

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOSEPH MANTHA on behalf of himself)	
and all others similarly situated,)	
)	
Plaintiff,)	Civil No. 19-12235-LTS
)	
v.)	
)	
QUOTEWIZARD.COM, LLC)	
)	
Defendant.)	

DECLARATION OF JOSEPH MANTHA

I attest under the pains and penalties of perjury, that the following facts are true and based on my personal knowledge.

1. I am a resident of Massachusetts where I live with my wife Melisa and my two young children.
2. Together with my counsel, I have worked diligently on this case since its filing in the fall of 2019.
3. I decided to file this case after having received illegal telemarketing calls for many years. I found these calls annoying and invasive of my privacy.
4. When I learned that I could pursue a lawsuit against a telemarketer on behalf of not only myself, but on behalf of all other consumers who received similar calls, I decided to take action.
5. One of the telemarketers I received telemarketing texts from was QuoteWizard. I received telemarketing texts from QuoteWizard even though my cell phone number was long listed on the National Do Not Call list. I decided to pursue a claim against QuoteWizard on behalf of myself and all other consumers who received similar calls.

6. QuoteWizard responded to the lawsuit by attacking me. It accused me of consenting to receive their texts when I had never done so. It accused myself and my counsel of engaging in unethical conduct by filing the lawsuit. These threats caused me great stress and concern. I was worried that QuoteWizard would file a counter-claim as many telemarketers do in response to being sued by consumers for violating the TCPA.
7. Over the course of discovery in this case, QuoteWizard deposed me on two occasions. It also insisted on deposing my wife, who had absolutely nothing to do with the case.
8. QuoteWizard also deposed my friend, Steven Novia, who initially explained to me that many of the telemarketing calls and texts I had received were illegal. Steve had pursued TCPA claims himself and referred me to his attorney Alex Washkowitz.
9. QuoteWizard claimed that Mr. Novia and I were engaged in an unethical money-making scheme to file frivolous telemarketing claims. QuoteWizard deposed Mr. Novia. It further insisted on deposing my employer, and sent it a subpoena for records, without regard to how this might affect said employment. QuoteWizard's baseless allegations against me of unethical conduct caused me stress and concern as to my employer's reaction.
10. Furthermore, Quotewizard during the various depositions claimed that my wife's brother, who has suffered from mental health and addiction issues, lived with us and somehow conspired or otherwise facilitated consent for me to receive text message solicitations that none of us had anything to do with. This false accusation caused familiar strife within my house.
11. After initially claiming I was engaged in an unethical scheme, QuoteWizard then switched strategy and tried to entice me to drop my class claims in exchange for an individual payment. These settlement offers gradually increased in size over the years, ultimately reaching \$100,000.00.
12. Although that amount of money would have made a substantive difference to our family, the offer did not include any relief whatsoever for the class. It also did not include any provisions to require QuoteWizard to comply with the law going forward.
13. I understood at all times that when I agreed to serve as a class representative, I had agreed to look out for all class members, and not just myself.

14. As these offers provided no relief to other class members, I rejected each one of these offers.
15. Throughout this litigation, I worked closely with my counsel to respond to many sets of discovery and multiple depositions.
16. I also read carefully many of the motions and briefs submitted by my counsel throughout this case and stayed current with the status of the ongoing case with updates. I consulted closely with my counsel throughout the entire litigation and settlement process to ensure that an excellent result was reached for all members of the class.
17. I respectfully ask that this Court approve the requested service award.
18. Regardless of the amount, however, it is most important to me that this Court recognize that the defendant's attacks on my character, the character of my friend and the professionalism of my legal counsel were false, frivolous, extensive, and completely unwarranted.

PURSUANT TO 28 U.S.C. § 1746, I DECLARE SIGNED UNDER PENALTY OF PERJURY OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT EXECUTED THIS 18th DAY OF JULY, 2025 IN THE COMMONWEALTH OF MASSACHUSETTS.

Signed by:



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Joseph Mantha