

## **NOTICE PLAN**

The Parties,<sup>1</sup> after substantial discovery and investigation of the facts and careful consideration of the applicable law, and after arm's length negotiations, have agreed to this Notice Plan in connection with the Memorandum of Settlement with National Arbitration Forum, Inc. (or the "Settlement Agreement").

**1. Internet / Website Notice.**

(a) The Notice, which will be in the form attached as Exhibit A to this Notice Plan, will be maintained at the settlement website for this matter, [arbitrationsettlement.ccfsettlement.com](http://arbitrationsettlement.ccfsettlement.com). The settlement website: (i) permits Persons to read and/or download the Notice, the Settlement Agreement, the complaints, certain Court orders and decisions, and other pertinent documents or information (including information concerning the prior settlements); (ii) facilitates the answering of frequently asked questions ("FAQs") and/or to provide any updates agreed upon by the Parties; and (iii) provides contact information for Class Member inquiries and correspondence, which will include a post office box<sup>2</sup> for written correspondence and the toll-free 800 telephone service described in Section 3. The website shall be available in Spanish and offer Spanish-language versions of the Notice and answers to FAQs.

(b) Access to the settlement website shall also be available via [www.ccfsettlement.com](http://www.ccfsettlement.com), which is the website used to assist with the administration of the settlement of the related MDL 1409 matter, *In re Currency Conversion Fee Antitrust Litig.* ("CCF"), MDL No. 1409, Master File No. M21-95 (S.D.N.Y.) (WHP).

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<sup>1</sup> The definitions of the words and terms contained in the Settlement Agreement are incorporated by reference in this Notice Plan.

<sup>2</sup> The cost to maintain a post office box is currently \$580 every six months.

(c) Because the Notice, and other information concerning this settlement, will use the pre-existing settlement website, the incremental cost for updating the settlement website will be small.

**2. Dissemination of the Notice to Targeted Class Members.**

The Notice will also be disseminated to individual Class Members who have previously provided address information, for either electronic or regular mail, in connection with inquiries or other correspondence (including submissions to the Court) concerning the prior settlements in this matter.

**3. Telephone Support.**

Class Members may continue to access the established toll free 800 telephone system (originally maintained in connection with the prior settlements) to permit callers to speak with a person who is knowledgeable about the litigation and the settlements, including this Settlement Agreement, and who can respond to any inquiries.

**4. Dissemination of the Notice to Consumer Advocacy Organizations.**

The Notice, as well as a copy of the Settlement Agreement, the First Amended Class Action Complaint and the decision of the Court of Appeals for the Second Circuit in this matter, will be mailed directly, via first class mail, to the following seven leading consumer advocacy groups that have an established track record of acting to protect consumers' rights: (i) Consumer Action; (ii) Consumer Federation of America; (iii) National Consumer Law Center; (iv) National Consumers League; (v) Public Citizen; (vi) Public Justice (formerly Trial Lawyers for Public Justice); and (vii) U.S. Public Interest Research Groups ("U.S. PIRG.").