

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

CLASS SETTLEMENT NOTICE

If you have received a validation notice from Land Home Financial Services, Inc., dated between July 17, 2019 and July 16, 2020, inclusive, which failed to state the amount of the debt, you may benefit from this class action settlement.

A state court authorized this notice. This is not a solicitation from a lawyer.

- A settlement has been reached in class action litigation involving certain mortgage loans being serviced by Land Home Financial Services, Inc. (“Land Home”). Land Home denies all allegations, and the Court has not decided which side is right.
- The settlement will provide for automatic payment of a share of the class fund to class members whose notices were not returned as undeliverable.
- To qualify, you must be: an individual with an address in the United States (b) to whom Land Home Financial Services, LLC sent a notice in the form represented by Appendix B (referred to as Exhibit 2) to the Complaint, (c) which failed to state, identified as such, the amount of the debt as of the date of the notice (d) which notice was sent on or after a date one year prior to the filing of this action;
- Your legal rights are affected whether you act or don’t act. Read this notice carefully.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
DO NOTHING BUT STAY IN THE SETTLEMENT	By doing nothing, you will remain a member of the settlement class and you will be entitled to receive certain relief provided for in the settlement.
EXCLUDE YOURSELF	You will receive no benefits. This is the only option that allows you to participate in any other lawsuit against Land Home about the claims in this case.
OBJECT	Write to the Court about why you don’t like the settlement.
GO TO A HEARING	Ask to speak in Court about the fairness of the settlement.

- **These rights and options and the deadlines to exercise them are explained in this notice.**
- **The Court in charge of this case still has to decide whether to approve the settlement. Benefits will be distributed if the Court approves the settlement and after appeals are resolved. Please be patient.**

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BASIC INFORMATION

1. Why did I get this notice?

You received this notice because you have a right to know about a proposed settlement of a class action lawsuit, and about your options, before the Court decides whether to approve the settlement. This notice explains the lawsuit, the settlement, and your legal rights.

The court in charge of the case is the Circuit Court of Cook County, Illinois, Chancery Division. The lawsuit is known as *Briggs v. Land Home Financial Services, Inc., et al.*, Case No. 2020-CH-04980. The person who sued is called the Plaintiff, and the company he sued, Land Home Financial Services, Inc, is called Defendant or Land Home.

2. What is this lawsuit about?

The Plaintiff claims that Land Home sent a validation notice which failed to state the amount of the debt in violation of the Fair Debt Collection Practices Act. Defendant denies all of the allegations and maintain that its conduct was proper and did not violate the law.

3. Why is this a class action?

In a class action, one or more people called Class Representatives (in this case, Ray G. Briggs), sue on behalf of a group (or a “Class”) of people who have similar claims.

4. Why is there a settlement?

The Court did not decide in favor of Plaintiff or Defendant. Instead, both sides agreed to a settlement. That way, the parties avoid the cost, risk, and delay of litigation and the uncertainty of trial. The Class Representatives and their attorneys think the proposed settlement is best for everyone who is affected.

WHO IS PART OF THE SETTLEMENT?

5. How do I know if I am a part of the settlement?

The Court decided that those individuals falling under the following definition are Class Members:

All individuals with addresses in the United States (b) to whom Land Home Financial Services, LLC sent a notice in the form represented by Appendix B (referred to as Exhibit 2) to the Complaint (c) which failed to state, identified as such, the amount of the debt as of the date of the notice (d) which notice was sent on or after a date one year prior to the filing of this action.

If you are not sure whether you are included, you can call the Settlement Administrator toll free number at 1-877-268-2976. You also can send questions to the Settlement Administrator at www.class-settlement.com or 20 Max Avenue, Hicksville, NY 11801.

THE SETTLEMENT BENEFITS

6. What can I get from the Settlement?

If the settlement is approved and becomes final, Defendant will issue all class members whose check was not returned as undeliverable, a check for a pro rata share of the \$260,000 class fund, after amounts are subtracted for administration, the Plaintiff's award and attorney's fees. If there is more than one borrower on an account, they will be treated as one class member for the purposes of the settlement. For jointly held accounts, checks will be payable to all joint borrowers, and will be mailed to the first borrower listed on the account.

7. What is the estimated value of the settlement benefits?

The total amount being refunded to the class members is expected to total approximately \$180,905. This number assumes that administrative expenses will be approximately \$6,595, but the actual final number may differ. There are approximately 1,704 class members. If no notices were returned as undeliverable, the class members would receive approximately \$106 each.

8. When will I receive my benefits?

The Court will hold a hearing and decide whether to approve the settlement. If the Court approves the settlement, there may be appeals afterwards. If there are appeals, resolving them can take time. If the settlement is approved by the Court, the time to appeal expires, and if any appeals are resolved in favor of settlement, the settlement will be effective. Within 21 days of the effective date of the settlement, the settlement administrator will mail checks to the Class Members.

9. I want to be part of the settlement and receive these benefits. What do I do?

You do not need to do anything to remain a Class Member. All relief provided by the Settlement Agreement will be provided automatically. If you are a Class Member and are entitled to benefits, a check will automatically be sent to your last known address.

10. What am I giving up to receive these benefits?

By remaining a Class Member, all of the Court's orders will apply to you, and you give Defendant a release. The Settlement Agreement is available at www.edcombs.com and describes the claims that you give up if you remain in the settlement.

11. Will the settlement impact any of my loan terms?

No, all terms and conditions of your Mortgage Loan will remain unchanged and in full force and effect.

12. How much will the Class Representatives receive?

Ray G. Briggs will request court approval for a payment of \$7,500 for his services as Class Representative in prosecuting the case on behalf of the Class.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you don't want to receive the benefits of the settlement, but you want to keep the right to sue Defendant on your own about the legal issues in this case, then you must take steps to get out of the settlement. This is called excluding yourself.

13. How do I get out of the Settlement?

To exclude yourself from the settlement, you must send a letter by first class mail, postage prepaid, or by private courier (such as Federal Express), to the Settlement Administrator at 20 Max Avenue, Hicksville, NY 11801. Your request must include:

- Your name, address, telephone number, and Mortgage Loan number;
- A statement that "I hereby wish to exclude myself from the settlement in *Briggs v. Land Home Financial Services, Inc., et al., Case No. 2020-CH-04980*"
- Your signature.

If sent by mail, your exclusion request must be postmarked no later than May 9, 2022. If sent by private courier, it must have a shipping date on the shipping label that is no later than May 9, 2022. All exclusion requests must be received by the Settlement Administrator no later than May 23, 2022, to be valid. You cannot exclude yourself by phone, email or on a website.

14. If I don't exclude myself, can I sue Defendant for the same thing later?

No. Unless you exclude yourself, you give up the right to sue Defendant for the claims that this settlement resolves.

15. If I exclude myself, do I still receive benefits from this settlement?

No, you will not receive anything resulting from the settlement of this case, but you may sue the

Defendant over the claims raised in this case on your own or as a part of a different lawsuit.

THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer in the case?

The Court has named the law firm of Edelman, Combs, Lattuner & Goodwin, LLC as “Class Counsel”. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense. If you choose to hire your own lawyer, he or she must file an appearance by May 9, 2022.

17. How will the lawyers be paid?

Class counsel will request Court approval of a payment of attorney’s fees and costs of \$65,000 to be paid by Defendant.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the settlement or some part of it.

18. How do I tell the Court that I don’t like the Settlement?

If you are a Class Member, you can object to the settlement if you don’t like any part of it. To object, you must send a letter to the Settlement Administrator that includes, among other things, the following:

- The name of the case, *Briggs v. Land Home Financial Services, Inc., et al., Case No. 2020-CH-04980*;
- Your full name, address and telephone number;
- All grounds for your objection, accompanied by any legal support for the objection;
- A statement confirming whether you intend to appear personally and/or testify at the final approval hearing (also referred to as the fairness hearing); and
- Your signature (an attorney’s signature is not sufficient).

For an objection to be considered by the Court, it must: (i) if mailed, be sent first-class, postage prepaid, and postmarked no later than May 9, 2022; (ii) if sent by private courier (e.g., Federal Express), have a shipping date of no later than May 9, 2022; and (iii) be received by the Settlement Administrator no later than May 23, 2022.

19. What is the difference between objecting and excluding?

Objecting is simply telling the Court that you don’t like something about the settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you don’t want to be

part of the Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the settlement. You may attend and you may ask to speak, but you are not required to do so.

20. Where and when is the fairness hearing?

The Court will hold a fairness hearing on June 30, 2022 at 10:30 am (CDT) a.m. in the courtroom of Judge Alison C. Conlon in Room 2408 of the Richard J. Daley Center, 50 W. Washington St., Chicago, Illinois. The purpose of the hearing will be for the Court to determine whether the proposed settlement is fair, reasonable and adequate and to determine the appropriate amount of compensation for Class Counsel. At that hearing, the Court will hear objections and arguments concerning the fairness of the proposed settlement. The hearing may be postponed to a later date without notice.

21. Do I have to attend the hearing?

No, you are not required to attend the fairness hearing, but you are welcome to attend at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as you sent your written objection on time, to the proper address, the Court will consider it (unless the settlement is terminated prior to the fairness hearing). You also may pay your own lawyer to attend, but it is not necessary to do so.

GETTING MORE INFORMATION

22. How do I get more information?

This notice summarizes the proposed settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement by calling Edelman, Combs, Lattner & Goodwin, LLC, the firm representing the Class, at (312) 739-4200 or by sending an email to: info@edcombs.com, or on its website at www.edcombs.com. If you have questions, you also can obtain information from the Settlement Administrator at the toll-free number, 1-877-268-2976, or on its web site: www.class-settlement.com.

23. What if I have a new address?

If this notice was sent to you at your current address, you do not have to do anything more to receive further notices concerning this case. However, if this notice was forwarded to you, or if it was otherwise sent to you at an address that is not current, you should immediately send a letter

to: Dorothy Sue Merryman, Project Administrator, Class-Settlement.com, 20 Max Avenue,
Hicksville, NY 11801.

CALL 1-877-268-2976 TOLL FREE