

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MASHAYILA SAYERS, BRITTNEY
TINKER, JENNIFER MONACHINO,
KIMBERLY MULLINS, HILDA MICHELLE
MURPHREE, and AMANDA JIMENEZ, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

ARTSANA USA, INC.

Defendant.

Case No. 7:21-cv-07933-VB

**DECLARATION OF AMANDA JIMENEZ IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND MOTION FOR
ATTORNEYS' FEES, COSTS, EXPENSES, AND INCENTIVE AWARD**

I, Amanda Jimenez, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an adult over the age of 18 and a resident of the State of New York. I am a Class Representative in the lawsuit entitled *Sayers et al. v. Artsana USA, Inc.*, Case No. 7:21-cv-07933-VB, currently pending in the Southern District of New York. I make this Declaration in support of (i) the Motion for Final Approval of Class Action Settlement, and (ii) the Motion for Attorneys' Fees, Costs, Expenses, and Incentive Awards. The statements made in this Declaration are based on my personal knowledge and, if called as a witness, I could and would testify competently thereto under oath.

2. In or about February 2017, I purchased Chicco's KidFit 2-in-1 booster seat (the "Product") in the State of New York. I purchased the Product because I believed the Product was suitable for children as small as 30 pounds and provided side-impact protection. However, I now know that the Product was not safe for children weighing less than 40 pounds, and Artsana

had no basis for saying that the Product provided side-impact protection. I would not have purchased the Product, or I would have paid significantly less for it, had I known that Artsana's promises that its Product is safe for children weighing as little as 30 pounds and that it provides side-impact protection were not true.

3. I assisted with the litigation of this case by detailing my dealings with Defendant. Specifically, I described to my lawyers my relationship as a customer of Defendant. I also provided information about my decision to purchase and experience with the Product.

4. I also worked with my attorneys to prepare the Class Action Complaint. I carefully reviewed the Class Action Complaint for accuracy and approved it before it was filed.

5. During the course of this litigation, I kept in regular contact with my lawyers. Specifically, I conferred with them regularly by phone and e-mail to discuss the status of the case. We also discussed case strategy, anticipated motions, and the prospects of settlement. Furthermore, when appropriate, I informed my attorneys of additional facts for their research and consideration.

6. I was also prepared to testify at deposition and trial, if necessary.

7. My lawyers have kept me well informed in regard to the efforts to resolve this matter. I reviewed the Class Action Settlement Agreement and gave my approval prior to signing it.


8. Based on the interactions and my relationship with my attorneys, I believe they have fairly and adequately represented me and the Settlement Class and will continue to do so.

9. Throughout this litigation, I understood that, as a Class Representative, I have an obligation to protect the interests of other Settlement Class Members and not act just for my own personal benefit. I do not have any conflicts with other Settlement Class Members. I have done

my best to protect the interests of other Settlement Class Members and will continue to fairly and adequately represent the Settlement Class to the best of my ability.

I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct.

Executed this 24 day of August, 2023.

Signature: 
Amanda Jimenez (Aug 24, 2023 14:58 EDT)
Amanda Jimenez