## IN THE UNITED STATES DISTRICT COURT FOR DISTRICT OF MASSACHUSETTS

JOSEPH MANTHA, individually and on behalf of a class of all persons and entities similarly situated,

Plaintiffs,

vs. Civil Act No: 1:19-CV-12235-LTS

QUOTEWIZARD.COM, LLC,

Defendant.

#### LONG-FORM NOTICE

Telephone calling records show you received sales texts from QuoteWizard. The purpose of this Notice is to inform you about a payment you will receive.

Depending on the number of texts the records show you received, you are entitled to receive at least approximately \$76.00 for the required minimum two texts received, with a payment of approximately \$38 per additional text received.

## NO CLAIM IS REQUIRED TO RECEIVE THIS MONEY.

QUOTEWIZARD.COM, LLC ("QUOTEWIZARD") has settled a class action that claimed that it made telemarketing texts to people whose numbers were on the National Do Not Call Registry, without consent.

You are included in the Settlement if your telephone number is one of 66,746 known numbers that received texts.

You are entitled to receive a payment. The answer to Question 8 below explains how these amounts were calculated. These payments will come from a \$19 million Settlement Fund. The Settlement Fund will also be used to pay the costs of notifying people about the Settlement; the lawyers' fees, costs, and expenses; and award to the person who helped bring the lawsuit.

If you are included, your legal rights are affected, whether you act or do not act. Read this Notice carefully.

The Court in charge of this case hasn't decided to approve it yet. Payments will only be made if the Court decides the Settlement is fair and approves the Settlement. The Court has ordered this notice.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT:	
DO NOTHING	Do nothing and receive a payment. You do not have to do anything to receive a payment.
OBJECT August 5, 2025:	Write to the Court about why you do not like something about the Settlement by "August 5, 2025"
ASK TO BE EXCLUDED FROM THE CLASS August 5, 2025:	If you don't want to be a part of the Settlement, you must send a written request to be excluded. You won't get any money, but you will keep any rights to sue QuoteWizard yourself for the same legal issues in this lawsuit.

#### **BASIC INFORMATION**

## 1. Why should I read this Notice?

This Notice explains the lawsuit, the Settlement, your rights, what payments are available, and how to get them. The Hon. Leo Sorokin of the United States District Court for the District of Massachusetts is in charge of this class action.

The lawsuit is known as *Mantha v. QUOTEWIZARD.COM, LLC*, Case No. 1:19-cv-12235-LTS. Judge Sorokin authorized this Notice.

#### 2. What is this lawsuit about?

A consumer in Massachusetts sued QUOTEWIZARD claiming that it made telemarketing texts to people whose telephone numbers were listed on the National Do Not Call Registry. The consumers alleged that these texts violated the Telephone Consumer Protection Act, which prohibits telemarketers from initiating two or more texts in a calendar year to numbers on the Registry. QuoteWizard denied that it contacted any consumers without their express written consent.

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

In a class action lawsuit, one or more people called "Class Representative" sue on behalf of other people who have similar claims. These people together are a "Class" or "Class Members." One court resolves the issues in the case for everyone in the Class—except for those people who choose to exclude himself from the Class. In this case, the Court appointed Joseph Mantha as the Class Representative.

## 4. Why is there a Settlement?

QUOTEWIZARD and the Class Representative spent more than five years in Court fighting this case. However, both sides agreed to a settlement. The Settlement gives Class Members guaranteed payments now whereas in a trial, Class Members might get nothing or might get payments only years from now. Because there is a settlement, the Court has not decided who should win the case.

#### WHO IS INCLUDED IN THE SETTLEMENT

To see if you can get a payment, you first need to determine whether you are included in this lawsuit.

### 5. Am I Included as part of the Class?

The Court decided that all people who fit this definition are included in the Class:

All persons within the United States (a) whose telephone numbers were listed on the National Do Not Call Registry, and (b) who received more than one telemarketing text within any twelve-month period at any time from Drips, (c) to promote the sale of QuoteWizard's goods or services, and (d) whose numbers are included on the Class List.

The Settlement Class encompasses only those persons associated with 66,746 telephone numbers identified from the Expert Report of Anya Verkhovskaya.

That list of phone numbers was obtained from telephone calling records kept by QUOTEWIZARD's vendors. The phone numbers were used to identify certain Class Members who should have received Notice via postcard.

If you received a postcard advising you of this settlement, your name is associated with a phone number that received allegedly illegal telemarketing texts from Defendant.

## 6. I'm still unsure if I am included.

If you are still not sure whether you are included, you can get free help at www.qwtcpasettlement.com, by calling the Settlement Administrator at 1-877-234-5462, or by calling the lawyers appointed to represent Class Members in this case. Please do not contact the Court, QUOTEWIZARD or QUOTEWIZARD's counsel.

#### THE SETTLEMENT BENEFITS

## 7. What does the Settlement provide?

QUOTEWIZARD will pay \$19 million to settle this case. That money will go into a "Settlement Fund" to pay for everything related to the Settlement. Most of the money will go to Class Members (more about that in the answer to FAQ titled "How much will my payment be?"). The rest will be used to pay the costs of notifying people about the Settlement, the lawyers' fees and costs, and the awards to the Class Representative who helped bring the lawsuit.

## 8. How much will my payment be?

The expected payment is a minimum of approximately \$76.00 for the two required minimum texts, with a payment of approximately \$38.00 per additional text received.

However, we don't know enough right now to give you an exact number. The exact number will depend on how many texts you received. There are 66,746 Class Members and they received 314,812 texts. Every class member received at least two texts, and some received more.

We also can't give you an exact number because we don't know what the amount of fees, costs, expenses, and awards will be deducted from the Settlement Fund.

The Settlement Website will periodically be updated to provide the estimated payment amount based on the number of Class Members participating.

#### 9. How can I get a payment?

You do not have to do anything to get a payment.

## 10. When will I get my payment?

We can't give you a date yet. There will be two payments made.

The first distribution shall be no later than twenty-one (21) days after the first Funding Date, which is estimated by October 22, 2025. The second distribution shall be by twenty-one (21) days after the final Funding Date, which is estimated to be April 22, 2026. The first distribution will be for one-third the Amount you will be entitled to.

The Court will consider final approval of the Settlement on September 29, 2025. Even if the Court approves the Settlement, there may be appeals. It is always uncertain whether and when appeals can be resolved and resolving them can take more than a year.

All checks will expire and become void 120 days after they are issued. If there is any money left because of uncashed checks, you may get a third payment. If there is money left after the third payments, that money may be donated to National Consumer Law Center to be used for their efforts to stop illegal telephone texts and calls to consumers and to protect consumer privacy.

The settlement website will be updated to inform Class Members of the progress of the Settlement. Please be patient.

#### WHAT HAPPENS IF YOU REMAIN IN THE SETTLEMENT

## 11. What am I giving up if I stay in the Class?

Unless you exclude yourself, you are staying in the Class. That means that if the Court approves the Settlement, you are giving up the right to file your own lawsuit against, or seek further money from, QUOTEWIZARD for any of the issues or claims in the case—whether or not you are currently aware of those claims.

The specific scope of the claims you are releasing is in the Settlement Agreement, which is available through the "Court Documents" link on the Settlement Website. If you have any questions, you can talk to the lawyers listed in Question 13 for free, or you can, of course, talk to your own lawyer.

## 12. What happens if I do nothing at all?

If you are a Class Member and do nothing (meaning you don't exclude yourself), you will get a payment and you will release your claims as explained above

#### THE LAWYERS REPRESENTING YOU

## 13. Do I have a lawyer in this case?

The Court has appointed the law firms of Bailey & Glasser, LLP; Law Office of Matthew P. McCue; Broderick Law, P.C.; Paronich Law, P.C. and CW Law Group, P.C. to represent you and all Class Members. These firms are called "Class Counsel." The law firms are experienced in handling similar class action cases.

They believe, after litigating with QUOTEWIZARD in Court for more than five years, that the Settlement Agreement is fair, reasonable, and in the best interests of the Class. You will not be separately charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

## 14. How will the lawyers and the Class Representative be paid?

The Court will determine how much Class Counsel will be paid for attorneys' fees, costs, and expenses in this case. The amounts will be paid from the \$19 million Settlement Fund. Class Counsel will apply for an attorneys' fees award of no more than one-third of the Settlement Fund, plus approximately \$322,289.21 in lawsuit expenses.

Class Counsel will also ask the Court to approve awards of up to \$100,000 to compensate the Class Representative for his service on behalf of the Class.

Class Counsel's application for an award of attorneys' fees, costs, and expenses and the Class Representative awards will be made available on the "Court Documents" page of the website at www.qwtcpasettlement.com.

## **EXCLUDING YOURSELF FROM THE CLASS**

## 15. How do I get out of the Settlement?

To exclude yourself from the Class, and no longer be part of the Settlement, you must mail a letter stating that you want to be excluded from the Class. Your letter must include: (1) your full name, address, and telephone number where he or she may be contacted; (2) the telephone number(s) on which you were called; and (3) a statement that you wish to be excluded from the Settlement. You must personally sign by the Settlement Class Member submitting the request.

You must mail your exclusion request no later than August 5, 2025, to:

Mantha v. QuoteWizard Attention: Exclusions P.O. Box 173001 Milwaukee, WI 53217

## 16. If I do not exclude myself, can I sue QUOTEWIZARD for the same thing later?

**No.** If you <u>do not</u> exclude yourself, you will be eligible to receive a payment and therefore, cannot sue QUOTEWIZARD for the same thing later.

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#### OBJECTING TO THE SETTLEMENT

## 17. How do I object to the Settlement or the request for Attorneys' Fees, Costs, and Expenses, and Service Award?

You can object to the Settlement, Class Counsel's request for attorneys' fees, costs and expenses, and the request for awards for the Class Representative. You can ask the Court to deny approval of the Settlement. You cannot ask the Court to order a different settlement; the Court can only approve or reject the Settlement.

If the Court denies approval, no payments will be made now, and the litigation will continue. If that is what you want to happen, you must object.

Any objection to the proposed Settlement <u>must be in writing</u>. If you file a written objection before the deadline, you may, but don't have to, appear at the Final Approval Hearing. If you want to appear, you can do so yourself or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

All written objections must contain the following:

- The name of the Settlement: Mantha v. QUOTEWIZARD.COM, LLC, Case No. 1:19-cv-12235-LTS
- Your full name
- Your complete address
- The telephone number where you may be contacted
- The telephone number(s) that you maintain were called
- All grounds for the objection, with specificity and with factual and legal support for each stated ground
- The identity of any witnesses you may call to testify
- Copies of any exhibits that you intend to introduce into evidence at the Final Approval Hearing
- A statement of the identity (including name, address, law firm, phone number and email) of any lawyer who will be representing you with respect to any objection
- A statement of whether you intend to appear at the Final Approval Hearing with or without counsel
- A statement as to whether the objection applies only to you, a specific subset of the Settlement Class, or the entire Settlement Class.

To be considered by the Court, your objection must be filed with the Court with an electronic filing stamped date on or before August 5, 2025 or sent to the Settlement Administrator by mail (with a postmark date on or before August 5, 2025) or by email (sent on or before August 5, 2025).

## 18. What's the difference between objecting and excluding myself from the Class?

Objecting means that you disagree with some aspect of the Settlement and think the Court should not approve the Settlement. An objection allows your views to be heard in court. You can object only if you stay in the Class. Excluding yourself from the Class means that you are no longer a Class Member and do not want the Settlement to apply to you. If you exclude yourself, you lose any right to receive any payments or benefits from the Settlement or to object to the Settlement because the case no longer affects you.

#### THE COURT'S FINAL APPROVAL HEARING

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

The Court is scheduled to hold the Final Approval Hearing on September 29, 2025, at 2:30 p.m. in the courtroom of the Hon. Leo Sorokin, at the United States Courthouse, 1 Courthouse Way, Boston, MA 02210. The hearing may be rescheduled to a different date or time or location without another Notice to Class Members. Please review the Settlement Website for any updated information regarding the Final Approval Hearing.

At the Final Approval Hearing, the Court will consider whether the Settlement is fair, reasonable and adequate. If there are objections, the Court will consider them. The Court may listen to people who appear at the hearing and who have provided notice of their intent to appear at the hearing. The Court may also consider Class Counsel's application for attorneys' fees, costs and expenses and for awards to Class Representative.

## 20. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you submit a written objection, you do not have to come to the Court to talk about it. As long as you submit your written objection on time, and follow the requirements above, the Court will consider it. You may also pay your own attorney to attend, but it is not required.

#### 21. May I speak at the Final Approval Hearing?

Yes. You may ask the Court for permission to speak at the Final Approval Hearing. At the hearing, the Court may hear any objections and arguments concerning the fairness of the Settlement and/or Class Counsel's request for attorneys' fees, costs, expenses, and Service Award. To do so, you must include in your objection a statement saying that you intend to appear at the Final Approval Hearing. If you have counsel representing you in your objections, you must include the lawyer's name, address, law firm, phone number and email. Please see Question 22 for a complete list of information your objection must include.

You cannot speak at the hearing if you exclude yourself from the Class.

#### **GETTING MORE INFORMATION**

## 22. How do I get more information?

This Notice summarizes the proposed Settlement. More details are in the Class Action Settlement Agreement and Release, in the Court's orders, and other relevant documents, which are available online at <a href="https://www.qwtcpasettlement.com">www.qwtcpasettlement.com</a>.

You can also get information about this case by accessing the Court docket, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at www.cand.uscourts.gov, or by visiting the office of the Clerk of the Court for the United States District Court for the District of Massachusetts, Wheeling Courthouse, between 9:00 a.m. and 5:00 p.m., Monday through Friday, excluding Court holidays.

You may also contact the Settlement Administrator by email at <a href="mailto:info@qwtcpasettlement.com">info@qwtcpasettlement.com</a>; or by telephone at 1-877-234-5462; or you can write to Settlement Administrator at:

Mantha v. QuoteWizard c/o A.B. Data Ltd. P.O. Box 170600 Milwaukee WI, 53217

You may also call Class Counsel, Bailey & Glasser, LLP at (304) 345-6555.

# PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT.

All questions regarding the Settlement should be directed to the Settlement Administrator or to Class Counsel.

By order of the United States District Court for the District of Massachusetts