

THE HONORABLE JOHN H. CHUN

IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

KIMBERLY BOTTOMS, on behalf of
herself and all other similarly situated,

Plaintiff,

v.

BLOCK, INC. (F/K/a, SQUARE, INC.)
(D/B/A, CASH APP)

Defendant.

Case No. 2:23-cv-01969-JHC

**DECLARATION OF KIMBERLY
BOTTOMS IN SUPPORT OF PLAINTIFF'S
MOTION FOR ATTORNEYS' FEES, COSTS
AND SERVICE AWARD**

I, Kimberly Bottoms, declare as follows:

1. I am over eighteen and I have personal knowledge of the facts set forth in this Declaration, and if called as a witness for this purpose, I could and would testify competently under oath to them.

2. I am a named Plaintiff in the above-captioned action. I submit this Declaration in support of Plaintiff's Motion for Attorneys' Fees, Costs and Service Award.

3. I received a referral text message urging me to join Cash App in March 2023. I never requested such advertisements from the Cash App user that sent me the text message and I was not interested in Cash App's services.

4. I found out about potential legal action against Cash App for such spam text messages when I saw a Facebook advertisement regarding an investigation by Berger Montague

1 PC. I contacted Berger Montague PC for the purposes of obtaining legal advice regarding a
2 potential legal claim against Cash App.

3 5. I retained Berger Montague PC following my initial contact.

4 6. After a discussion with my lawyers, I decided to participate in a claim against Cash
5 App as a Class Representative. I was fully prepared to participate in every aspect of this case,
6 including trial if necessary.

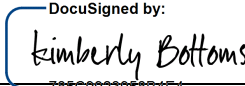
7 7. I estimate I have spent at least 50 hours participating in this litigation.

8 8. Throughout the case, I took my responsibilities as a Class Representative seriously
9 and always had the best interests of the class in mind. I have stayed actively involved in every
10 stage of this litigation for more than one and a half years.

11 9. I actively participated in discovery by responding to written requests and searching
12 for and producing hundreds of pages of documents from my personal email, social media accounts,
13 and text messages. I prepared for and sat for an in-office, full-day deposition. During the
14 deposition, I was asked personal questions about my social media, the person who sent me a
15 referral text, and my finances. In order to attend my deposition, I turned down an opportunity to
16 work at the Washington State Fair that would have paid me \$2,500. I also reviewed and approved
17 the settlement agreement.

18
19 The foregoing statement is made under penalty of perjury and is true and correct to the
20 best of my knowledge and belief.

21 EXECUTED at Port Angeles, Washington this 24th day of September, 2025.

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23 By: 
24 Kimberly Bottoms
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