

LEGAL NOTICE

YOU MAY BE ENTITLED TO A CASH BENEFIT IF YOU ARE A NEW JERSEY CITIZEN WHO, BETWEEN NOVEMBER 29, 2016 AND JULY 12, 2023 PARTICIPATED IN A REAL ESTATE CLOSING FOR A PROPERTY LOCATED IN NEW JERSEY WHERE SURETY TITLE COMPANY, LLC SERVED AS THE CLOSING AGENT; AND WAS CHARGED A SEPARATE FEE FOR AT LEAST ONE OF THE FOLLOWING ITEMS: A “RECORD NOTICE OF SETTLEMENT”, A “TAX SEARCH”, AN “UPPER COURT/U.S. PATRIOT SEARCH”, A “CORPORATE STATUS SEARCH”, A “TIDELANDS SEARCH, A “REAL ESTATE CLOSING”.

WHAT IS THIS NOTICE ABOUT? A lawsuit entitled Viggiano v. Surety Title Company, LLC, Docket No. CAM-L-3155-22, was filed in the Superior Court of New Jersey, Camden County on behalf of all New Jersey citizens who between November 29, 2016 and July 12, 2023 participated in a real estate closing for a property located in New Jersey where Surety Title Company, LLC (“Defendant” or “Surety”) served as the closing agent and was charged a separate fee for at least one of the following: a “Record Notice of Settlement”, a “Tax Search”, an “Upper Court/U.S. Patriot Search”, a “Corporate Status Search”, a “Tidelands Search,” a “Real Estate Closing”(collectively the “Fees at Issue”). The lawsuit alleges that Surety potentially overcharged Class Members on any one of the alleged six Fees at Issue and seeks to obtain refunds for Class Members who paid any alleged excessive fee(s) in violation of New Jersey law. Surety denies the claims and allegations asserted by Plaintiff, denies any wrongdoing or liability to Plaintiff and the class whatsoever, and maintains that it has fully complied with New Jersey law in all its dealings with Plaintiff and the class. The parties nevertheless have agreed to settle the lawsuit on a class-wide basis, and the proposed class settlement has now been preliminarily approved by the Court.

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 on a class-wide basis. 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 may be a Class member if you are a New Jersey citizen who participated in a closing for a property located in New Jersey between November 29, 2016 and July 12, 2023 where Surety served as the closing agent.

WHAT ARE THE TERMS OF THE SETTLEMENT? Surety has agreed to pay each Class Member who submits an Eligible Claim Form, as follows: (i) a \$3.00 Customer Relations and Inconvenience Award and (ii) a check for full refund for any excessive Fee at Issue charged in violation of New Jersey law. Surety has also agreed to certain injunctive relief, in that it will change its opening letter to customers to provide a mechanism by which customers can receive an estimate of most of the fees they will be charged and, for a period of two years, will self-audit their fees wherein if it finds an overcharge it will refund its customers as more fully set forth in the Settlement Agreement.

Surety has also agreed to pay up to \$2,500 to the Named Plaintiff/Class Representative as an Incentive Award to compensate him for his efforts in bringing this case. Also, Surety has agreed to pay all costs of notice and administering the settlement, and up to \$80,000 to Class Counsel in attorney’s fees and litigation expenses, subject to court approval, for their time and expenses incurred in prosecuting the case. All

incentive awards, notice and administration costs, and attorney's fees and costs awarded will be paid separately by Surety and will not reduce the benefit to you or any class member. The proposed settlement is intended to settle all claims against Surety that arise in any way from Surety's actions that 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 Class Counsel's website, www.denittislaw.com, or by contacting Surety or Class Counsel at the below email address or telephone number.

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 **December 27, 2023**.

If you do not wish to be a part of this Settlement, you may exclude yourself. If you do not exclude yourself, you will be bound by the Settlement and all Orders of the Court. As a result, you will no longer be able to sue or continue to sue Surety about the claims in the lawsuit that are covered by the Settlement. To request exclusion, you must mail your request in writing, postmarked no later than December 27, 2023, to Surety Class Settlement, in care of **Class Counsel** at DeNittis Osefchen Prince, P.C., 5 Greentree Centre, Suite 410, 525 Route 73 N., Marlton, NJ 08053 and **Defendant's Counsel** Jay N. Varon, Foley & Lardner LLP, Washington Harbour, 3000 K Street, N.W., Suite 600, Washington, D.C. 20007-5109. Alternatively, this request for exclusion can be emailed to Stephen Denittis <SDenittis@Denittislaw.com and JVaron@foley.com.

If you are a member of the Class and you wish to intervene or object to this Settlement, you must file an Objection with the Court. Your Objection must also be mailed, postage pre-paid, to Class Counsel and Defense Counsel at the addresses in the preceding paragraph. Your Objection must be post-marked on or before **December 27, 2023**, and contain: the name of the lawsuit; your full name, current address, and phone number; your signature; proof that you are in the Class; a specific statement of your intention to object to the Settlement; and the reasons you are objecting to the Settlement.

On **January 8, 2024**, at 9 AM., the Superior Court of New Jersey, Law Division, Camden County, the Honorable Judith S. Charney, J.S.C., Courtroom 33, Camden County Hall of Justice, 101 S. 5th St., Camden, NJ 08103, 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 (i) Class Counsel's website, www.denittislaw.com, or by contacting Class Counsel at 856-797-9951 or sdennittis@denittislaw.com or (ii) by visiting the website www.viggianonewjerseytitlesettlement.com.

PLEASE DO NOT WRITE OR TELEPHONE THE COURT FOR INFORMATION ABOUT THE LAWSUIT OR PROPOSED SETTLEMENT.

Dated: November 22, 2023