

LEGAL NOTICE

If you received one or more prerecorded calls to your cellular phone from the phone number 615-348-5237 on July 16 or 17, 2020, a class action lawsuit may affect your rights.

Records indicate that you may be a member of a class in the action styled *Elrod et al. v. NoTax4Nash, et al.*, United States District Court for the Middle District of Tennessee, Nashville Division, Case No. 3:20-cv-00617 consolidated with No. 3:20-cv-00618, which has been settled subject to court approval. The purpose of this Notice is to inform Settlement Class Members of the terms of the proposed settlement and important deadlines relating to the settlement, as summarized below and described more fully on the Settlement Website at www.NoTax4NashSettlement.com.

WHAT IS THE LAWSUIT ABOUT? Plaintiffs allege that Defendants NoTax4Nash, Michelle Foreman, and Karen Moore (“Defendants”) violated the federal Telephone Consumer Protection Act, 47 U.S.C. § 227, et seq., by sending pre-recorded voice messages to Plaintiffs and class members, without their prior express consent, on July 16 or 17, 2020. Defendants deny all liability and wrongdoing whatsoever. The Court has not ruled on the merits of Plaintiffs’ claims or Defendants’ defenses.

WHAT ARE THE TERMS OF THE PROPOSED SETTLEMENT? Defendants, along with third-parties Best Sellers, LLC, Heather Sellers, Joe Gergley, and Hypermetrics, LLC (“Third-Parties”), have agreed to pay \$1,010,050 into a Settlement Fund, from which, subject to court approval, payments to Settlement Class Members, Settlement Administration Costs, service awards to the Class Representatives and Class Counsel’s Fee and Cost Request (“Fee Request”) will be paid. Further, Defendants and Third-Parties have agreed to refrain from engaging in future conduct which would violate the Telephone Consumer Protection Act.

WHO REPRESENTS YOU? Spragens Law, PLC and Branstetter, Stranch & Jennings, PLLC represent you as “Class Counsel.” You do not have to pay any money to Class Counsel directly. However, Class Counsel is requesting attorneys’ fees and costs of up to 35% of the settlement amount that will be paid from the Settlement Fund. Class Counsel’s Fee Request and documents in support of the Fee Request will be available for viewing on the Settlement Website by July 25, 2022.

WHAT ARE YOUR RIGHTS AND OPTIONS? You can do nothing and stay in the Class, or you can exclude yourself from the Class as set forth below. You may also file an objection and appear at the final approval hearing.

- **In order to receive benefits under the proposed settlement, you must submit a fully executed Claim Form by no later than August 23, 2022.** The Claim Form will be sent to you via electronic means or may be accessed on the Settlement Website, www.NoTax4NashSettlement.com. The Claim Form may be submitted to the Class Administrator by mail, email, facsimile transmission or electronically through the settlement website. Please see the settlement website for additional details concerning how to submit a claim form.
- **To exclude yourself from the settlement, submit a written exclusion either by mail, fax or through the Settlement Website on or before August 8, 2022.** To be valid, the written exclusion request must contain specific information that is described on the Settlement Website, at www.NoTax4NashSettlement.com and in the Settlement Agreement also available on the settlement website at www.NoTax4NashSettlement.com. If you do not submit a fully executed and timely exclusion request, you will be bound by the terms of the proposed settlement and you will give up your right to sue the Released Parties (as that term is defined in the Settlement Agreement), including Defendants and Third-Parties, concerning the legal claims in this case.
- **To object to the proposed settlement or the Fee Request, you must file an objection with the Court and send the objection to counsel postmarked by August 8, 2022** at the addresses listed on the Settlement Website. Anyone who files a timely objection to the proposed settlement may ask to appear at the final approval hearing. If your objection is valid and timely, the Court may consider it whether or not you appear.
- **If you do not file a claim**, you will not receive any monetary award and you will lose the right to sue the Released Parties (as that term is defined in the Settlement Agreement), including Defendants and Third-Parties, regarding the legal claims in this case.

The Final Approval Hearing will take place on September 15, 2022, at 9:00 a.m. at the United States District Court for the Middle District of Tennessee, 719 Church Street, Nashville, Tennessee 37203.

WANT MORE INFORMATION? Complete details about your rights and options are available on the Settlement Website, www.NoTax4NashSettlement.com. Do not call the Court.