

DECLARATION OF HOLLIE SCHULTZ

I, Hollie Schulz, state as follows:

1. I am the co-creator and publisher of The Baby Gizmo website and blog has been active at BabyGizmo.com since 2006.
2. As a middle class, middle American mother, I did a lot of baby product shopping and was incredibly choosy about the purchases I made for my children.
3. Over many years, my product research skills expanded to include calls directly with manufacturers, trips to industry trade shows, and the creation of The Baby Gizmo Company.
4. Baby Gizmo was the internet's first and, for many years, the only product resource guide dedicated to baby gear that parents could trust.
5. Baby Gizmo evolved into an independent product testing and research coalition of moms, pediatricians, and child development experts from around the country.
6. Baby Gizmo has had millions of Mom Reviewers write in with baby gear they loved and loved to hate, and had a team of many Mom Editors from across the country helping create content Baby Gizmo, but I remained Senior Editor of Baby Gizmo.
7. Baby Gizmo also had a YouTube channel which I used to post since 2006.
8. On the Baby Gizmo YouTube channel, I posted videos reviewing child products for parents to understand the different features of different products and get an honest opinion on the value before purchasing.
9. All videos posted on the Baby Gizmo YouTube channel were made publicly available immediately as of their posting date on the open Internet without restriction or payment.
10. Many of my early videos were reviews of strollers.

11. Because of the large following of Baby Gizmo, many of the strollers I reviewed were samples provided directly by manufacturers.

12. I recorded most of the video stroller videos were myself in various locations around Chicago, Illinois and Charlotte, North Carolina.

13. A screenshot from the Baby Gizmo YouTube channel attached as Exhibit 1 shows all of the videos I posted before December 2008.

14. On June 12, 2007, I posted the video titled “Baby Gizmo Uppa Baby Vista” on the Baby Gizmo YouTube channel, available at <https://www.youtube.com/watch?v=9IrmQs8kL5I> and attached as Exhibit 2.

15. I received the Uppa Baby Vista stroller before filming the video, on or before June 12, 2007.

16. As seen in that video, the Uppa Baby Vista stroller is a luxury stroller system that came with the frame, a toddler seat, and bassinet, as seen below:



17. In that review, I demonstrated how the Uppa Baby Vista stroller seat was removable and reversible to either face the parent or face out, as seen in the screenshots below. (Exhibit 2, 1:15-1:22.)



18. I also demonstrated the foldability of the Baby Planet Unity Sport Double stroller for parents without the toddler seat or bassinet attached (Exhibit 2, 2:00-2:05) and with the toddler seat attached (Exhibit 2, 2:05-2:22.)

19. On June 14, 2007, I posted the video titled “Baby Gizmo Joovy Caboose” on the Baby Gizmo YouTube channel, available at <https://www.youtube.com/watch?v=8Z0S4UJuUMc> and attached as Exhibit 3.

20. I recieved the Joovy Caboose stroller before filming the video, on or before June 14, 2007.

21. As I describe in the video, the Joovy Caboose stroller is a double stroller that allows a younger child to sit in the front, and an older child to sit or stand in the back, as seen below:



22. I demonstrated the Joovy Caboose stroller’s car seat adapter, which clipped onto the front of the front seat and allowed a parent to attach a car seat on the stroller.

23. I also demonstrated the foldability of the Joovy Caboose stroller for parents. (Exhibit 3, 1:45-2:01.)

24. On July 10, 2007, I posted the video titled “Baby Gizmo Mutsy 4Rider” on the Baby Gizmo YouTube channel, available at <https://www.youtube.com/watch?v=iuKXuVwCk0s> and attached as Exhibit 4.

25. I recieved the Mutsy 4Rider stroller before filming the video, on or before July 10, 2007.

26. Musty, as discussed in the video, is a well-known stroller manufacturer in the Netherlands and had just made its debut in the United States.

27. The Mutsy 4Rider is a luxury stroller system that was sold with the frame, stroller seat, and bassinet, as seen below:



28. With stroller systems such as the Mutsy 4Rider, the stroller seat/bassinet clip onto the stroller frame. I demonstrated the removal and reversibility of the seat, seen below. (Exhibit 4, 1:24-1:45)



29. I also demonstrated the foldability of the Mutsy 4Rider stroller for parents, where it can be folded with or without the seat/bassinet attached. (Exhibit 4, 1:01-1:23.)

30. On July 29, 2007, I posted the video titled “Baby Gizmo Valco Baby TriMode Review” on the Baby Gizmo YouTube channel, available at <https://www.youtube.com/watch?v=UGtXcpYdsAs> and attached as Exhibit 5.

31. I recieved the Valco Baby TriMode stroller on or before filming the video on July 29, 2007.

32. The Valco Baby TriMode stroller was sold as a single stroller having three wheels: one in the front, and two in the back.



33. In my review, I discuss how with the addition of Valco’s optional toddler seat that attaches, the Valco Baby TriMode stroller can turn into a double stroller. (Exhibit 5, 0:36-0:40.)

34. I explain how the toddler seat sits on the front, almost like a shopping cart, to sit up front while the second child sits reclined in the seat. (Exhibit 5, 3:02-3:14.)

35. I also explain how the Valco Baby TriMode has optional car seat adapters that work with a variety of major car seat manufacturer products. (Exhibit 5, 3:14-3:23.)

36. I also demonstrated the foldability of the Valco Baby TriMode stroller for parents. (Exhibit 5, 3:22-3:55.)

37. On November, 5, 2007, I posted the video titled “Baby Gizmo Baby Planet Unity Sport Double Stroller Review” on the Baby Gizmo YouTube channel, available at <https://www.youtube.com/watch?v=zS4p82qv15Y> and attached as Exhibit 6.

38. I recieved the Baby Planet Unity Sport Double stroller before filming the video, on or before November, 5, 2007.

39. As seen in that video, the Baby Planet Unity Sport Double stroller was a double side-by-side stroller, as seen in the below screenshot:



40. I also demonstrated the foldability of the Baby Planet Unity Sport Double stroller for parents. (Exhibit 6, 2:26-3:01.)

41. On November, 5, 2007, I also posted the video titled “Baby Gizmo Dreamer Design Park Avenue Stroller Review” on the Baby Gizmo YouTube channel, available at <https://www.youtube.com/watch?v=6G4B4Ebz85w> and attached as Exhibit 7.

42. I recieved the Dreamer Design Park Avenue stroller before filming the video, on or before November, 5, 2007.

43. As seen in that video, the Dreamer Design Park Avenue stroller was a luxury single three-wheel stroller, as seen in the below screenshot:



44. I demonstrated how the Dreamer Design Park Avenue stroller seat was removable and reversible, either facing the parent or facing away, as seen below. (Exhibit 7, 0:26-0:40.)



45. I also demonstrated the foldability of the Dreamer Design Park Avenue stroller for parents. (Exhibit 7, 2:26-3:01.)

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47. I recieved the Graco Quattro Tour Duo stroller before filming the video, on or before August 25, 2008.

48. As seen in that video, the Graco Quattro Tour Duo stroller is a tandem double stroller with its seats oriented stadium-style, as seen in the below screenshot:



49. In the review, I discussed show the Graco Quattro Tour Duo stroller can accept two infant car seats, one over the back seat and one over the front seat, which is great for parents of twins. (Exhibit 8, 2:23-2:40.)



50. I also demonstrated the foldability of the Graco Quattro Tour Duo stroller, showing how to collapse and reopen the stroller. (Exhibit 8, 2:50-3:16.)

51. On October 22, 2008, I posted the video titled “Baby Gizmo Peg Perego Skate Stroller Review” on the Baby Gizmo YouTube channel, available at <https://www.youtube.com/watch?v=LxtK-FQdEjY> and attached as Exhibit 9.

52. As seen in that video, the Peg Perego Skate Stroller had a reversible seat in which the child could face the parent, or away from the parent (Exhibit 9, 2:21-2:38) and I demonstrated its foldability (Exhibit 9, 6:22-7:17.)



53. After years of the Baby Gizmo Company blogs, reviews, and videos, I decided to write a stand-alone book that explained the ins and outs of baby products to new and old parents alike.

54. I intended the book to not be a review of individual products, as it would quickly become outdated as new products launched, but rather as an overall guide for new parents with factors and features to consider when purchasing baby gear. The book was a “how” to buy rather than telling parents “what” to buy.

55. In February 2008, my book *The Baby Gizmo Buying Guide: From Pacifiers to Potties . . . Why, When, and What to Buy for Pregnancy Through Preschool* (“The Baby Gizmo Buying Guide”) was published. The Baby Gizmo Buying Guide is attached as Exhibit 10.

56. The Baby Gizmo Buying Guide was intended to help new and experienced parents alike select the right products for their unique needs and lifestyle, and provide an overview of various types of products available in each major baby product market.

57. The Baby Gizmo Buying Guide was the most comprehensive guide to baby products available when it was published, and remains a resource for new and experienced parents alike.

58. The Baby Gizmo Buying Guide was available for anyone who wanted to buy a copy at least as early as March 2008 through Amazon and at Barnes and Noble.

59. Chapter 25 of the Baby Gizmo Buying Guide is dedicated to exclusively to strollers.

60. Chapter 25 begins with a short discussion about designer stroller company Bugaboo. When Bugaboo introduced its stroller to the market and it hit the American mainstream after being featured on the television show *Sex in the City*, it caused a Bugaboo trickle-down design effect that has hit almost every major stroller manufacturer.

61. Folding strollers were prevalent in the stroller industry at the time of publication.

62. A few pages in chapter 25 are dedicated to discuss all the different terminology the stroller industry uses for the way a stroller folds, such as a flat fold, umbrella fold/three-dimensional fold, two-piece fold, compact tri-fold, one-hand fold, one-touch fold, one-step fold, five-second fold, quick fold system, and standing fold.

63. Chapter 25 continues with discussions about carriages, single standard strollers, travel systems, lightweight-plus strollers, lightweight/umbrella strollers, luxury stroller systems, all-terrain strollers, jogging strollers, double standard strollers, double lightweight/umbrella strollers, double all-terrain strollers, double jogging strollers, strollers-and-a-half, and multiples strollers.

64. These separate types of strollers generally aligned with how the Baby Gizmo website was organized.

65. Within the travel systems section of chapter 25, a “travel system” is described as a single standard stroller packaged with a complimentary infant car seat carrier designed to be clipped into said stroller.

66. Luxury stroller systems like the Bugaboo were three-strollers in one: a carriage, a toddler stroller, and an all-terrain stroller.

67. Luxury stroller systems typically came with detachable carry-cots that could be easily carried into a house and used as a Moses basket. Now, many come with infant car seat carriers.

68. Most luxury stroller systems required you clip the stroller seat onto the frame, so I cautioned readers to consider these features when buying a luxury stroller system.

69. Within the double standard strollers section of chapter 25, the two different types of double standard strollers are outlined: tandem seating and side-by-side seating.

70. Tandem seating, described as “when one seat sits in front of the other,” was the most popular seating arrangement in double strollers.

71. The book continues to describe that “Many tandems go one step further and offer stadium seating, giving the little guy in the back a view from the top.”

72. Again in the double all-terrain section of chapter 25 side-by-side seating and tandem seating are discussed.

73. Tandem basket seating is discussed as a newer design at the time of publication for double all-terrains strollers, where a second seat is mounted “underneath and slightly behind” where the stroller basket would be.

74. The last strollers discussed in chapter 25 are multiples strollers to accommodate families with three or more children. The book discusses how both side-by-side-by-side options exist, as well as inline/tandem arrangements with stadium seating.

I declare under penalty of perjury that the foregoing is true and correct.

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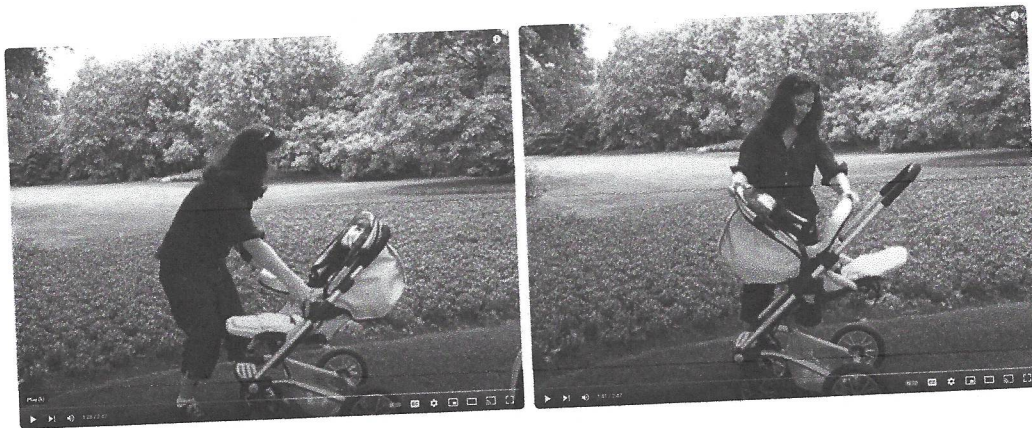
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I declare under penalty of perjury that the foregoing is true and correct.

Dated: 1/21/25

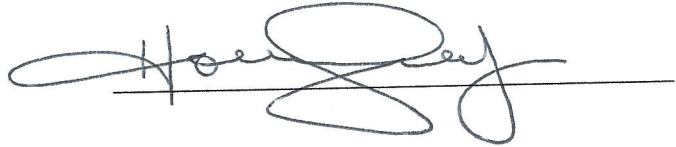
A handwritten signature in black ink, appearing to read "H. J. Gray", is written over a horizontal line.

EXHIBIT LIST TO HOLLY SCHULTZ DECLARATION

- Exhibit 1: Screenshot from Baby Gizmo YouTube channel – Pre-December 2008 videos
- Exhibit 2: June 12, 2007 "Baby Gizmo Uppa Baby Vista" video available at <https://www.youtube.com/watch?v=9IrmQs8kL5I>
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- Exhibit 10: Heather MacLean & Hollie Schultz, The Baby Gizmo Buying Guide, (Thomas Nelson, 2008.)

EXHIBIT 1
Hollie Schultz Declaration
Baby Gizmo YouTube Channel Screenshot

Baby Gizmo - YouTube

youtube.com/@BabyGizmoCompany/videos

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Subscriptions

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Baby Gizmo Valco Baby TriMode Review
25K views · 17 years ago

Baby Gizmo Lillebaby Eurotote Review
7.2K views · 17 years ago

Baby Gizmo Bumbleride Indie Stroller Review
30K views · 17 years ago

Baby Gizmo Stokke Tripp Trapp Review
63K views · 17 years ago

Baby Gizmo Dreamer Design Park Avenue Stroller Review
10K views · 17 years ago

Baby Gizmo Quinny Buzz Review
202K views · 17 years ago

Baby Gizmo Quinny Zapp Review
199K views · 17 years ago

Baby Gizmo Baby Planet Unity Sport Double Stroller Review
27K views · 17 years ago

Baby Gizmo Svan High Chair Review
42K views · 16 years ago

Baby Gizmo Fisher Price Healthy Care High Chair Review
50K views · 16 years ago

Baby Gizmo Fisher Price Space Saver High Chair Review
40K views · 16 years ago

Baby Gizmo Valco Baby Rad Stroller Review
9.8K views · 16 years ago

Baby Gizmo Chicco Cortina Stroller Review
98K views · 16 years ago

Baby Gizmo Maclaren Quest Stroller Review
122K views · 16 years ago

Baby Gizmo Inglesina Zuma High Chair Video Review
66K views · 16 years ago

Baby Gizmo Chicco Polly High Chair Review
73K views · 16 years ago

Baby Gizmo Peg Perego Prima Pappa Best High Chair Review
87K views · 16 years ago

Baby Gizmo Bumbleride Indie Twin Review
30K views · 16 years ago

Baby Gizmo Maxi Cosi Foray Review
159K views · 16 years ago

Baby Gizmo Maxi Cosi Perle Review
26K views · 16 years ago

Baby Gizmo - YouTube

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26K views · 16 years ago

Baby Gizmo Eddie Bauer Endeavor Travel System Review
39K views · 16 years ago

Baby Gizmo Boon Flair High Chair Review
60K views · 16 years ago

Baby Gizmo Top 5 Picks for High Chairs
43K views · 16 years ago

Baby Gizmo Micralite Toro Stroller Review
56K views · 16 years ago

Baby Gizmo Baby Jogger City Mini Stroller Review
198K views · 16 years ago

Baby Gizmo Graco Quattro Tour Duo Stroller Review
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