

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

JORDAN C. BLOCK,	)	
	)	
Plaintiff,	)	No. 02 CH 15137
	)	
v.	)	Judge Patrick E. McGann
	)	
IMPERIAL TRADING, LTD.,	)	
	)	
Defendant.	)	

**NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT**

**TO: All persons who on or after September 3, 1998, were sent advertising faxes by Imperial Trading, Ltd.  
PLEASE READ THIS NOTICE CAREFULLY. THIS IS NOT A NOTICE OF A LAWSUIT  
AGAINST YOU. IT IS A NOTICE OF A SETTLEMENT BEING SENT TO YOU BY COURT ORDER.  
YOU MAY BENEFIT FROM READING THIS NOTICE.**

**WHAT THIS LAWSUIT IS ABOUT:**

Jordan Block filed this lawsuit against Imperial Trading Ltd. alleging that Imperial Trading sent him an unsolicited fax advertisement in violation of the Telephone Consumer Protection Act ("TCPA"). In filing this lawsuit, Jordan Block filed it as a *class action lawsuit*, on behalf of *himself and all others who received the advertising faxes as well*. You were sent this notice because it is believed that you received the advertisement fax as well.

Edelman, Combs, Lattuner & Goodwin LLC are Jordan Block's attorneys and are the *CLASS COUNSEL*. This lawsuit has settled out of court and Imperial Trading denies any wrongdoing. Judge McGann has preliminarily approved the settlement that was reached between the parties.

**THE PROPOSED SETTLEMENT:**

The Parties have agreed that the Defendant will pay \$100,000.00 into a Settlement Fund. From this fund, Jordan Block will ask for \$2,500.00 for being a class representative, Class Counsel will ask for 30% of the fund for its fees and expenses, the costs of sending of sending this notice will be deducted, and the remaining amount will be paid to class members (up to \$500.00 a piece), such as yourself, who return a claim form by **July, 14, 2006**.

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**YOUR OPTIONS:**

1. **SUBMIT A CLAIM FORM:** If you submit a complete claim for by **July, 14, 2006** to our office (address listed below), you will then be entitled to a portion of the settlement, up to \$500.00. In submitting a claim form, you will be releasing your right to file a lawsuit against Imperial Trading for the sending of unsolicited fax advertisements, but will be eligible for monetary compensation.

The amount that each class member receives depends on the number of claims. If the number of class members does not exceed the amount remaining in the settlement fund, each member will receive \$500.00, and any remaining money will be donated to charity. If the number of claims exceeds the amount remaining in the settlement fund, each class member will receive an equal portion of the fund. If you submit a claim form, you are *not required* to do anything else such as attend the fairness hearing or appear in court. If the settlement and your claim are approved, you will receive a check in the months following the fairness hearing.

The claim form must be post marked by **July, 14, 2006**.

2. **EXCLUDE YOURSELF:** If you do not wish to participate, you can do so by sending a request to three places: a) CLERK OF THE CIRCUIT COURT OF COOK COUNTY, 50 W. Washington, Chicago, IL 60602; b) Julie Clark at EDELMAN, COMBS, LATTURNER & GOODWIN LLC, 120 S. LaSalle St. 18<sup>th</sup> Floor, Chicago, IL 60603; and c) James K.

Borcia at TRESSLER, SODERSTROM, MALONEY & PRIESS, 233 S. Wacker Drive, 22<sup>nd</sup> Floor, Chicago, IL 60606. If you exclude yourself, you will not be eligible to receive any portion of the settlement. Please include case name and court number (at the top of this notice) on the letters and they must be received by **July 14, 2006**.

3. **OBJECT:** If you wish to object this settlement you must submit your objection to the three offices listed in the paragraph above by **July 14, 2006**, again, including case name and court number. If you do object to the settlement, you must state why you object to settlement.

4. **DO NOTHING:** If you do nothing, you will still remain a class member in this case, releasing your right to file a lawsuit against Imperial Trading, and you will *not* receive any portion of the settlement.

**FAIRNESS HEARING**

On August 7, 2006, at 11:00 a.m., Judge McGann will hold a fairness hearing in room 1703 of the Richard J. Daley Center, 50 W. Washington, Chicago, IL 60602 to hear any objections from class members and to review the settlement proceedings. *You do not have to attend this hearing.*

**OPINION OF THE SETTLEMENT:** Edelman, Combs, Lattuner & Goodwin LLC is the Class Counsel in this case. It represents the named plaintiff, Jordan Block, and all the class members. Edelman, Combs, Lattuner & Goodwin LLC believes this to be fair settlement in that it enables class members to recover up to \$500.00 for receiving an unsolicited fax advertisement, without the expense and complexity of each member filing their own lawsuit.

**QUESTIONS:** If you have any questions regarding the settlement, your rights, or any other questions, please contact Class Counsel, Edelman, Combs, Lattuner & Goodwin LLC, at the address below, as it has been appointed by the court to represent you. Please do not contact the Court or the defendant's counsel.

*IF YOU WOULD LIKE TO PARTICIPATE IN THIS SETTLEMENT AND BE ELIGIBLE FOR A MONETARY REWARD, PLEASE COMPLETE THE FORM BELOW AND MAIL IT TO THE ADDRESS BELOW BY JULY 14, 2006.*

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**PROOF OF CLAIM**

**JORDAN C. BLOCK v. IMPERIAL TRADING, LTD., et. al., CASE NO: 03 CH 21621**

(Circuit Court of Cook County, Illinois)

**IMPORTANT: THIS CLAIM FORM MUST BE POSTMARKED OR RECEIVED ON OR BEFORE JULY 14, 2006, AT THE FOLLOWING ADDRESS:**

EDELMAN, COMBS, LATTURNER & GOODWIN, LLC

120 S. LaSalle 18<sup>th</sup> Floor

Chicago, Illinois 60603

312-917-4504

312-419-0379 (fax)

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Please print the following information:

NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

CITY/STATE: \_\_\_\_\_

ZIP CODE: \_\_\_\_\_

I certify that I received a facsimile ad from Imperial Trading LLC during the Class Period.

\_\_\_\_\_  
(YOUR SIGNATURE)