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Attorneys for Plaintiff

HARSH ALKUTKAR

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

HARSH ALKUTKAR, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

BUMBLE INC. and BUMBLE HOLDING
LIMITED,

Defendants.

Case No.:

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

1 Plaintiff Harsh Alkutkar (“Plaintiff”), individually and on behalf of all others similarly
2 situated, brings this action against Defendants Bumble Inc. and Bumble Holding Limited (together
3 “Bumble” or “Defendants”). Upon personal knowledge as to his own acts and status and upon
4 information and belief as to all other matters, Plaintiff alleges the following:

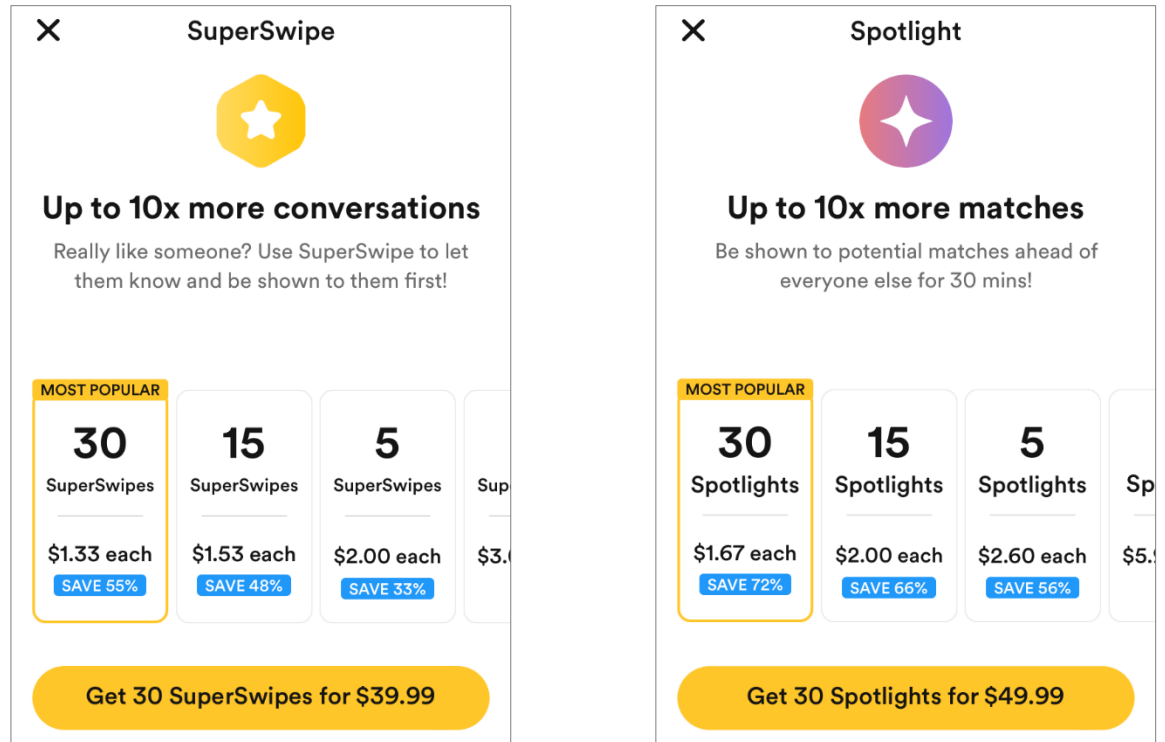
5 INTRODUCTION

6 1. This is a class action against Bumble for false advertising on its popular dating
7 software application (“app”) called Bumble. The app works by allowing users to create their own
8 profile, with photos and information about themselves. Bumble then presents users with other user
9 profiles on which users can ‘swipe’ left or right to ‘like’ or ‘dislike’ the other user. When two users
10 mutually swipe right on one another’s profile, they ‘match.’ After two users match, Bumble creates
11 a private line of communication between the users, after which they can start a ‘conversation.’

12 2. Bumble is unique among the dating apps because on Bumble, “women make the first
13 move” and “men cannot initiate a conversation with women.”¹ To increase the likelihood of
14 matching with another user, Bumble advertises premium features that users can purchase.

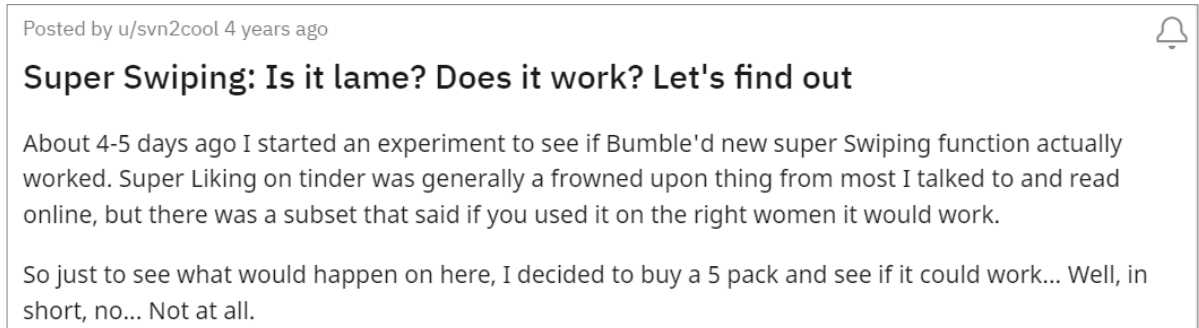
15 3. Two examples of such features are “Spotlights” and “SuperSwipes.” To induce users
16 to purchase Spotlights, Bumble advertises that users will receive “**Up to 10x more matches.**” To
17 induce users to purchase SuperSwipes, Bumble advertises that users will receive “**Up to 10x more**
18 **conversations.**” Users understand “10x more conversations” to mean they will receive ten times
19 more matches because a match is required before a conversation can start.

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28 ¹ Source: [https://bumble.com/help/why-can-t-i-start-a-conversation-with-somebody-i-ve-swiped-](https://bumble.com/help/why-can-t-i-start-a-conversation-with-somebody-i-ve-swiped-right-on)
[right on](https://bumble.com/help/why-can-t-i-start-a-conversation-with-somebody-i-ve-swiped-right-on) last visited January 21, 2022.



4. The claims that Spotlights and SuperSwipes provide up to ten times more matches and conversations are gross exaggerations of the actual benefits these features provide. Indeed, even Bumble's website and official Twitter account seem to contradict these claims, instead promising that "Men who use SuperSwipe are twice as likely to get a match" and "users who SuperSwipe are twice as likely to match!"²

5. But even twice the number of matches is a gross exaggeration of the benefit that SuperSwipes provide. In reality, it appears that most men who use SuperSwipes see no increase in matches whatsoever. For example, on one internet website, several men complained:



² Source: <https://bumble.com/en-us/the-buzz/how-to-get-more-matches> and <https://twitter.com/bumble/status/978425900526521344>. Last visited January 21, 2022.



NeedAcuteHispanicGf · 19 days ago

Bumble superswipes are a scam, they do not show her that you superswiped her prior to her swiping on you. You arent even moved to the front of the deck. You skip maybe 10-20 profiles but there will be several that she sees before you. And yours looks ordinary, doesnt shine in gold colors saying you superswiped her. I tested it with two accounts and superswiped myself

1 Reply Share Report Save Follow

3

Posted by u/omgitsmint 1 year ago

**Superswipe is BROKEN**

So, I thought I'd give superswipes a go. Stupidly, I bought 30 instead of 2.

Anyway, now that I had 30 superswipes to use, I thought it would be a good idea to properly test it out.

Now, I only used all superswipes on high-quality profiles that appealed to me.

I gave everyone two weeks to check their profile.

How many matches did I get? Zero.



[deleted] · 3 yr. ago

Fuck super swipes.

I remember about a year ago buying like 25, and getting 1 match with a woman who ghosted me.

6 months later buying another 25, no matches.

4



redi20 · 1 yr. ago

It's not the app and it's likely not you either.

After buying 30 SuperSwipes nearly every day for weeks, sometimes multiple 30's a day, I can say with authority that it's not worth it. And, yet, sometimes I see a spectacular woman and still throw my money away, hoping it will make a difference. 99% of the time it doesn't, but at least I know what to expect.

Bumble is designed for women to choose, and choose they do. If they're interested, they'll swipe you.

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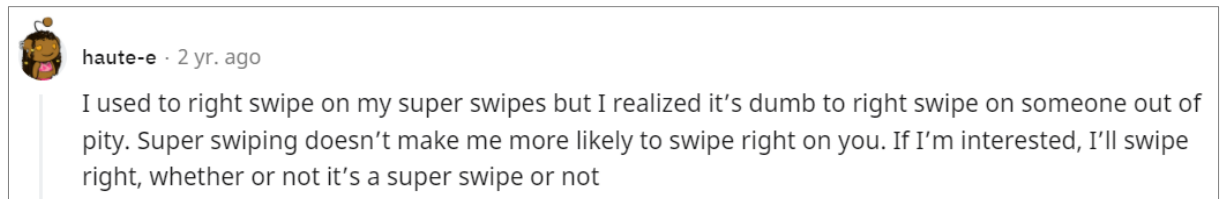
³ Source: https://www.reddit.com/r/Bumble/comments/6s114c/super_swiping_is_it_lame_does_it_work_lets_find, last visited January 21, 2022.

⁴ Source: https://www.reddit.com/r/datingoverthirty/comments/a8ei2u/if_you_use_bumble_what_are_your_feelings_on, last visited January 21, 2022.

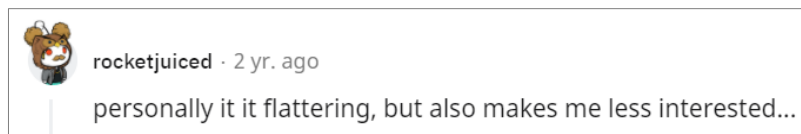
⁵ Source: https://www.reddit.com/r/Bumble/comments/kj0ihr/superswipe_is_broken, last visited January 21, 2022.

6. Ironically, under some circumstances, SuperSwipes may actually harm a man's chances at matching with a woman. Normally, when a woman is viewing a man's profile, she has no way of knowing whether the man has swiped left or right on her. SuperSwipes eliminate that uncertainty by letting the woman know that the user whose profile she is viewing already 'SuperSwiped' on her. According to Bumble, SuperSwipes allows men to "make a bold first impression" and "tell a potential match you're confidently interested in them." Inadvertently, SuperSwipes also tell potential matches that the user spent a lot of money to make that impression.

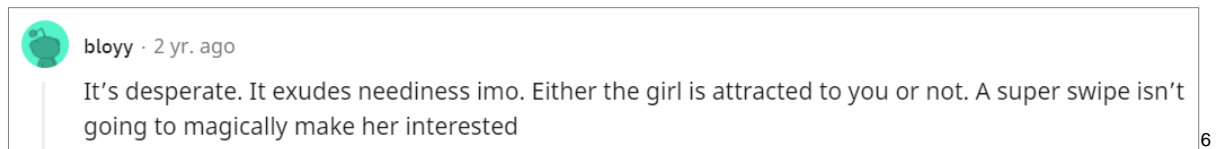
7. For example, in response to the question, "Ladies, Does Super Swipe make you consider someone more?" one woman responded:



Another woman responded:



And yet another woman responded:



8. It appears Bumble recognizes that informing women that a man spent money on a premium feature might make that woman less—not more—attracted to the man. For that reason, in its Spotlight marketing, Bumble assures men that "you'll advance your profile to the top of the stack to be viewable by more people instantly *without anyone knowing*."⁷

⁶ Source: https://www.reddit.com/r/Bumble/comments/cugrd8/ladies_does_super_swipe_make_you_consider_someone, last visited January 1, 2022.

⁷ <https://bumble.com/help/what-is-spotlight> (emphasis added), last visited January 21, 2022.

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