

EXHIBIT 2

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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In re PAYMENT CARD INTERCHANGE	:	MDL No. 1720(MKB)(JO)
FEE AND MERCHANT DISCOUNT	:	
ANTITRUST LITIGATION	:	Civil No. 05-5075(MKB)(JO)
_____	:	
This Document Relates To:	:	DECLARATION OF VINCENT ARCHER
	:	OF LEON'S TRANSMISSION SERVICE,
	:	INC.
ALL ACTIONS.	:	
_____	X	[REDACTED]

I, Vincent Archer, declare as follows:

1. Leon's 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.

2. Following the remand, Leon's 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. Those 35 interrogatories, several of which were multi-part, called for detailed review and analysis by Leon's. The interrogatories called for many years' worth of information regarding every aspect of Leon's payment acceptance methods and practices. 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. Leon's undertook considerable efforts to provide detailed answers to these interrogatories. On December 4, 2017 Leon's provided its responses.

3. On September 11, 2017, Defendants served their Second Set of Requests for Production and Inspection of Documents to Each of the Putative (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 even further back, to 2000. Responding to these requests was very challenging and required significant time and effort by Leon's to locate and provide the responsive materials.

4. I personally spent considerable time and effort gathering materials responsive to defendants' second document requests. I searched through our electronic files and email systems using key words and in addition conducted a review of hard copy documents, which resulted in a

large production of additional documents. In this second round of discovery, Leon's produced 19,093 pages of documents.

5. On April 30, 2018 I provided a second deposition in this matter. The deposition lasted a full day and I spent considerable time preparing for this deposition by reviewing discovery materials and meeting with counsel beforehand. This was time I necessarily spent away from my regular job duties at Leon's.

6. 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 Leon's. In addition, I kept up my usual practice of closely following developments in the payment card industry.

7. One aspect of my attention to this case merits special explanation. Because of my role as the point person responsible for all aspects of our payments systems as well as my familiarity with the litigation, I was the person who first alerted Lead Counsel to issues related to a third-party claims-filing service that was misleading merchants who are or were members of the plaintiff class. When I received a notice from one of these entities, I was immediately able to determine that information provided regarding the prior settlement was incorrect. I contacted Lead Counsel about this questionable activity, and I understand that this, in turn, set in motion significant efforts to stop unscrupulous entities from preying upon Leon's fellow class members. I have followed this issue over the past several years and continue to bring issues related to third-party claims filing companies to the attention of Lead Counsel.

8. The above-described activities undertaken by me personally on behalf of Leon's and its fellow class members accounted for in excess of [REDACTED] of my time since the date of my previous declaration (dated July 21, 2014) wherein [REDACTED] of my time and [REDACTED] of

the time of Henry Springer, who was Leon's President and Chief Executive Officer throughout that time, were detailed.

9. In 2017, the President and Chief Executive Officer of Leon's to whom I reported and who was referenced in my earlier declaration, died. He was succeeded as President by John Armstrong, and since his becoming President, Mr. Armstrong devoted [REDACTED] of his own time to matters pertaining to Leon's involvement as a class representative herein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 29th day of May, 2019 in Reseda, California.



VINCENT ARCHER