

EXHIBIT 8

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

_____	X	
In re PAYMENT CARD INTERCHANGE	:	MDL No. 1720(JG)(JO)
FEE AND MERCHANT DISCOUNT	:	
ANTITRUST LITIGATION	:	Civil No. 05-5075(JG)(JO)
	:	
_____	:	DECLARATION OF ROBERT ZURITSKY
This Document Relates To:	:	
	:	
ALL ACTIONS.	:	
	:	
_____	X	

I, Robert Zuritsky, declare as follows:

1. I am President of Class Plaintiff Parkway Corporation (“Parkway”). On July 12, 2005, Parkway filed a Class Action Complaint against Visa U.S.A., Inc., Visa International, and MasterCard International Inc. On April 24, 2006, that Complaint was consolidated with the other class action complaints. On March 27, 2009, Class Plaintiffs filed a Second Consolidated Amended Class Action Complaint which proposed Parkway as a Class Representative. On November 27, 2012, this Court named Parkway as a Class Plaintiff to represent the interests of the Settlement Classes. Parkway has served as a representative of the Class throughout the entire litigation.

2. Parkway is a Philadelphia-based corporation, engaged in the automobile parking business. Parkway acquires, develops, manages, leases, and sells commercial parking facilities across the United States and Canada. In owning, leasing, or managing approximately 80 commercial parking facilities, Parkway is very familiar with the payment card industry, interchange fees, and Visa’s and MasterCard’s rules governing merchants. Throughout the litigation, I have maintained contact with Class Counsel in order to monitor the case, provide input concerning strategy decisions, comply with discovery obligations, and fulfill various other duties on behalf of the Class. I am familiar with the terms of the settlement in the above-captioned case and am of the opinion that the settlement constitutes a good resolution of the case and is in the best interests of the Class.

3. In July 2005, Parkway retained counsel and authorized the filing of Parkway’s complaint. Since that time, Parkway has been highly dedicated to the prosecution of this litigation and to the mediation process. On behalf of the Class, Parkway spent substantial time and effort in pursuit of the litigation with Class Counsel.

4. I understand that Parkway’s discovery efforts are the subject of a declaration by Howard Trachtman, Parkway’s Senior Vice President - Finance and General Counsel. While Mr.

Trachtman led Parkway in connection with discovery, other Parkway senior executives also played a significant role. Documents were collected from senior executives' files (including my email files), and I was deposed in this litigation (as was another senior executive, Paul Ierubino, Senior Vice President of Operations and COO). In short, Parkway's leadership was very committed to the discovery process.

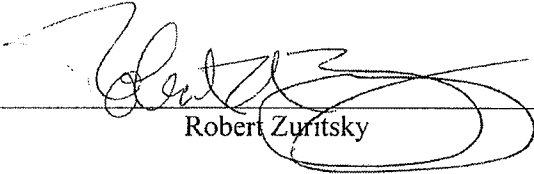
5. Along with Parkway's discovery work, Parkway has devoted significant time and resources to other aspects of the litigation. On numerous occasions over seven years of litigation, I conferred with counsel regarding various phases of the litigation and participated in decision-making about how to conduct and resolve the case. In particular, I have worked closely with outside counsel with respect to the mediation and settlement. Among other efforts in connection with the mediation and settlement, I participated in a settlement conference held by the Court in Brooklyn, New York on December 2, 2011. Throughout 2012, I conferred with outside counsel concerning the status of settlement negotiations and proposed settlement terms.

6. Given its extensive involvement in this litigation, the settlement in this case is of special import to Parkway. The settlement is also important to Parkway because of the magnitude of interchange fees Parkway pays. At Parkway parking facilities, customers pay with payment cards in over 60% of transactions. As such, interchange fees are among Parkway's most significant operating costs.

7. I believe the settlement is in the best interests of the Class for two primary reasons. First, it requires Visa and MasterCard to change their rules to give new rights to merchants, for example, that enable merchants to steer customers to less-costly payment methods and brands. These changes will make the United States payment card market more competitive. Second, the settlement provides very substantial monetary relief to merchants. In light of the inherent risks of

litigation, especially in complex litigation against defendants with vast resources, the billions of dollars of monetary relief brought about by the settlement is an excellent result for the Class.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 8th day of April, 2013, at Philadelphia, Pennsylvania.


Robert Zuritsky