

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SIDNEY NAIMAN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

TOTAL MERCHANT SERVICES, INC.
and QUALITY MERCHANT
SERVICES, INC.,

Defendants.

No. 4:17-cv-03806-CW

DECLARATION OF SIDNEY NAIMAN

Complaint Filed: July 5, 2017

DATE: April 2, 2019

TIME: 2:30 p.m.

LOCATION: 1301 Clay St., Oakland, CA 94612
Courtroom 6—2nd Floor

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1 I, Sid Naiman, declare as follows:

2 1. I previously lived in Contra Costa County in California, before moving to
3 Scottsdale, Arizona.

4 2. I own and use the cellular telephone number that received calls from Quality
5 Merchant Services.

6 3. Throughout this litigation I worked closely with my counsel and reviewed
7 numerous pages of documents.

8 4. I had to gather phone records which required me to go to my telephone provider
9 personally. I had to continually review those call records to ensure the accuracy of my claim. I
10 reviewed multiple pleadings and interrogatories during this case as well. I also worked with
11 counsel to prepare for a deposition, even though ultimately there was none.

12 5. I am aware of the probability of the exhaustive discovery requests, and the
13 invasion of privacy including forensic imaging and data gathering from my computer that may
14 occur as a result of filing a claim.

15 6. I pursue these cases with no guarantee of compensation, and will continue to
16 pursue these cases in hopes of stopping unlawful actors.

17 7. I receive spam in many forms, most prevalent being email, fax and phone calls. I
18 do everything I can to stop these type of nuisances, again, even when no compensation is
19 guaranteed.
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21 8. Finally, I consulted with my counsel throughout the settlement process to ensure
22 that an excellent result was reached for all members of the class. I support the settlement in its
23 entirety.
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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 EXECUTED in Scottsdale, Arizona, this 13th day of December, 2018.

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5 By: Sidney Naiman
6 Sidney Naiman
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