

If you purchased St. Louis Rams tickets or merchandise in the State of Missouri for personal, family, or household purposes between April 21, 2010 and January 4, 2016, a proposed class action settlement may affect your rights.

A class-wide settlement has been proposed in a class action lawsuit called *Pudlowski v. The St. Louis Rams, LLC*, No. 1622-CC00083-01, which is pending before Judge Timothy J. Boyer in the Circuit Court for the City of St. Louis, State of Missouri.

The proposed settlement resolves claims about whether the St. Louis Rams violated the Missouri Merchandising Practices Act through alleged misrepresentations and omissions regarding their intent to move the team out of St. Louis. Plaintiffs allege that the Rams' tickets and merchandise they and other Class Members purchased were worth less than the products they thought they were purchasing had the Rams' representations been true regarding the Rams' future location. The Rams deny all claims of wrongdoing and have agreed to a proposed settlement in order to avoid incurring further expenses and burdens relating to this litigation.

You are potentially a class member if you purchased Rams tickets or merchandise in the State of Missouri for personal, family, or household purposes between April 21, 2010 and January 4, 2016. If you made such a purchase of Rams tickets or merchandise during this time period, and otherwise meet the qualifications to be a Class Member, the proposed settlement, if approved, will pay you an Award if you submit a Qualified Claim. To get complete information regarding this settlement and your rights under it, call [insert telephone number] or visit (...).

Who's Included? You are a Class Member if you meet the criteria for the following Class:

All Missouri residents who were Missouri citizens and remained Missouri citizens when this action was commenced who purchased Rams' tickets and/or merchandise between April 21, 2010 and January 4, 2016, in the State of Missouri for personal, family or household purposes.

Excluded from the class are Named Plaintiffs' counsel and their agents. Also excluded from the class are Defendants and any entity in which Defendants have a controlling interest, and Defendants' legal representatives, heirs and successors; the judicial officers assigned to this litigation and members of their staffs and immediate families.

What Does the Settlement Provide? If approved, and if you qualify, you may be entitled to an Award of 25% of the total documented ticket and/or merchandise pre-tax price if you are a Class Member and you submit a Qualified Claim.

How Can I Get a Payment? To be eligible for payment, Class Members must send in a claim form (available at (insert website)) for the Rams tickets or merchandise for which they seek to recover an Award. If you think you have a valid claim, read the claim form instructions carefully, follow the instructions applicable to your purchase(s), call the settlement administrator as necessary, fill out the claim form, gather any required documentary support, sign the claim

form, and mail or electronically submit it, postmarked or timestamped no later than [30 days after final approval hearing date]. A settlement administrator will review the information you provide and determine if you qualify to receive a payment.

Your Other Options. If you do not want to be legally bound by the proposed settlement, you must exclude yourself by [75 days after the preliminary approval date]. If you do not exclude yourself, you will release any claims you may have against the Rams, as more fully described in the Settlement Agreement, available at the settlement website. If you are a Class Member and do not exclude yourself, you may object to the terms of the proposed settlement by [75 days after the preliminary approval date]. For more information about excluding yourself from, or objecting to, the proposed settlement, please visit (insert website). The timeliness of requests for exclusion and objections will be conclusively determined by the post-mark date or other like proof of the date of mailing or for the delivery.

The Court will hold a Hearing on _____, 2019 to consider whether to approve the proposed settlement and a request for attorneys' fees and expenses of up to \$7,000,000.00 and a service award of \$20,000.00 in the aggregate to the Class Representatives. You may appear at the hearing, either yourself or through an attorney hired by you, but you don't have to. For more information, visit the website or call the number below.

(insert website) [insert telephone number]

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