discovery materials and meeting with counsel. This was time I spent away from my job at Discount Optics.

7. Additionally, I requested and received regular status updates regarding the case in this second phase. I regularly spoke with the attorneys prosecuting the litigation and provided reports regarding the litigation to others at Discount Optics.

8. I estimate that I and other executives at Discount Optics spent at least [REDACTED] since October 2017 on this case, including [REDACTED] for deposition and deposition preparation; [REDACTED] gathering documents and information and responding to document requests; [REDACTED] in meetings among board members and employees discussing the case and organizing responses to requests; [REDACTED] responding to interrogatories; [REDACTED] in telephone conferences and meetings with our lawyers; and [REDACTED] concerning settlement and the settlement agreement. I estimate my hourly rate for this work to be [REDACTED].

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 5 day of June, 2019 at Boca Raton, Florida.

  
\_\_\_\_\_  
Jared Oppen