

Superior Court of New Jersey, Law Division, Hudson County

If you purchased DriveSafeToday.com Inc.'s TLSAE Course or TLSAE & Driver's Education Combination Course between April 1, 2019 and September 5, 2020, you could get benefits from a class-action settlement.

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

- A settlement has been reached in a class action lawsuit against DriveSafeToday.com, Inc. involving its Traffic Law and Substance Abuse and Education Course (TLSAE Course) and TLSAE & Driver's Education Combination Course (Combination Course).
- The Settlement provides an opportunity to be reimbursed for your purchase of the TLSAE Course or Combination Course.
- Your legal rights are affected whether you act or don't act, so please read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:		
SUBMIT A CLAIM FORM	Make a claim to receive reimbursement of \$30.00 for your purchase of the TLSAE Course or \$55.00 for the Combination Course.	Claims must be submitted by March 8, 2022 . <i>See Question 8, below.</i>
EXCLUDE YOURSELF	Write to the Defendant's Counsel to opt out of the Settlement. This is the only option that allows you to be part of any other lawsuit, or your own lawsuit, against the Defendant about the legal claims released in this Settlement.	Requests for Exclusion must be postmarked by March 8, 2022 . <i>See Questions 11-14, below.</i>
OBJECT	Write to the judge about why you do not like the Settlement.	Objections must be postmarked by March 8, 2022 . <i>See Question 17, below.</i>
GO TO A HEARING	Ask to speak in court to the judge about the Settlement.	The Final Approval Hearing is currently scheduled for April 14, 2022 at 9:00 a.m. <i>See Questions 19-21, below.</i>
DO NOTHING	Give up the benefits you may be entitled to under the Settlement and your right to be part of any other lawsuit against the Defendant about the legal claims released by the Settlement.	<i>See Question 22, below.</i>

- These rights and options -- **and the deadlines to exercise them** -- are explained in this notice.
- The Court in charge of this case still must decide whether to approve the Settlement before any benefits can be distributed. Please be patient.

QUESTIONS? CALL CLASS COUNSEL AT (215) 258-4700

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QUESTIONS? CALL SETTLEMENT CLASS COUNSEL AT (215) 258-4700

1. Why have I received this notice?

A Court has authorized this notice because you have a right to know about the proposed settlement of this class-action lawsuit, and your options, before the Court decides whether to give “final approval” to the Settlement. This notice explains the lawsuit, the proposed Settlement, and your legal rights. You have received this notice because DriveSafeToday.com Inc.’s records indicate that you took and/or purchased either DriveSafeToday’s TLSAE course (TLSAE Course) or DriveSafeToday’s TLSAE & Driver’s Education Combination course (Combination Course) between April 1, 2019 and September 5, 2020.

The Honorable Joseph A. Turula of the Superior Court of New Jersey, Law Division—Hudson County, is overseeing this class-action lawsuit, known as *Rosario et al. v. DriveSafeToday.com, Inc.*, Case No. HUD-L-002984-20 (the “Action”). Fabian Rosario, Gavin Alexander Rosario, and Quynh Anh Huu Nguyen, the people who sued, are called the “Plaintiffs,” and the company that was sued, DriveSafeToday.com, Inc., is called the “Defendant.”

2. What is the lawsuit about?

This lawsuit involves DriveSafeToday’s TLSAE Course and Combination Course. The lawsuit alleges that the website advertising the TLSAE Course and the Combination Course included misleading language because a fee labeled the “State Reporting Fee” included charges that were not actually mandated by the State of Florida.

3. Why is this a class action?

In a class action, one or more people called “Class Representatives” assert claims on behalf of people who have similar claims. All of these people are the “Class” or “Class Members.” One court resolves the issues for all Class Members, except for those who timely exclude themselves from (or “opt out” of) the Class. The Class Representatives in the Action are the Plaintiffs identified above. You have received this notice because you have been identified as potentially being a Class Member.

4. Why is there a Settlement?

All parties have agreed to a Settlement to avoid further cost and risk of a trial, and so that the people affected can begin getting benefits in exchange for releasing the Defendant from liability for the claims that were raised or could have been raised in the Action involving the TLSAE Course and the Combination Course. The Settlement does not mean that the Defendant broke any laws, or otherwise did anything wrong, because Judge Turula did not decide which side was right. The Class Representatives and the lawyers representing them think the Settlement is fair and reasonable for the Class.

5. How do I know if I am part of the Settlement? What vehicles are included in the Settlement?

The Settlement Class includes all persons who purchased DriveSafeToday’s TLSAE Course or Combination Course between April 1, 2019 and September 5, 2020.

6. What are the benefits of the Settlement?

If Judge Turula grants final approval of the Settlement and the Settlement becomes effective (the “Effective Date”), you may be entitled to reimbursement of \$30.00 for the TLSAE Course or \$55.00 for the Combination Course.

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In order to obtain reimbursement, you must submit a Claim Form and provide all the information requested in the Claim Form.

7. What am I giving up in exchange for the Settlement benefits?

If the Settlement becomes final, Class Members will be releasing Defendant and related people and entities from all of the claims described and identified in Section 14 of the Settlement Agreement. In essence, the claims released by Class Members are all claims related to the purchase of the TLSAE Course or the Combination Course. The Settlement Agreement is provided with this Notice. The Settlement Agreement describes the released claims with specific descriptions, in necessarily accurate legal terminology, so read it carefully.

Judge Turula has appointed specific lawyers to represent you in this lawsuit and Settlement. You can talk to one of the lawyers listed in Answer 15 below, free of charge, if you have questions about the released claims or what they mean. You can also speak with your own lawyer, should you have one, about this Settlement.

8. How do I get the benefits of the Settlement?

If you are a Class Member and would like to obtain the reimbursement benefits (described in Answer 6, above), you need to complete the Claim Form that accompanies this Notice and mail it to the address provided on the Claim Form. Claim Forms must be postmarked no later than **March 8, 2022**.

If you have any questions on how to complete the Claim Form or what information is needed, you can call Settlement Class Counsel at **(215) 258-4700**.

9. What if my claim is denied?

There is a process in the Settlement Agreement to resolve disagreements between you and Defendant over your claim. During this process, the court-appointed lawyers listed in the answer to Question 15 below will represent you in any dispute regarding relief under the terms of the Settlement, and the dispute will be handled in accordance with the procedures set forth in the Settlement Agreement. You may have the right to appeal a denied claim. If you have questions regarding this process, contact Settlement Class Counsel below.

10. When will I get the Settlement benefits?

If you have submitted a claim, your Claim Form will be processed and payments will be issued on a continuing, rolling basis after the Effective Date.

11. Can I exclude myself from this Settlement?

Yes. If you want to keep the right to sue or if you are already suing Defendant in another action over the legal issues in this case, then you must take steps to opt out of this Settlement. This is called asking to be excluded from – sometimes called “opting out” of – the Settlement.

12. If I exclude myself, can I get anything from this Settlement?

No. If you ask to be excluded, you cannot object to the Settlement and you will not receive any of the benefits of the Settlement. But you may sue, continue to sue, or be part of a different lawsuit against Defendant in the future, including for claims that this Settlement resolves. You will not be bound by anything that happens in this lawsuit.

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13. If I don't exclude myself, can I sue later?

No. Unless you exclude yourself, you give up the right to sue Defendant for the claims that this Settlement resolves.

14. How do I exclude myself from the Settlement?

To exclude yourself from the Settlement, you must send a letter by mail saying that you want to be excluded from *Rosario et al. v. DriveSafeToday.com, Inc.*, Case No. HUD-L-002984-20. Be sure to include: (1) your full name and current address; (2) whether you purchased or took either the TLSAE Course or the Combination Course, the date of purchase, and the email address used to purchase the class; (3) specifically and clearly state your desire to be excluded from the Settlement and from the Settlement Class; and (4) your signature. You cannot ask to be excluded over the phone or via email or the internet. You must mail your request to be excluded, postmarked no later than **March 8, 2022**, to Defendants' Counsel at the address below:

Christopher J. Dalton, Esq.
Melissa J. Bayly, Esq.
BUCHANAN INGERSOLL & ROONEY PC
550 Broad Street, Suite 810
Newark, New Jersey 07102

Failure to comply with any of these requirements for excluding yourself may result in you being bound by this Settlement.

15. Do I have a lawyer in the case?

The Plaintiffs and you have been represented by lawyers and a law firm that has prosecuted this case. Judge Turula has appointed the following lawyers to represent you and other Class Members as Settlement Class Counsel:

David S. Senoff, Esq.
Hillary B. Weinstein, Esq.
FIRST LAW STRATEGY GROUP LLC
121 S. Broad Street, Suite 300
Philadelphia, PA 19107

You will not be charged for these lawyers. If you want to be represented by another lawyer, you may hire one to appear in Court for you at your own expense.

16. How will the lawyers be paid?

As part of the resolution of the Action, Settlement Class Counsel and Defendants have agreed that Settlement Class Counsel may apply to Judge Turula for an award of attorneys' fees, costs, and expenses not to exceed \$61,900.00, inclusive of service awards to each of the three Plaintiffs in the amount of \$500.00 (\$1,500.00 in total). Defendant has agreed not to oppose this request. The Settlement Class Counsel fees and expenses, inclusive of the service awards to the class representatives, will be paid separate and apart from any relief provided to the Class and will not reduce the value of the benefits distributed to Class Members. Defendant will also separately pay the costs to administer the Settlement. The judge will determine the amount of attorneys' fees, costs, and expenses and service awards after evaluating Plaintiffs' submission.

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17. How do I tell the Court if I don't like the Settlement?

You can object to the Settlement if you don't like some part of it. You can give reasons why you think Judge Turula should not approve it. To object, send a letter saying that you object to the Settlement in *Rosario et al. v DriveSafeToday.com, Inc.*, Case No. HUD-L-002984-20. You must include: (1) your full name, current address, current telephone number, and the name of your lawyer and your lawyer's address if you are represented by a lawyer other than Settlement Class Counsel; (2) whether you purchased or took either the TLSAE Course or the Combination Course, the date of purchase, and the email address used to purchase the class; (3) whether the objection applies only to you, to a specific subset of the Class, or to the entire Class; (4) a statement of the position(s) you wish to assert, including the factual and legal grounds for the position; and (5) any documents that you wish to submit in support of your position.; (6) a Notice of Intention to Appear at the Final Approval Hearing if you intend to appear in person at the hearing; and (7) your signature. **The objection must be mailed to the Clerk of the Court, with copies to Settlement Class Counsel, and Defendant's Counsel at the below addresses.** The mailed copies must be postmarked on or before **March 8, 2022**:

COURT	Clerk, Superior Court of New Jersey – Law Division, Civil Part Hudson County Administration Building 595 Newark Avenue Jersey City, 07306
CLASS COUNSEL	David S. Senoff, Esq. Hillary B. Weinstein, Esq. FIRST LAW STRATEGY GROUP LLC 121 S. Broad Street, Suite 300 Philadelphia, PA 19107
DEFENDANTS' COUNSEL	Christopher J. Dalton, Esq. Melissa J. Bayly, Esq. Buchanan Ingersoll & Rooney PC 550 Broad Street, Suite 810 Newark, New Jersey 07102-4582

18. What's the difference between objecting and excluding?

Objecting is simply telling Judge Turula that you don't like something about the Settlement. You can object only if you stay in the Settlement. Excluding yourself is telling Judge Turula that you don't want to be part of the Settlement, and thus do not want to receive any benefits from the Settlement as described in Answer 6. If you exclude yourself, you have no basis to object because the Settlement no longer affects you.

19. When and where will Judge Turula decide whether to approve the Settlement?

Judge Turula will hold a "Final Approval Hearing" to decide whether to approve the Settlement on **April 14, 2022 at 9:00 a.m.**, at the William J. Brennan Courthouse, 583 Newark Avenue, 2nd Floor, Jersey City, 07306. At this hearing, Judge Turula will determine whether the Settlement is fair, adequate, and reasonable and whether the objections by Class Members, if any, have merit. If you have filed an objection on time, and also filed a Notice of Intention to Appear, as described in Answer 21 below, you may attend and ask to speak, but you don't have to. However, Judge Turula will only listen to people who have asked to speak at the hearing (*See* Answer 21 below). At this hearing, Judge Turula will also decide the service awards for the Class Representatives, as well as the attorney's fees for the lawyers representing the Class Members. We do not know how long the Court's decision will take, and the hearing date may change due to other court business.

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20. Do I need to go to the hearing?

No. Settlement Class Counsel will answer any questions Judge Turula 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 mail your valid written objection on time, Judge Turula will consider it. You may also pay another lawyer to attend, but that's not required.

21. May I speak at the hearing?

You may ask Judge Turula for permission to speak at the Final Approval Hearing. To do so, you must file a "Notice of Intent to Appear" in *Rosario et al. v. DriveSafeToday.com, Inc.*, Case No. HUD-L-002984-20. Be sure to include your name, address, telephone number, signature, and other requirements outlined in Answer 17. Your Notice of Intent to Appear must be postmarked no later than **March 8, 2022** and mailed to the addresses listed in Answer 17. You cannot speak at the hearing if you have excluded yourself from the Settlement.

22. What if I do nothing?

If you do nothing, you will give up the right to be part of any other lawsuit against Defendant about the legal claims released by the Settlement. **You will not receive any of the reimbursement benefits described in Answer 6 offered by this Settlement unless you timely submit a Claim Form.**

23. Are there more details about the Settlement?

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement. You may also contact Settlement Class Counsel with any questions at the addresses listed in Answer 17 or at (215) 258-4700.

QUESTIONS? CALL SETTLEMENT CLASS COUNSEL AT (215) 258-4700