

**SUPERIOR COURT OF NEW JERSEY  
BURLINGTON COUNTY**

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<b>JEFFREY ESPINOSA, on behalf of himself</b>	:	
<b>and all others similarly situated</b>	:	
	:	
<b>Plaintiff,</b>	:	<b>DOCKET NO.: BUR-L-2668-11</b>
	:	
<b>v.</b>	:	<b>CLASS ACTION</b>
	:	
<b>INTEGRITY TITLE AGENCY INC.</b>	:	
	:	
	:	
	:	
<b>Defendant.</b>	:	

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**LEGAL NOTICE**

**YOU MAY BE ENTITLED TO A REFUND IF YOU WERE CHARGED A MORTGAGAGE RECORDING FEE BY INTEGRITY TITLE AGENCY, INC. DURING A NEW JERSEY REAL ESTATE SALE BETWEEN AUGUST 12, 2005 AND THE PRESENT.**

**WHAT IS THIS NOTICE ABOUT?** A lawsuit captioned Espinosa v. Integrity Tile, Inc. (“Integrity”), Docket No. BUR-L-2668-11 was filed in the Superior Court of New Jersey, Burlington County on behalf of all persons who were charged a mortgage recording fee and/or deed recording fee by Integrity in New Jersey between August 12, 2005 and June 22, 2012. The Complaint alleges that Integrity had a uniform policy of improperly charging buyers to whom it provided real estate settlement services in New Jersey fees for recording mortgages (“Mortgage Recording Fees”) and recording deeds (“Deed Recording Fees”) in excess of the amounts allowed by New Jersey law. Integrity denies any wrongdoing, denies the claims and allegations asserted by Plaintiff and maintains that any overcharges that may have occurred were unintentional errors and non-systematic occurrences. The parties nevertheless have agreed to settle the lawsuit.

**WHY SHOULD I READ THIS NOTICE?** You may be a member of the Class. This is a class action lawsuit that the parties have proposed to settle. If the proposed settlement is approved by the Court, your legal rights may be affected. This notice describes what the lawsuit is about, explains the terms of the proposed settlement, tells you who would be covered and what legal claims would be resolved by the settlement if the Court approves it, and explains how individuals can obtain benefits under the settlement.

**AM I COVERED BY THIS CLASS ACTION LAWSUIT AND THE PROPOSED SETTLEMENT?** You can determine if you are a Class Member by reviewing your closing documents, and specifically your HUD-1 Form (commonly referred to as a settlement sheet) at

Lines 1200 and 1201 to see if you were charged a Mortgage Recording Fee and/or Deed Recording Fee and the amounts of those fees. If you were charged a Mortgage Recording Fee and/or Deed Recording Fee by Integrity in New Jersey between August 12, 2005 and June 22, 2012 you are a Class Member. If you have any questions regarding whether you are a Class Member, you can contact Class Counsel at 856-797-9951 or send an e-mail to Class Counsel at [sdenittis@shabeldenittis.com](mailto:sdenittis@shabeldenittis.com). You can also obtain more information about the settlement by visiting Class Counsel's website "[www.shabeldenittis.com](http://www.shabeldenittis.com)."

**WHAT ARE THE TERMS OF THE SETTLEMENT?** Integrity has agreed to create a procedure whereby for each Class Member who submits a claim, Integrity (with appropriate monitoring from Plaintiffs' counsel) will review and re-calculate the charge that should have been made for recording the claimant's mortgage and deed. If this process reveals you were charged more per page than is allowed under N.J.S.A. 22A:4-4.1, the amount of such an overcharge will be refunded to you. Integrity has also agreed to pay up to \$50,000 to class counsel in attorney's fees and litigation expenses, subject to court approval. Any attorney's fees and litigation costs awarded will be paid separately by Integrity and such fees and expenses will not come out of your refund or the refunds paid to the other Class Members. The proposed settlement is intended to settle all claims against Integrity that arise in any way from the Defendant's conduct in the transactions which are the subject of this lawsuit. By participating in this Settlement, each Class Member is releasing all such claims.

The foregoing is a summary of the basic settlement terms. The full settlement is set forth in a Settlement Agreement that can be viewed at "[www.shabeldenittis.com](http://www.shabeldenittis.com)", or by contacting Class Counsel as set forth under the heading below "HOW DO I GET MORE INFORMATION."

**WHAT ARE MY RIGHTS?** If you are a member of the Class and wish to participate in the settlement, you need to complete and submit a claim form on or before **July 10, 2012**.

If you are a member of the Class and you do NOT want to remain part of the Class, you must exclude yourself ("opt-out"). To opt-out, you must mail a written request, postage pre-paid, to Class Counsel at Shabel & DeNittis, P.C., 5 Greentree Centre, Suite 302, 525 Route 73 N., Marlton, NJ 08053 and Defendant's Counsel, Leon Piechta, Esq., Tompkins, McGuire, Wachenfeld & Barry, LLP, 4 Gateway Center, Suite 5 Newark, NJ 07102. The request must be post-marked on or before **June 8, 2012**, and contain: the name of the lawsuit; your full name, current address and phone number; your signature; and a specific statement of your intention to exclude yourself from the Settlement Class and any judgment entered pursuant to the proposed Settlement. If you do not opt-out as instructed above, you will be automatically included and bound by any determination of the Court, whether favorable or not, and any claim of yours will be ended by judgment.

You may also file a motion with the Court for permission to intervene in this lawsuit if you wish. You do not have to intervene. If you do not intervene in this case or exclude yourself from the class, your interests will be represented by class counsel.

You may object to the proposed settlement if you wish. Any objection to the settlement must be sent to the addresses listed above and postmarked no later than **June 8, 2012**. Any objection should contain the name of this lawsuit; your full name, current address and telephone number; your signature; proof of your membership in the Class; and the specific reason(s) for your objection.

On **June 22, 2012**, at **9 a.m.**, the Superior Court of New Jersey, Law Division, Burlington County, the Honorable M. Patricia Richmond, J.S.C., Burlington County Courts Facility, 49 Rancocas Road, Mt. Holly, New Jersey 08060, will hold a public hearing to determine whether the proposed settlement is fair, adequate, and reasonable and should be approved. Class members who support the proposed settlement do not need to appear at the hearing or take any other action to indicate their approval. Class members who object to the proposed settlement are not required to attend the settlement hearing. If you want to be heard orally in opposition to the settlement, either personally or through counsel, you must indicate your intention to appear at the hearing in your written objection.

**HOW DO I GET MORE INFORMATION?** Claim forms and further information about the settlement can be obtained by visiting the following website address: “[www.shabeldenittis.com](http://www.shabeldenittis.com)”, contacting Class Counsel at 856-797-9951, or emailing Class Counsel at [sdenittis@shabeldenittis.com](mailto:sdenittis@shabeldenittis.com).

**PLEASE DO NOT WRITE OR TELEPHONE THE COURT, DEFENDANT OR ANY OF THEIR AGENTS FOR INFORMATION ABOUT THE PROPOSED SETTLEMENT OR THIS LAWSUIT.**

Dated: May 11, 2012