

CIRCUIT COURT FOR THE CITY OF ST. LOUIS, STATE OF MISSOURI

Pudlowski et al., individually and on behalf of all others similarly situated, v. The St. Louis Rams, LLC & The St. Louis Rams Partnership, Cause No. 1622-CC00083-01

LEGAL NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

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

- This notice is to inform you of a proposed settlement of a class action lawsuit called *Pudlowski v. The St. Louis Rams, LLC*, No. 1622-CC00083-01. This settlement affects Missouri citizens who 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.
- If you qualify, you may be entitled to an Award of 25 percent of the total documented ticket and/or merchandise pre-tax price if the settlement is approved, you are a Class Member as defined below, and you submit a Qualified Claim.
- The settlement resolves plaintiffs' allegations that 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 and, as a result of these alleged actions, Rams' tickets and merchandise were worth less than what people paid for them. The Court has certified a Class for these claims. The settlement avoids costs and risks to you from continuing the lawsuit, pays money to Class Members, and releases the Rams from liability.
- The Rams deny all claims of wrongdoing and have agreed to a proposed Settlement Agreement in order to avoid incurring further expenses and burdens relating to this litigation.
- Lawyers for the Class will ask the Court to order the Rams to pay up to \$7,000,000.00 to be paid as fees and expenses for investigating the facts, litigating the case, and negotiating the settlement.

Your legal rights are affected whether you act or don't act.

Read this notice carefully.

*****YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT*****

SUBMIT A CLAIM FORM	The only way to find out if you qualify for payment.
EXCLUDE YOURSELF	Get no payment. This is the only option that allows you to ever be part of any other lawsuit against the Rams about the legal claims in this case.
OBJECT	Write to the Court about why you don't like the settlement. You will remain a part of the Class and will be entitled to payment if you qualify and submit a complete claim form, but may still object to the settlement.
GO TO A HEARING	Ask to speak in Court about the fairness of the settlement.
DO NOTHING	Get no payment. Give up rights.

- 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. Payments will be made if the Court approves the settlement and after appeals are resolved. Please be patient.

QUESTIONS? CALL (844)-951-2349 TOLL FREE

PARA UNA NOTIFICACIÓN EN ESPAÑOL, LLAMAR O VISITAR www.ramsclassactionsettlement.com

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BASIC INFORMATION

1. Why did I receive notice of the proposed settlement?

You received this notice because our records indicate that you may have purchased St. Louis Rams tickets or merchandise in the State of Missouri between April 21, 2010 and January 4, 2016, and you may be a member of the class on whose behalf this lawsuit was filed. The Court authorized this notice because you have a right to know about a proposed settlement of this class action lawsuit, and about all of your options, before the Court decides whether to approve the settlement. If the Court approves it, and after objections and appeals are resolved, an administrator approved by the Court will make the payments that the settlement allows. You will be informed of developments on this website. The information below explains the lawsuit, the settlement, your rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of the case is the Circuit Court for the City of St. Louis, State of Missouri, and the case is known as *Pudlowski, et al. v. The St. Louis Rams, LLC, et al.*, No. 1622-CC00083-01. The plaintiffs are James Pudlowski, Louis C. Cross III, Gail Henry, and Steve Henry. The Los Angeles Rams, LLC f/k/a The St. Louis Rams, LLC and The St. Louis Rams Partnership are the defendants.

2. What is a class action?

A class action is a lawsuit in which one or more members of a class may sue or be sued as representative parties on behalf of absent class members where: (a) the class is so numerous that it would be impracticable for all parties to be joined; (b) there are questions of law or fact common to the class; (c) the claims or defenses of

the representative parties are typical of the claims or defenses of the class; and (d) the representative parties will fairly and adequately protect the interests of the absent class members. One court resolves the issues for all class members, except for those who exclude themselves from the class.

3. What is this lawsuit about?

The Plaintiffs claim in this lawsuit that the Defendants violated the Missouri Merchandising Practices Act through alleged misrepresentations and omissions regarding their intent to move the team out of St. Louis, and as a result of these alleged actions, Rams' tickets and merchandise were worth less than what people paid for them.

Defendants deny all of Plaintiffs' allegations, deny they violated the Missouri Merchandising Practices Act or otherwise acted improperly, deny Plaintiffs or the Class are entitled to the requested relief, and believe they have numerous other valid defenses.

4. Why is this lawsuit a class action?

This lawsuit is a class action because the Court has decided that it meets the requirements of Missouri Rule 52.08, which governs class actions in Missouri. Specifically, the Court found that it would be impracticable to join all of the Missouri residents who were Missouri citizens and remained Missouri citizens when this action was commenced and who purchased Rams tickets or merchandise in the State of Missouri between April 21, 2010 and January 4, 2016; questions of law and fact are common to the class members; the claims of the Named Plaintiffs are typical of the Class; the Named Plaintiffs are able to fairly and adequately protect the interests of the Class; that common questions of law or fact predominate over individual issues; and that a class action is superior to other available methods for resolving this case. Judge Timothy J. Boyer is in charge of this class action. The representatives of the Class are plaintiffs James Pudlowski, Louis C. Cross III, Gail Henry, and Steve Henry.

5. Why is there a settlement?

The Court did not decide in favor of the plaintiffs or the Rams. The plaintiffs think that they would have won more than the agreed-to settlement payments if they won at trial. The Rams think that the plaintiffs would not have won anything at trial. There was no trial in this matter. Instead, both sides have agreed to a settlement. That way they avoid the cost of a trial and the people affected will get compensation. The Class Representatives and their counsel think the settlement is the best result for all Class Members.

WHO IS IN THE SETTLEMENT

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

Judge Boyer has certified 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.

The Settlement Agreement, which is available for your review on www.ramsclassactionsettlement.com, contains more detailed information about how to determine whether you are a Class Member.

7. Are there exceptions to being included?

You are not a Class Member if you do not meet the requirements of the Class set forth in response to Question 6 above.

8. I'm still not sure if I am included.

If you are still not sure whether you are included, you can ask for free help. You can call Plaintiffs' Counsel at (855) 957-0200 or (314) 640-7550 for more information. Or you can fill out and return the claim form described in question 11, to see if you qualify.

THE SETTLEMENT BENEFITS—WHAT YOU GET

9. What does the settlement provide?

The Rams have agreed to pay Class Members who submit a completed and qualifying claim form 25 percent of the total documented ticket and/or merchandise pre-tax price. There is a cap on settlement payments the Rams may be required to pay to Class Members. Specifically, the Rams will pay not more than \$25,000,000 to the qualifying claimants. If the number of claims filed would require payment of more than the settlement cap, then the payment for each Qualified Claim will be adjusted on a pro rata basis.

10. Will I have to pay taxes on my payment?

You should consult your tax preparer when you file your tax returns.

HOW YOU GET A PAYMENT—SUBMITTING A CLAIM FORM

11. How can I get a payment?

To qualify for payment, you must send in or electronically submit a claim form for all of the Rams' tickets or merchandise purchases for which you seek to recover. A claim form is available on www.ramsclassactionsettlement.com. 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 January 16, 2020.

After you submit the claim form, the settlement administrator will review the information you provide and determine if you are eligible to receive a payment. If you are eligible, you will be added to the Class and receive a payment. If you are not eligible, you will receive a letter notifying you of the fact.

12. When would I get my payment?

The Court will hold a hearing on December 17, 2019 at 9:00AM to decide whether to approve the settlement. If Judge Boyer approves the settlement, then there may be appeals. It's always uncertain whether these appeals can be resolved, and resolving them can take time. Everyone who sends in a claim form will be informed of the progress of the settlement, and Plaintiffs' Counsel will continue to update the progress of the case on this website. Please be patient.

13. What am I giving up to stay in the Class?

Unless you exclude yourself, you are staying in the Class, and that means that you can't sue, continue to sue, or be part of any other lawsuit against the Rams about the legal issues related to this case. It also means that all of the Court's orders will apply to you and legally bind you. If you sign the claim form, you will agree to a "Release of Claims" attached to the claim form, which describes the legal claims that you give up if you get settlement benefits. A complete copy of the Settlement Agreement is available on this website. Talk to Class Counsel or your own lawyer if you have any questions about the released claims or what they mean.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you don't want a payment from this settlement, but you want to keep the right to sue or continue to sue the Rams on your own about the legal issues in this case, then you must take steps to get out. This is called excluding yourself—or is sometimes referred to as "opting out" of the Class.

14. How do I get out of the settlement?

To exclude yourself from the settlement, you must send a letter by mail saying that you want to be excluded from *Pudlowski v. The Rams* (a "Request for Exclusion"). As more fully detailed in the Settlement Agreement, you must include:

- (a) your full name and current address,
- (b) a description of the Rams' tickets or merchandise purchased between April 21, 2010 and January 4, 2016, and
- (c) a sentence stating: "The undersigned hereby requests exclusion from the Class in *Pudlowski et al. v. The St. Louis Rams, LLC, et al.*, Cause No. 1622-CC00083-01 in the Circuit Court for the City of St. Louis, State of Missouri."

In addition, you must mail your Request for Exclusion no later than November 4, 2019 to:

Pudlowski v. The Rams Exclusion

c/o RG/2 Claims Administration

P.O. Box 59479

Philadelphia, PA 19102-9479

DO NOT MAIL YOUR REQUEST FOR EXCLUSION TO THE COURT. Requests mailed to the Court will not result in your exclusion from the class action. The timeliness of Requests for Exclusion will be conclusively determined by the post-mark date or other like proof of the date of mailing or for the delivery.

If you exclude yourself from this class action:

- (a) You will NOT share in any recovery that might be paid to Class Members as a result of trial or settlement of this lawsuit;
- (b) You will not be bound by any decision in this lawsuit favorable to the Defendants; and
- (c) You may present any claims you have against the Defendants by filing your own lawsuit, or you may seek to intervene in this lawsuit.

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

No. Unless you exclude yourself, you give up any right to sue the Rams for the claims that this settlement resolves. If you have a pending lawsuit, speak to your lawyer in that case immediately. You must exclude yourself from *this* Class to continue your own lawsuit. Remember, the exclusion deadline is November 4, 2019.

16. If I exclude myself, can I get money from this settlement?

No. If you exclude yourself, you will not receive any payment. But, you may sue, continue to sue, or be part of a different lawsuit against the Rams.

THE LAWYERS REPRESENTING YOU

17. Do I have a lawyer in this case?

The Court appointed the following lawyer to represent you and other Class Members. The lawyer is called Plaintiffs' Counsel or Class Counsel. You will not be charged for this lawyer. If you want to be represented by your own lawyer, you may hire one at your own expense.

Steven J. Stolze
Of Counsel, Holland Law
300 N. Tucker, Suite 800
St. Louis, MO 63101
T: 855-957-0200
T: 314 640 7550
stevenstolze@yahoo.com

18. How will the lawyers be paid?

Plaintiffs' Counsel will ask the Court to order the Rams to pay up to \$7,000,000.00 to them for attorneys' fees and expenses and \$20,000.00 in the aggregate to James Pudlowski, Louis C. Cross, III, Gail Henry, and Steve Henry for their services as class representatives. The fees would pay Plaintiffs' Counsel for investigating the facts, litigating the case, and negotiating the settlement. The Court may award less than these amounts. The Rams will separately pay the fees, expenses, and payments that the Court awards. These amounts will not reduce the payments available for Class Members. The Rams have agreed not to oppose Plaintiffs' Counsel's request for these payments. The Rams will also pay the costs to administer the settlement

OBJECTING TO THE SETTLEMENT

You can tell the Court that you don't agree with the settlement or some part of it.

19. How do I tell the Court that I don't like the settlement?

If you're a Class Member, you can object to the settlement if you don't like any part of it, including any part of the Settlement Agreement, the Fee Application, or the Class Representatives' incentive awards. However, your objection must be in writing and include: (a) your full name, address and telephone number and that of your counsel, if any; (b) a statement as to whether the objection applies only to you, to a specific subset of the class, or to the entire class; (c) all objections, the legal and factual grounds of which are stated with specificity, and a statement of any evidence you wish to introduce in support of the objection(s); (d) a statement as to whether you intend to appear at the Final Approval Hearing, either individually or through counsel; (e) a statement that you are a member of the Class, along with documentary proof of membership in the Class; (f) your signature; (g) the case name and case number set forth in the caption of this Order; (h) a list containing the names, addresses, and telephone numbers of each person you intend to call as a witness; and (i) a detailed list of any other objections submitted by you, or your counsel, to any class actions submitted in any court, whether state or otherwise, in the United States, including a list of all cases in which you or your counsel has appeared to object to a class action settlement. If you and/or your counsel have not objected to any other class action settlement in any court in the United States, you must affirmatively state so in the written materials provided in connection with your objection. You must also attach to your written statement of objections: (a) an averment under penalty of perjury that (i) you were a Missouri citizen and remained a Missouri citizen when this action was commenced and 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, and (ii) that you did not resell all of the Rams tickets that serve as the basis for your membership in the Class; and (b) any evidence you wish to introduce in support of the objection.

The Court will consider your objection and your views, but you must send your letter saying that you object to the settlement and providing the supporting documentation outlined above. You must mail the objection to each of these three different places and it must be postmarked no later than November 4, 2019:

Court	Clerk of the Court Circuit Court of St. Louis City 10 N. Tucker Blvd. St. Louis, Missouri 63101
Plaintiffs' Counsel	Steven Stolze OF COUNSEL, HOLLAND LAW 300 N. Tucker, Suite 800 St. Louis, MO 63101
Counsel for the Rams	Roger K. Heidenreich Elizabeth Ferrick DENTONS US LLP 211 North Broadway, Suite 3000 St. Louis, Missouri 63102

The timeliness of objections will be conclusively determined by the post-mark date or other like proof of the date of mailing or for the delivery.

Please note: Judge Boyer has ordered that, if you object, Plaintiffs' Counsel and Counsel for the Rams may take your deposition, and review any relevant documents you may have, concerning your objection to the settlement. Neither Plaintiffs' Counsel nor Counsel for the Rams would represent you in those proceedings. If you desire to have legal representation in connection with such a deposition, you will have to obtain that yourself at your own expense.

20. What's 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 COURT'S 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 don't have to do so.

21. When and where will the Court decide whether to approve the settlement?

The Court will hold a Fairness Hearing on December 17, 2019 at 9:00AM, at the Circuit Court for the City of St. Louis, Missouri, 10 N. Tucker Blvd., St. Louis, Missouri 63101, Division No. 8 (6th Floor). At this hearing the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. Judge Boyer will listen to people who have asked to speak at the hearing. The Court will also decide how much to pay to Plaintiffs' Counsel. After the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

22. Do I have to come to the hearing?

No. Plaintiffs' Counsel will answer questions Judge Boyer may have. But you are welcome to come 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 mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

23. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter saying that it is your "Notice of Intention to Appear in *Pudlowski v. The Rams*." This would be included with your written objection. Be sure to include your name, address, telephone number, and your signature. Your Notice of Intention to Appear must be postmarked no later than November 4, 2019 and be sent to the Clerk of the Court, Plaintiffs' Counsel, and Counsel for the Rams, at the three addresses specified in question 19. You cannot speak at the hearing if you excluded yourself.

IF YOU DO NOTHING

24. What happens if I do nothing at all?

If you do nothing, you'll get no money from this settlement. But unless you exclude yourself, you won't be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Rams about the legal issues in this case, ever again.

GETTING MORE INFORMATION

25. Are there more details about the settlement?

This notice summarizes the proposed settlement. More details can be found in the Settlement Agreement and other documents that can be found on this website.

26. How do I get more information?

More information is available on this website. You can also call (844)-951-2349 toll free or write to:
Rams Class Action Settlement, c/o RG/2 Claims Administration, P.O. Box 59479, Philadelphia, PA 19102-9479.

**PLEASE DO NOT CALL OR WRITE THE COURT
OR THE RAMS FOR INFORMATION OR ADVICE.**