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Attorneys for Plaintiffs

ANDREW SNYDER; LORI MARINI;
JAMES and NICOLE O’ROURKE, husband
and wife; BRIAN FEGLEY and ALLISON
FEGLEY, husband and wife; and JOSEPH
and LINDA LEON, husband and wife, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

TIM SCHAEFFER DEVELOPMENT
CORP, d/b/a “Tim Schaeffer Communities”
and “Schaeffer Family Homes;”
LONACONING, L.L.C., d/b/a “Tim
Schaeffer Communities” and “Schaeffer
Family Homes;” DAYSTAR
CONSTRUCTION, INC., d/b/a “Tim
Schaeffer Communities” and “Schaeffer
Family Homes;” SCHAEFFER FAMILY
HOMES, LLC,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
CAMDEN COUNTY

DOCKET NUMBER: CAM-L-864-14

LEGAL NOTICE

**YOU MAY BE ENTITLED TO COMPENSATION IF YOU ARE BOTH THE CURRENT
OWNER AND ORIGINAL PURCHASER OF A PROPERTY LOCATED IN THE
“TOWNHOMES AT LONACONING” DEVELOPMENT LOCATED IN BERLIN,
CAMDEN COUNTY NEW JERSEY**

WHAT IS THIS NOTICE ABOUT? A lawsuit captioned Andrew Snyder et al. v. Tim Schaeffer Development Corp. et al. (“Schaeffer Development”), Docket No. CAM-L-864-14, was filed in the Superior Court of New Jersey, Camden County, New Jersey on behalf of all persons who are both the current owners and the original purchasers of residences located in the “Townhomes At Lonaconing”

development located in Berlin, New Jersey. The complaint alleges that Schaeffer Development constructed its homes in error by improperly installing the stucco on the homes in violation of the relevant building codes in effect at the time of construction. Schaeffer Development denies any wrongdoing and denies the claims and allegations asserted by Plaintiffs and maintains that Plaintiffs' homes do not contain any construction errors. The parties nevertheless have agreed to settle the lawsuit.

AM I COVERED BY THIS CLASS ACTION LAWSUIT AND THE PROPOSED

SETTLEMENT? If you are both the current owner and also the original purchaser of a home in the "Townhomes At Lonaconing" development located in Berlin, New Jersey, you may be a Class Member. If you have any questions regarding whether you are a Class Member, you can contact Class counsel Stephen P. DeNittis at 856-797-9951 or via email at sdennittis@denittislaw.com. You can also obtain more information about the settlement by visiting Class counsel's website at www.denittislaw.com.

WHAT ARE THE TERMS OF THE SETTLEMENT? Schaeffer Development has agreed to create a Common Fund of \$60,000.00 that will be used, among other things, to pay approximately \$1,200.00 to Class Members who are both current owners and original purchasers of a property located in the "Townhomes at Lonaconing" in Berlin, New Jersey. Under the proposed settlement, Class Members who submit a timely completed claim form with the required documentation showing they are both the current owner and the original purchaser of their home will receive a check in the amount of approximately \$1,200.00 per townhome from the Common Fund, via first class mail within 100 days of Final Approval of the proposed Settlement, if the Settlement is approved by the Court (or within 10 days after the Court's order becomes final if an appeal is filed). Pursuant to the terms of the settlement, Class counsel also will apply to the Court for an award of reasonable attorneys' fees and litigation costs not to exceed \$40,000.00 subject to court approval. Attorneys' fees and costs are separate and apart from the Common Fund and will be paid by Defendants separately. An application shall be made for incentive award payments for the three named Plaintiffs in the amount of \$2,000.00 per residence which will be paid from the Common Fund, subject to court approval. These payments will not diminish the approximately \$1,200.00 to be paid to Class Members who file a timely claim with supporting proofs. Should the amount of claims exceed the amount of the Common Fund, Class members shall receive a pro rata distribution from the Common Fund. The proposed settlement is intended to settle all claims against Defendants that arise from a Class Member's claims for alleged stucco defects associated with their homes and by participating in this Settlement each class member is releasing all such claims as further described in the Settlement Agreement. This includes any and all claims or causes of action that were, or could have been, asserted by the named Plaintiffs or any member of the Class against Defendants based upon or related to the facts, conduct, omissions, transactions, occurrences or matters that were alleged or could have been alleged in the litigation regarding alleged stucco defects of the townhomes.

WHAT ARE MY RIGHTS? If you are a member of the Class and wish to participate in the settlement, you will need to complete and sign the attached claim form and mail, fax, or email where directed at the bottom of the form along with supporting documentation. Additional Claim forms are also available at Class counsel's website (www.denittislaw.com). Completed claim forms must be submitted by December 23, 2015. **Failure to submit completed claims and supporting documentation by December 23, 2015 will prevent you from receiving any money from the Common Fund.** If the settlement is approved, Class members who submit a timely claim with the required supporting documents will receive a check in the amount of approximately \$1,200.00 within 100 days of the court entering the Final Approval order (or within 10 days after the Court's Order becomes final if an appeal is filed). 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 the Clerk of Court, Superior Court of New Jersey, Camden County, Hall of Justice, 101 S. Fifth Street, Camden, New Jersey 08103 and to Lori A. Clarke-Ratliff, Claims Administrator, Ballard Spahr LLP, Woodland

Falls Corporate Park, 210 Lake Drive East, Suite 200, Cherry Hill, New Jersey 08002; Class counsel at Stephen P. DeNittis, DeNittis Osefchen, P.C., Five Greentree Centre, Suite 410, Route 73 N., Marlton New Jersey 08053 and to the Defendants' Counsel, David A. Haworth, Esq., Ballard Spahr LLP, Woodland Falls Corporate Park 210 Lake Drive East, Suite 200 Cherry Hill, NJ 08002. The request must be post-marked on or before November 27, 2015, 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 regardless of whether you submit a timely claim. You may also file a motion with the Court for permission to intervene in this lawsuit and/or object on or before November 27, 2015, a copy of which also must be served on the Court, Class counsel and Defendants' counsel at the above addresses by no later than November 27, 2015. Any objection must contain the name of this lawsuit; your full name, current address and telephone number; your signature; proof of your membership in the Class; the specific reason(s) for your objection; and any and all evidence and supporting papers (including, without limitation, all briefs, written evidence, and declarations) that you would like the Court to consider.

On December 11, 2015, at 9:00 a.m., the Superior Court of New Jersey, Camden County, Hall of Justice, 101 S. Fifth Street, Camden New Jersey 08103, the Honorable Michael J. Kassel, J.S.C. presiding, Courtroom 32, 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 or by filing other papers with the Court post-marked by November 27, 2015 indicating your intention to appear.

HOW DO I GET MORE INFORMATION? Additional claim forms and further information about the settlement can be obtained by visiting the following website address: www.denittislaw.com, by contacting Class counsel at 856-797-9951, or via email at sdenittis@denittislaw.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: September 24, 2015

The Honorable Michael J. Kassel, J.S.C.