

Exhibit A:
Declaration of Cameron R. Azari, Esq.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 2:23-cv-14337-KMM

MICHAEL SHUTLER individually and on
behalf of others similarly situated,

Plaintiff,

v.

CITIZENS DISABILITY LLC,

Defendant.

_____ /

**DECLARATION OF CAMERON R. AZARI, ESQ. ON IMPLEMENTATION AND
ADEQUACY OF SETTLEMENT NOTICE PROGRAM**

I, Cameron R. Azari, Esq. declare as follows:

1. My name is Cameron R. Azari, Esq. I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am a nationally recognized expert in the field of legal notice, and I have served as an expert in hundreds of federal and state cases involving class action notice plans.

3. I am a Senior Vice President of Epiq Class Action & Claims Solutions, Inc. (“Epiq”) and the Managing Director of Epiq Legal Noticing (aka Hilsoft Notifications), a business unit of Epiq that specializes in designing, developing, analyzing, and implementing large-scale, un-biased, legal notification plans. Epiq recently rebranded Hilsoft Notifications as Epiq Legal Noticing. Epiq and Epiq Legal Noticing will hereinafter be referred to as “Epiq”).

4. The facts in this declaration are based on my personal knowledge, as well as information provided to me by my colleagues in the ordinary course of my business at Epiq.

OVERVIEW

5. This declaration describes the successful implementation of the Settlement Notice Program (“Notice Program”) and notice (the “Notice” or “Notices”) for *Shutler v. Citizens*

DECLARATION OF CAMERON R. AZARI, ESQ. ON IMPLEMENTATION AND
ADEQUACY OF SETTLEMENT NOTICE PROGRAM

Disability LLC, Case No. 2:23-cv-14337-KMM in the United States District Court for the Southern District of Florida. Previously I executed my *Declaration of Cameron R. Azari, Esq. on Notice Program* (“Class Certification Declaration”) filed with the Court on October 4, 2024 (ECF No. 51-2), which described the proposed Class Certification Notice Program, detailed Epiq’s class action notice experience, and attached Epiq’s *curriculum vitae*. I also provided my educational and professional experience relating to class actions. Subsequently, I executed my *Declaration of Cameron R. Azari, Esq. on Settlement Notice Program* (“Settlement Notice Program Declaration”) filed with the Court on December 18, 2024, (ECF No. 121-2), which described the proposed Notice Program.

6. As of May 20, 2025, individual notice was delivered to 3,222 of the 3,411 unique, identified Settlement Class members, or 94.4% of the identified Settlement Class. Additionally, 385 Claim Forms have been submitted. As of May 20, 2025, Epiq is aware of no objections or opt-outs.

NOTICE PROGRAM DETAIL

7. On September 26, 2024, the Court appointed Epiq as the Notice Administrator in the *Notice of Administrator Selection*. Subsequently, on January 31, 2025, the Court approved the Notice Program in the *Order* (“Preliminary Approval Order”). In the Preliminary Approval Order, the Court approved and certified, for settlement purposes, the following “Settlement Class”:

All people in the United States (1) who answered one or more prerecorded calls from Citizens, (2) made from the Pipes.ai calling platform, (3) between 11/8/2019 to 10/25/2023, (4) and at the time of the call Citizens’ only lead source for the person called was GrantsAssistanceForYou.com.

Excluded from the Settlement Class are Defendant, including any of their parents, subsidiaries, affiliates or controlled persons, as well as their officers, directors, agents, servants, and employees, and the immediate family members of such persons and the judges and staff of the United States District Court for The Southern District of Florida.

8. Rule 23 of the Federal Rules of Civil Procedure directs that the best notice practicable under the circumstances must include “individual notice to all members who can be identified through reasonable effort,” and that “the notice may be by one or more of the following:

United States mail, electronic means, or other appropriate means.”¹ The Notice Program as implemented satisfied this requirement.

9. The Notice Program as designed and implemented reached the greatest practicable number of Settlement Class members. The Notice Program individual notice efforts via email and/or mail reached approximately 94.4% of the identified Settlement Class members. The Settlement Website also expanded the reach of the notice further. In my experience, the reach of the Notice Program was consistent with other court approved notice programs, was the best notice practicable under the circumstances of this case and satisfied the requirements of due process, including its “desire to actually inform” requirement.²

10. After the Court’s Preliminary Approval Order was entered, Epiq implemented the Notice Program approved by the Court. This declaration details the notice activities undertaken to date and explains how and why the Notice Program was comprehensive and well-suited to reach the Settlement Class. This declaration also discusses the administration activity to date.

Individual Notice

11. On September 30, 2024, Epiq received one data file with 3,416 records for identified Settlement Class members. The data included names, telephone numbers, email addresses, and physical addresses for identified Settlement Class members. Epiq deduplicated and rolled-up the records and loaded the unique, identified Settlement Class member records into its database for this Settlement. These efforts resulted in 3,411 unique, identified Settlement Class member records (of these records, eight records had invalid contact information and were not sent Notice). An Email Notice was sent to all identified Settlement Class members for whom a facially

¹ FRCP 23(c)(2)(B).

² *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 315 (1950) (“But when notice is a person’s due, process which is a mere gesture is not due process. The means employed must be such as one desirous of actually informing the absentee might reasonably adopt to accomplish it. The reasonableness and hence the constitutional validity of any chosen method may be defended on the ground that it is in itself reasonably certain to inform those affected . . .”).

valid email address was available, and a Postcard Notice was sent to all identified Settlement Class members with an associated physical address for whom a valid email address was not available or an Email Notice was returned as undeliverable after multiple attempts. The Postcard Notices were mailed via United States Postal Service (“USPS”) first class mail. The Email Notice and Postcard Notice clearly described the Settlement and the legal rights of the Settlement Class members. In addition, the Email Notice and Postcard Notice directed the recipients to a Settlement Website where they could access additional information.

Individual Notice – Email Notice

12. On February 21, 2025, Epiq commenced sending 3,403 Email Notices to all identified Settlement Class members for whom a facially valid email address was available. The following industry standard best practices were followed. The Email Notice contained the substantive information approved by the Court, and was drafted in such a way that the subject line, the sender, and the body of the message overcame SPAM filters and ensured readership to the fullest extent reasonably practicable. For instance, the Email Notices used an embedded html text format. This format provided easy-to-read text without graphics, tables, images and other elements that in our experience would have increased the likelihood that the message would have been blocked by Internet Service Providers (ISPs) and/or SPAM filters for this type of communication. The Email Notices were sent from an IP address known to major email providers as one not used to send bulk “SPAM” or “junk” email blasts. Each Email Notice was transmitted with a digital signature to the header and content of the Email Notice, which allowed ISPs to programmatically authenticate that the Email Notices were from our authorized mail servers. Each Email Notice was also transmitted with a unique message identifier. The Email Notices included an embedded link to the Settlement Website. By clicking the link, recipients were able to easily access the Long Form Notice, and other information about the Settlement. The Email Notice clearly and concisely summarized the Settlement and the legal rights of the Settlement Class members. The Email Notice is included as **Attachment 1**.

13. If the receiving email server could not deliver the message, a “bounce code” was returned along with the unique message identifier. For any Email Notice for which a bounce code was received indicating that the message was undeliverable for reasons such as an inactive or disabled account, the recipient’s mailbox was full, technical autoreplies, etc., at least two additional attempts were made to deliver the Notice by email.

Individual Notice – Direct Mail

14. On March 7, 2025, Epiq commenced sending 378 Short-Form Notices (“Postcard Notice”) to all identified Settlement Class members with an associated physical address for whom a valid email address was not available or for whom an Email Notice was returned as undeliverable after multiple attempts. The Postcard Notice was sent via USPS first class mail. The Postcard Notice clearly and concisely summarized the Settlement and the legal rights of the Settlement Class members. The Postcard Notice also directed Settlement Class members to the Settlement Website where they could access the Long Form Notice and additional information about the Settlement. The Postcard Notice is included as **Attachment 2**.

15. Prior to sending the Postcard Notices, all mailing addresses were checked against the National Change of Address (“NCOA”) database maintained by the USPS to ensure Settlement Class member address information was up-to-date and accurately formatted for mailing.³ In addition, the addresses were certified via the Coding Accuracy Support System (“CASS”) to ensure the quality of the zip code, and was verified through Delivery Point Validation (“DPV”) to verify the accuracy of the addresses. This address updating process is standard for the industry and for the majority of promotional mailings that occur today.

³ The NCOA database is maintained by the USPS and consists of approximately 160 million permanent change-of-address (“COA”) records consisting of names and addresses of individuals, families, and businesses who have filed a change-of-address with the Postal Service™. The address information is maintained on the database for 48 months and reduces undeliverable mail by providing the most current address information, including standardized and delivery point coded addresses, for matches made to the NCOA file for individual, family, and business moves.

16. The return address on the Postcard Notices is a post office box that Epiq maintains for this Settlement. The USPS automatically forwarded Postcard Notices with an available forwarding address order that had not expired (“Postal Forwards”). Postcard Notices returned as undeliverable were re-mailed to any new address available through USPS information, (for example, to the address provided by the USPS on returned mail pieces for which the automatic forwarding order had expired, but was still within the time period in which the USPS returned the piece with the address indicated), and to better addresses that were found using a third-party address lookup service. Upon successfully locating better addresses, Postcard Notices were promptly remailed. As of May 20, 2025, Epiq has remailed 20 Postcard Notices.

17. Additionally, a Long Form Notice and Claim Form (“Claim Package”) was mailed to all persons who requested one via the toll-free telephone number or other means. As of May 20, 2025, Epiq has mailed 27 Claim Packages as a result of such requests. The Long Form Notice is included as **Attachment 3**. The Claim Form is included as **Attachment 4**.

Notice Results

18. As of May 20, 2025, an Email Notice and/or Postcard Notice was delivered to 3,222 of the 3,411 unique, identified Settlement Class members. This means the individual notice efforts reached approximately 94.4% of the identified Settlement Class.

Settlement Website, Toll-free Telephone Number, and Postal Mailing Address

19. On February 21, 2025, Epiq established a Settlement Website with an easy-to-remember domain name (www.CitizensDisabilityTCPALitigation.com) to provide information about the Settlement. Settlement Class members are able to obtain detailed information about the Settlement and review key documents, including the Complaint, Long Form Notice, Claim Form, Settlement Agreement, and other important court documents. In addition, the Settlement Website includes relevant dates, answers to frequently asked questions (“FAQs”), instructions for how Settlement Class members could opt-out (request exclusion) from or object to the Settlement prior

to the deadlines, contact information for the Class Action Administrator, and how to obtain other case-related information. Settlement Class members are also able to file a Claim Form on the Settlement Website. The Settlement Website address was prominently displayed in all notice documents. As of May 20, 2025, there have been 8,807 unique visitor sessions to the Settlement Website, and 62,585 web pages have been presented.

20. On February 21, 2025, Epiq established a toll-free telephone number (1-888-884-7716) to provide information about the Settlement. Settlement Class members are able to call for additional information, listen to answers to FAQs, and request that a Claim Package be mailed to them. The toll-free telephone number was prominently displayed in all notice documents. The automated telephone system is available 24 hours per day, 7 days per week. As of May 20, 2025, there have been 107 calls to the toll-free telephone number representing 261 minutes of use.

21. A postal mailing address was established and continues to be available for the Settlement, providing Settlement Class members with the opportunity to request additional information or ask questions.

Requests for Exclusion and Objection

22. The deadline to request exclusion from the Settlement or to object to the Settlement was March 17, 2025. As of May 20, 2025, Epiq has received no requests for exclusion. As of May 20, 2025, Epiq is aware of no objections to the Settlement.

Claim Submission & Distribution Options

23. The Notices provided a detailed summary of relevant information about the Settlement, including the Settlement Website address and how Settlement Class members can file a Claim Form online or by mail. Settlement Class members are given the option of receiving a digital payment or a traditional paper check.

24. The deadline for Settlement Class members to file a Claim Form is May 22, 2025. As of May 20, 2025, Epiq has received 385 Claim Forms (25 online and 360 paper). Since the

May 22, 2025, deadline has not yet passed, these numbers are preliminary and are subject to change. As standard practice, Epiq is in the process of conducting a complete quality control review of Claim Forms received.

PLAIN LANGUAGE NOTICE DESIGN

25. The Notices were designed to be “noticed,” reviewed, and—by presenting the information in plain language—understood by Settlement Class members. The design of the Notices followed the principles embodied in the Federal Judicial Center’s (“FJC”) illustrative “model” notices posted at www.fjc.gov. Many courts, and the FJC itself, have approved notices that Epiq’s noticing experts have written and designed in a similar fashion for TCPA cases such as this, and others. The Notices contained substantial, albeit easy-to-read summaries of all key information about the Settlement Class members’ rights and options. Consistent with our normal practice, all notice documents underwent a final edit prior to actual mailing and publication for grammatical errors and accuracy.

26. The Notices contained all of the information necessary to allow Settlement Class members to make informed decisions and included all of the information required by Rule 23(c)(2)(B), describing the central elements of Plaintiffs’ legal claims in plain, easily understood language. The Notices stated the class definition, a brief overview of the Settlement, the options for any Settlement Class member to opt-out and the procedure to do so, a statement that a judgment would be binding on Settlement Class members who do not opt-out, and the right of any Settlement Class member who did not opt-out to appear in the case through their own lawyer, among other information.

CONCLUSION

27. In class action notice planning, execution, and analysis, we are guided by due process considerations under the United States Constitution, by federal and local rules and statutes, and further by case law pertaining to notice. This framework directs that the notice program be

designed to reach the greatest practicable number of potential class members and, that the notice or notice program provide class members with easy access to the details of how the class action may impact their rights. All of these requirements were met in this case.

28. The Notice Program included individual, direct notice by email and/or mail to all Settlement Class members who could be identified with reasonable effort. With the address updating protocols that were used, the Notice Program individual notice efforts reached approximately 94.4% of the identified Settlement Class members. The Settlement Website also expanded the reach of the notice further.

29. In 2010, the FJC issued a *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide*, relied upon for federal cases. This Guide states that, “the lynchpin in an objective determination of the adequacy of a proposed notice effort is whether all the notice efforts together will reach a high percentage of the class. It is reasonable to reach between 70–95%.” Here, we have developed and implemented a Notice Program that readily achieved a reach at the high end of that standard.

30. The Notice Program followed the guidance for how to satisfy due process obligations that a notice expert gleans from the United States Supreme Court’s seminal decisions, which are: a) to endeavor to actually inform the class, and b) to demonstrate that notice is reasonably calculated to do so:

- A. “But when notice is a person’s due, process which is a mere gesture is not due process. The means employed must be such as one desirous of actually informing the absentee might reasonably adopt to accomplish it,” *Mullane v. Central Hanover Trust*, 339 U.S. 306, 315 (1950).
- B. “[N]otice must be reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections,” *Eisen v. Carlisle & Jacquelin*, 417 U.S. 156 (1974) citing *Mullane* at 314.

31. The Notice Program described above provided for the best notice practicable under the circumstances of this case, conformed to all aspects of Rule 23 regarding notice, and comported

with the guidance for effective notice set out in the Manual for Complex Litigation, Fourth.

32. The Notice Program schedule afforded sufficient time to provide full and proper notice to Settlement Class members before the opt-out and objection deadlines.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed on May 20, 2025, at Beaverton, Oregon.



Cameron R. Azari

Attachment 1

From: Class Action Administrator <ShutlervCitizensDisability@e.epinotice.com>

To: [REDACTED]

Subject: Shutler v Citizens Disability Class Action Settlement

Shutler v. Citizens Disability LLC
Civil Action No. 2:23-cv-14337-KMM-RMM

If you answered one or more prerecorded telephone calls between November 8, 2019, and October 25, 2023, from Citizens Disability LLC, you may be eligible to receive a cash payment from a class action settlement.

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

You can learn more at www.CitizensDisabilityTCPALitigation.com.

UniqueID: [REDACTED]

A Settlement has been reached in a class action lawsuit claiming that Citizens Disability LLC ("Citizens Disability") made prerecorded calls without prior express consent of the recipient. Citizens Disability denies any wrongdoing. The Court has not decided who is right.

What is this lawsuit about? The Plaintiff alleges Citizens Disability made prerecorded calls where, at the time the call was made, the only lead source for the person called was GrantsAssistanceForYou.com. The lawsuit also alleges that the prerecorded voice calls violated the Telephone Consumer Protection Act, which prohibits making prerecorded voice calls to individuals without prior express consent. The Plaintiff alleges that thousands of people answered such prerecorded calls. You are receiving this Email Notice because Citizens Disability LLC's records show you may be one of those people.

Who is included? You are a Settlement Class member if you are a person in the United States who (1) answered one or more prerecorded calls from

Citizens Disability (2) made from the Pipes.ai calling platform (3) between November 8, 2019, and October 25, 2023, and (4) at the time of a call, Citizens Disability's only lead source for the person called was GrantsAssistanceForYou.com.

What does the Settlement provide? If you are a Settlement Class member, you may submit a timely and valid Claim Form to receive a pro rata (a legal term meaning equal share) cash payment from a \$320,000 Settlement Fund after the following are deducted: (1) attorneys' fees in an amount equal to 30% of the Settlement Fund (before any other deduction), (2) Class Counsel's costs, and (3) settlement administration costs and expenses.

How can I get a cash payment? You must submit a valid and timely Claim Form online at www.CitizensDisabilityTCPALitigation.com by **May 22, 2025**, or by mail, postmarked by **May 22, 2025**, to receive a cash payment.

What are my other options? If you do not want to be legally bound by the Settlement, you must exclude yourself from the Settlement Class by **March 17, 2025**. If you do not exclude yourself, you will give up the right to sue and will release the Released Parties about the legal claims in this lawsuit and you will be bound by the Settlement and any judgments or orders. If you do not exclude yourself, you may object to the Settlement if filed with the Court by **March 17, 2025**. Instructions on how to exclude yourself or object are in the Long Form Notice on the Settlement Website. If you do nothing, you will not get a cash payment. The Court will hold a Final Approval Hearing on **June 3, 2025**, to consider whether to approve the Settlement and attorneys' fees and costs. You do not need to attend the hearing.

This Email Notice is only a summary. For more information, visit www.CitizensDisabilityTCPALitigation.com or call 1-888-884-7716 (toll-free).

If [REDACTED] should not be subscribed or if you need to change your subscription information for Shutler v Citizens Disability, [please use this preferences page](#).

Attachment 2

Shutler v. Citizens Disability LLC
Class Action Administrator
P.O. Box 2850
Portland, OR 97208-2850

Court-Approved Legal Notice
Shutler v. Citizens Disability LLC, Civil
Action No. 2:23-cv-14337-KMM-RMM, U.S.
District Court, Southern District of Florida

**If you answered one or more
prerecorded telephone calls between
November 8, 2019, and October 25, 2023,
from Citizens Disability LLC, you may
be eligible to receive a cash payment
from a class action settlement.**

*A court has authorized this notice.
This is **not** a solicitation from a lawyer.*
www.CitizensDisabilityTCPALitigation.com
1-888-884-7716



A Settlement has been reached in a class action lawsuit claiming that Citizens Disability LLC ("Citizens Disability") made prerecorded calls without prior express consent of the recipients. Citizens Disability denies any wrongdoing. The Court has not decided who is right.

What is this lawsuit about? The Plaintiff alleges that Citizens Disability made prerecorded calls where, at the time the call was made, the only lead source for the person called was GrantsAssistanceForYou.com. The lawsuit also alleges that the prerecorded voice calls violated the Telephone Consumer Protection Act, which prohibits making prerecorded voice calls to individuals without their prior express written consent. The Plaintiff alleges that thousands of people answered such prerecorded calls. Citizens Disability LLC records show you may be one of those people.

Who is included? You are a Settlement Class member if you are a person in the United States who (1) answered one or more prerecorded calls from Citizens Disability (2) made from the Pipes.ai calling platform (3) between November 8, 2019, and October 25, 2023, and (4) at the time of a call, Citizens Disability's only lead source for the person called was GrantsAssistanceForYou.com.

What does the Settlement provide? If you are a Settlement Class member, you may submit a timely and valid Claim Form to receive a pro rata (a legal term meaning "equal share") cash payment from a \$320,000 Settlement Fund after the following are deducted: (1) attorneys' fees in an amount equal to 30% of the Settlement Fund (before any other deduction), (2) Class Counsel's costs, and (3) settlement administration costs and expenses.

How can I get a cash payment? You must submit a valid and timely Claim Form online at www.CitizensDisabilityTCPALitigation.com by **May 22, 2025**, or by mail, postmarked by **May 22, 2025**, to receive a cash payment.

What are my other options? If you do not want to be legally bound by the Settlement, you must exclude yourself from the Settlement Class by **March 17, 2025**. If you do not exclude yourself, you will give up the right to sue and will release the Released Parties about the legal claims in this lawsuit and you will be bound by the Settlement and any judgments or orders. If you do not exclude yourself, you may object to the Settlement if filed with the Court by **March 17, 2025**. Instructions on how to exclude yourself or object are in the Long-Form Notice on the Settlement Website. If you do nothing, you will not get a cash payment. The Court will hold a Final Approval Hearing on **June 3, 2025**, to consider whether to approve the Settlement and attorneys' fees and costs. You do not need to attend the hearing.

This notice is a summary. Learn more at www.CitizensDisabilityTCPALitigation.com or by calling 1-888-884-7716 toll-free.

Unique ID: [REDACTED] AL0282 v.02

Attachment 3

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA

If you answered one or more prerecorded telephone calls between November 8, 2019 and October 25, 2023 from Citizens Disability, LLC, you may be able to receive a cash payment from a class action settlement.

A Federal Court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

A Settlement has been reached in a class action lawsuit against Citizens Disability LLC (“Citizens Disability”). The Plaintiff alleges Citizens Disability placed prerecorded telephone calls through a platform to individuals who did not give their prior express written consent. Citizens Disability denies any wrongdoing.

You are a Settlement Class member if you are a person in the United States who (1) answered one or more prerecorded calls from Citizens Disability, (2) made from the Pipes.ai calling platform, (3) between November 8, 2019, and October 25, 2023, and (4) at the time of a call, Citizens Disability’s only lead source for the person called was GrantsAssistanceForYou.Com.

If you are a Settlement Class member, you may submit a timely and valid Claim Form to receive a pro rata (a legal term meaning equal share) cash payment.

This Notice may affect your rights. Please read it carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT		DEADLINE
SUBMIT A CLAIM FORM	The only way to get a cash payment is to submit a timely and valid Claim Form.	Submitted or Postmarked by MAY 22, 2025
EXCLUDE YOURSELF	Get no Settlement benefits. Keep your right to file your own lawsuit against Defendant about the legal claims in this case.	Postmarked by MARCH 17, 2025
OBJECT TO THE SETTLEMENT	Stay in the Settlement, but tell the Court why you do not agree with the Settlement. You will still be bound by the Settlement if the Court approves it.	Filed by MARCH 17, 2025
DO NOTHING	Get no Settlement benefits. Be bound by the Settlement.	

These rights and options –and the deadlines to exercise them—are explained in this Notice.

The Court in charge of this lawsuit must decide whether to approve the Settlement and the requested attorneys’ fees and expenses. No cash payments will be provided to Settlement Class members unless the Court approves the Settlement and it becomes final.

Questions? Call 1-888-884-7716 or visit www.CitizensDisabilityTCPALitigation.com.

BASIC INFORMATION

1. Why is this Notice being provided?

The Court authorized this Notice because you have the right to know about the Settlement of this class action lawsuit and about all of your rights and options before the Court decides whether to grant final approval to the Settlement. Chief Judge K. Michael Moore of the United States District Court for the Southern District of Florida is presiding over this lawsuit. The lawsuit is called *Shutler v. Citizens Disability LLC*, Civil Action No. 2:23-cv-14337-KMM-RMM.

2. What is this lawsuit about?

This lawsuit alleges that Plaintiff Michael Shutler, and other persons nationwide, answered one or more prerecorded telephone calls where Citizens Disability's only lead source for the person called was GrantsAssistanceForYou.com. The lawsuit alleges that Citizens Disability violated the federal Telephone Consumer Protection Act, 47 U.S.C. § 227 ("TCPA"), because that law prohibits placing prerecorded calls to people without their prior express written consent.

3. What is a class action and who is involved?

In a class action, a person called the "Class Representative," (in this case, Michael Shutler), sues on behalf of a group (or groups) of people who have similar legal claims. The people collectively are called a "Settlement Class," and each person is called a "Settlement Class member." The individual who sues—and all of the Settlement Class members—are called the "Plaintiffs." The entity or company they sue, (in this case, Citizens Disability), is called the "Defendant." In a class action lawsuit like this one, the Court resolves the issues and legal claims in the lawsuit for all Settlement Class Members, **except** for those who exclude themselves from the Settlement Class.

Additional information about the Court's reasons for allowing this lawsuit to proceed as a class action is available in the Court's Memorandum Opinion and Order, dated September 9, 2024, which is available at www.CitizensDisabilityTCPALitigation.com in the Court Documents section.

THE LEGAL CLAIMS IN THE LAWSUIT

4. What are the Plaintiff's legal claims in this lawsuit?

The legal claims that are made by the Plaintiff in this lawsuit are described above in the answer to Question 2. For additional information, you may read a copy of Plaintiff's Class Action Complaint, available at www.CitizensDisabilityTCPALitigation.com.

5. What does Citizens Disability say about the Plaintiff's legal claims?

Citizens Disability denies that it did anything wrong or violated any law. Specifically, it claims that it did not make the calls. It also claims that if it did make any of the calls, it had prior express written consent to call each person. You can read a copy of Citizen Disability's Answer to Plaintiff's Class Action Complaint, which is available at www.CitizensDisabilityTCPALitigation.com.

6. Did the Court decide who is right?

The Court has not decided whether the Plaintiff or Citizens Disability is correct. Instead, the Plaintiff and Defendant have agreed to a settlement to avoid the risk, cost, and time of continuing the lawsuit.

7. Why is there a Settlement?

The Plaintiff and Defendant do not agree about the legal claims made in this lawsuit. The lawsuit has not gone to trial, and the Court has not decided in favor of the Plaintiff or Defendant. Instead, Plaintiff and Defendant have agreed to settle the lawsuit. The Plaintiff, Defendant, and their lawyers believe the Settlement is best for all Settlement Class members because of the benefits available to Settlement Class members and the risk and uncertainty associated with continuing the lawsuit.

WHO IS INCLUDED IN THE SETTLEMENT CLASS

8. Am I part of the Settlement Class?

The Settlement Class includes:

All people in the United States (1) who answered one or more prerecorded calls from Citizens, (2) made from the Pipes.ai calling platform, (3) between November 8, 2019 to October 25, 2023, (4) and at the time of the call Citizens' only lead source for the person called was GrantsAssistanceForYou.com.

People with a telephone number that appeared in Citizens Disability's call records are potential Settlement Class members and will be notified of this Settlement.

If you did not receive a notice by email or mail regarding the Settlement, you may be part of the Settlement Class if your telephone number appears in Citizens Disability's records. You may be able to obtain your telephone bill and/or records from your telephone carrier, but you do not need to submit that information at this time. If you have any questions about how to obtain this information, or if you are still not sure if you are included in the Settlement Class, you may visit www.CitizensDisabilityTCPALitigation.com or call the Class Action Administrator at 1-888-884-7716. You may also receive free help by calling Class Counsel, the lawyers in this lawsuit at the telephone number listed in the answer to Question 28 below.

9. Are there exceptions to being included in the Settlement?

Yes. Excluded from the Settlement Class are Defendant, including any of their parents, subsidiaries, affiliates or controlled persons, as well as their officers, directors, agents, servants, and employees, and the immediate family members of such persons and the judges and staff of the United States District Court for The Southern District of Florida.

SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

10. What does the Settlement provide?

As a result of the Settlement, Citizens Disability has agreed to create a Settlement Fund of \$320,000.

If you are a Settlement Class member and you submit a timely and valid Claim Form, you may be eligible to receive a pro rata (a legal term meaning equal share) cash payment of the Settlement Fund

after the following items are deducted from the Settlement Fund: attorneys' fees and expenses awarded by the Court, and costs and expenses associated with class notice and administration of the Settlement.

The actual amount paid to each Settlement Class Member who submits a timely and valid Claim Form will not be determined until after the Claim Form filing deadline has passed. The actual amount each participating member of the Settlement Class will receive may be more or less depending on the number of Settlements Class Members who submit timely, valid claims. Cash payments will not be provided to Settlement Class Members unless and until the Court approves the Settlement and it becomes final.

11. What am I giving up by staying in the Settlement Class to receive a cash payment?

Unless you exclude yourself (opt out), you will remain in the Settlement Class. If the Settlement is approved and becomes final, all Court orders and any judgments will apply to you and legally bind you. You will not be able to sue, continue to sue, or be part of any other lawsuit against the Released Parties about the legal issues in this lawsuit that are released by this Settlement. The specific rights you are giving up are called "Released Claims."

12. What are the Released Claims?

Section 17 of the Settlement Agreement describes the Releases, Released Claims, and Released Parties, in necessary legal terminology, so please read those sections carefully. The Settlement Agreement is available at www.CitizensDisabilityTCPALitigation.com. For questions regarding the Releases or Released Claims and what the language in the Settlement Agreement means, you can also contact Class Counsel listed in Question 23 for free, or you can talk to your own lawyer at your own expense.

HOW TO GET BENEFITS FROM THE SETTLEMENT

13. How do I make a claim for a cash payment?

You must submit a timely and valid Claim Form for a cash payment described in Question 10. Your Claim Form must be submitted online at www.CitizensDisabilityTCPALitigation.com by **MAY 22, 2025**, or mailed to the Class Action Administrator at the address on the Claim Form, **postmarked by MAY 22, 2025**. Claim Forms are also available by calling 1-888-884-7716 or by writing to:

Shutler v. Citizens Disability, LLC
Class Action Administrator
P.O. Box 2850
Portland, OR 97208-2850

14. What happens if my contact information changes after I submit a Claim Form?

If you change your mailing address or email address after you submit a Claim Form, it is your responsibility to inform the Class Action Administrator of your updated information. You may notify the Class Action Administrator of any changes by writing to:

Shutler v. Citizens Disability, LLC
Class Action Administrator
P.O. Box 2850
Portland, OR 97208-2850

15. When will I receive my cash payment?

If you file a timely and valid Claim Form, cash payments will be provided by the Class Action Administrator after the Settlement is approved by the Court and becomes final.

It may take time for the Settlement to be approved and become final. Please be patient and check [www. CitizensDisabilityTCPALitigation.com](http://www.CitizensDisabilityTCPALitigation.com) for updates. The Settlement Website is your best source of up to date information.

YOUR RIGHTS AND OPTIONS

You have a choice to make now about whether to stay in the Settlement Class or ask to be excluded from the Settlement Class.

16. What happens if I do nothing?

If you are a Settlement Class member, by doing nothing you will remain in the Settlement Class and you will not receive a cash payment. If you are a Settlement Class member and you do nothing, you will not be able to file your own lawsuit, or continue to separately sue, Citizens Disability—as part of any other lawsuit—about the same legal claims that are the subject of this lawsuit. This means that if you do nothing, you may not be able to sue Citizens Disability for the TCPA violations related to the prerecorded calls you may have answered between November 8, 2019, and October 25, 2023. You will also be legally bound by all Orders the Court issues and judgments the Court may make in this lawsuit.

17. Why would I ask to be excluded?

If you already have filed, or want to file, your own lawsuit against Citizens Disability for the same types of prerecorded calls it made during the same time period, and want to continue pursuing your individual lawsuit, you need to ask to be excluded from the Settlement Class. If you exclude yourself from the Settlement Class—sometimes referred to as “opting-out” of the Settlement Class—you will not get any money or benefits from this lawsuit. However, you will be able to continue to pursue your own lawsuit, or separately file your own lawsuit, against Citizens Disability for the calls that are at issue in this lawsuit. If you exclude yourself from the Settlement Class, you will not be legally bound by the Court’s judgments in this lawsuit. If you start your own lawsuit against Citizens Disability after excluding yourself from the Settlement Class, you will need to hire and pay your own lawyer for your lawsuit, and you will need to prove your individual legal claim(s).

18. How do I ask to be excluded from the Settlement Class?

To exclude yourself from the Settlement Class, you must mail a written request for exclusion stating that you want to be excluded from *Shutler v. Citizens Disability, LLC*, Case No. 2:23-cv-14337-KMM-RMM.

Your request for exclusion must include:

- 1) your name and address,
- 2) the telephone number that answered the prerecorded calls at issue in this lawsuit, and
- 3) your personal physical signature.

Your exclusion request must be **mailed** to the Class Action Administrator at the following address **postmarked** by **MARCH 17, 2025**:

Shutler v. Citizens Disability, LLC
EXCLUSIONS
Class Action Administrator
P.O. Box 2850
Portland, OR 97208-2850

You cannot opt out (exclude yourself) by telephone or by email.

“Mass” or “class” requests for exclusion filed by third parties on behalf of a “mass” or “class” of Settlement Class members or multiple Settlement Class members where the request for exclusion hasn’t been signed by each and every individual Settlement Class Member will not be allowed.

19. If I exclude myself from the Settlement Class, can I get anything from the Settlement?

No. If you exclude yourself, you will not be able to receive a cash payment, but you will not be bound by the Settlement or any judgment in this lawsuit. You can only get a cash payment if you stay in the Settlement and submit a timely and valid Claim Form.

20. If I do not exclude myself from the Settlement Class, can I sue Citizens Disability for the same thing later?

No. Unless you exclude yourself, you give up any right to sue any of the Released Parties for the legal claims this Settlement resolves and Releases relating to the lawsuit. You exclude yourself from this lawsuit to start or continue with your own lawsuit or be part of any other lawsuit against the Released Parties regarding the legal claims in this lawsuit. If you have a pending lawsuit, speak to your lawyer in that case immediately.

OBJECTING TO THE SETTLEMENT

21. How do I tell the Court that I do not like the Settlement?

If you are a Settlement Class member, you can tell the Court you do not agree with all or any part of the Settlement.

To object, you must file timely written notice with the Court as provided below no later than **MARCH 17, 2025**, with copies sent to Class Counsel and Defendant’s Counsel postmarked by **MARCH 17, 2025**, stating you object to the Settlement in *Shutler v. Citizens Disability, LLC*, Case No. 2:23-cv-14337-KMM-RMM.

To file an objection, you cannot exclude yourself from the Settlement Class. Your objection must include all of the following information:

- 1) Your full name, address, telephone number(s), and email address (if any);
- 2) The specific grounds for the objection, accompanied by any legal support for the objection known to you as the objector or your own lawyer;
- 3) The number of times you have objected to a class action settlement within the five (5) years preceding the date that you file the objection, the caption of each case in which you have made such objection, and a copy of any orders related to or ruling upon your prior objections that were issued by the trial and appellate courts in each listed case;
- 4) The identity of any lawyers representing you in connection with the objection (if any);
- 5) The number of times in which your lawyer or your lawyer's law firm have objected to a class action settlement within the five (5) years preceding the date of the filed objection, the caption of each case in which your lawyer or the firm has made such objection and a copy of any orders related to or ruling upon your lawyer's or the lawyer's law firm's prior objections that were issued by the trial and appellate courts in each listed case in which your lawyer's counsel and/or lawyer's law firm have objected to a class action settlement within the preceding (5) years;
- 6) A list of all persons who will be called to testify at the Final Approval Hearing in support of the objection (if any); and
- 7) Your signature as the objector (an attorney's signature is not sufficient).

To be timely, written notice of an objection including all of the information above must be filed with the Court by **MARCH 17, 2025**.

COURT	CLASS COUNSEL	DEFENDANT'S COUNSEL
U.S. District Court for the Southern District of Florida Wilkie D. Ferguson, Jr. U.S. Courthouse Attn: Judge K. Michael Moore <i>Re: Objection in Shutler v. Citizens Disability LLC</i> 400 North Miami Avenue Miami, FL 33128	The HQ Firm, P.C. Attn: Brittany Clark, Esq. 299 S. Main St. #1300 Salt Lake City, UT 84111	Troutman Amin LLC Attn: Jenniffer Cabrera, Esq. 1825 NW Corporate Blvd - Suite 100 Boca Raton, Florida 33431

If you fail to comply with the requirements for objecting as detailed above, you will waive and forfeit any rights you may have to appear separately and/or to object to the Settlement, and you will be bound by all the terms of the Settlement and by all proceedings, orders, and judgments entered in the lawsuit.

22. What is the difference between objecting and asking to be excluded (or opting out)?

Objecting is simply telling the Court you do not like something about the Settlement or the requested attorneys' fees and costs. You can object only if you stay in the Settlement Class (meaning you do not opt out of the Settlement). Opting out of the Settlement, also known as asking to be excluded from the Settlement, is telling the Court you do not want to be part of the Settlement Class or the Settlement. If you opt out, you cannot also object to the Settlement.

THE LAWYERS REPRESENTING YOU

23. Do I have a lawyer in this lawsuit?

The Court has appointed a team of lawyers from the law firm The HQ Firm, P.C. to represent you and the Settlement Class for this Settlement. They are called “Class Counsel.” They are experienced in handling similar class action lawsuits and legal claims.

24. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf in this lawsuit, and the Court appointed Class Counsel to do so. If you want someone else to represent you in the lawsuit, you may hire your own lawyer at your own expense.

25. How will Class Counsel be paid?

You will not personally pay Class Counsel. Class Counsel will file a motion asking the Court to award attorneys’ fees in an amount equal to 30% of the Settlement Fund before any other deduction and costs of up to \$106,000 of the Settlement Fund. If this is awarded by the Court, the attorneys’ fees and costs will be paid from the Settlement Fund. The Court may also award less than the amounts Class Counsel asks for.

Class Counsel’s application for the attorneys’ fees and costs will be made available on the Settlement Website at www.CitizensDisabilityTCPALitigation.com.

THE FINAL APPROVAL HEARING

26. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing on **JUNE 3, 2025, at 11:00 a.m. EST** before the Honorable K. Michael Moore at the United States District Court for the Southern District of Florida, Wilkie D. Ferguson, Jr. United States Courthouse, 400 North Miami Avenue, Miami, Florida 33128. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate, and will decide whether to approve the Settlement and Class Counsel’s application for the attorneys’ fees and costs.

Note: The date and time of the Final Approval Hearing are subject to change without further notice to the Settlement Class. The Court may also decide to hold the hearing via video conference or by telephone. You should check the Settlement Website www.CitizensDisabilityTCPALitigation.com for updates and to confirm the date, time, and format of the Final Approval Hearing has not changed.

27. Do I need to attend the Final Approval Hearing?

You do not need to attend the Final Approval Hearing. Class Counsel will represent you there and will answer any questions the Court may have. You are welcome to attend at your own expense.

GETTING MORE INFORMATION

28. Where can I get more information?

This Notice summarizes the proposed Settlement. Complete details about the Settlement are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at www.CitizensDisabilityTCPALitigation.com. The Settlement Website will be updated with the most current information about the lawsuit as it becomes available.

You may get additional information by visiting www.CitizensDisabilityTCPALitigation.com, calling toll-free at 1-888-884-7716, or by writing to:

Shutler v. Citizens Disability, LLC
Class Action Administrator
P.O. Box 2850
Portland, OR 97208-2850

You may also call Class Counsel at 1-866-710-2484 if you have further questions.

PLEASE DO NOT CALL THE COURT REGARDING THIS NOTICE

Attachment 4

Shutler v. Citizens Disability LLC, Civil Action No. 2:23-cv-14337-KMM-RMM

Return this Claim Form to: Shutler v. Citizens Disability LLC, P.O. Box 2850, Portland, OR 97208-2850.
Questions? Visit www.CitizensDisabilityTCPALitigation.com.

DEADLINE: THIS CLAIM FORM MUST BE POSTMARKED BY MAY 22, 2025, FULLY COMPLETED, SIGNED UNDER OATH, AND MEET ALL CONDITIONS OF THE SETTLEMENT AGREEMENT.

You Must Complete All FOUR Steps to Claim a Share of the Settlement Fund.

Please note that if you are a Settlement Class member, the Settlement Class Member Verification section below requires you to state, under penalty of perjury, that all information contained therein is true and correct. This Claim Form may be researched and verified by the Class Action Administrator.

I. You Must Provide Your Contact Information

Name:

First

MI

Last Name

Current Address:

City

State

ZIP Code

Unique ID:

Telephone Number(s) on the date you received a prerecorded message from Citizens Disability:

 - -
 - -
 - -
 - -

[List all numbers. You may attach a separate sheet.]

Email Address:

II. Settlement Class Member Verification

Pursuant to 28 U.S.C. Section 1746(2), I declare under penalties of perjury that the telephone number(s) identified above or attached to this Claim Form was/were mine between November 8, 2019, and October 25, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Signature

Date: - -
MM DD YYYY

Print Name

III. You Must Return this Claim Form by May 22, 2025

(a) Mail this Claim Form to: *Shutler v. Citizens Disability LLC*, P.O. Box 2850, Portland, OR 97208-2850

OR

(b) Submit this claim form electronically at www.CitizensDisabilityTCPALitigation.com

IV. Payment Selection

You may elect to receive your payment either by check or as a Digital Payment.

Which do you prefer?

☐ Check mailed to me

☐ Digital Payment (*Note: After the Settlement is approved, an email will be sent from noreply@epiqpay.com to the email address you provided on this Claim Form, prompting you to elect your method of payment. Popular electronic payment options will be available, or you can elect to have a check sent to you. Please ensure you have provided a current and complete email address. If you do not provide a current and valid email address, the claims administrator may attempt to send you a check relying on your physical address on file.*)