

EXHIBIT 3

Questions? Call toll-free **TOLL-FREE NUMBER** or visit www.CanogaParkClassAction.com.
PLEASE DO NOT CONTACT THE COURT

Behar v. Northrop Grumman Corporation, et al.

Case No. 2:21-cv-03946-HDV-SK

United States District Court for the Central District of California

If you own or owned a single-family home or townhome in the Canoga Park / Winnetka area in the zones outlined in the map on the following page, you may be entitled to a payment from a class action settlement.

WHY YOU SHOULD READ THIS NOTICE

Eligible current homeowners may be entitled to receive thousands of dollars.

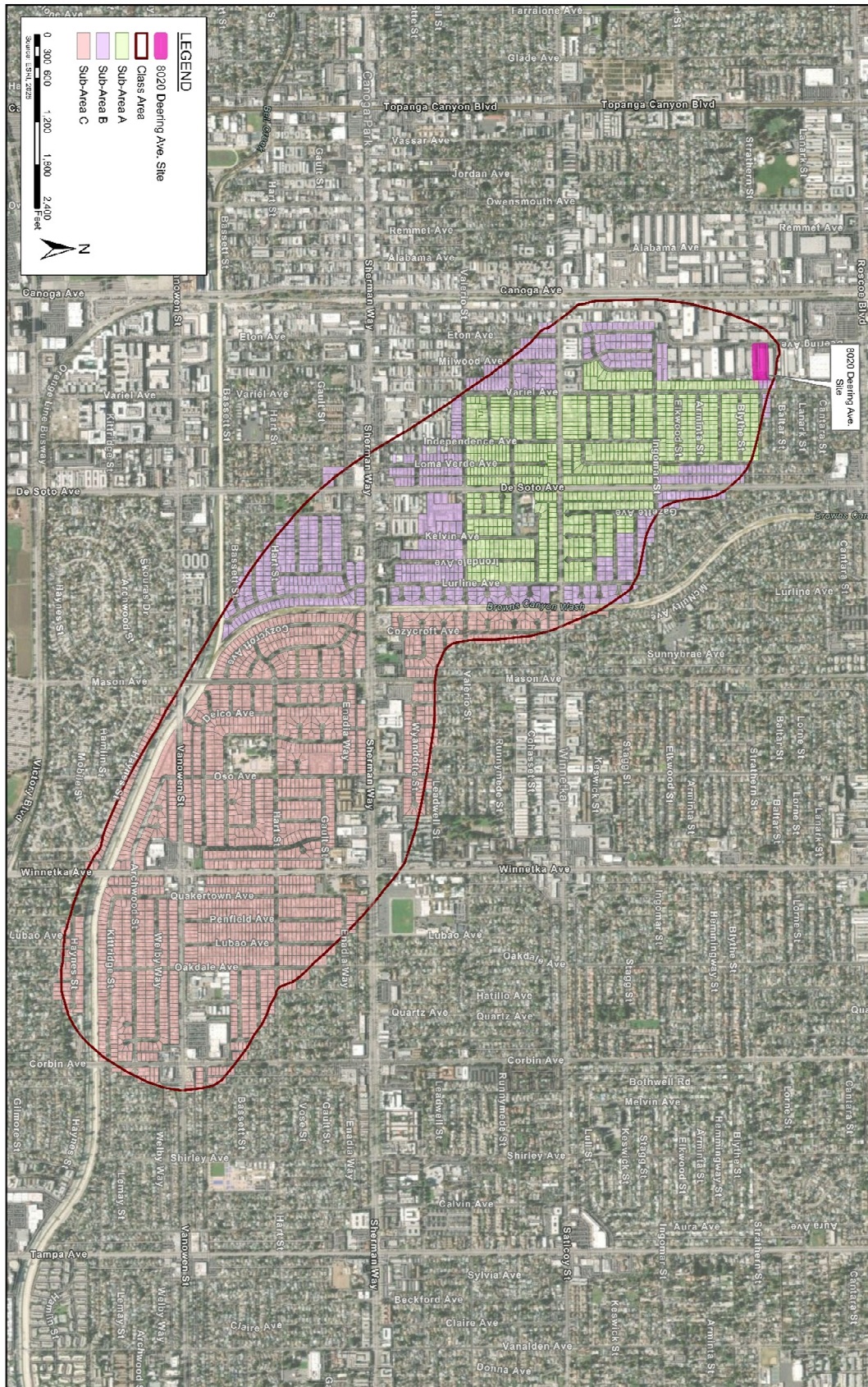
Eligible former owners who sold a home after July 1, 2024, may be entitled to receive hundreds of dollars or more.

These amounts are estimates only. Your actual payment will depend on the factors described in this Notice. Read this Notice carefully to understand your rights and how to submit a claim.

A federal court authorized this notice. This is not a solicitation from a lawyer.

- A class action settlement has been reached with Northrop Grumman Corporation and Northrop Grumman Systems Corporation (the “Defendants”) that, if approved by the Court, will create a cash settlement fund of \$75,000,000.00 to resolve claims that Defendants are responsible for contamination of soil and groundwater in the Class Area, including trichloroethylene (TCE) and perchloroethylene (PCE). No portion of the Settlement Fund will revert to Defendants.
- The Settlement Fund will be used to pay (i) eligible Settlement Class Members, (ii) Class Counsel’s Court-approved attorneys’ fees and costs, (iii) Court-approved service awards to the Class Representatives, and (iv) costs of settlement administration.
- The Plaintiffs allege that contamination from operations of Defendants’ alleged legal predecessors at 8020 Deering Ave., Canoga Park, CA 91304 has decreased property values in the Class Area and that homes require the installation of vapor-intrusion mitigation measures. The Defendants deny these allegations and deny any wrongdoing or liability.
- This Class Action Settlement does not release any claims Settlement Class Members may have for personal injury, wrongful death, or medical monitoring. See Question 15 below for information regarding what claims are released by this Class Action Settlement.
- If you own or owned a single-family home or townhome located in the Class Area as identified on the map included with this Notice, you may be a Settlement Class Member. The Class includes (i) all persons who own such a home as of the date this Notice was postmarked, and (ii) all persons who owned such a home as of July 1, 2024, but who have since sold it as of the date this Notice was postmarked. Employees of Defendants are excluded from the Class and may not participate in this settlement.
- If you are a Settlement Class Member, your legal rights are affected whether you act or do not act. Read this Notice carefully.

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CLASS AREA MAP

Questions? Call toll-free [TOLL-FREE NUMBER] or visit www.CanogaParkClassAction.com.

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YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

Option	Effect
Submit a Claim Form	The only way to receive a cash payment. The Claim Form must be submitted to the Class Administrator no later than [CLAIMS DEADLINE]. See Question 13 below.
Exclude Yourself	Receive no payment. This is the only option that preserves your right to bring or be part of any other lawsuit against Defendants relating to the legal claims released in this case. To opt out, you must mail a written request to the Class Administrator postmarked no later than [OPT-OUT DEADLINE]. See Question 16 below.
Object	Write to the Court explaining why you disagree with the Settlement, in whole or in part. You must remain in the Settlement Class to object. Objections must be postmarked no later than [OBJECTION DEADLINE]. See Question 21 below.
Go to the Hearing	You may ask the Court for permission to speak at the Final Approval Hearing about the fairness of the Settlement. You must remain in the Settlement Class and timely submit a written objection containing a Notice of Intention to Appear. See Question 25 below.
Do Nothing	Receive no payment. Give up the right to sue Defendants for the claims released by the Settlement Agreement.

These rights and options—and the deadlines to exercise them—are explained in this Notice. Additional information is available at www.CanogaParkClassAction.com.

The Court still must decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved.

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION

1. Why did I get this Notice?.....5
2. What is this lawsuit about? 5
3. Why is this a class action? 5
4. Why is there a Settlement? 5

WHO IS IN THE SETTLEMENT

5. How do I know if I am a Settlement Class Member?6
6. Which companies are included as “Defendants”?6
7. If I own property in the Class Area but I don’t think it is damaged, am I included?.....6
8. I’m still not sure if I am included.6

THE SETTLEMENT BENEFITS—WHAT YOU GET

9. What does the Settlement provide?6
10. How will payments be allocated among Settlement Class Members?7
11. What if more than one person owns my home?7
12. What if I sold my home after July 1, 2024?7

HOW YOU GET THE SETTLEMENT BENEFITS—SUBMITTING A CLAIM

13. How can I get a payment?8
14. When would I get a payment?8
15. What am I giving up if I remain in the Settlement Class?8

EXCLUDING YOURSELF FROM THE SETTLEMENT

16. How do I get out of the Settlement?9
17. If I don’t exclude myself, can I sue Defendants for the same thing later?9
18. If I exclude myself, can I get money from this Settlement?9

THE LAWYERS REPRESENTING YOU

19. Do I have a lawyer in this case?9
20. How will the lawyers be paid?.....10

OBJECTING TO THE SETTLEMENT

21. How do I tell the Court that I disagree with the Settlement?10
22. What is the difference between objecting and excluding myself?11

THE COURT’S FINAL APPROVAL HEARING

23. When and where will the Court decide whether to approve the Settlement?11
24. Do I have to attend the Hearing?11
25. May I speak at the Hearing?11

IF YOU DO NOTHING

26. What happens if I do nothing at all?11

GETTING MORE INFORMATION

27. Are there more details about the Settlement?11
28. How do I get more information?12

BASIC INFORMATION

1. Why did I get this Notice?

The Court authorized this Notice because you have a right to know about a proposed settlement of a class action lawsuit, and about your options, before the Court decides whether to approve the Settlement. If the Court approves the Settlement, and after any objections and appeals are resolved, eligible Settlement Class Members who submit timely and valid Claim Forms will receive the settlement benefits described in this Notice.

This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to obtain them.

The Court in charge of the case is the United States District Court for the Central District of California, and the case is known as *Behar v. Northrop Grumman Corporation, et al.*, Case No. 2:21-cv-03946-HDV-SK. The Honorable Hernán D. Vera is the District Judge presiding over the Action. The people who sued are called the Plaintiffs, and the companies they sued—Northrop Grumman Corporation and Northrop Grumman Systems Corporation—are called the Defendants.

Neither this Notice nor the Settlement is an admission of wrongdoing or liability by any party. Defendants deny all allegations in the lawsuit and do not admit any fault, liability, or violation of law, and the Court has not decided who is right.

2. What is this lawsuit about?

Plaintiffs Jed Behar and Alisa Behar filed this lawsuit on behalf of themselves and a class of property owners in the Class Area. Plaintiffs allege that Defendants are responsible for certain contaminants in the soil and groundwater in the Class Area, including but not limited to trichloroethylene (TCE) and perchloroethylene (PCE). Plaintiffs allege that the contamination was caused in the late 1960s to early 1970s by alleged legal predecessors of Defendants. Plaintiffs asserted claims of negligence, private nuisance, and trespass. Plaintiffs claim that the presence of the alleged contamination has caused property values in the Class Area to decrease and that homes in the Class Area require the installation of vapor-intrusion mitigation measures (“Mitigation Measures”).

Defendants deny these allegations and contend, among other things, that they are not responsible for any alleged contamination, that there is no evidence of any loss of property value in the Class Area, that there is no evidence of the presence of contamination from its alleged predecessor’s operations in any homes—or of any measurable risk that such contamination will ever be present in any homes—in the Class Area, and that there is no evidence of any need for Mitigation Measures at any property. Defendants also contend that their remediation and clean-up efforts have been successful and that the groundwater contamination in the Class Area has been reduced and will continue to be reduced. The Court has not decided who is right.

3. Why is this a class action?

In a class action, one or more people, called Class Representatives (in this case, Jed Behar and Alisa Behar), sue on behalf of others who have similar claims. All these people together are a “Class” or “Class Members.” One court resolves the issues for all Class Members, except for those who exclude themselves from the Class. On July 1, 2024, the Court certified two classes in this case (Dkt. 175). For purposes of this Settlement only, the Court will be asked to certify a single Settlement Class as defined in Question 5 below.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiffs or the Defendants. The Parties reached this Settlement in the middle of trial, after engaging in extensive litigation. By settling, both sides avoid the costs and risks of continued trial and appellate proceedings, and eligible property owners will receive compensation. The

Class Representatives and Class Counsel believe that the Settlement is fair, reasonable, and adequate, and is in the best interest of the Class.

WHO IS IN THE SETTLEMENT

To receive money from this Settlement, you must be a Settlement Class Member.

5. How do I know if I am a Settlement Class Member?

If you received this Notice in the mail or by email without requesting it, public records show you may be a current or former owner of a single-family home or townhome in the Class Area. You should still verify that you meet the definition of the Settlement Class:

Settlement Class: All persons who own a single-family home or townhome within the Class Area as of the date of notice of the settlement, as well as all persons who owned a single-family home or townhome within the Class Area as of July 1, 2024, but who have since sold their single-family homes or townhomes as of the date of notice of the settlement, excluding employees of Defendants.

A map of the Class Area is included on page 2 of this Notice and is also available at www.CanogaParkClassAction.com. The Class Area is divided into three geographic sub-areas, and Settlement Class Members in each sub-area are entitled to different payment amounts under the Settlement (see Question 10 below). A list of addresses within the Class Area, organized by sub-area, is also available at the Settlement Website.

6. Which companies are included as “Defendants”?

The Defendants are Northrop Grumman Corporation and Northrop Grumman Systems Corporation. The Settlement also releases certain affiliated and related persons and entities, as set forth in the Settlement Agreement.

7. If I own property in the Class Area but I don’t think it is damaged, am I included?

Yes. You are still included in the Settlement Class and are eligible to submit a Claim, regardless of whether you believe your property is actually damaged, so long as you (i) own a single-family home or townhome within the Class Area as of the date this Notice was postmarked, or (ii) owned such a home as of July 1, 2024 and have since sold it as of the date this Notice was postmarked.

8. I’m still not sure if I am included.

If you are still not sure whether you are a Settlement Class Member, you can get free help. You may call [TOLL-FREE NUMBER] or visit www.CanogaParkClassAction.com, which contains a list of addresses within the Class Area, organized by sub-area, and additional information about the Settlement.

THE SETTLEMENT BENEFITS—WHAT YOU GET

9. What does the Settlement provide?

Defendants have agreed to pay \$75,000,000.00 to create a non-reversionary Settlement Fund. The Settlement Fund will be used to pay (i) cash payments to eligible Settlement Class Members who submit timely and valid Claim Forms; (ii) Court-approved attorneys’ fees and costs to Class Counsel; (iii) Court-approved service awards to the Class Representatives of up to \$30,000 each; and (iv) the costs of settlement administration (the fees and costs of the Class Administrator). No portion of the Settlement Fund will revert to Defendants. The amount of the Settlement Fund remaining after deduction of attorneys’ fees and costs, service awards, and administrative costs is referred to as the “Net Settlement Proceeds.”

10. How will payments be allocated among Settlement Class Members?

Payments to Settlement Class Members will be allocated as follows:

First, \$100,000.00 of the Net Settlement Proceeds will be distributed equally among Settlement Class Members who owned a single-family home or townhome within the Class Area as of July 1, 2024, but who have since sold their home as of the date this Notice was postmarked (“Former Owners”), and who submit timely and valid Claim Forms.

Second, the remaining Net Settlement Proceeds will be allocated among current homeowners within three geographic sub-areas:

- Sub-Area A (approximately 789 homes): 40% of the remaining Net Settlement Proceeds will be divided equally among Settlement Class Members who own these homes as of the date of this Notice and submit timely and valid Claim Forms.
- Sub-Area B (approximately 727 homes): 28% of the remaining Net Settlement Proceeds will be divided equally among Settlement Class Members who own these homes as of the date of this Notice and submit timely and valid Claim Forms.
- Sub-Area C (approximately 1,778 homes): 32% of the remaining Net Settlement Proceeds will be divided equally among Settlement Class Members who own these homes as of the date of this Notice and submit timely and valid Claim Forms.

Based on conservative estimates and assumptions about administrative costs, attorneys’ fees and costs, service awards, and the number of Settlement Class Members who submit valid Claim Forms, Class Counsel estimates that each eligible property will entitle its owner(s) to a total payment of approximately:

- Sub-Area A: \$21,110 per eligible home.
- Sub-Area B: \$16,037 per eligible home.
- Sub-Area C: \$7,494 per eligible home.
- Former Owners (sold after July 1, 2024): \$444 per eligible home.

These figures are estimates only. The actual amount of any payment will depend on the Court’s award of attorneys’ fees and costs, the Court’s award of service awards, the costs of settlement administration, and the number of Settlement Class Members who submit timely and valid Claim Forms. Final amounts may be more or less than these estimates.

There will be only one payment per single-family home or townhome in the Class Area, regardless of the number of owners. For example, if the home at 123 Maple Street is located in Sub-Area A, is owned jointly by three individuals, and the Court determines that homes in Sub-Area A are entitled to \$21,110 per home, then a single payment of \$21,110 will be issued for the home at 123 Maple Street, and the three co-owners will be responsible for dividing that payment among themselves. In the case of homes that were sold after July 1, 2024, both the Former Owner and the current owner may be eligible, with the Former Owner’s payment coming from the Former Owners pool described above and the current owner’s payment coming from the applicable sub-area allocation.

11. What if more than one person owns my home?

If multiple people own or owned the property at the same time and each of them files a valid claim, the Settlement Administrator will write a single check payable to all co-owners of the property. Co-owners are responsible for dividing the single payment among themselves; the Settlement Agreement does not provide a procedure for resolving disputes among co-owners.

12. What if I sold my home after July 1, 2024?

If you owned a single-family home or townhome in the Class Area on July 1, 2024, but sold it before the date of this Notice, you are a Former Owner. You may submit a Claim Form to receive a share of the

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\$100,000 Former Owners pool described in Question 10. The current owner of your former home may submit a separate Claim for the applicable sub-area allocation.

HOW YOU GET THE SETTLEMENT BENEFITS—SUBMITTING A CLAIM

13. How can I get a payment?

To qualify for a payment, you must submit a Claim Form, together with proof of ownership, to the Class Administrator. A Claim Form is enclosed with this Notice. Read the instructions carefully, complete the Claim Form, include the required proof of ownership, sign it, and mail it (or submit it electronically through the Settlement Website) so that it is postmarked or received no later than [CLAIMS DEADLINE].

You may also submit your Claim Form electronically at www.CanogaParkClassAction.com using the login information that appears on the Claim Form mailed to you.

Only Claim Forms submitted directly to the Class Administrator will be accepted. No Claim Form submitted to a third party (e.g., a claims aggregator) will be valid. If the Class Administrator receives a Claim Form from any third party, the Class Administrator will take steps to contact the claimant and explain how to submit a Claim directly.

14. When would I get a payment?

The Court will hold a Final Approval Hearing on [FINAL APPROVAL HEARING DATE] at [TIME] to decide whether to approve the Settlement. If the Court approves the Settlement, there may be appeals. It is always uncertain whether and when appeals can be resolved, and resolving them can take time, perhaps more than a year. Defendants are required to fund the Settlement Fund within 30 days after the Effective Date (as defined in the Settlement Agreement). The Class Administrator will then make reasonable efforts to issue payments to eligible Settlement Class Members within 45 days after the Effective Date.

Checks issued under the Settlement will remain valid for 180 days from the date of mailing. If your check is not cashed within that period, the Class Administrator will attempt to locate you and re-issue a check with a 90-day expiration. If you cannot be located within 180 days after the expiration of the original check, uncashed funds will be redistributed equally among Settlement Class Members who timely cashed their checks. After one redistribution, any remaining funds will be paid to a Court-approved *cy pres* beneficiary.

15. What am I giving up if I remain in the Settlement Class?

Unless you exclude yourself, you will remain a member of the Settlement Class. That means that, in exchange for the consideration provided by the Settlement, you and your heirs, successors, and assigns will release Defendants and the Released Parties from any and all claims, known or unknown, for property damage or Mitigation Measures that arise out of or relate to the facts alleged in the Second Amended Complaint or Section VII of the Proposed Final Pretrial Conference Order, regardless of whether you submit a Claim Form. A copy of those documents is available for you to review on the settlement website www.CanogaParkClassAction.com. The released claims are described in detail in Section 5 of the Settlement Agreement and in the Release on the Claim Form.

Important: The Settlement does not release, and you will not be giving up, any claims based on alleged personal injury, wrongful death, or claims for medical monitoring.

The Release also includes a waiver of California Civil Code section 1542 (and any similar law of any other state or jurisdiction), which protects against the release of unknown claims. The full text of the section 1542 waiver appears in the Release on the Claim Form and in Section 5 of the Settlement Agreement, which is available at www.CanogaParkClassAction.com.

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You are solely responsible for determining the tax consequences of any payment you may receive under this Settlement. Neither the Court, the Defendants, the Plaintiffs/Class Representatives, Class Counsel, nor the Class Administrator is providing any advice or making any representations about the tax consequences of payments made under the Settlement. The Class Administrator will issue the necessary IRS tax forms to Settlement Class Members who receive payments.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from this Settlement, and you want to keep the right to sue or continue to sue Defendants on your own about the legal issues released by the Settlement, you must take steps to exclude yourself from the Settlement Class. This is called “opting out.”

16. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must send a written request stating that you want to be excluded from the Settlement Class in *Behar v. Northrop Grumman Corporation, et al.*, Case No. 2:21-cv-03946-HDV-SK. Your request must include your name, address, telephone number, the address of the property you own or owned in the Class Area, and your signature. Your request must be mailed to the Class Administrator, postmarked no later than [OPT-OUT DEADLINE], at the following address:

Behar v. Northrop Grumman Class Administrator
c/o A.B. Data, Ltd.
EXCLUSIONS
P.O. Box 173001
Milwaukee, WI 53217

You may not exclude yourself by telephone or e-mail. You cannot exclude anyone but yourself. Late-submitted opt-out requests will not be accepted and shall not be effective. If you ask to be excluded, you will not receive any settlement payment, you cannot object to the Settlement, and you will not be bound by anything that happens in this lawsuit. You may then be eligible to sue (or continue to sue) Defendants on your own about the released claims, subject to all applicable defenses.

17. If I don't exclude myself, can I sue Defendants for the same thing later?

No. Unless you exclude yourself, you give up the right to sue Defendants or the Released Parties for the Released Claims described in the Settlement Agreement and in Question 15. If you have a pending lawsuit related to the released claims, speak to your lawyer in that lawsuit immediately. The deadline to exclude yourself is [OPT-OUT DEADLINE].

18. If I exclude myself, can I get money from this Settlement?

No. If you exclude yourself, you cannot submit a Claim Form to receive a payment. But, subject to applicable defenses, you may sue, continue to sue, or be part of a different lawsuit against Defendants on your own.

THE LAWYERS REPRESENTING YOU

19. Do I have a lawyer in this case?

The Court has appointed the following attorneys to represent you and the other Settlement Class Members (collectively, “Class Counsel”):

- W. Mark Lanier, Alex J. Brown, Ryan D. Ellis, and Michael Akselrud, THE LANIER LAW FIRM, P.C.
- Christopher T. Nidel, Jonathan Nace, and William W. Cowles, NIDEL & NACE, P.L.L.C.

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- David P. Page, ENVIRONMENTAL ENERGY & NATURAL RESOURCES ADVOCATES, P.L.L.C.
- Gideon Kracov, LAW OFFICE OF GIDEON KRACOV.

You will not be separately charged for these lawyers. Class Counsel will seek a recovery of attorneys' fees plus costs and expenses to be paid out of the Settlement Fund. You do not need to hire your own lawyer, however, if you want to be represented by your own lawyer, you may hire one at your own expense.

20. How will the lawyers be paid?

Class Counsel intends to apply to the Court for an award of attorneys' fees of up to forty percent (40%) of the Settlement Fund (\$30,000,000.00), as well as reimbursement of reasonable costs and expenses which are estimated not to exceed \$3,000,000.00, and the costs and fees of the Class Administrator for settlement administration, which are estimated not to exceed \$200,000.00. In the event of an appeal, Class Counsel intends to request additional attorneys' fees of up to forty-five percent (45%) of the Settlement Fund to compensate for additional work in defending the Settlement on appeal (\$33,750,000.00), as well as reimbursement of all reasonable costs and expenses associated with such appeal. Class Counsel will also request Court-approved service awards of up to \$30,000 each for Class Representatives Jed Behar and Alisa Behar in recognition of their work and risk in serving as Class Representatives. The Court will determine the actual amounts to be awarded. All such amounts will be paid from the Settlement Fund. Class Counsel's motion for attorneys' fees and costs will be filed with the Court no later than [FEE MOTION DEADLINE] and will be available for review at www.CanogaParkClassAction.com at least 20 days before the deadline to object to the Settlement.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you disagree with the Settlement or some part of it.

21. How do I tell the Court that I disagree with the Settlement?

If you are a Settlement Class Member, you may object to the Settlement (in whole or in part) by submitting a written objection to the Court no later than [OBJECTION DEADLINE]. To be valid, your written objection must:

- Contain a heading referring to *Behar v. Northrop Grumman Corporation, et al.*, Case No. 2:21-cv-03946-HDV-SK;
- Include your full name, current address, telephone number, the address of your property within the Class Area, and your signature;
- Set forth, in clear and concise terms, the legal and factual arguments supporting your objection;
- Include any documents or other evidence you wish the Court to consider; and
- State whether you (or your attorney, if any) intend to appear at the Final Approval Hearing (a "Notice of Intention to Appear").

Your written objection must be mailed to or filed with the Court at the following address, and a copy must also be served by first-class mail on Class Counsel and Defense Counsel at the addresses below:

Court

Clerk of the Court
U.S. District Court for the
Central District of California
350 W. 1st Street, Suite 4311
Los Angeles, CA 90012-4565

Class Counsel

The Lanier Law Firm, P.C.
Attn: Ryan D. Ellis
10940 W. Sam Houston Pkwy.
Suite 100
Houston, Texas 77064

Defense Counsel

Gibson, Dunn & Crutcher LLP
Attn: Christopher Chorba
333 South Grand Avenue
Los Angeles, California 90071

Questions? Call toll-free [TOLL-FREE NUMBER] or visit www.CanogaParkClassAction.com.
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The postmark date will be the exclusive means for determining whether your objection is timely. Settlement Class Members who fail to make objections in the manner described above shall be deemed to have waived any and all objections and shall be foreclosed from making any objection, by appeal or otherwise.

22. What is the difference between objecting and excluding myself?

Objecting is telling the Court that you disagree with something about the Settlement. You can only object if you remain in the Settlement Class. Excluding yourself (opting out) is telling the Court that you do not want to be part of the Settlement Class at all. If you exclude yourself, you cannot object, because the Settlement no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

The Court will hold a hearing to decide whether to approve the Settlement. You may attend, and you may ask to speak, but you do not have to do either.

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

The Court will hold a Final Approval Hearing on [FINAL APPROVAL HEARING DATE] at [TIME], before the Honorable Hernán D. Vera, at the United States Courthouse, 350 W. 1st Street, Los Angeles, CA 90012, in Courtroom 5B. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the hearing. The Court may also decide how much to award to Class Counsel for attorneys' fees, costs, and expenses, as well as how much of a service award to award to the Class Representatives. We do not know how long the Court's decision will take. The hearing may be postponed or adjourned without further notice.

24. Do I have to attend the Hearing?

No. Class Counsel will answer any questions the Court may have. You are welcome to attend at your own expense. If you submit a written objection, you do not need to attend the hearing to have it considered, but you may attend if you wish.

25. May I speak at the Hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must include a Notice of Intention to Appear in your written objection submitted in accordance with Question 21. You may not speak at the Hearing if you have excluded yourself from the Settlement Class.

IF YOU DO NOTHING

26. What happens if I do nothing at all?

If you do nothing, you will receive no payment from this Settlement. Unless you exclude yourself, you will still be bound by the Court's orders and the Release of Released Claims. You will not be able to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against Defendants or the Released Parties about the Released Claims, ever again.

GETTING MORE INFORMATION

27. Are there more details about the Settlement?

This Notice summarizes the proposed Settlement. The complete Settlement Agreement, the operative complaint, and other case documents are available for review at www.CanogaParkClassAction.com. You may also review papers filed in the case at the Office of the Clerk of the United States District Court for the Central District of California.

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28. How do I get more information?

You may call toll-free [TOLL-FREE NUMBER] or visit www.CanogaParkClassAction.com. Please do not contact the Court or Defendants for information about the Settlement.

DATED: [DATE]

BY ORDER OF HON. HERNÁN D. VERA

THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA