

# **Exhibit 3**

Declaration of Tiffany Janowicz

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

BENSON GITHIEYA, *et al.*,

Plaintiffs,

v.

GLOBAL TEL\*LINK CORP.,

Defendant.

CIVIL ACTION NO:  
1:15-CV-00986-AT

**DECLARATION OF TIFFANEY JANOWICZ  
REGARDING NOTICE TO CLASS MEMBERS**

I, Tiffany Janowicz, hereby declare as follows:

1. I am a senior vice president of Rust Consulting, Inc. (“Rust”), a nationally recognized notice and administration firm. Rust designs and implements notice and administration programs of all sizes and types, including consumer, antitrust, securities, insurance, healthcare, labor and employment, property, finance, telecom, and products liability class actions. A C.V. outlining Rust’s services and experience is attached as Exhibit A.

2. I have over 25 years of experience at Rust. I lead Rust's consumer, insurance, and healthcare practice areas, and I also have a significant depth of experience in antitrust, consumer, and product liability matters. I have designed and/or managed hundreds of class action notice and administration programs. I speak on class action matters (Continuing Legal Education courses), and I have been a co-author or panelist on relevant topics in the notice and administration industry. Attached as Exhibit B is my C.V., which outlines my experience and qualifications.

3. I submit this declaration in connection with the above-captioned matter to describe the plan of notification and administration ("Notice Program") and notices. This declaration is based upon my personal knowledge and information provided by my associates and staff. The information included in this declaration is of a type reasonably relied upon in the fields of class notice and administration.

4. Subject to the approval of the Court, the parties have agreed to jointly request that the Court appoint Rust to fulfill the role of Settlement Administrator in the above-captioned case to design the Notice Program and help implement the terms and conditions of the Settlement Agreement. I submit this declaration to describe the Notice Program to reach class members and why it is reasonable and adequate under the circumstances.

## **OVERVIEW**

5. I understand that the class includes all persons nationwide who (1) established and initially funded a prepaid account through GTL's interactive-voice-response ("IVR") system and (2) had a positive account balance that was reduced to \$0.00 due to account inactivity for 180 days or less from April 3, 2011, until October 6, 2021.

## **NOTICE PROGRAM**

6. The Notice Program is designed to reach the greatest practicable number of class members; provide class members opportunities to learn about the Settlement and act upon their rights; and ensure that they will be exposed to, see, review, and understand the Notices. To achieve this goal, a three-part notification program was designed, which includes:

- a. Direct Notice (U.S Mail postcard and email);
- b. Paid Media Notice - including print, digital, and social media advertising; and
- c. Earned Media coverage obtained through a national press release.

7. The Notice Program also includes Notices designed to meet due process requirements that are written in plain language.

**Direct Notice**

8. Rust worked with Counsel to develop the following plan to disseminate Notice to all known members of the class.

9. For all class members, Rust expects to receive the telephone number that was used to receive calls using the GTL AdvancePay account and the date range that the related account was active. GTL additionally will provide contact information, including the name, last known address, or email address if found in its records. Due to the age of the data, the class's likely mobility, and the incompleteness of the class data, Rust will perform a skip trace to facilitate direct notice. For records without either a complete mailing address or email address, Rust will use the telephone number to search for the account holder's current email address. For records four years old or older, Rust will use the date of the GTL account to attempt to locate the owner of the telephone number during that time frame and obtain their current email address. This skip trace will be done through TransUnion or a similar third-party vendor. TransUnion uses a variety of third-party sources to compare the latest addresses for individuals and returns updated addresses for them. Through this process, Rust will compile a listing of class member mailing addresses and email addresses to effectuate direct notice.

10. Rust will send a short form notice describing the Settlement via email (“Email Class Notice”) to Settlement Class Members for whom an email address was located within GTL’s records or obtained during the skip trace process. The Email Class Notice will include a link to the Settlement Website where Class Members will find the Settlement details, including the Settlement Agreement, Long Form Notice, and Claim Form, and a direct link to the online Claim Form.

11. Email delivery attempts will be tracked; if an item is returned as undeliverable, commonly referred to as a “bounce,” the reason is noted. If the email address is noted as non-existent as attempted, this is referred to as a “hard” bounce, and no additional attempts to deliver the Notice to that email address will be made. Responses, where the inbox is full or other circumstances prevent delivery are referred to as “soft” bounces and will receive up to eight attempts for delivery. The timeframe to complete soft bounce re-delivery attempts may vary based on the volume of emails included in the campaign, but typically this process will be complete within a few days of receiving the bounce notification.

12. Rust will mail the summary notice via First Class U.S. Mail in the form of a postcard, including a tear-off Claim Form, to all complete mailing addresses provided in GTL’s records (“Mailed Class Notice”). Prior to mailing, Rust will process the class member address information using the National Change of Address

(NCOA) system maintained by the United States Postal Service (USPS). The NCOA system contains new addresses of people and businesses that have moved over the past 48 months and notified USPS of their new addresses. Standardizing and updating addresses prior to mailing using NCOA is industry standard and improves delivery rates.

13. Postcard Notices that are returned as non-deliverable will be reviewed and re-mailed as appropriate. If notices are returned as non-deliverable with an automatic forwarding order, the notices will be re-mailed to any address indicated by the USPS. Notices returned as non-deliverable without a forwarding address will be further traced through TransUnion or a similar vendor to obtain a more current address. If any such address is found, the notice will be re-mailed.

14. Additionally, Rust will send Reminder Notices via email to any email address that previously received notice but for which a claim has not been received within 90 days of the initial notice emailing. The Reminder Notice will remind class members of their right to file a claim and provide the deadline to do so.

15. Rust will also mail class notice via First Class U.S. Mail in the form of a Long Form Notice (with included Claim Form) to any potential class member who requests it. The Long Form Notice includes detailed information about the Settlement, including answers to frequently asked questions.

**Paid Media Notice**

16. The proposed media program was designed to satisfy due process by reaching a broad target audience that includes class members and targeting media to populations and areas of the country that include the heaviest concentrations of potential class members.

17. The first step in determining what media is appropriate to reach potential class members is to establish an equivalent demographic profile, otherwise known as a target audience, of potential class members. The second step is to analyze available data (demographics, media habits) about that target audience. This information is used to select the most appropriate media to reach potential class members.

18. We used media survey data from MRI-Simmons 2021 *Doublebase Study* (“MRI”)<sup>1</sup> to choose the target audience and analyze the notice program. In this case, MRI does not measure individuals with GTL prepaid accounts; therefore, the Notice Program media was selected to target adults 18 years and older.

19. We researched additional information about prisoners to help develop our targeted media recommendations.

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<sup>1</sup> MRI-Simmons produces an annual survey, called a *Doublebase Study*. The study includes survey responses from over 50,000 people and covers thousands of brands and hundreds of product categories.



20. The Bureau of Prisons reports that the federal population is 38% Black and 30% Hispanic.<sup>2</sup> Numerous research studies have also found that people from low-income families are heavily represented in the prison population.<sup>3</sup>

21. To tailor our media recommendations, we investigated areas of the country that have the heaviest levels of incarceration and found:

a. The Top Five Most Populated Prisons:<sup>4</sup>

<b>Prison</b>	<b>Location</b>	<b>Inmate Population</b>
Los Angeles County	Los Angeles, CA	19,836
Rikers Island	New York, NY	13,849
Harris County Jail	Houston, TX	10,000
Cook County Jail	Chicago, IL	9,900
Maricopa County Jail	Phoenix, AZ	9,265

<sup>2</sup> Bureau of Prisons, *Inmate Race*, [https://www.bop.gov/about/statistics/statistics\\_inmate\\_race.jsp](https://www.bop.gov/about/statistics/statistics_inmate_race.jsp) (last visited Oct. 27, 2021).

<sup>3</sup> Institute for Research on Poverty, *Connections Among Poverty, Incarceration, And Inequality*, <https://www.irp.wisc.edu/resource/connections-among-poverty-incarceration-and-inequality/> (last visited Oct. 27, 2021).

<sup>4</sup> World Atlas, *The Largest Jails in the United States*, <https://www.worldatlas.com/articles/the-largest-jails-in-the-united-states.html> (last visited Dec. 5, 2021).

b. The Top Five States with the Largest Prison Populations:<sup>5</sup>

State	Inmate Population
Texas	154,479
California	122,417
Florida	96,009
Georgia	54,113
Ohio	50,338

c. Top Five States with Heaviest Concentration of Prison Population per Capita:<sup>6</sup>

State	Inmate Population per 100,000
Louisiana	683
Mississippi	638
Oklahoma	635
Arkansas	584
Arizona	545

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<sup>5</sup> World Population Review, *Prison Population by State 2021*, <https://worldpopulationreview.com/state-rankings/prison-population-by-state> (last visited Dec. 5, 2021).

<sup>6</sup> *Id.*

### ***Paid Media***

22. The paid media notice is designed to ensure that the Notice is placed in media outlets whose audiences are likely to include potential class members. This paid media program includes print, digital, and social media.

#### Print Advertising

##### *Consumer Magazines*

23. Most adults read one or more magazines during an average month, and nearly three out of five adults read or look at a magazine daily. Adults 18+ read an average of five magazines per month.

24. The Publication Notice will appear once as a half-page ad in *T.V. Guide* and twice as a half-page ad in *Prison Legal News*, national magazines with the following circulation:

<b>Magazine</b>	<b>Circulation</b>
<i>T.V. Guide</i>	1,100,000
<i>Prison Legal News</i>	9,000

##### *Target Audience Print Readership*

25. Readership includes both primary readers and pass-along readers. Primary readers purchase a publication or are members of a household where the

publication was purchased. Pass-along readers are those who read the publication outside the home, in places such as a doctor's office. The table below indicates the estimated number of readers in the target audience of an average issue of the magazine:

<b>Magazine<sup>7</sup></b>	<b>Readers</b>
<i>T.V. Guide</i>	9,900,000

*Shopper Newspapers*

26. The Print Notice will appear once as a one-sixth page ad in the highest-circulating shopper newspapers in the top five states with the highest prison population per capita. These newspapers provide shoppers with shopping deals, coupons, or other promotional codes.

<b>Title</b>	<b>Circulation</b>	<b>State</b>
<i>Bargains Plus!</i>	20,959	Louisiana
<i>Impact</i>	38,024	Mississippi
<i>Clipper</i>	11,700	Oklahoma
<i>Free Weekly</i>	7,495	Arkansas
<i>Ad-King</i>	10,000	Arizona

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<sup>7</sup> *Prison Legal News*' readership is not measured in MRI. Information provided by the publisher notes that 65% to 70% of readers are inmates.

## Digital Advertising

27. The Notice Program includes Internet advertising to provide class members with additional notice opportunities beyond the print placements. Over 94% of Adults 18+ have used the Internet in the past 30 days.<sup>8</sup> Internet advertising delivers an immediate message and allows the viewer of an advertisement to instantly click through to the website for further information.

28. An estimated 124,000,000 gross impressions<sup>9</sup> will be delivered nationally across mobile, tablet, and desktop platforms for six weeks on Google Display Network, YouTube, Facebook, Instagram, and the *Prison Legal News e-newsletter*. Facebook ads will appear in English and Spanish.

29. Keywords and phrases will be implemented with all major search engines, including Google AdWords, Bing (Microsoft Advertising), and their search partners. When a user searches for one of the specified search terms or phrases (e.g., “GTL settlement,” “inmate call settlement”), sponsored links will appear on the results page.

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<sup>8</sup> 2021 MRI-Simmons *Spring Study*.

<sup>9</sup> *Gross impressions* are the total number of times a digital ad will be shown. This figure does not represent the total number of unique viewers of the ad, as some viewers will see the ad on more than one website.

30. Targeted Internet advertising will also be used to reach areas of the country that include heavier concentrations of potential class members. The following tactics are recommended:

Tactic	Definition
Email Matching	Ads targeted to users who have an email that matches a known class member on Facebook and Google.
Social Media Support Groups	Ads targeted to Facebook fans of specialized pages and groups that relate to prison-related categories (e.g., Prison Wives Support Group, Prison Talk, Prison Wives/Girlfriends, Families Supporting Prisoners, Prison Wives, Moms of Prisoners).
Mobile Geofencing	Ads targeted to areas surrounding the five highest populated jails (Los Angeles County, Rikers Island, Harris County Jail, Cook County Jail, and Maricopa County Jail).
Geotargeting	Ads targeted to lower-income households in the top five states with the largest prison population (Texas, California, Florida, Georgia, and Ohio).
Demographics	Ads targeted to Blacks and Latinos with a lower household income.
Channel/Contextual	Ads targeted to users who have viewed and browsed for Pennysaver, extreme couponing, coupon codes, or coupon and classified related topics.

### ***Earned Media Program***

31. An earned media program also will be implemented to amplify the paid media and provide additional notice to class members. The message will be

distributed to media outlets (newspapers, websites, and television and radio stations) to spark press interest and generate coverage.

32. The earned media program will focus on a press release highlighting the toll-free telephone number and Settlement website address so that class members can obtain complete information about the proceeding and settlement. The press release will be distributed on P.R. Newswire's US1 national wire. It will reach approximately 5,400 traditional media outlets (T.V., radio, newspaper, magazine), relevant trade publications, and 4,000 national websites.

### **Forms of Notice**

33. Attached as Exhibits C, D, E, F, and G are the Long Form Notice, Emailed Class Notice, Mailed Class Notice, Publication Class Notice, and Reminder Notice. The forms of Notice are written in plain, easily understood language. The Notices effectively communicate the required information about the Settlement and provide class members with opportunities to learn about the lawsuit and act upon their rights.

34. The short form notices (Emailed, Mailed, and Publication) are designed to capture the class members' attention with clear, concise, plain language. The plain language text provides important information regarding the subject of the litigation, the class definition, and the legal rights available to class members. No

important or required information is missing or omitted. The Notices state all required information without omitting significant facts that class members need to understand their rights. These Notices will feature the toll-free phone number and the Settlement website address for potential class members to find more information or request or access the Long Form Notice.

35. The Long Form Notice will be available at the website, by calling the toll-free number, or by mailing or emailing a request to the Settlement Administrator. The Long Form Notice provides substantial information, including background on the issues in the case and all specific instructions class members must follow to properly exercise their rights. No important or required information is missing or omitted. It is designed to encourage readership and understanding in a well-organized and reader-friendly format. The Long Form Notice will be available in English and Spanish.

#### **Class Member Response Mechanisms**

36. Rust will establish a website to enable class members to get information about the Settlement, including the Long Form Notice (in English and Spanish), the Claim Form, frequently asked questions, the Settlement Agreement, and other court documents from this action. Class members will be able to download materials and the Claim Form and file a claim online. The stand-alone, single-page Claim Form



is attached as Exhibit H. The Settlement Website will be operational before the Notice Program begins.

37. Rust will establish a toll-free informational number to allow class members to call and listen to answers to frequently asked questions 24 hours a day and seven days a week. The toll-free informational number will be operational before the Notice Program begins.

38. Rust will establish a U.S. Mail Post Office Box to allow class members to submit Requests for Exclusion, Claim Forms, and correspondence by mail with any specific requests or questions.

### **CONCLUSION**

39. The Notice Program is expected to reach at least 70% of the class.

40. The Notice Program incorporates a modern approach to Notice. The reach is within the guidelines established by the Federal Judicial Center.<sup>10</sup>

41. It is my opinion that the Notice Program is adequate and reasonably designed to maximize the likelihood of reaching the largest number of class members that is practicable under the circumstances. It is consistent with the

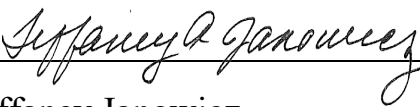
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<sup>10</sup> The Federal Judicial Center, *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide*, <https://www.consumerclassdefense.com/wp-content/uploads/sites/235/2013/06/FJC-Notice-Checklist-and-Plain-Language-Guide.pdf> (last visited Nov. 29, 2021).

standards employed by Rust in administering these types of class action settlements and designing effective notice programs to reach class members.

I declare that the foregoing is true and correct to the best of my knowledge.

Executed in Niwot, Colorado this 5th day of December, 2021.

  
\_\_\_\_\_  
Tiffany Janowicz

## Exhibit A



# Qualifications Summary

This document outlines Rust Consulting's qualifications to serve as the administrator for class action, mass tort, and regulatory settlements, as well as to perform other similar, complex and time-sensitive matters such as remediation programs, data breach responses, and product recalls. It includes summary information categorized as follows:

- Firm Overview
- Practice Area Organization
- Personnel
- Services
- Representative Case Experience
- Data and System Security

## Firm Overview

Rust, an Exela Technologies brand, is an industry-leading consulting and administration firm that provides public and private sector clients a full complement of services required to administer legal settlements and similar programs. These services include consulting; project management; data management; notification; contact center and websites; claims processing; and fund management, distribution, and tax reporting.

Rust grew out of the litigation support firm the Rust Consulting Group, which was founded in 1976. In 1988, the Group administered its first class action settlement, eventually leading in 1995 to the formation of Rust Consulting, Inc. as a separate entity focused on legal settlement administration. Since then, Rust has administered more than 7,500 settlements and projects.

Headquartered in Minneapolis, Rust also has an office in Faribault, Minnesota. Our subsidiary Kinsella Media maintains a Washington, D.C., location. Rust and Kinsella are wholly owned subsidiaries of Exela Technologies, Inc. (NASDAQ: XELA, XELAW and XELAU), one of the largest global providers of transaction processing solutions and enterprise information management.

## Practice Area Organization

Rust administers programs spanning diverse subject matter. The depth and breadth of our legal settlement administration experience spans all prominent practice areas, such as antitrust, consumer, finance, insurance and healthcare, labor and employment, product liability, and securities matters on behalf of private sector clients and governmental agencies at all levels. Our services also lend themselves to our clients' non-settlement needs, including data breach responses, recalls, and remediation programs.

Our leadership and certain operations and client services personnel focus on specific practice areas relevant to our clients, deepening their subject matter expertise and directly relevant experience.

## Personnel

Our permanent staff of approximately 200 includes professionals with backgrounds and disciplines including project management, information technology, finance, law, and operations. This cross-functional, innovative team includes experts in their respective disciplines, such as CPAs, Ph.D.s, attorneys, and PMPs.

Rust's team includes some of the most experienced practitioners in the industry, with much of that experience Rust-specific. Our senior vice presidents average 17 years of Rust experience and our functional directors average over 20 years.

## Services

The Rust team provides high quality administrative services for matters of any size and scope. Specific approaches may vary depending upon the requirements of each individual matter; however, the below services are typical of our engagements.

## Preliminary Consulting

Rust consults with clients prior to settlement to help set expectations based on our experience with similar matters and to anticipate otherwise identified issues that may arise in administration based on a settlement or program's characteristics.

## Project Management

Our project management personnel prepare plans of notice and administration, create or customize project tracking tools and reports, and oversee the creation of project-specific databases designed to house and capture appropriate information for use in claims administration. Throughout the administration process, project management personnel coordinate all activities between the parties, vendors, and internal Rust departments to ensure work is completed accurately and according to any service level agreements, internal standards, settlement documents, etc. We provide regular and on-demand reports and statistics to the appropriate parties and raise potential issues requiring their attention, as necessary. Upon completion of each major phase of administration, or as required, we prepare declarations or affidavits attesting to the scope and results of our work.

## Data Management

The secure and efficient handling of data underlies all aspects of claims administration; Rust creates and customizes data management processes, databases, applications to meet the unique needs of each settlement or project. Tasks associated with data management throughout administration may include:

- Intaking original client data.
- Normalizing data for cross-platform usability, such as meeting mailing or other outreach requirements.
- Consolidating and deduplicating data from multiple sources.
- Extracting data for standard or customized trace services.
- Extracting data for mailing or other outreach.
- Calculating awards.



## Notification

Rust disseminates hundreds of millions of notices annually by mail and email. We also work with our subsidiary Kinsella Media, the leading provider of notice to unidentified audiences and the only firm in the nation with qualified, court-recognized notice expertise, to develop and implement notice plans.

With respect to legal settlements, these notice programs notify class members or other affected individuals of their legal rights and options. With respect to data breach responses, recalls, or remediation, these programs inform affected individuals about the situations and any options those affected individuals may have.

Among our notification-related services are:

- Designing notice programs (through Kinsella Media).
- Drafting plain language materials (through Kinsella Media).
- Designing and proofreading notice materials.
- Locating unidentified individuals and updated addresses.
- Printing and mailing.
- Processing and forwarding undeliverable mail.
- Opining about notice program adequacy (through Kinsella Media).

## Contact Center

Rust supports the programs we administer through an assortment of contact center services including call center, websites, and email support up to 24/7 and for class members and other affected individuals worldwide.

Our call center services include inbound and outbound calls in our own domestic, in-house call center. The call center is located in our Minneapolis headquarters and is readily expandable to meet the needs of specific programs of any size.

All customer service representatives (CSRs)—permanent or temporary—undergo background checks and training on Rust's policies and technology, customer service fundamentals, and project-specific information. Typical engagements include English- and Spanish-speaking CSRs, while we provide support in additional languages, as required. In one case, Rust CSRs took live inbound calls in 10 languages.

In lieu of or in conjunction with live customer service, Rust builds and maintains automated Interactive Voice Response (IVR) systems that provide 24/7 service to toll-free numbers and include menus of prerecorded options such as program overviews, frequently asked questions and answers, and options for requesting forms or filing claims. Rust's IVR systems regularly support English- and Spanish-language speakers and can be programmed to support other languages, as required. In one case, Rust managed IVR support including translations of information pre-recorded by native speakers in 67 languages.



## Claims Processing

Rust develops or executes claims processing or adjudication programs as required by the diverse terms of our engagements. We use several proprietary software applications and tested, streamlined processes to provide the most appropriate solutions for each engagement's needs, whether for paper or online claims. Our systems automate the claims administration process:

- Receipt.
- Link to class member database record.
- Data capture.
- Review of supporting documentation.
- Initial adjudication.
- Deficiency processing.
- Final adjudication.
- Rejection letters.
- Reporting/affidavits.

To meet the needs of each engagement, our systems can be configured to give clients or authorized parties secure online access to claimant data and reporting, or to class members to facilitate online claims filing.

## Fund Management, Distribution, and Tax Reporting

Rust annually distributes billions of dollars associated with settlements and similar programs. Our Bank and Tax group is responsible for day-to-day banking and tax reporting functions for all settlement funds.

Banking Services	Tax Reporting Services
<ul style="list-style-type: none"> <li>▪ Account setup.</li> <li>▪ Online bank reporting.</li> <li>▪ Escrow, investment and distribution accounts.</li> <li>▪ Escrow agent services.</li> <li>▪ Positive Pay – all claimant checks are issued with Positive Pay verification.</li> <li>▪ Check images.</li> <li>▪ Wire transfers.</li> <li>▪ Account reconciliation (daily, weekly or monthly).</li> <li>▪ Balance inquiry and reporting.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Tax identification numbers (federal and state).</li> <li>▪ Qualified Settlement Fund (QSF) determination.</li> <li>▪ Claimant award taxability and reporting.</li> <li>▪ W-9 review.</li> <li>▪ Annual 1120 SF tax returns and quarterly tax deposits.</li> <li>▪ IRS and state 1099 and 1042S reporting and transmission.</li> <li>▪ Backup withholding deposits and 945 annual reporting.</li> <li>▪ Employment payroll taxes: 941, 940, SUTA, SIT, and local income taxes.</li> </ul>



## Representative Case Experience

Having administered more than 7,500 projects, a complete listing of our experience is voluminous. However, the below tables demonstrate the scope of our experience and capacity.

Note: All numbers are rounded

Notices	Case
183 million	<i>In re Domestic Airline Travel Antitrust Litigation</i> , MDL 2656 (D.D.C.).
83 million	<i>In re Target Corporation Customer Data Security Breach Litigation</i> , MDL 2522 (D. Minn.).
31 million	<i>In re Lawnmower Engine Horsepower Marketing and Sales Practices Litigation</i> , No. 2:08-md-01999 (E.D. Wis.).
24 million	<i>Microsoft I-V Cases</i> , J.C.C.P. No. 4106 (Cal. Super. Ct. San Francisco County).
15.7 million	<i>Blessing v. Sirius XM Radio</i> , No. 09-cv-10035 (S.D.N.Y.).

Distributed	Case
\$3.6 billion	Independent Foreclosure Review
\$1.5 billion	National Mortgage Settlement
\$800 million	<i>Naef v. Masonite Corp.</i> , No. CV 944033 (Ala. Cir. Ct. Mobile County).
\$800 million	<i>Microsoft I-V Cases</i> , J.C.C.P. No. 4106 (Cal. Super. Ct. San Francisco County).
\$762 million	<i>In re American International Group, Inc. Securities Litigation</i> , No. 04 Civ. 8141 (S.D.N.Y.). (PwC, Company, Starr, and Gen Re Settlements)

Claims	Case
3.5 million	<i>In re Compact Disc Minimum Advertised Price Antitrust Litigation</i> , MDL No. 1361 (D. Me.).
3.2 million	<i>In re American International Group, Inc. Securities Litigation</i> , No. 04-cv-8141 (S.D.N.Y.) (Company, PwC, Starr, and Gen Re settlements).
3 million	Abbott Infant Formula Settlements
2.8 million	<i>Fogel v. Farmers Group, Inc.</i> , No. BC300142 (Cal. Super. Ct. Los Angeles County).
1.2 million	National Mortgage Settlement

Calls	Case
3.6 million	Independent Foreclosure Review
1.5 million	<i>Dyson v. Flagstar Corp.</i> , No. DKC93-1503 (D. Md.).
1.4 million	National Mortgage Settlement
1.3 million	Abbott Infant Formula Settlements
1 million	<i>Naef v. Masonite Corp.</i> , No. CV 94-4033 (Ala. Cir. Ct. Mobile County).





## Data and System Security

The security of systems and applications and confidentiality of data are of utmost importance to Rust, our clients, the parties to engagements we administer, and members of the public impacted by our operations. Thus Rust actively protects its systems and mitigates potential threats by adhering to a comprehensive assortment of security best practices, certifications, and audits that we refer to collectively as our “unified compliance posture.”

As part of our unified compliance posture, Rust:

- Has received from three federal agencies (CFPB, FTC, and SEC) an Authority to Utilize Controlled Unclassified Information under the guidelines of FISMA and NIST 800-171.
- Undergoes an annual SSAE18 SOC 2 Type II Report audit of our data and system security controls and protocols.
- Complies with applicable laws, such as the Sarbanes-Oxley Act (SOX), Gramm-Leach-Bliley Act (GLBA) and the Health Insurance Portability and Accountability Act (HIPAA).
- Continues to adhere to the (now invalidated) controls formerly known as the U.S.-E.U. Privacy Shield Framework.
- Adheres to documented and audited processes.
- Maintains a business continuity plan to ensure uninterrupted, secure service.
- Has implemented controls to prevent unauthorized access or disclosure, maintain data accuracy, and ensure the appropriate use and confidentiality of information, either for its own purposes or on behalf of our clients.
- Has put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we process.
- Processes personal information only in ways compatible with the purpose for which it was collected or subsequently authorized to do.



## Exhibit B



Senior Vice President

**Tiffany A. Janowicz, Esq.**

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Minneapolis, MN 55402**

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**E:** [tjanowicz@rustconsulting.com](mailto:tjanowicz@rustconsulting.com)

## Education & Certifications

- **J.D.** William Mitchell College of Law, 1995 (St. Paul, MN)
- **B.S. Marketing Education** University of Minnesota, 1990 (Minneapolis, MN)

Tiffany Janowicz leads Rust's consumer, product liability, and insurance and healthcare practice areas, with a depth of experience in antitrust matters. She also has been recognized as a class action notice and claims administration expert by state and federal courts.

Janowicz began her career as a consultant at Rust in 1996 and was promoted to senior vice president in 2003. In her current role, Janowicz specializes in customer relations and strategic consultation on class action notice and claims administration programs. She also provides guidance to a team of project management professionals who handle projects within her practice areas. Rust's clients benefit from her expertise in developing and executing strategies designed to achieve their settlement administration goals.

Janowicz has overseen all aspects of hundreds of settlements, including many of the firm's largest claims-processing matters. Examples include Microsoft's antitrust settlements for the states of California, Iowa, Minnesota, New York and Wisconsin, as well as the multi-district litigation claiming that companies fixed the price of Dynamic Random Access Memory (DRAM) in the United States. Janowicz has also lead many of Rust's insurance-related settlements and a number of credit life settlements.

## Recent Declarations

- *Hamm v. Sharp*, No. 19-cv-488 (M.D. Fla.).
- *Marya v. Warner Chappell*, No. CV 13-04460 (C.D. Cal.).
- *Gold v. Lumber Liquidators*, No. 3:14-cv-05373 (N.D. Cal.).
- *Fleisher v. Phoenix*, No. 11-cv-8405 (S.D.N.Y.).
- *Farar v. Bayer*, No. 3:14-cv-04601 (N.D. Cal.).
- *Royal Mile Company v. UPMC*, No. 2:10-cv-01609 (W.D. Penn.).

- *In re CenturyLink Sales Practices and Securities Litigation*, MDL 17-2795 (D. Minn.).
- *Opalka v. Amalie Oil*, No. 18-40605 (Fla. Cir. Ct. Miami-Dade County).

## Case Experience

Following are some additional details of cases that Rust has administered under the leadership of Janowicz.

- ***In re: CenturyLink Sales Practices and Securities Litigation, No. 17-2795 (D. Minn.)***. Rust received several data files that constituted the class list and which included more than 17 million rows of information. The data team at Rust concatenated that data, sent it to National Change of Address, appended emails through a trace processes, and formatted the data to prepare for notification. Rust ultimately sent notice of the settlement to 6.5 million potential class members via email, and 6.7 million via First-Class Mail, eventually distributing 122,000 payments totaling nearly \$8.5 million.
- ***Parko v. Shell Oil Company, No. 3:12-cv-00336 (S.D. Ill.)***. Janowicz was personally appointed as the neutral arbitrator in this \$4.83 million class action settlement resolving claims against Shell and ConocoPhillips over groundwater contamination in Roxana, Illinois.
- ***Stinson v. The City of New York, No. 10 Civ. 4228 (S.D.N.Y.)***. In a major civil rights class action settlement valued at up to \$75 million, the City of New York agreed to provide compensation to class members who received summonses from New York police officers that had been issued without probable cause, allegedly in response to a summons quota within the NYPD. Rust mailed 922,000 notices and managed a website that received 131,000 unique visitors.
- ***Chaudhri v. Osram Sylvania, No. 11-CV-05504 (D. N.J.)***. A lawsuit claimed that Sylvania made misrepresentations regarding the performance of certain premium automotive lighting. The notice program used a mix of direct and media notice that included 1.6 million mailed postcards along with television, radio, and Internet advertising. Rust mailed 1.4 million checks totaling \$16 million; Sylvania also changed the packaging for the covered products to address the issues in the lawsuit.
- ***In re: Target Corporation Customer Data Security Breach Litigation, MDL No. 14-2522 (D. Minn.)***. Plaintiffs claimed that Target did not adequately protect their payment card data and personal information and that Target delayed in providing notice of a widespread data breach. Rust's direct notice program consisted of 12 million mailed notices and 71 million email notices.
- ***In re Dynamic Random Memory (DRAM) Antitrust Litigation, MDL No. 1486 (N.D. Cal.)***. The lawsuits combined into this multi-district litigation claimed that the Defendant companies fixed the price of DRAM in the United States, causing individuals and businesses to pay more for DRAM and DRAM-containing devices. The combined direct and indirect settlements totaled \$310 million.
- ***Maksimovic v. Sony of Canada Ltd., Ontario Superior Court of Justice, No. CV-11 425487-00CP***. This Canadian settlement resolved allegations that Sony failed to adequately safeguard the computer systems used to provide the Sony PlayStation Network, the Qriocity service, and the Sony Online Entertainment services, which were attacked by criminal intruders in April 2011. Rust managed the translation of all materials into French and provided all documentation and communication in both English and French. Rust also established a Canadian P.O. box for the matter and drop-shipped the mail to our processing center in Minnesota.



- ***In re Nutella Marketing and Sales Practices Litigation, No. 3:11-cv-01086-FLW-DEA (D.N.J.)***. Plaintiffs claimed that Defendant Ferrero U.S.A., Inc. made representations through its marketing and advertising of Nutella® brand hazelnut spread, improperly suggesting that Nutella is healthier than it actually is. Rust placed notice of the settlement in magazines and banner ads on popular websites; the settlement website received over 1 million visits and over a quarter million consumers filed claims.
- ***In re Online DVD Rental Antitrust Litig., MDL No. 2029 (N.D. Cal.)***. Rust sent over 34 million email notices to potential class members in this project. Rust has processed more than 1.1 million claims for gift cards or cash benefit in this ongoing project. Rust also created a settlement website which has to-date received over 2.2 million site visits.
- ***Microsoft I-V Cases, J.C.C.P. No. 4106, (Cal. Super. Ct. S.F. County)***. Janowicz was responsible for the design and management of the direct mail notice program that involved the mailing of 18 million notice-and-claim form packages and deployment of 7 million email notices to a class consisting of consumers who purchased at retail selected Microsoft software for use in California. During the first years of the multi-year program, Janowicz was actively involved in the daily project activities and second in project responsibility only to the company president. Janowicz was and continues to be responsible for overseeing project management, claims and voucher processing, benefits and cy pres distribution, and call center activities.
- ***The Authors Guild, Inc. v. Google, Inc., No. 05-cv-8135 (S.D.N.Y.)***. Janowicz led and continues to lead her team in the administration services provided this settlement involving rights-holders around the world. Janowicz oversaw the translations of the claim forms and supporting materials and well as the provision of telephone support in more than 30 languages. For this ongoing project, Rust's CSRs assist rights-holders in claiming their books and inserts, responding to questions related to the complex settlement and providing technical support throughout the online claims process.
- ***Thompson v. Metropolitan Life, No. 00-CIV-5071 (W.D. Pa.)***. Janowicz was second in project responsibility only to the company president in overseeing Rust's provision of services for this settlement, which included an estimated 25 million policies. Rust mailed more than 550,000 customized and 104,000 generic notices to potential class members. In this race-based underwriting insurance settlement, Rust received 220,000 claim forms, forwarded them on a rolling basis to the company for their research into class membership, and followed up on the company's direction by mailing 80,000 "cure" letters and more than 270,000 response letters to claimants. Rust's call centers answered calls generated by both the mailed notice and an extensive media campaign. During the national TV noticing campaign, there were 500 call center operators in two sites.
- ***McNeil v. American General Life & Accident, No. 3:99-1157 (D. Tenn.)***. Janowicz was second in project responsibility only to the company president in the management of Rust's claims administration services for a settlement covering 9 million class members. Rust mailed over 3 million notices within approximately two weeks. Rust also arranged for an ad campaign to help reach class members for whom the company did not have current addresses. Rust received 600,000 calls on this project, and printed and mailed more than 440,000 payments.
- ***Naef v. Masonite Corp., No. CV 944033 (Ala. Cir. Ct. Mobile County)***. Project involved receiving and processing according to pre-determined criteria (including proof of property ownership, proof of product ownership, and proof of damage) more than 400,000 claims, eventually distributing more than \$800



million to more than 260,000 claimants whose claims were validated. Janowicz co-directed the initial design of the claims intake process of this 10-year claims program, and managed claims review and contact center operations.

## Thought Leadership

- Co-Author, “**The Plain Language Toolkit for Class Action Notice,**” in *A Practitioner’s Guide to Class Actions, 3rd Ed.* (Marcy Greer ed., 2021).
- Speaker, “**How to Get Your Notice Actually Noticed: Claims Stimulation 3.0,**” Women Antitrust Plaintiffs’ Attorneys, Napa, CA (June 2018).
- Webinar Speaker, “**Balancing Due Process and Claims: A Conversation on Strategies to Safeguard Your Settlement,**” American Association for Justice (Sept. 2016).
- Speaker, “**Balancing Due Process and Claims: A Conversation on Strategies to Safeguard Your Settlement,**” Plaintiffs’ Forum, Rancho Palos Verdes, CA (Apr. 2015).
- Co-Author, “**Estimating Claims – What Every Attorney Should Know,**” What We’ve Noticed, Feb. 2015
- Co-Author, “**Increasing Judicial Attention to Claims-Filing Rates,**” What We’ve Noticed, Oct. 2014
- Co-Author, “**The Case for Simplified Notice and Claims,**” What We’ve Noticed, July 2014
- Co-Author, “**Tracking Ted...,**” What We’ve Noticed, April 2014
- Panelist, “**Crafting Class Settlement Notice Programs: Due Process, Reach, Claims Rates, and More – Minimizing Court Scrutiny and Overcoming Objector Challenges,**” Strafford CLE Webinar, Feb. 2014
- Co-Author, “**Efficient, Cost-Effective Notification and Administration in Antitrust Class Actions,**” Class Action Perspectives, 2013
- Co-Author, “**Recent Court Decisions Indicate Greater Scrutiny of Class Notice Programs,**” What We’ve Noticed, Dec. 2013
- Panelist, “**Mechanics, Logistics & Statistics: How to Settle a Class Action Lawsuit,**” FDCC Section Presentations for CLE 2013 Winter Program, March 2013
- Panelist, “**Emerging Trends in Class Action Notice,**” CLE International 6th Annual Conference Class Actions: Hot Topics, Winning Strategies and More, June 2010
- Speaker, “**Class Action Notice and Claims Administration: Trends and Innovation,**” Women Antitrust Plaintiffs’ Attorneys Networking Event, Aug. 2009
- Author, “**Anticipating Claims Filing Rates in Class Action Settlements,**” Class Action Perspectives, Nov. 2008

## Bar Admissions

- Licensed to practice law in Minnesota



## Exhibit C

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

**If you used Global Tel\*Link services to speak by phone with someone in jail or prison  
between 2011 and 2021, you could get money from a settlement.**

*A federal court directed this notice. This is not a solicitation from a lawyer. You are not being sued.*

A Settlement has been reached in a class action lawsuit claiming Global Tel\*Link (“GTL”) improperly retained money that was deposited in prepaid “AdvancePay” accounts after the account was inactive for 180 days or less. GTL denies any and all wrongdoing of any kind, and denies any liability. The Court has not decided who is right.

The Settlement will provide either a credit or refund to current and former GTL customers. Eligible Class Members may receive up to 100% of the money that was retained from their account.

If you are a current or former GTL customer, your legal rights may be affected by the Settlement whether you act or do not act. To determine if you are included in the Class, please review Section 6 below.

**IMPORTANT: PLEASE READ THIS NOTICE CAREFULLY**

A SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
<b>CURRENT GTL CUSTOMERS: GET AUTOMATIC CREDIT</b>	If you have an active AdvancePay account with GTL when the settlement is finalized in mid to late 2022, you will automatically receive a credit to your GTL account (see Question 7 for more information).
<b>FORMER GTL CUSTOMERS: SUBMIT A CLAIM FORM</b>	If you do not currently or will not have an active AdvancePay account with GTL when the settlement is finalized in mid to late 2022, you must file a claim by <b>Month XX, 2022</b> to receive a refund (see Question 8 for more information).
<b>EXCLUDE YOURSELF</b>	If you do not wish to be part of the Settlement, you may request to be excluded no later than <b>Month XX, 2022</b> and receive no payment or credit from the Settlement. This is the only option that allows you to be part of any other lawsuit against GTL about the legal claims in the Settlement.
<b>OBJECT</b>	You may also write to the Court by <b>Month XX, 2022</b> about why you do not like the Settlement.

QUESTIONS? VISIT [www.XXXXXX.com](http://www.XXXXXX.com) OR CALL 1-8XX-XXX-XXXX TOLL-FREE  
*Para una notificación en español, visite [www.XXXXXX.com](http://www.XXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX*



**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

<b>GO TO A HEARING (On Month XX, 2022)</b>	You may ask to speak in Court about the fairness of the Settlement.
<b>DO NOTHING</b>	You may give up your right to be part of this Settlement or any other lawsuit against GTL about the legal claims in this Settlement. Former GTL customer will receive no payment (unless you reactivate your account within two years of final approval – see Question 22).

These rights and options—**and the deadlines to exercise them**—are explained in this Notice.

The Court preliminarily approved the Settlement on Month XX, 2022. But the Court still must decide whether to finally approve the Settlement after considering any objections and holding the Fairness Hearing. If it does, and after any appeals are resolved, payments or credits will be distributed to eligible Class Members. Please be patient.

**WHAT THIS NOTICE CONTAINS**

- A. BASIC INFORMATION .....

  - 1. Why is there a notice? .....
  - 2. What is the Case about? .....
  - 3. Why is this a class action? .....
  - 4. Why is there a Settlement? .....

- B. WHO IS PART OF THE SETTLEMENT .....

  - 5. Who is included in the Settlement? .....
  - 6. What should I do if I am still not sure if I am included? .....

- C. THE BENEFITS OF THE SETTLEMENT AND HOW TO MAKE A CLAIM .....

  - 7. What benefits does the Settlement provide to the Class? .....
  - 8. How do I get a refund? .....
  - 9. How much will my refund be? .....
  - 10. What happens after I file a Claim Form? .....

QUESTIONS? VISIT [www.XXXXXX.com](http://www.XXXXXX.com) OR CALL 1-8XX-XXX-XXXX TOLL-FREE  
*Para una notificación en español, visite [www.XXXXXX.com](http://www.XXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX*

11. When will I receive my payment?

D. EXCLUDING YOURSELF FROM THE SETTLEMENT ..... [X]

- 12. How do I get out of the Settlement?
- 13. If I exclude myself, can I still get a payment?
- 14. What am I giving up if I do not exclude myself?

E. THE LAWYERS REPRESENTING ALL CLASS MEMBERS ..... [X]

- 15. Do I have a lawyer in the Case?
- 16. How will the lawyers be paid?

F. OBJECTING TO THE SETTLEMENT ..... [X]

- 17. How do I tell the Court if I do not like the Settlement?
- 18. What is the difference between objecting and asking to be excluded?

G. THE COURT'S FAIRNESS HEARING..... [X]

- 19. When and where will the Court decide whether to approve the Settlement?
- 20. Do I have to attend the hearing?
- 21. May I speak at the hearing?

H. IF YOU DO NOTHING..... [X]

- 22. What happens if I do nothing at all?

I. GETTING MORE INFORMATION..... [X]

- 23. How do I get more information?

QUESTIONS? VISIT [www.XXXXXX.com](http://www.XXXXXX.com) OR CALL 1-8XX-XXX-XXXX TOLL-FREE  
*Para una notificación en español, visite [www.XXXXXX.com](http://www.XXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX*

## A. BASIC INFORMATION

### 1. Why is there a notice?

This notice is to inform you about the proposed Settlement of a class action lawsuit and your rights and options. This notice describes the lawsuit, the proposed Settlement, your legal rights, payments (“refunds”) and credits that are available.

District Court Judge Amy Totenberg of the United States District Court for the Northern District of Georgia is overseeing the proposed Settlement in the case titled *Githieya, et al. v. Global Tel Link Corp.*, Civil Action No. 1:15-cv-00986-AT (the “Case”). The proposed Settlement will resolve the claims made against GTL in the Case. The persons who sued on behalf of the Class are called the “Plaintiffs.” GTL is the “Defendant.”

### 2. What is this Case about?

The lawsuit claims that, between April 3, 2011, and October 6, 2021 (the “Class Period”), GTL had an Inactivity Policy. This Policy allowed GTL to keep any money deposited into customers’ AdvancePay accounts that was not used for a period of 180 days or less. Plaintiffs claimed in the lawsuit that GTL’s Inactivity Policy violated GTL’s contracts with its AdvancePay customers who signed up using GTL’s automated telephone system and unjustly enriched GTL.

The Settlement resolves the Case. The Court has not decided who is right. Instead, the Parties agreed to a Settlement. By agreeing to a Settlement, the Parties avoid the costs and risk of a trial and the Class will get benefits described in the Settlement. The Class Representatives and their attorneys believe that the Settlement is in the best interest of Class Members.

### 3. Why is this a class action?

In a class action, one or more people called “class representatives” sue on behalf of themselves and people who have similar claims. The Class Representatives in this case are Benson Githieya, Darlene Byers, the Estate of Nellie Lockett, Michelle Mendoza, Sarai Morris, Betty Davis, and Adrian Mohamed. This notice refers to the Class Representatives as the “Plaintiffs.” The Plaintiffs and the people who have similar claims are individual “Class Members” and, together, they are the “Class.”

QUESTIONS? VISIT [www.XXXXXX.com](http://www.XXXXXX.com) OR CALL 1-8XX-XXX-XXXX TOLL-FREE  
Para una notificación en español, visite [www.XXXXXX.com](http://www.XXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX

The Class in the Case is defined in Question 5 below. In a class action, one court resolves the issues for everyone in the Class, except for those people who choose to exclude themselves from the Class.

#### 4. Why is there a Settlement?

GTL has denied all liability and wrongdoing in this case and has asserted various defenses to the Plaintiffs' claims. The Court has not decided in favor of the Plaintiffs or GTL. Instead, both sides have agreed to a Settlement. That way, they avoid the cost and risk of a trial, and if the Settlement is approved by the Court, Class Members will receive the refunds, credits, and other benefits of the Settlement that are described in this notice sooner.

This Settlement is the product of extensive negotiations between lawyers for the Plaintiffs and GTL. The Plaintiffs and Class Counsel think the Settlement is fair and in the best interests of all Class Members.

### **B. WHO IS PART OF THE SETTLEMENT**

**TO SEE IF YOU ARE AFFECTED BY THE SETTLEMENT,  
YOU FIRST HAVE TO DETERMINE IF YOU ARE A CLASS MEMBER.**

#### 5. Who is included in the Settlement?

The Settlement Class includes:

All persons nationwide who (i) established and funded a prepaid account through GTL's interactive-voice-response ("IVR") system and (ii) had a positive account balance that was reduced to \$0.00 due to account inactivity for 180 days or less on or after April 3, 2011, and through and including October 6, 2021.

The following people are not members of the Class: (a) any Class Member who timely and validly elects to be excluded from the Class in accordance with the procedure described in the Court's Preliminary Approval Order (the "Opt-Outs"); (b) GTL and its respective parents, subsidiaries, divisions, affiliates, associated entities, business units, predecessors in interest, successors, successors in interest, representatives, and each of their respective immediate family members; (c) Class Counsel; and (d) the Judges who have presided over the Case and any related cases.

QUESTIONS? VISIT [www.XXXXXX.com](http://www.XXXXXX.com) OR CALL 1-8XX-XXX-XXXX TOLL-FREE  
*Para una notificación en español, visite [www.XXXXXX.com](http://www.XXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX*

6. What should I do if I am still not sure if I am included in the Class?

If you are still not sure whether you are included in the Class, you can visit [www.XXXXXXX.com](http://www.XXXXXXX.com) or call 1-8XX-XXX-XXXX for more information. You may contact the Settlement Administrator for further information or assistance at: PO Box 2627, Faribault, MN 55021-9627.

**C. THE BENEFITS OF THE SETTLEMENT  
AND HOW TO MAKE A CLAIM**

7. What benefits does the Settlement provide to the Class?

Under the Settlement, GTL has agreed to pay up to \$67 million in refunds and credits (the “Settlement Fund”) to reimburse Class Members for deposits retained under its Inactivity Policy. The Settlement Fund will also be used to pay: attorneys’ fees and Class Counsel expenses, the costs associated with administering the Settlement, and Plaintiffs for their service as Class Representatives in this case.

GTL will reimburse Class Members for deposits taken under its Inactivity Policy in three ways:

1. **Active AdvancePay Customers:** GTL will automatically credit 100% of the amount of money retained under the Inactivity Policy into the Class Member’s AdvancePay account. These Class Members will receive credits without having to file a Claim Form. Please note, you must have an active account at the time the Settlement funds are disbursed. We estimate that this will occur in mid-to-late 2022, after the Court grants final approval to the Settlement and any appeals have been resolved.
2. **Former AdvancePay Customers - File a Valid Claim:** GTL will refund 100% of the amount of money GTL retained from the Class Members’ account under the Inactivity Policy (see Question 8). If the total amount of credits and refunds to current and former customers exceeds the remaining amount of the Settlement Fund, the refunds paid out will be reduced proportionally.
3. **Former AdvancePay Customers – Do Not File Claim But Reactivate Account:** For former customers who reactivate their AdvancePay accounts at any time during the two years after the Settlement is approved by the Court, GTL will credit 100% of the amount of money GTL retained from the Class Member’s account under the Inactivity Policy into the Class Member’s AdvancePay account. If at any point during this two-year period the

QUESTIONS? VISIT [www.XXXXXXX.com](http://www.XXXXXXX.com) OR CALL 1-8XX-XXX-XXXX TOLL-FREE  
*Para una notificación en español, visite [www.XXXXXXX.com](http://www.XXXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX*

total amount of refunds and credits exceeds the remaining amount of the Settlement Fund, GTL will stop providing automatic credits.

In addition to refunds and credits, GTL has also agreed in the Settlement to change its Inactivity Policy in ways that benefit Class Members and others. This includes:

1. Lengthening the baseline Inactivity Policy that applies to most AdvancePay accounts from 90 days to 180 days.
2. Ensuring that customers affirmatively agree to the Inactivity Policy as a part of the account sign-up process.
3. Disclosing the Inactivity Policy conspicuously in a banner on GTL's website homepage, in its automated telephone system, and in all of its advertising materials.
4. Providing notice by text message and email to customers who opt in before their accounts will be subject to the Inactivity Policy.
5. Permitting customers to obtain a refund of any money remaining in their accounts while the account remains active.
6. And training GTL's customer-service personnel to fully disclose GTL's Inactivity Policy and its refund policies.

A complete description of the benefits that the Settlement provides can be found in the Settlement Agreement, which is available at [www.XXXXXXX.com](http://www.XXXXXXX.com).

## 8. How do I get a refund if I don't have an active GTL account?

**To receive a refund, you must fill out and submit a Claim Form by Month XX, 2022.**

If you are a Class Member who does not have an active AdvancePay Account and you do not exclude yourself from the Settlement, you are eligible to receive a refund payment from the Settlement Fund. To receive a refund, you must fill out and timely submit a Claim Form. Claim Forms can be downloaded from [www.XXXXXXX.com](http://www.XXXXXXX.com), or you can obtain one by calling the toll-free number 1-8XX-XXX-XXXX. To submit a Claim Form, either:

1. Mail the Claim Form by Month XX, 2022 to: GTL Settlement Administrator, PO Box 2627, Faribault, MN 55021-9627.

*-or-*

QUESTIONS? VISIT [www.XXXXXXX.com](http://www.XXXXXXX.com) OR CALL 1-8XX-XXX-XXXX TOLL-FREE  
*Para una notificación en español, visite [www.XXXXXXX.com](http://www.XXXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX*

2. Submit a Claim Form online at [www.XXXXXXX.com](http://www.XXXXXXX.com) by Month XX, 2022.

Please read the Claim Form carefully and provide all the information required. You may be asked to verify the accuracy of the information provided in your Claim Form. Your claim must be valid to receive a refund. If the Court approves the Settlement (*see* “The Court’s Fairness Hearing,” Questions 18-20 below), refunds and credits will be distributed at a later date to members of the Class who submit valid Claim Forms.

#### 9. How much will my refund be?

Eligible current and former GTL customers will receive 100% of the money GTL retained from their accounts under the Inactivity Policy. Current GTL customers will receive a credit to their account and former GTL customers need to file a valid claim to receive a refund.

**Important!** Class Members who exclude themselves using the process outlined in Question 12 below will not get money from the Settlement Fund.

#### 10. What happens after I submit a Claim Form?

GTL will provide refunds to Class Members with inactive accounts only if they timely submit a Claim Form. Once a Claim Form is submitted, the Settlement Administrator will check the AdvancePay account telephone number submitted on the Claim Form against GTL’s records (i) to verify that the person submitting the Claim is a Class Member entitled to a refund and (ii) to determine the amount of the Class Member’s refund.

There may be circumstances in which a person who submits a Claim Form will not be entitled to a refund. For example, GTL’s records could show that the person submitting the Claim Form did not set up their account using GTL’s automated telephone IVR system. Similarly, GTL’s records could show that GTL did not retain any money from the person’s account under its Inactivity Policy.

If you submit an incomplete Claim Form, the Settlement Administrator will contact you, and you will have 21 days to fix it. If the Settlement Administrator is unable to confirm that you are a Class Member and entitled to a refund relying on the information you provide on the Claim Form, the Settlement Administrator will contact you, and you will have 30 days to produce records showing the amount and validity of your claim to a refund. After reviewing any additional information, you provide, the Settlement Administrator’s decision about the amount and validity of any claim to a refund will be final.

QUESTIONS? VISIT [www.XXXXXXX.com](http://www.XXXXXXX.com) OR CALL 1-8XX-XXX-XXXX TOLL-FREE  
*Para una notificación en español, visite [www.XXXXXXX.com](http://www.XXXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX*

11. When will I receive my payment?

Refunds and credits will be made only after the Settlement Administrator resolves valid claims, and the Court enters a Final Order and Judgment granting approval of the Settlement, as well as after any appeals are resolved and the final approval of the Settlement is upheld. If there are appeals, resolving them can take time. We do not know how much time it could take to resolve any appeals that may be filed. Please be patient. If the Court does not approve the Settlement or the Settlement is not approved in any appeal that may be brought, you will not receive a payment or credit through this Settlement.

In addition, if your refund totals \$600 or more, the law might require you to provide your Taxpayer ID or a W-9 to the Settlement Administrator in order to comply with IRS reporting requirements. If such information is required but you do not provide it within the specified time, then you will lose the opportunity to obtain your refund. The Settlement Administrator will let you know whether you need to provide your Taxpayer ID or a W-9. You do not need to include a Taxpayer ID on your Claim Form.

**D. EXCLUDING YOURSELF FROM THE SETTLEMENT**

12. How do I get out of the Settlement?

If you want to keep the right to sue or continue to sue GTL on your own about the legal issues being resolved by the Settlement, then you must take steps to get out of the Class. This is called excluding yourself or “opting out.” If you opt out of the Class, you will not receive any payment from the Settlement.

To opt out of the Settlement, you must send a letter to: GTL Opt Outs, PO Box 2627, Faribault, MN 55021-9627.

Your opt-out request must be personally signed by you and contain a statement that you are a member of the Class but desire to be excluded. Your opt-out request must also contain the following information: (i) your name; (ii) your current street address and email address (if any); (iii) the phone number(s) associated with your AdvancePay account; (iv) and the name, address, telephone number, and email address of your lawyer, if a lawyer is representing you in connection with your opt-out.

QUESTIONS? VISIT [www.XXXXXX.com](http://www.XXXXXX.com) OR CALL 1-8XX-XXX-XXXX TOLL-FREE  
*Para una notificación en español, visite [www.XXXXXX.com](http://www.XXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX*



Your opt-out request must be postmarked by **Month XX, 2022**. You cannot opt out by phone, by email, or in any other way. If your request for exclusion is sent after the deadline, your request to opt out will be considered invalid and you will not be excluded from the Class.

You may opt out of the Settlement Class only for yourself, not for anyone else.

Please Note: Unless you exclude yourself, if the Court approves the Settlement, you give up any right to sue GTL for the claims that the Settlement resolves. If you have a pending lawsuit against GTL, speak to your lawyer in that case immediately. You may need to exclude yourself from the Settlement Class in order to continue your own lawsuit against GTL.

13. If I exclude myself, can I still get a payment?

No. If you exclude yourself from the Settlement, you will not receive a refund or credit from the Settlement.

14. What am I giving up if I do not exclude myself?

Unless you exclude yourself using the process outlined in Question 12 above, you will remain in the Class. If you remain in the Class, you cannot sue, continue to sue, or be part of any other lawsuit against GTL related to its Inactivity Policy or any other claims that were or could have been brought in the Case from April 3, 2011, to the date the Court finally approves the Settlement.

Section VI of the Settlement Agreement says:

If the Final Approval Order approving this Settlement Agreement becomes Final, then the Class Plaintiffs, in consideration of this Settlement Agreement and the benefits extended to the Settlement Class, on behalf of themselves, the Settlement Class Members, and each Settlement Class Member, and his/her respective successors, assigns, past, present, and future parents, subsidiaries, joint venturers, partnerships, related companies, affiliates, directors, officers, shareholders, employees, agents, representatives, servants, partners, executors, administrators, assigns, predecessors, descendants, dependents, and heirs, fully release and forever discharge the Released Parties from the Released Claims, arising on or before the Effective Date.

That section of the Settlement Agreement also says:

QUESTIONS? VISIT [www.XXXXXX.com](http://www.XXXXXX.com) OR CALL 1-8XX-XXX-XXXX TOLL-FREE  
*Para una notificación en español, visite [www.XXXXXX.com](http://www.XXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX*

This Agreement may be pleaded as a full and complete defense to, and may be used as the basis for a temporary restraining order or preliminary or permanent injunction against, any action, suit, or other proceeding, which has been or may be instituted, prosecuted, continued to be prosecuted, or attempted, asserting any of the Released Claims.

The words “Released Claims” are defined in the Settlement Agreement to mean “any and all claims that were brought or could have been brought in the Action, including, but not limited to, any and all claims arising out of or relating to the Inactivity Policy.”

The words “Released Parties” are defined in the Settlement Agreement to mean “Global Tel\*Link Corporation and its past and present parent companies, subsidiaries, joint ventures, partnerships, affiliates, controlled entities, assignees, and all of their respective predecessors, assigns, and successors-in-interest, and all of their respective present or former directors, officers, members, shareholders, agents, employees, representatives, administrators, insurers, and indemnitees.”

The complete Settlement Agreement is available at [www.XXXXXX.com](http://www.XXXXXX.com), emailing [XXXXXX@XXXXXX.com](mailto:XXXXXX@XXXXXX.com), or writing to Settlement Administrator, PO Box 2627, Faribault, MN 55021-9627. The Settlement Agreement provides more detail about the release of claims with specific legal terminology, so read it carefully.

## **E. THE LAWYERS REPRESENTING ALL CLASS MEMBERS**

### **15. Do I have a lawyer in the Case?**

Yes. The Court has appointed three law firms as “Class Counsel” to represent you and all other Class Members. Those three firms are: (i) Caplan Cobb LLP; (ii) Goldstein, Borgen, Dardarian & Ho; and (iii) Radford & Keebaugh, LLC.

You will not be charged for these lawyers’ services. Their attorneys’ fees and expenses will be paid by GTL. If you want to be represented by another lawyer, you may hire one at your own expense.

### **16. How will the lawyers be paid?**

The Court has to approve any payment to Class Counsel. Class Counsel will ask the Court to award up to \$18,425,000 in attorneys’ fees, reimbursement of up to \$250,000 in actual expenses they have incurred in the Case, and an amount not to exceed \$25,000 for each of the Plaintiffs. The fees will compensate counsel for the six and a half years they spent pursuing the Case on

QUESTIONS? VISIT [www.XXXXXX.com](http://www.XXXXXX.com) OR CALL 1-8XX-XXX-XXXX TOLL-FREE  
*Para una notificación en español, visite [www.XXXXXX.com](http://www.XXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX*

behalf of the Class, and much of the work they will continue to do on the Case until the Settlement Agreement terminates. The fees, costs, expenses, and payments awarded by the Court will be paid by GTL out of the Settlement Fund.

Class Counsel’s request for attorneys’ fees, expenses and awards to the Plaintiffs will be on file with the Court, and available for review at [www.XXXXXXX.com](http://www.XXXXXXX.com) no later than Month XX, 2022.

## F. OBJECTING TO THE SETTLEMENT

### 17. How do I tell the Court if I do not like the Settlement?

If you are a Class Member (and do not opt out of the Class), and you do not agree with the Settlement, you can object to any part of it. However, you can only ask the Court to deny approval of the Settlement — you cannot ask the Court to just change some part of it. To object, you must submit a written document signed by you that includes the following:

1. Your name, address, telephone number, and email address (if you have one);
2. If a lawyer represents you in connection with your objection, the name, address, telephone number, and email address of your counsel;
3. Any telephone number or numbers you used to receive calls on your AdvancePay Account;
4. A signed declaration stating that you are a member of the Settlement Class;
5. A clear statement in detail of all your objections to the Settlement;
6. Attach copies of any materials that you or your lawyer may submit at the Fairness Hearing; and
7. A statement of whether you intend to appear at the Fairness Hearing, either with or without counsel, and if with counsel, the name, address, telephone number, and email address of your counsel who will attend.

You must file your objection with the Court and mail your objection by **Month XX, 2022** to each of the following:

Settlement Administrator PO Box 2627	Class Counsel Michael A. Caplan	GTL’s Counsel Josh Belinfante
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QUESTIONS? VISIT [www.XXXXXXX.com](http://www.XXXXXXX.com) OR CALL 1-8XX-XXX-XXXX TOLL-FREE  
*Para una notificación en español, visite [www.XXXXXXX.com](http://www.XXXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX*

Faribault, MN 55021-9627	James W. Cobb T. Brandon Waddell <b>CAPLAN COBB LLP</b> 75 Fourteenth Street, NE, Suite 2750 Atlanta, Georgia 30309	Jeremy U. Littlefield Evan C. Dunn <b>ROBBINS ALLOY BELINFANTE LITTLEFIELD LLC</b> 500 14th Street, NW Atlanta, Georgia 30318
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18. What is the difference between objecting and asking to be excluded?

Objecting is telling the Court that you want her to reject the Settlement because you do not like something about the Settlement. You can object to the Settlement only if you do not opt out.

Opting out is telling the Court that you do not want to be part of the Settlement. If you opt out, you have no basis to object to the Settlement because it no longer affects you.

**G. THE COURT’S FAIRNESS HEARING**

The Court will hold a hearing to decide whether to approve the Settlement and Class Counsel’s requests for fees and expenses and a payment to the Plaintiffs (the “Fairness Hearing”).

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

The Court has scheduled a Fairness Hearing on Month XX, 2022, at X:XX xm at the United State District Court for the Northern District of Georgia, in the Richard B. Russell Federal Building, 2211 United States Courthouse, 75 Ted Turner Drive, SW Atlanta, GA 30303-3309. The hearing may be moved to a different date or time without additional notice.

At the Fairness Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and whether to approve Class Counsel’s request for attorneys’ fees and expenses and awards to the Plaintiffs. If there are objections, the Court will consider them at that time. After the Fairness Hearing, the Court will decide whether to approve the Settlement and the requests for attorneys’ fees and expenses and awards to the Plaintiffs. We do not know how long these decisions will take.

QUESTIONS? VISIT [www.XXXXXX.com](http://www.XXXXXX.com) OR CALL 1-8XX-XXX-XXXX TOLL-FREE  
*Para una notificación en español, visite [www.XXXXXX.com](http://www.XXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX*

19. Do I have to attend the hearing?

No. Class Counsel will answer any questions the Court may have. But you are welcome to attend the hearing at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you mailed your written objection on time, to the proper addresses, and it complies with the other requirements listed in Question 17 above, the Court will consider it. You also may pay your own lawyer to attend the hearing, but it is not necessary.

20. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, your filed objection must include a statement that you intend to appear at the Fairness Hearing.

You cannot speak at the hearing if you opt out of the Settlement.

## **H. IF YOU DO NOTHING**

21. What happens if I do nothing at all?

If you are a member of the Class and do nothing, you will remain in the Class and be bound by the terms of the Settlement. If you do not have an active AdvancePay account, you will receive no money from the Settlement, although you may receive credits if you reactivate your account later. Unless you opt out, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit, arbitration, or proceeding against GTL over the Released Claims.

QUESTIONS? VISIT [www.XXXXXX.com](http://www.XXXXXX.com) OR CALL 1-8XX-XXX-XXXX TOLL-FREE  
*Para una notificación en español, visite [www.XXXXXX.com](http://www.XXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX*

## I. GETTING MORE INFORMATION

### 22. How do I get more information?

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement, which is available at [www.XXXXXXX.com](http://www.XXXXXXX.com), by calling 1-8XXX-XXX-XXXX, or writing to Settlement Administrator, PO Box 2627, Faribault, MN 55021-9627. The Settlement Agreement provides more detail about the release of claims with specific legal terminology, so read it carefully.

**PLEASE DO NOT WRITE OR CALL THE  
COURT OR THE CLERK'S OFFICE FOR  
INFORMATION.**

DATED: \_\_\_\_\_, 2021

BY ORDER OF THE COURT  
UNITED STATES DISTRICT  
COURT FOR THE NORTHERN  
DISTRICT OF GEORGIA

QUESTIONS? VISIT [www.XXXXXXX.com](http://www.XXXXXXX.com) OR CALL 1-8XX-XXX-XXXX TOLL-FREE  
*Para una notificación en español, visite [www.XXXXXXX.com](http://www.XXXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX*

## Exhibit D

To: <<ClaimantEmailAddress>>  
From: GTL Settlement Administrator  
Subject: Global Tel\*Link Settlement

If You Used Global Tel\*Link Services to Receive Inmate Phone Calls  
Between 2011 and 2021

**You Could Get Benefits from a Settlement**

*Para una notificación en español, visite [www.XXXXXX.com](http://www.XXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX*

There is a class action Settlement with Global Tel\*Link (“GTL”). The lawsuit claims that GTL improperly retained money that was deposited in prepaid “AdvancePay” accounts after the account was inactive for 180 days or less. GTL denies it did any and all wrongdoing of any kind, and denies any liability. GTL will provide up to \$67 million that will pay (1) credits/refunds to eligible Class Members, (2) the costs of notice and administration, (3) attorneys’ fees and costs, and (4) special service payments to the Class Representatives. GTL has also agreed to change its Inactivity Policy in ways to benefit the Class Members and others. Visit [www.XXXXXX.com](http://www.XXXXXX.com) to learn more about the Settlement.

**Why Did I Receive This Notice?** You received this notice because you may be a member of the Settlement Class, if you (1) established and initially funded a prepaid account through GTL’s automated telephone system (also called interactive-voice-response or IVR) and (2) had a positive account balance that was reduced to \$0.00 due to account inactivity for 180 days or less from April 3, 2011, until October 6, 2021.

**How Can I Get a Payment?** If you have an active GTL AdvancePay account at the time the Settlement is finally approved in mid to late 2022, you will receive an automatic credit to your account. If you have or will have an inactive GTL AdvancePay account at the time the Settlement is approved, you need to submit a Claim Form online or by mail by **Month XX, 2022** to receive a refund. If you are not sure you will continue to use your GTL AdvancePay account through 2022, you should file a claim. Anyone who has both active and inactive GTL AdvancePay accounts will receive an automatic credit on their active account but will need to file a claim for their inactive account(s) to get a refund.

GTL will credit or refund 100% of the amount that GTL retained from your account due to inactivity. Payments to former customers may be reduced if the total credits/refunds exceed the available Settlement fund.

**What Are My Rights?** Even if you do nothing, you will be bound by the Court’s decisions. Former GTL customers who do nothing will receive no refund (unless they reactivate their account within two years of final approval and funds remain available, in which case they may be eligible to receive a credit). If you want to keep your right to sue GTL yourself, you must exclude yourself from the Settlement by **Month XX, 2022**. If you stay in the Settlement, but do not agree with the terms, you may object to it by **Month XX, 2022**. The Court will hold a hearing on **Month XX, 2022** to consider whether to approve the Settlement, a request for attorneys’ fees and costs up to \$18,675,000, and special service payments of \$25,000. You or your lawyer may appear and speak at the hearing at your own expense.

**For more information or a Claim Form visit [www.XXXXXX.com](http://www.XXXXXX.com) or call 1-8XX-XXX-XXXX.**



## Exhibit E

There is a class action Settlement with Global Tel<sup>®</sup>Link (“GTL”). The lawsuit claims that GTL improperly retained money that was deposited in prepaid “AdvancePay” accounts after the account was inactive for 180 days or less. GTL denies any and all wrongdoing of any kind, and denies any liability.

**Who is included in the Settlement?** The Class includes anyone who (1) established and initially funded a prepaid account through GTL’s automated telephone system (also called interactive-voice-response or IVR) and (2) had a positive account balance that was reduced to \$0.00 due to account inactivity for 180 days or less from April 3, 2011, until October 6, 2021.

**What does the Settlement provide?** GTL will provide up to \$67 million that will pay (1) credits/refunds to eligible Class Members, (2) the costs of notice and administration, (3) attorneys’ fees and costs, and (4) special service payments to Class Representatives. GTL has also agreed to change its Inactivity Policy to benefit Class Members and others. Additional details are in the Settlement Agreement available on the website.

**How can I get a payment?** If you have an active GTL AdvancePay account at the time the Settlement is finally approved in mid to late 2022, you will receive an automatic credit to your account. If you have or will have an inactive GTL AdvancePay account at the time the Settlement is

approved, you need to submit a Claim Form online or by mail by **Month XX, 2022** to receive a refund. If you are not sure you will continue to use your GTL AdvancePay account through 2022, you should file a claim. Anyone who has both active and inactive GTL AdvancePay accounts will receive an automatic credit on the active account but will need to file a claim for their inactive account(s) to get a refund.

GTL will credit or refund 100% of the amount that GTL retained from your account due to inactivity. Payments to former customers may be reduced if the total credits/refunds exceed the available Settlement fund.

**What are my rights?**

Even if you do nothing, you will be bound by the Court’s decisions. Former GTL customers who do nothing will receive no refund (unless they reactivate their account within two years of final approval and funds remain available, in which case they may be eligible to receive a credit). If you want to keep your right to sue GTL yourself, you must exclude yourself from the Settlement by **Month XX, 2022**. If you stay in the Settlement but do not agree with the terms, you may object to it by **Month XX, 2022**.

The Court will hold a hearing on **Month XX, 2022** to consider whether to approve the Settlement, a request for attorneys’ fees and costs up to \$18,675,000, and special service payments of \$25,000. You or your lawyer may appear and speak at the hearing at your own expense.

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SETTLEMENT ADMINISTRATOR  
C/O RUST CONSULTING INC - 7513  
PO BOX 2627  
FARIBAULT, MN 55021-9627

**Did you use Global Tel\*Link services to receive inmate phone calls between 2011 and 2021?**

*You could get benefits from a settlement*

**Active GTL Account Customers:** *If you have an active GTL account that you created and funded through the automated payment method of an interactive voice response system (IVR), you may be eligible to receive automatic credits.*

**Inactive GTL Account Customers:** *If you do not have an active GTL account, but you signed up for and funded a GTL account using GTL's IVR, the deadline to file a claim for money is **Month XX, 2022**.*

*Go to [www.XXXXXX.com](http://www.XXXXXX.com) or call toll-free 1-8XX-XXX-XXXX to get more detailed information.*

*Para una notificacion en espanol, visite [www.XXXXXX.com](http://www.XXXXXX.com) o llame gratis al 1-8XX-XXX-XXXX.*

SETTLEMENT ADMINISTRATOR  
C/O RUST CONSULTING - 7513  
PO BOX 2627  
FARIBAULT, MN 55021-9627

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FIRST-CLASS MAIL  
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Rust Consulting, Inc.

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TO RECEIVE A PAYMENT UNDER THE SETTLEMENT,  
YOU MUST COMPLETE AND RETURN THIS CARD  
OR FILE YOUR CLAIM ONLINE BY MONTH XX, 2022

**GLOBAL TEL\*LINK SETTLEMENT CLAIM FORM**

**I. CLASS MEMBER INFORMATION:**

Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code \_\_\_\_\_

Telephone Number: ( \_\_\_\_\_ ) \_\_\_\_\_ - \_\_\_\_\_ Email: \_\_\_\_\_

If this information changes, you **MUST** notify the Settlement Administrator in writing.

**II. ADVANCEPAY ACCOUNT INFORMATION:** Please provide the telephone number or numbers you used to receive calls from inmates through your GTL AdvancePay Account from 2011 to 2021. This only includes accounts that were set up and initially funded using the GTL automated telephone system (IVR).

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**III. VERIFICATION:** By signing below, you are verifying under penalty of perjury that:

1. The information provided in this Claim Form is accurate and complete;
2. You established and initially funded your AdvancePay Account using the GTL automated telephone system (IVR);
3. You owned the GTL AdvancePay Account(s) associated with the telephone number(s) above; and
4. You agree to submit to the jurisdiction of the U.S. District Court for the Northern District of Georgia, where the Case is pending, for purposes of resolving any issues related to or arising from your Claim.

Signature: \_\_\_\_\_

**\*XXXX\***

**\*CF\***

**\*RUST\***

## Exhibit F

**Did you use Global Tel\*Link services  
to receive inmate phone calls  
between 2011 and 2021?**

*You could get benefits from a settlement*

There is a class action Settlement with Global Tel\*Link (“GTL”). The lawsuit claims that GTL improperly retained money that was deposited in prepaid “AdvancePay” accounts after the account was inactive for 180 days or less. GTL denies any and all wrongdoing of any kind, and denies any liability.

**Who is included in the Settlement?**

The Class includes anyone who (1) established and initially funded a prepaid account through GTL’s automated telephone system (also called interactive-voice-response or IVR) and (2) had a positive account balance that was reduced to \$0.00 due to account inactivity for 180 days or less from April 3, 2011, until October 6, 2021.

**What does the Settlement provide?**

GTL will provide up to \$67 million that will pay (1) credits/refunds to eligible Class Members, (2) the costs of notice and administration, (3) attorneys’ fees and costs, and (4) special service payments to Class Representatives. GTL has also agreed to change its Inactivity Policy to benefit Class Members and others. Additional details are in the Settlement Agreement available on the website.

**How can I get a payment?**

If you have an active GTL AdvancePay account at the time the Settlement is finally approved in mid to late 2022, you will receive an automatic credit to your account. If you have or will have an inactive GTL AdvancePay account at the time the Settlement is approved, you need to submit a Claim Form online or by mail by **Month XX, 2022** to receive a refund. If you are not sure you will continue to use your GTL AdvancePay account through 2022, you should file a claim. Anyone who has both active and inactive GTL AdvancePay accounts will receive an automatic credit on the active account but will need to file a claim for their inactive account(s) to get a refund.

GTL will credit or refund 100% of the amount that GTL retained from your account due to inactivity. Payments to former customers may be reduced if the total credits/refunds exceed the available Settlement fund.

**What are my rights?**

Even if you do nothing, you will be bound by the Court’s decisions. Former GTL customers who do nothing will receive no refund (unless they reactivate their account within two years of final approval and funds remain available, in which case they may be eligible to receive a credit). If you want to keep your right to sue GTL yourself, you must exclude yourself from the Settlement by **Month XX, 2022**. If you stay in the Settlement but do not agree with the terms, you may object to it by **Month XX, 2022**.

The Court will hold a hearing on **Month XX, 2022** to consider whether to approve the Settlement, a request for attorneys’ fees and costs up to \$18,675,000, and special service payments of \$25,000. You or your lawyer may appear and speak at the hearing at your own expense.

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**For More Information:**

**1-8XX-XXX-XXXX**

**www.XXXXXX.com**

## Exhibit G

To: <<ClaimantEmailAddress>>  
From: GTL Settlement Administrator  
Subject: Claim Money Now in GTL Settlement

**Global Tel\*Link Settlement**  
***File a Claim Now to Get a Refund***

You previously received notice of a Settlement in a case involving Global Tel\*Link services that were used to receive inmate phone calls between 2011 and 2021. This is a reminder that you must submit a Claim Form to get a refund if you have an inactive ActivePay account.

**Who's Included?** Anyone who (1) established and initially funded a prepaid account through GTL's automatic telephone system (also called interactive-voice-response or IVR) and (2) had a positive account balance that was reduced to \$0.00 due to account inactivity for 180 days or less from April 3, 2011, until October 6, 2021.

**What Can You Get?** GTL will credit or refund 100% of the amount that GTL retained from your account due to inactivity. Payments to former customers may be reduced if the total credits/refunds exceed the available Settlement fund.

**How to Get a Payment.** File a Claim Form by mail or online to get a refund. The Claim Form is available at the [www.XXXXXXX.com](http://www.XXXXXXX.com) or by calling 1-8XX-XXX-XXXX.

**The deadline to submit a Claim Form is Month XX, 2022.**

## Exhibit H



SETTLEMENT ADMINISTRATOR  
 C/O RUST CONSULTING INC - 7513  
 PO BOX 2627  
 FARIBAULT MN 55021-9627

FOR OFFICIAL USE ONLY  
 03

Page 1 of 1

IMPORTANT LEGAL MATERIALS

**GLOBAL TEL\*LINK SETTLEMENT CLAIM FORM**

This Claim Form must be submitted online or mailed and postmarked by **Month XX, 2022**. To be eligible for a refund, you must be a Settlement Class Member. If you are not sure you will continue to use your GTL AdvancePay Account through 2022, you should file a claim. Please review the Notice at [www.XXXXXXX.com](http://www.XXXXXXX.com) to learn more.

**I. CLASS MEMBER INFORMATION**

Name: \_\_\_\_\_  
 Street Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_ Zip Code: \_\_\_\_\_  
 Telephone Number: (\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_ Email: \_\_\_\_\_

If this information changes, you **MUST** notify the Settlement Administrator in writing.

**II. ADVANCEPAY ACCOUNT INFORMATION**

Please provide the telephone number or numbers you used to receive calls from inmates through your GTL AdvancePay Account from 2011 to 2021. This only includes accounts that were set up and initially funded using the GTL automated telephone system (IVR).

(____) _____ - _____	(____) _____ - _____	(____) _____ - _____
(____) _____ - _____	(____) _____ - _____	(____) _____ - _____

**III. VERIFICATION**

By signing below, you are verifying under penalty of perjury that:

1. The information provided in this Claim Form is accurate and complete;
2. You established and initially funded your AdvancePay Account using the GTL automated telephone system (IVR);
3. You owned the GTL AdvancePay Account(s) associated with the telephone number(s) above; and
4. You agree to submit to the jurisdiction of the District Court for the Northern District of Georgia, where the Case is pending, for purposes of resolving any issues related to or arising from your Claim.

Signature: \_\_\_\_\_

Questions? Call 1-8XX-XXX-XXXX or visit [www.XXXXXXX.com](http://www.XXXXXXX.com)  
**YOU MUST COMPLETE AND SUBMIT THIS CLAIM FORM BY MONTH XX, 2022, TO:**

Settlement Administrator  
 c/o Rust Consulting, Inc. - 7513  
 PO Box 2627  
 Faribault MN 55021-9627

