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# IF YOU PURCHASED SECURITIES ISSUED BY ROSE CITY INCOME FUND I, ROSE CITY INCOME FUND II, AND/OR SENECA VENTURES, YOU MAY BE ENTITLED TO A PAYMENT FROM A CLASS ACTION SETTLEMENT.<sup>1</sup>

# A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

The purpose of this Notice is to inform you of: (i) the pendency of a class action pending in the United States District Court for the District of Oregon known as *Amit Fatnani and Srinivas Guruzu v. JPMorgan Chase & Co, et al.*, No. 3:23-cv-00712 concerning a crypto-currency based Ponzi scheme operated by Sam Ikkurty (the "Action"); (ii) the proposed settlements of claims against certain Defendants in the Action (the "Settlements," as defined below); and (iii) an upcoming hearing to be held by the Court to consider: (a) whether the Settlements and (b) Class Counsel's application for attorneys' fees and expenses, as well service awards (not to exceed \$5,000) to be awarded to the Class Representatives, should be approved (the "Fairness Hearing") You are receiving this Notice because records reflect that you are a member of the settlement class entitled to receive payment in connection with the Settlements. This Notice describes important rights you may have and what steps you must take if you wish to be excluded from the Class (defined below).

The proposed Settlements have been reached with Defendants Mercury Technologies, Inc. ("Mercury") and Evolve Bank & Trust ("Evolve"), (collectively "Settling Defendants"). The Settlements resolve all claims in the Action involving Settling Defendants, only. Claims against other defendants in the case will continue whether or not the Settlements are approved.

**Terms of the Settlements:** The Settlements provide for \$90,000, collectively, in cash (the "Settlement Funds") paid pursuant to the terms of certain Stipulations of Settlement ("Stipulations") entered into between Plaintiff and Mercury on September 27, 2024, and Plaintiff and Evolve on October 3, 2024. The Evolve and Mercury Settlements are collectively referenced herein as the "Settlements." The net proceeds from these Settlements (after deduction of any fees and expenses, and payment of any service award to the Class Representatives, all as described in more detail herein) will be distributed to Class Members on a *pro rata* basis pursuant to the plan of allocation approved by the Court. See the answer to question 9 (page 5) for more information regarding the allocation of the proceeds from these Settlements.

If you are a Class Member (and have not excluded yourself from the Class), you can object to the Settlements or Class Counsel's request for an award of attorneys' fees, charges, and expenses in representing the Class, or to Class Counsel's request for service awards for Settlement Class Representatives. Any objection must be in writing and must include all grounds for the objection. The Court will consider your views. Information on how to object is in the answer to question 19 (page 7).

Request Exclusion:	, 2024/5
File Objection to Settlements:	, 2024/5
File Objection to Settlement Class Counsel's request for attorney's fees and/or service awards for Settlement Class Representatives :	, 2024/5
Court Hearing on Fairness of Settlements:	, 2024/5

# Deadlines:

**Class Definition:** The Settlement Class is defined as All individuals and entities that invested in the Alleged Ponzi Scheme and/or contributed funds to the Alleged Ponzi Scheme Entities<sup>2</sup>.

<sup>&</sup>lt;sup>2</sup> The "Alleged Ponzi Scheme" means the alleged fraudulent scheme referenced in Plaintiff's Second Amended Complaint, available at <u>www......com</u>. The Alleged Ponzi Scheme Entities are defined in the Settlements to include Jafia, LLC; Rose City Income Fund; Rose City Income Fund II, LP; MySivana, LLC; Merosa, LLC; Seneca Ventures, LLC; and any other entities that played a similar role in the Alleged Ponzi Scheme.

**Reason for Settlement:** The Settlements provide guaranteed recovery for the Class on disputed claims against the Settling Defendants. In addition to the total settlement amount of \$90,000, the Settlements avoid the costs, delay, and risks associated with continued litigation, including the danger of no recovery. Continuing with the case against Settling Defendants could have resulted in loss at the motion to dismiss or summary judgment stages, or at trial or on appeal. The parties vigorously disagree on both liability and the amount of money that could have been won if the Class Representatives prevailed at trial. Settling Defendants expressly deny all of the claims and allegations of wrongdoing or liability made against them arising out of any of the conduct alleged in the Action.

The Class Representatives and Class Counsel believe that this substantial benefit, payable upon final approval of the Settlements by the Court, is preferable to the risks of continued litigation and the possibility of a smaller recovery, or no recovery, years into the future after a trial and any appeals.

**Attorneys' Fees and Expenses:** Court-appointed Class Counsel will ask the Court for attorneys' fees up to 33% of the Settlements, and reimbursement of litigation expenses to be paid from the Settlement Fund. Class Counsel have not received any payment for their work investigating the facts, prosecuting this Action, and negotiating these Settlements on behalf of the Class Representatives and the Class.

Settlement Administrator:	Representatives of Class Counsel:
Stretto Fatnani, et al., v. JPMorgan Chase & Co., et al., c/o Stretto 410 Exchange, Ste. 100 Irvine, CA 92602	Peiffer Wolf Carr Kane Conway & Wise, LLP   Daniel B. Centner   935 Gravier St., Suite 1600,   New Orleans, LA 70112   dcentner@peifferwolf.com;   Silver Law   Scott L. Silver   11780 W. Sample Road, Suite 103   Coral Springs, Florida 33065   ssilver@silverlawcom;   Olsen Daines   Michael Fuller   10011 SE Division St. Suite 314   Portland, OR 97266   michael@underdoglawyer.com.

# More Information:

Your legal rights are affected whether you act or do not act. Read this Notice carefully.

# DO NOT CALL THE COURT WITH QUESTIONS ABOUT THE SETTLEMENTS

YOUR LEGAL RIGHTS AND OPTIONS IN THESE SETTLEMENTS	
DO NOTHING	If you agree to the Settlements and wish to participate in the distribution of the proceeds from these Settlements, you do not need to do anything.
EXCLUDE YOURSELF	Get no payment. This is the only option that allows you to pursue your own lawsuit against Settling Defendants or the Released Parties for the legal claims in this Action or any other Released Claims.
GO TO THE HEARING	You may ask to speak in Court about the fairness of the Settlements, the request for attorneys' fees, charges, and expenses, or the request for service awards for the Class Representatives.

OBJECT	You may write to the Court if you do not like any aspect of the Settlements, the request for attorneys' fees, charges, and expenses, or the request for service awards for the Class Representatives. If you exclude yourself, you cannot also object to the Settlements.
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These rights and options, and the deadlines to exercise them, are explained in this Notice.

# The Court in charge of this case must decide whether to approve the Settlements. Payments will be made if the Court approves the Settlements and after objections or appeals, if any, are resolved. Please be patient.

# **BASIC INFORMATION**

# 1. Why Did I Get This Notice Package?

This Notice is being sent to you pursuant to an order of the United States District Court for the District of Oregon (the "Court") because you may have purchased securities in Rose City Income Fund, Rose City Income Fund II, LP and/or Seneca Ventures LLC, and suffered losses thereby. The Court directed that you be sent this Notice because a class action lawsuit has been filed that potentially impacts your rights. You have been identified as a member of the Class and have a right to know about the proposed Settlements that include some, but not, all, of the Defendants in this class action lawsuit, and about all of your options, before the Court decides whether to approve the Settlements.

The United States District Court for the District of Oregon is the Court in charge of the case, and the case is known as *Amit Fatnani, et al. v. JPMorgan Chase & Co, et al.*, No. 3:23-cv-00712 (the "Action"). Amit Fatnani and Srinivas Guruzu (the "Class Representatives") brought this case on behalf of themselves, and others similarly situated. The case named multiple defendants, including but not limited to Mercury and Evolve (previously defined as the "Settling Defendants"). The Class Representatives and Settling Defendants have entered into proposed Settlements that, if approved, would resolve claims against the Settling Defendants, only. Claims against other Defendants in the Action will continue whether or not the Settlements are approved. The Settlements are only effective if they are approved by the Court.

This package explains the lawsuit, the terms of the Settlements, your legal rights, what benefits are available, who is eligible for those benefits, and how to obtain them. The purpose of this Notice is to inform you of this Action, that it is a proposed class action, how you might be affected, and how to exclude yourself from the Settlements if you wish to do so. It is also being sent to you to inform potential members of the Class of a hearing to be held by the Court to consider the fairness and reasonableness of the Settlements and to consider Class Counsel's motion for attorneys' fees and for the reimbursement of litigation expenses and related issues (the "Fairness Hearing").

The Fairness Hearing will be held before the Honorable Michael H. Simon on \_\_\_\_\_\_ 2024/5, in Courtroom \_\_\_\_\_ of the United States District Court for the District of Oregon, Mark O. Hatfield U.S. Courthouse, 1000 SW Third Ave., Portland, OR 97204. At the Fairness Hearing, the Court will determine:

- (i) whether the Settlements are fair, reasonable, and adequate, and should be finally approved by the Court;
- (ii) whether the judgments provided for under the Settlements should be entered, dismissing the claims against Settling Defendants, and whether the releases set forth in the Settlements should be ordered;
- (iii) whether Class Counsel's motion for an award of reasonable attorneys' fees (not to exceed 33% of the gross settlement amount) and reimbursement of litigation expenses, as well as a reasonable service award for the Class Representative (not to exceed \$5,000 each), should be approved.

# 2. What Is This Lawsuit About, and What Has Happened in the Lawsuit So Far?

This Notice does not express any opinion by the Court concerning the merits of any claim in the Action, and the Court still has to decide whether to approve the Settlements. If the Court approves the Settlements, and after any objections or any

appeals are resolved, the Settlement Administrator appointed by the Court will make the payments that the Settlements allow.

On August 30, 2024, the Class Representatives filed the operative complaint in a proposed class action. The Class Representatives, on behalf of themselves and all other similarly situated investors, assert claims under the Oregon Securities Law based on his purchases of certain "Rose City" securities that were later determined to be a Ponzi scheme. The Class Representatives allege that the securities at issue were sold in violation of the Oregon Securities Law because the issuers: 1) did not register the securities; and 2) sold the securities by means of untrue statements and omissions of material adverse facts regarding: (a) the use of investor funds; (b) the return of investor funds as distributions; and (c) various other misrepresentatives and other investors lost millions of dollars. The lawsuit further alleges that the Settling Defendants are jointly and severally liable for the violations of the Oregon Securities Law because they participated or materially aided in the allegedly illegal securities sale. Settling Defendants deny liability.

# 3. Why Is This Action a Class Action?

In a class action, one or more people called class representatives (in this case the Class Representatives identified above) sue on behalf of people who have similar claims. All of these people and/or entities together are called a "Class" or "Class Members." One court resolves the issues for all Class Members, except for those who exclude themselves from the Class.

# 4. Why Is There a Settlement?

The parties disagree about numerous issues in this Action, including: (1) whether the "Rose City" securities were required to be registered; (2) whether those securities were sold by means of false statements or omissions; (3) whether the Settling Defendants can be held liable for the sale of the securities; (4) whether the Court has jurisdiction over Settling Defendants; and (5) whether the Action can properly be maintained as a class action.

The Court did not decide in favor of the Class Representatives or Settling Defendants. Instead, the lawyers for settling parties have negotiated settlements that they believe are in the best interests of their respective clients. The Settlements allow settling parties to avoid the risks and cost of lengthy and uncertain litigation and the uncertainty of a trial and appeals, and permit Class Members to be compensated without further delay.

Had the case proceeded, the Class faced numerous difficult and complex legal and factual issues that presented significant risks to the case. Had Settling Defendants prevailed on any one of these issues, the Class would have received nothing. The case will continue against the non-settling Defendants.

In light of the risks of continued litigation with the Settling Defendants, the Class Representatives and Class Counsel believe that the Settlements are fair, adequate, and reasonable, and in the best interest of all Class Members. The Class Representatives and Class Counsel also believe that Settlements provide a substantial benefit, namely the payment of \$90,000 before court- awarded attorney's fees and reimbursement of costs, as compared to the risk that the claims would produce a similar, smaller, or no recovery after summary judgment, trial, and any appeals, possibly years in the future.

# WHO IS IN THE SETTLEMENTS

To see if you will get money from the Settlements, you first have to determine if you are a Class Member.

# 5. How Do I Know if I Am Part of the Settlements?

The Class includes: All individuals and entities that invested in the Alleged Ponzi Scheme and/or contributed funds to the Alleged Ponzi Scheme Entities. The Alleged Ponzi Scheme is described in the Class Representative's Second Amended Complaint, available at <u>www.....com</u>. The Alleged Ponzi Scheme Entities include Jafia, LLC; Rose City Income Fund; Rose City Income Fund II, LP; MySivana, LLC; Merosa, LLC; Seneca Ventures, LLC; and any other entities that played a similar role in the Alleged Ponzi Scheme.

#### 6. What Are the Exceptions to Being Included?

You are not a Class Member if you submit a valid and timely request for exclusion from the Class or if you are a Defendant in this Action; any entity in which Defendants have a controlling interest, Sam Ikkurty, Ravi Avadhanam, any Judge to whom this action is assigned and/or any member of such Judge's staff and immediate family.

# 7. I'm Still Not Sure if I Am Included.

If you are still not sure whether you are included, you can ask for free help. You can email Stretto, which is acting as Settlement Administrator ("Settlement Administrator") at [] or Class Counsel listed in the answer to Question 26 for more information.

#### THE SETTLEMENT BENEFITS - WHAT YOU GET

#### 8. What Do the Settlements Provide?

Defendants have agreed to pay \$90,000.00 in cash pursuant to the Settlements. These payments, less all costs of administration of the Settlements, and reasonable attorneys' fees and litigation expenses awarded to Class Counsel, as well any reasonable service award made to the Class Representatives, shall constitute the "Net Settlement Fund" available for distribution to Class Members pursuant to the distribution method discussed below.

# 9. How Will the Settlements Be Allocated?

The Net Settlement Fund will be distributed to Class Members *pro rata* following final approval of the Settlements. Stretto is an administrator that works with the Rose City Receivership and has also been appointed by the Court to serve as the Settlement Administrator in this Action. The Settlement Administrator will issue a check to each Class Member pursuant to the plan of distribution approved by the Court.

It is not possible to determine how much any individual Class Member may receive from the Settlement Fund at this time. Payment shall be conclusive against all Class Members. No person shall have any claim against the Class Representative, Class Counsel, Settling Defendants, Settlement Administrator, or other person designated by Class Counsel or Settling Defendants and/or the other released parties and/or their counsel based on distributions made substantially in accordance with the Settlements or further orders of the Court.

# HOW YOU GET A PAYMENT

10. How Will I Get a Payment?
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The Settlement Administrator will provide you with a net loss determination calculating your investment losses that will be used to determine your eventual payment. The Settlement Administrator will rely on the Rose City Receivership's net loss calculations. If you agree with the Settlement Administrator's calculations, you do not need to do anything further. If you believe those calculations are incorrect you may contest those calculations by providing supporting documentation.

If the Court grants final approval of the Settlements, Class Members will receive a check in the mail from the Settlement Administrator representing each Class Member's share of the Settlement Fund.

#### 11. When Will I Get My Payment?

The Court will hold the Fairness Hearing on \_\_\_\_\_\_, 2024/5, to decide whether to approve the Settlements. If the Court approves the Settlements, there may be appeals. It is always uncertain whether these appeals can be resolved favorably, and resolving them can take time, perhaps several years. Please be patient.

# 12. What Am I Giving Up to Get a Payment or Stay in the Class?

Unless you exclude yourself, you are staying in the Class, and that means that you cannot sue, continue to sue, or be part of any other lawsuit against the Settling Defendants about the claims asserted in this Action or that could have been asserted in this Action. It also means that all of the Court's orders will apply to you and legally bind you and you will release your Released Claims against the Released Parties as outlined below.

# a. <u>Terms of the Settlement Releases</u>

The "Released Parties" include Evolve Bank & Trust and Mercury Technologies, Inc. and each of their predecessors, successors (including without limitation acquirers of all or substantially all of its assets, stock, or other ownership interests), and assigns; the past, present, and future direct and indirect parents, subsidiaries, and affiliates of any of the foregoing; and

the past, present, and future principals, trustees, partners, insurers, managers, officers, directors, employees, agents, attorneys, shareholders, advisors, predecessors, successors (including without limitation acquirers of all or substantially all of their assets, stock, or other ownership interests), assigns, representatives, heirs, executors, and administrators of any of the above.

The "Releasing Parties" include the Settlement Class Representative, all Settlement Class Members who have not timely and validly excluded themselves from the Settlement Class, and any person or entity claiming by, for, on behalf of, or through them.

The "Released Claims" include any and all Claims the Releasing Parties ever had, now have, or hereafter can, shall or may have, individually, representatively, derivatively, or in any other capacity, against the Released Parties, arising from or related in any way to the conduct alleged in this Litigation or the factual predicate of this Litigation, to the fullest extent allowed by law, from the beginning of time through the date of distribution of Notice to Settlement Class Members. Released Claims include, without limitation, any and all Claims arising out of or relating to the Alleged Ponzi Scheme or the Alleged Ponzi Scheme Entities.

# **EXCLUDING YOURSELF FROM THE SETTLEMENTS**

If you do not want a payment from the Settlements, but you want to keep any right you may have to sue or continue to sue

Defendants and the released parties on your own for any released claims, then you must take steps to get out of the Class. This is called excluding yourself or is sometimes referred to as opting out of the Class.

# 13. How Do I Get Out of the Class?

To exclude yourself from the Class, you must mail to the Settlement Administrator a written request for exclusion to the address listed below, postmarked no later than sixty (60) days after the Settlement Administrator emails you with Notice of the Settlements (or, if Notice is provided via U.S. Mail, the date that Notice is postmarked). To be effective, the request for exclusion must include (a) the Settlement Class Member's full name and contact information (telephone number, email, and/or mailing address); (b) a clear and unequivocal statement that the Settlement Class Member wishes to be excluded from the Settlement Class; (c) an unequivocal reference by name of the Litigation, e.g., "Amit Fatnani, et al. v. JPMorgan Chase & Co., et al., Case No. 3:23-cv-00712"; and (d) the Settlement Class Member's signature or the signature or affirmation of an individual authorized to act on the Settlement Class Member's behalf.

Requests for exclusion should be sent to:

Stretto:

Fatnani, et al., v. JPMorgan Chase & Co., et al., EXCLUSIONS c/o Stretto 410 Exchange, Ste. 100 Irvine, CA 92602

You cannot exclude yourself on the phone or by e-mail. Your request must be in writing and signed by you or an individual authorized to act on your behalf. If you ask to be excluded, you are not eligible to get any Settlement payment, and you cannot object to the Settlements. By excluding yourself from the Class, you are also excluding yourself from any participation in the Action. You will not be legally bound by anything that happens in Action, and will not receive any benefit from the Action.

# 14. If I Do Not Exclude Myself, Can I Sue Defendants for the Same Claim Later?

No. Unless you exclude yourself, you give up any right to sue Settling Defendants and the released parties for the released claims. If you have a pending lawsuit against Settling Defendants or the released parties, speak to your lawyer in that case immediately.

# 15. If I Exclude Myself, Can I Get Money from the Settlements?

No. If you exclude yourself, you will not be entitled to any recovery under the Settlements described here. But, you may sue, continue to sue, or be part of a different lawsuit against Defendant or the released parties asserting a released claim.

# THE LAWYERS REPRESENTING YOU

# 16. Do I Have a Lawyer in This Case?

The Court appointed the law firms of Peiffer Wolf Carr Kane Conway & Wise, LLP, Silver Law Group, and OlsenDaines as Class Counsel to represent you and other Class Members. These lawyers will apply to the Court for payment from the Settlement Funds; you will not otherwise be charged for their work. If you want to be represented by your own lawyer, you may hire one at your own expense.

#### 17. How Will the Lawyers Be Paid?

At the Fairness Hearing, Class Counsel will request the Court to award reasonable attorneys' fees up to 33% of the Settlement Fund, and for reimbursement of charges and expenses that were incurred in connection with the Action. If approved, this compensation will be paid from the Settlement Funds. Class Members are not personally liable for any such fees or expenses. To date, Class Counsel have not received any payment for their services in conducting this Action on behalf of the Class Representatives and the Class, nor have counsel been paid for their charges or expenses. The fees requested will compensate Class Counsel for their work in achieving the Settlement Funds and will be within the range of fees awarded to class counsel under similar circumstances in other cases of this type. The Court may award less than these amounts.

18.	Can I Make an Appearance in this Action?
10.	

Yes. Any Class Member may make an appearance in this Action through their own counsel, at their own expense.

#### **OBJECTING TO THE SETTLEMENTS**

You can tell the Court that you do not agree with the Settlement or Class Counsel's request for an award of attorneys' fees, charges, and expenses.

# 19. How Do I Tell the Court that I Do Not Agree with the Settlement, Class Counsel's Request for an Award of Attorneys' Fees and Expenses, or Class Counsel's Request for service awards for Settlement Class Representatives?

If you are a Class Member (and have not excluded yourself from the Class), you can object to the Settlements or Class Counsel's request for an award of attorneys' fees, charges, and expenses in representing the Class, or to Class Counsel's request for service awards for Settlement Class Representatives. Any objection must be in writing and must include all grounds for the objection. The Court will consider your views. To object, you must send a letter saying that you object to the Settlements in *Amit Fatnani, et al. v. JPMorgan Chase & Co, et al.*, No. 3:23- cv-00712; whether your objection(s) applies only to you, to a specific subset of the class, or to the entire class; and the reasons for your objection(s). Be sure to include your name, address, telephone number, and your signature. Any objection to the Settlements must be mailed or delivered such that it is received by the Court no later than \_\_\_\_\_\_\_, 2024/5 at

the address below, and any objection to Class Counsel's request for an award of attorneys' fees, charges, and expenses, or to Class Counsel's request for service awards for Settlement Class Representatives must be mailed or delivered such that it is received by the Court no later than \_\_\_\_\_, 2024/5 at the address below:

Court: Clerk of the Court UNITED STATES DISTRICT COURT DISTRICT OF OREGON Mark O. Hatfield United States Courthouse 1000 SW Third Avenue Portland, OR 97204 Class Members will be able to view Class Counsel's requests for final approval of the Settlements, along with Class Counsel's motion for attorney's fees, and Class Counsel's motion for service awards for Settlement Class Representatives, along with any supporting documentation on the Settlement Administrator's website at www. .com. These documents will be available on the website the day after they are filed with the Court, which is \_\_\_\_\_, 2024/5 for the final approval of Settlements and , 2024/5 for the attorney's fees and service awards.

# 20. What Is the Difference Between Objecting and Excluding?

Objecting is simply telling the Court that you do not like something about the Settlements. You can object only if you stay in the Class. Excluding yourself is telling the Court that you do not want to be part of the Class. If you exclude yourself, you have no basis to object because the Settlements no longer affect you.

# THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the Settlements. You may attend and you may ask to speak, but you do not have to.

# 21. When and Where Will the Court Decide Whether to Approve the Settlements?

The Court will hold the Fairness Hearing at \_\_\_.m., on \_\_\_\_\_, 2024/5 in Courtroom \_\_of the United States District Court for the District of Oregon, Mark O. Hatfield United States Courthouse, 1000 SW Third Ave., Portland, OR 97204. At this hearing, the Court will consider whether the Settlements are fair, reasonable, and adequate. If there are objections, the Court will consider them. The Judge will listen to people who have asked to speak at the hearing. The Court will also consider whether to approve Class Counsel's request for an award of attorneys' fees, charges, and expenses. The Court may decide these issues at the hearing or take them under consideration.

We do not know how long these decisions will take. The Court may adjourn or continue the Fairness Hearing without further notice to the Class.

#### 22. Do I Have to Come to the Hearing?

No. Class Counsel will answer any questions that the Court may have, but you are welcome to come at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as your written objection is received on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

#### 23. May I Speak at the Hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter saying that it is your intention to appear in *Amit Fatnani, et al. v. JPMorgan Chase & Co, et al.,* No. 3:23-cv-00712. Be sure to include your name, address, telephone number, and signature. Your notice of intention to appear must be received no later than \_\_\_\_\_, 2024/5, by the Clerk of the Court and Class Counsel. You cannot speak at the hearing if you exclude yourself from the Class because the Settlements no longer affect you. You also cannot speak at the hearing if you have not provided written notice of your intention to speak at the Fairness Hearing, unless the Court orders otherwise.

# IF YOU DO NOTHING

#### 24. What Happens If I Do Nothing at All?

You do not have to do anything to participate in the Settlements. If the Court grants final approval of the Settlements, you will be bound by the Settlements (including the releases provided in the Settlements) and will receive a payment based on the distribution method discussed above.

#### **GETTING MORE INFORMATION**

# 25. Are There More Details About the Settlements?

This Notice summarizes the proposed Settlements but does not contain all the details included in the Settlements. You can get a copy of the Stipulations at <u>www...com</u> or by contacting the Settlement Administrator at the contact information provided below. You can also get a copy of the Stipulations from the Clerk's office at the United States District Court for the District of Oregon, 1000 SW Third Ave., Portland, OR 97204 during regular business hours.

# 26. How Do I Get More Information?

You can call the Settlement Administrator toll-free at (937)-235-8988 or visit the Settlement Administrator's website at <u>www.....com.</u>

You can also contact Class Counsel:

#### Peiffer Wolf Carr Kane Conway & Wise, LLP

Daniel Centner 935 Gravier St., Suite 1600 New Orleans, LA 70112 (504) 523-2434 dcentner@peifferwolf.com

# Silver Law

Scott L. Silver 11780 W. Sample Road, Suite 103 Coral Springs, Florida 33065 (954) 755-4799 ssilver@silverlaw.com

# OlsenDaines

Michael Fuller 10011 SE Division St. Suite 314 Portland, OR 97266 (503) 222-2000 michael@underdoglawyer.com

# DO NOT TELEPHONE THE COURT REGARDING THIS NOTICE

DATED: \_\_\_\_\_, 2024

BY ORDER OF THE COURT UNITED STATES DISTRICT COURT DISTRICT OF OREGON