

**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,

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

Plaintiffs,

v.

ARTSANA USA, INC.,

Defendant.

**DECLARATION OF KIMBERLY MULLINS IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND MOTION FOR
ATTORNEYS' FEES, COSTS, EXPENSES, AND INCENTIVE AWARDS**

I, Kimberly Mullins, 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 Maryland. 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. About four years ago, I purchased eight Chicco KidFit Booster Car Seats (the "Booster Seats") at Target in Middle River, Maryland for my granddaughter and grandson who each weighed less than 40 pounds. I purchased the Boosters Seats because Artsana had represented

that it was safe for children as small as 30 pounds, like my granddaughter and grandson, and provided side-impact protection. However, I now know that the Booster Seats were not safe for children weighing less than 40 pounds, and Artsana had no basis for saying that the Booster Seats provided side-impact protection. I would not have purchased the Booster Seats, or I would have paid significantly less for them, had I known that Artsana's promises that its Booster Seats are safe for children weighing as little as 30 pounds and that they provided side-impact protection were not true.

3. I assisted with the litigation of this case by discussing with my lawyers my purchase of the Artsana Booster Seats, the Artsana representations I relied on, and the reasons I chose that Booster Seat. 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. I also was prepared to respond to requests for documents and to testify in a deposition or at trial if necessary.


4. During the course of this litigation, I have kept in contact with my lawyers regarding the status of the case and the efforts to settle this case. I thoroughly discussed the proposed settlement with my attorneys, reviewed the Stipulation of Settlement, and approved and signed it.

5. 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.

6. 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 that the foregoing is true and correct.

Executed this 24 day of August, 2023.

Signature: 
Kimberly F Mullins (Aug 26, 2023 20:46 EDT)