

Villegas, et al. v. ADT Security Services, Inc., et al.
Case No. BC510665

IF YOU RECEIVED PENALTIES FROM THE CITY OF LOS ANGELES FOR NOT HAVING A PERMIT FOR YOUR ALARM SYSTEM MONITORED BY ADT AT ANY TIME ON OR AFTER MAY 31, 2009 BUT BEFORE DECEMBER 7, 2018, A CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS.

Why did I get this notice? You received this notice because a Settlement has been reached in the above Action. Based on Defendant's and the City of Los Angeles' records, you appear to be a member of the Settlement Class and therefore eligible for the relief detailed below.

The purpose of this Notice is to inform you of the Action and the Settlement so that you may decide what steps to take in relation to it.

What is the Action about? Plaintiffs Christine Smith and Oscar Gardner ("Representative Plaintiffs") filed a lawsuit against Defendant ADT on behalf of themselves and all others similarly situated. The lawsuit alleges the Defendant failed to ensure permits existed or to obtain permits for Los Angeles customers' alarm systems prior to installing or monitoring them.

Defendant ADT denies any wrongdoing, any allegations of unlawful conduct, and any liability, and no court or other official entity has made any judgment or other decision that ADT acted wrongfully or unlawfully, or that ADT is liable. ADT also denies that any Class Member is entitled to relief or that this Action is appropriate for treatment as a class action, except for the purposes of this Settlement and the relief it provides.

No court has decided which side is right. But both sides agreed to provide benefits to Class Members now through this Settlement to resolve the case.

What relief does the Settlement provide? Under the Agreement, Defendant has agreed to establish a Maximum Settlement Fund of \$635,000. The Maximum Settlement Fund will be used to provide Class Members who submit a Claim Form on time with a one-time payment of approximately \$19.40.

This amount is calculated by taking the Maximum Settlement Fund and subtracting anticipated Class Counsel's attorneys' fees (estimated at \$211,666.67), actual litigation costs not to exceed \$42,000, administration expenses of \$50,000, and the two Class Representative Enhancement awards of a combined \$15,000. The remaining amount, approximately \$318,333.33, is to be divided by the total number of Class Members (approximately 16,418) for an average benefit to each class member of \$19.40. If not all Class Members make claims, then the average settlement amount for those who submit Claim Forms will be higher than that, but in no event will payments to those Class Members who submit Claim Forms exceed \$251 per Class Member. The Claim Form can be found at www.villegas-v-adt.com. You must submit a Claim Form to receive your Settlement Benefit.

What are my other options? If you don't want to be legally bound by the Settlement and to receive its benefits, you shall exclude yourself as explained in the detailed notice available at www.villegas-v-adt.com. If you do not exclude yourself, you will participate in the Settlement, and you won't be able to sue ADT or its representatives over the legal claims raised in this Action ever again. If you exclude yourself, you cannot receive a benefit from this Settlement.

If you wish to stay in the Settlement but to challenge aspects of it in Court, you may object to it as explained in the detailed notice available at www.villegas-v-adt.com. The Court will hold a hearing on July 26, 2021 at 10:00 a.m. to consider any objections and whether to approve the Settlement and a request by the lawyers representing all Class Members for an award of up to \$211,666.67 in attorney's fees and no more than \$42,000.00 in costs, and for the two Class Representatives' request for a service award of up to \$7,500 each for their services. If you choose to object in writing, you may appear at the hearing but do not have to. Please see the notice on the settlement website for details regarding the Court's social distancing procedures.

What am I giving up if I stay in the Class? If the Court approves the proposed Settlement, unless you exclude yourself from the Settlement, all Class Members will be legally bound by the Settlement and will release claims against Defendant and its representatives relating to penalties received from Los Angeles for unpermitted alarm systems. This generally means that you will not be able to file a lawsuit, continue prosecuting a lawsuit, or be part of any other lawsuit against ADT or its representatives regarding the claims in the Action. The Settlement Agreement, available on the Internet at the website www.villegas-v-adt.com, contains the full terms of the release.

Fairness Hearing. A Final Fairness Hearing will be held on July 26, 2021 at 10:00 a.m., before the Honorable Amy D. Hogue in Department 7 of the Los Angeles Superior Court, Spring Street Courthouse, located at 312 Spring Street, Los Angeles CA 90012, to determine whether the Settlement Agreement should be finally approved as fair, reasonable, and adequate.

More information? For complete information about the Settlement, to view the Settlement Agreement, related Court documents, and to learn more about how to exercise your various options under the Settlement, visit www.villegas-v-adt.com. You may also write to the Settlement Administrator at the email address notice@phoenixclassaction.com or the postal address Phoenix Settlement Administrators, PO Box 7408, Orange, CA 92867.