

LANTERI-TCPA Class Action

Notice Administrator

c/o KCC Class Action Services
P.O. Box 404000
Louisville, KY 40233-4000

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LEGAL NOTICE



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Legal Notice of Class Action Lawsuit against Credit Protection Association, L.P. and ETAN General, Inc.

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

You may be a member of a class action lawsuit against Credit Protection Association, L.P. and ETAN General, Inc. (“Defendants”). The lawsuit alleges that Defendants violated the Telephone Consumer Protection Act by continuing to send automated text messages to individuals’ cell phones after the individuals return texted the word “stop.”

You are getting this notice because you appear to be a member of the class based on Defendants’ records. There is no class settlement and the case continues to be litigated.

This is a summary of your rights – you can:

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| DO NOTHING to stay in the class | By doing nothing, you will remain a member of the class. If the Court rules against Defendants, you may be entitled to payment. If the Court rules for Defendants, you will receive nothing. Either way, you will be bound by any judgment and may lose your right to file your own lawsuit against Defendants regarding the conduct at issue. |
| EXCLUDE YOURSELF FROM THE CLASS by following the instructions below | If you exclude yourself from the class you will not receive any benefit from a resolution of this case, but you will not be giving up your legal claims against Defendants. |

These rights and the deadlines to exercise them are explained more fully below.

1. What is this lawsuit against Defendants about? Plaintiff Katherine Lanteri filed a class action lawsuit against Defendants in the United States District Court for the Southern District of Indiana. The case name is *Lanteri v. Credit Protection Association, L.P. and ETAN General, Inc.*, No. 13-cv-1501-WTL-MJD (S.D. Ind.).

The lawsuit alleges that Defendants violated the Telephone Consumer Protection Act (“TCPA”) because Credit Protection Association continued to send text messages on Defendants’ behalf to individuals after the individuals return texted the word “stop.” The TCPA permits a plaintiff to recover \$500 per text message found to violate the law, and up to \$1,500 per text if the violation is found to be knowing or willful. Defendants deny the plaintiff’s allegations.

2. Why is this a class action? The Court determined that a class action was appropriate after the plaintiff asked the Court to certify a class. In a class action, one or more people called Class Representatives, in this case Katherine Lanteri, sue on behalf of a group (or a “class”) of people who all suffered the same injury and have the same legal claims. In this case, the plaintiff sued on behalf of a class of individuals to whom Defendants continued to send automated text messages on Defendants’ behalf after the individuals return texted the word “stop.”

3. How do I know if I am a part of the class? The Court certified the following class:

(1) All persons within the United States (2) to whose cellular telephone number (3) Credit Protection Association, L.P., sent a text message (4) using its vendor RingClear (5) within four years of September 8, 2013, (6) after the cellular phone owner replied with the one-word reply “stop” in any combination of uppercase and lowercase letters other than “STOP” in all uppercase letters.

To be a class member, you must meet the above definition.

4. Why am I receiving this notice? This Notice explains your legal rights as a potential member of the class. Please read this Notice carefully. You were identified as a potential member of the class because Defendants’ business records show that a text message was sent to your cell phone number by Ring Clear on Defendants’ behalf after you return texted the word “stop.”

5. What happens if I do not exclude myself? Unless you exclude yourself, you will remain a member of the class. By staying in the class, the Court will resolve your TCPA claim. If you do not exclude yourself and the class wins, you may receive a payment. If you do not exclude yourself and the class loses, you will receive nothing. Either way, you will be bound by the judgment and may lose your right to file your own lawsuit against Defendants regarding the matter at issue.

6. How do I exclude myself? You have the right to be excluded from this class action by mailing a written request to the notice administrator at:

LANTERI-TCPA Class Action Notice Administrator
P.O. Box 404000, Louisville, KY 40233-4000

Your request for exclusion **must be postmarked by May 4, 2019**. Your request for exclusion must also include your full name, address, and telephone number, and reference the case name (Lanteri v. Credit Protection Association, L.P. and ETAN General, Inc.) and the case number (13-cv-1501-WTL-MJD).

If you exclude yourself, you will not receive any money recovered in the class action, but you will have the right to bring your own case to sue Defendants over the claims raised in this case. Also, the time you have in which to file your own lawsuit (called the “statute of limitations”) will begin to run again. You will have the same amount of time to file the suit that you had when this case was filed.

7. Do I have a lawyer in this case? The attorneys representing the named plaintiff Katherine Lanteri also represent the class members. These attorneys are:

Keith J. Keogh, Keogh Law Firm, Ltd.
David J. Philipps, Philipps & Philipps, Ltd.
Steven J. Halbert, Attorney at Law

You will not be charged for the services of these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

8. How will the lawyers be paid? If the class wins this lawsuit, the class’s attorneys may ask the Court to approve the payment of attorney’s fees and expenses from any judgment amount entered against Defendants. The class’s attorneys have expended time and expense in this case without any guarantee of payment. If the class loses the lawsuit, you will not owe the class’s attorneys anything.

9. What if my address has changed? If this notice was forwarded by the Postal Service, or if it was otherwise sent to you at an address which is not current, you should immediately update your contact information at www.keoghlaw.com/Lanteri and click on the notice for this case. You may also send a letter to LANTERI-TCPA Class Action Notice Administrator, P.O. Box 404000, Louisville, KY 40233-4000 stating your name, past and current addresses, telephone number, and reference the case name (Lanteri v. Credit Protection Association, L.P. and ETAN General, Inc.) and the case number (13-cv-1501-WTL-MJD).

10. How do I get more information? Please visit www.keoghlaw.com/Lanteri if you would like more information. You can review important updates and important documents filed in the case at the website. You can also call toll free to Keogh Law, Ltd. for further information at (866) 726-1092 or e-mail TCPA@Keoghlaw.com if you still have any questions not answered on the website. Before doing so, please read this full notice carefully.

DO NOT CONTACT THE COURT REGARDING THIS NOTICE.

