

NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION,
FINAL APPROVAL HEARING, AND RIGHT TO APPEAR

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA
Matus v. Sport Squad, Inc., Case No. 24-cv-60954-DSL

A federal court authorized this Class Notice (“Notice”). This is not an advertisement or a solicitation from a lawyer.

Please read this Notice carefully.

If you own and have in your possession a JOOLA “Gen 3” Paddle and did not accept JOOLA’s prior offer to tender and return your Gen 3 Paddle, you could be affected by this class action settlement.

On August 19, 2025, the Honorable David S. Leibowitz of the United States District Court for the Southern District of Florida entered an order preliminarily approving a settlement agreement and conditionally certifying a class of all persons residing within the United States who own and have in their possession a Gen 3 Paddle. No determination of wrongdoing or liability on the part of JOOLA was made by the Court, and the settlement is not an admission of liability by JOOLA.

You are a settlement class member (“Settlement Class Member”) if you are a person residing within the United States who owns and has in their possession a Gen 3 Paddle. Persons who accepted JOOLA’s prior offer to tender and return their Gen 3 Paddle are not part of the Settlement Class. If a Gen 3 Paddle holder has more than one Gen 3 Paddle and did not already return all of their Gen 3 Paddles, such purchaser may still be part of the class as to the remainder of the paddles that were not previously returned. Excluded from the Settlement Class are JOOLA and its officers, directors, affiliates, legal representatives, employees, assigns and successors, and JOOLA’s authorized retailers.

Please read this Notice carefully. Your legal rights will be affected whether you act or do not act. You now have to make a choice to preserve your legal rights.

YOUR LEGAL RIGHTS AND OPTIONS IN THE SETTLEMENT
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Questions? Visit www.SportSquadPaddleSettlement.com or call toll-free (833) 621-6134

Submit a Claim Form by December 15, 2025	• Receive benefits from the settlement • Give up your rights to sue the Defendant for the legal claims in this case and pertaining to your purchase of any Gen 3 Paddle • Be bound by the settlement	Submitted or mailed so that it is postmarked no later than December 15, 2025
Exclude yourself by December 15, 2025	• Receive no benefits from the settlement • Keep your right to file or continue your own lawsuit concerning the legal claims in this case against Defendant	Filed or postmarked no later than December 15, 2025
Object to the Settlement by December 15, 2025	• Tell the Court what you like or do not like about the settlement • You will still be bound by the settlement, and you will still receive benefits • You may also ask to speak at the Final Approval Hearing about your comment or objection, but you are not required to speak at the hearing	Filed or postmarked no later than December 15, 2025
Attend the Final Approval Hearing	• Ask to speak in Court about the settlement • You or your own attorney are welcome to come at your own expense • File your Notice of Intention to Appear by December 15, 2025	January 27, 2026, at 2:00 PM ET
Do Nothing	• Give up your rights to sue the Defendant for the legal claims in this case • Be bound by the settlement • Keep your JOOLA Gen3 Paddle	

PLEASE DO NOT CALL THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THE SETTLEMENT OR THE CLAIMS PROCESS.

- This Notice explains your legal rights and options—and the deadlines to exercise them.
- The Court in charge of this case still has to decide whether to approve the final settlement.
- Payments may be made if the Court approves the settlement, and after appeals, if any, are resolved, and after the Court orders that the Settlement Funds (as described in **Question 13** below) be distributed. Please be patient. Please do not call the Court or the court clerk’s office directly.
- This is not a lawsuit against you.

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- This Notice summarizes the proposed settlement with JOOLA. For the precise terms and conditions of the settlement, please see the Settlement Agreement available at www.SportSquadPaddleSettlement.com, contact the Settlement Administrator at 1-833-621-6134 or via the Contact Us form on the www.SportSquadPaddleSettlement.com website, or access the public Court docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.flsd.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Southern District of Florida, 400 North Miami Avenue, Miami, FL 33128, between 8:30 a.m. and 4:30 p.m., Monday through Friday, excluding Court holidays. You may also speak with a live representative with the Settlement Administrator by calling 1-833-621-6134.

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BASIC INFORMATION

1. Why did I receive this Notice?

Settlement Class Members have the right to know about the settlement of a class action lawsuit and about their legal rights and options before the Court holds a Final Approval Hearing to decide whether to grant final approval of the settlement. This Notice explains the lawsuit, the settlement, and your legal rights. It also explains what benefits from the settlement are available at this time, who is eligible to participate, and how to share in the settlement.

If the Court approves the settlement, and after any objections and appeals are resolved, the Settlement Administrator will disburse the Settlement Funds or the one-time gift code for use on www.joola.com (as described in **Question 9** below) in one or more distributions at a time to be determined by the Court. The Court has preliminarily approved the settlement. If you are a Settlement Class Member, you have legal rights and options that you may exercise before the Court considers whether it will grant final approval to the proposed settlement at the Final Approval Hearing. The Court will hold the Final Approval Hearing on **January 27, 2026**, to decide whether the proposed settlement with the Defendant is fair, reasonable, and adequate. The Court will also consider Class Counsel's request for payment of attorneys' fees, class representative general release payments, and reimbursement of litigation expenses.

If you wish to comment on (including object to) or exclude yourself from the settlement, you must do so by following the procedures described below. If you do nothing, you will be bound by any final judgment concerning the Defendant regardless of whether you submit a claims form and receive monetary benefit from the settlement.

2. What is this lawsuit about?

This lawsuit claims that Defendant JOOLA falsely and misleadingly advertised its Gen 3 Paddles as being approved by USA Pickleball Association ("USAP"). JOOLA denied these allegations and raised various defenses to the lawsuit's claims.

The Gen 3 Paddles that are included in the settlement are the following models: Tyson McGuffin Magnus 3 14mm, Tyson McGuffin Magnus 3 16mm, Collin Johns Scorpeus 3 16mm, Anna Bright Scorpeus 3 14mm, Simone Jardim Hyperion 3 16mm, Ben Johns Hyperion 3 16mm, Ben Johns Hyperion 3 14mm, Ben Johns Perseus 3 14mm, or Ben Johns Perseus 3 16mm (the "Gen 3 Paddles" and individually, a "Gen 3 Paddle"). To obtain more information about the claims in this lawsuit, you can view the complaint and other court documents in this case at www.SportSquadPaddleSettlement.com.

3. Why is this a class action, and who is involved?

Questions? Visit www.SportSquadPaddleSettlement.com or call toll-free (833) 621-6134

In a class action lawsuit, one or more “Plaintiffs” or “Class Representatives” sue on behalf of other people who have similar claims. The people with similar claims together are a “Settlement Class” and each is called a “Settlement Class Member.” In a class action, the court resolves the issues for all Settlement Class Members, except for those who exclude themselves (or “opt out”) from the Settlement Class.

4. Why are there settlements?

The Court has not yet found in favor of Plaintiff or Defendant. While the lawsuit is still pending before the United States District Court, Southern District of Florida, Plaintiff and Defendant have agreed to the settlement that, if approved, will bring the claims against Defendant to an end. This way, Plaintiff and Defendant will avoid the uncertainty of continuing the case between them. They also avoid the cost and delay of further litigation, and Settlement Class Members will receive the benefits of the settlement. By settling, JOOLA did not acknowledge any liability or wrongdoing.

WHO HAS THE RIGHT TO PARTICIPATE IN THE SETTLEMENT AND THE CLASS ACTION LAWSUIT?

5. Am I a Settlement Class Member who is part of the settlement and the ongoing class action lawsuit against the Defendant?

In general, persons who own and have in their possession a JOOLA Gen 3 Paddle are “Settlement Class Members,” i.e., persons or entities are eligible for a payment from the proposed settlement when the funds are distributed, if they meet the following definition:

You are a Settlement Class Member if you are a person who resides within the United States and owns and has in their possession a Gen 3 Paddle (or a substantially complete Gen 3 Paddle). Persons who accepted JOOLA’s prior offer to tender and return their Gen 3 Paddle are not part of the Settlement Class. However, if a Gen 3 Paddle holder has more than one Gen 3 Paddle and did not already return all of their Gen 3 Paddles, such purchaser may still be part of the class as to the remainder of the paddles that were not previously returned. Excluded from the Settlement Class are Defendant and its officers, directors, affiliates, legal representatives, employees, assigns and successors, and JOOLA’s authorized retailers.

6. I am still not sure if I am included.

If you received an email notice and still possess a Gen 3 Paddle, you are considered part of the class

7. What are my rights as a Settlement Class Member?

You may do nothing and stay and receive benefits from the settlement at a time to be determined by the Court (see **Question 20**). Or you may exclude yourself from the settlement (see **Question 15**). You may also comment on or object to the proposed settlement and the request for fees and litigation expenses (see **Question 18**). You may also attend the Court's Final Approval Hearing to speak in support of, or against, the Court's final approval of the proposed settlement and the request for fees and litigation expenses.

THE SETTLEMENT BENEFITS

8. What does the settlement provide?

JOOLA agreed to compensate all Settlement Class Members who properly return their Gen 3 Paddles as required by the Settlement Agreement. The type and amount of compensation depends on whether you are a Category 1 or Category 2 Class Member. Category 1 Class Members are required to submit a Claims Form, return their Gen 3 Paddle to JOOLA, and provide proof of purchase from an Authorized Retailer. Category 2 Class Members must submit a Claims Form and return their Gen 3 Paddle to JOOLA but need not provide proof of purchase.

If you are a Settlement Class Member who submits a Claim Form that is available at www.SportSquadPaddleSettlement.com, once the Settlement Administrator approves your claim, you will receive a pre-paid FedEx label via email with instructions for returning your Paddle to JOOLA.

As a Settlement Class Member, you will give up, or "release," claims against Defendant. This release includes any claims made or that could have been made arising from the facts alleged in this class action lawsuit.

All of the specific terms of the settlement and the releases are described in more detail in the Settlement Agreement. You can view or download copies of the Settlement Agreement at www.SportSquadPaddleSettlement.com.

9. How much money can I get from the settlement?

It depends on whether you are a Category 1 or Category 2 Settlement Class Member. The difference between a Category 1 and Category 2 Settlement Class Member is the required proof of Original Purchase from an Authorized Retailer.

If you are a Category 1 Settlement Class Member, you can receive a refund of \$300. If you are a Category 2 Settlement Class Member, you can receive a \$150 one-time gift code to be used on www.joola.com.

10. When will I get my payment?

Questions? Visit www.SportSquadPaddleSettlement.com or call toll-free (833) 621-6134

As noted above, the Court is scheduled to hold a Final Approval Hearing on **January 27, 2026, at 2:00 PM ET** to decide whether to approve the proposed settlement and the request for the payment of attorneys' fees and the reimbursement of litigation expenses. The Court may reschedule the Final Approval Hearing or change any of the deadlines described in this Notice. There is no current guarantee of any payment. Please check www.SportSquadPaddleSettlement.com or the Court's PACER site at <https://ecf.flsd.uscourts.gov> to confirm that the date has not changed, or for news of any such changes.

11. What am I giving up under the settlement?

If you are a Settlement Class Member, unless you exclude yourself from the settlement with Defendant, you will remain in the Settlement Class, and that means that you cannot sue, continue to sue, or be part of any other lawsuit against the Defendant about USAP's approval of the Gen 3 Paddles. It also means that all of the Court's orders will apply to you and legally bind you, and that you agree to the "Releases of Claims" in the Settlement Agreement with the Defendant, available at www.SportSquadPaddleSettlement.com. In general (and subject to the precise terms as set forth in the Settlement Agreement), upon the Settlement Agreement becoming effective, the Plaintiffs and Settlement Class Members who did not otherwise properly and timely exclude themselves agree that the Defendant will be completely released pursuant to the scope of the Released Claims and the binding terms of the proposed Settlement Agreement, which is available at www.SportSquadPaddleSettlement.com. For example, a non-exhaustive list of the Released Claims include, but are not limited to any and all claims asserted or which could have been asserted in this litigation related to USAP's approval of the Gen 3 Paddles, including but not limited to, claims for: (1) violation of Florida's Deceptive and Unfair Trade Practices Act, (2) unjust enrichment, (3) California's Fraudulent Competition Law, (4) California Unfair, Deceptive, Untrue, and Misleading Advertising Law, (5) California's Unfair and Deceptive Consumer Practices Law, and (6) California's Unlawful and Unfair Competition Law.

To view the legally binding terms about the scope of the Released Claims, please refer to the proposed Settlement Agreement, which is available at www.SportSquadPaddleSettlement.com.

THE LAWYERS REPRESENTING YOU

12. Who represents me in this case?

The Court appointed the following law firms as Co-Lead Class Counsel (also referred to as "Class Counsel") to represent the Settlement Class:

Sigrid McCawley
Boies Schiller Flexner LLP
401 East Los Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301

Brad Edwards
Edwards Henderson Law Firm
425 North Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301

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Tyler Ulrich
Boies Schiller Flexner LLP
100 SE Second St., Suite 2800
Miami, FL 33131

Hallie Von Rock
Aiman-Smith & Marcy
7677 Oakport St., Suite 1000
Oakland, CA 94621

13. How will the lawyers be paid?

At the Final Approval Hearing, Class Counsel will seek payment of an award of Attorneys' Fees and Expenses of \$790,000 for the work they have done in this case and for reimbursement of their reasonable litigation expenses. If the Court awards such payment, it will be paid by Defendant at the time as ordered by the Court. Class Counsel's award of Attorneys' Fees will not affect Settlement Class Members' rights to monetary relief from the settlement. Class Counsel will also ask the Court to approve general release settlements entered by the two Plaintiffs, in the amount of \$10,000 for each, which would be paid out of Class Counsel's award of Attorneys' Fees and Expenses and will not affect Settlement Class Members' right to monetary relief. You personally do not have to pay any of Class Counsel's Attorneys' Fees and Expenses.

EXCLUDING YOURSELF FORM THE SETTLEMENT

14. How do I opt out of the settlement?

If you fall within the Settlement Class Member definition (see **Question 5** above) but wish to keep the right to sue or continue to sue the Defendant (at your own expense) about the legal issues in this case, then you must take steps to remove yourself from the Settlement Class. This is called excluding yourself from, or opting out of, the settlement.

To exclude yourself from (or opt out of) the settlement with the Defendant, you must send a request for exclusion to the Settlement Administrator at the address below. A written request for exclusion must: (a) contain a caption or title that identifies it as "request for exclusion in "*Matus v. Sport Squad, Inc. d/b/a JOOLA*"; (b) include the Settlement Class Member's name, mailing and email addresses, and contact telephone number; (c) specify that he or she wants to be "excluded from the Settlement Class"; and (d) be personally signed by the Settlement Class Member.

If you request to be excluded from the settlement with the Defendant, you will not be legally bound by the settlement with the Defendant. You will be able to sue (or continue to sue) the Defendant in the future about the legal claims in this case, subject to applicable law and statutes of limitations.

If you ask to be excluded from the settlement with the Defendant, you will not get any payment from the settlement with respect to the Defendant, and you cannot object to the settlement.

Request for Exclusion Mailing Information:

To exclude yourself from the settlement with the Defendant, you must submit your request for exclusion postmarked via First Class United States Mail (or United States Mail for overnight delivery) **no later than December 15, 2025**, to the following address:

Matus v. Sport Squad
c/o Kroll Settlement Administration, LLC
P.O. Box 225391
New York, NY 10150-5391

You cannot exclude yourself (opt out) by telephone.

15. If I do not exclude myself, can I sue the Defendant for the same thing later?

No. If you are a Settlement Class Member, unless you exclude yourself from the settlement with the Defendant, you give up the right to sue the Defendant for the claims that the settlement resolves as more fully described in **Question 11** above. Instead, you will receive the benefits provided under the Settlement as described in **Question 9** above.

If you have a pending lawsuit against the Defendant, speak to your lawyer immediately, because you may need to exclude yourself from the Settlement Class to continue your own lawsuit. The process for excluding yourself from the settlement is described in the preceding section.

16. If I exclude myself, can I get money from this settlement?

No. If you exclude yourself from the settlement with the Defendant, you will not receive money under the settlement.

COMMENTING ON OR OBJECTING TO THE SETTLEMENT

17. How do I tell the Court that I like or do not like the proposed settlement, and may I speak at the hearing?

You can ask the Court to deny approval by filing an objection. You cannot ask the Court to order a different settlement; the Court can only approve or reject the settlement. If the Court denies approval, no settlement payments will be sent out and the lawsuit will continue. If that is what you want to happen and you want to let the Court know, you must object.

Any objection to the proposed settlement must be in writing. If you file a timely written objection, you may, but are not required to, appear at the Final Approval Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

All written objections and supporting papers must: (a) clearly identify the case name and number *Matus v. Sport Squad, Inc. d/b/a JOOLA*, Case No. 24-cv-60954-DSL (S.D. Fla.); be submitted to the Court either by mailing them to the Class Action Clerk, United States District Court for the Southern District of Florida, 400 North Miami Avenue, Miami, FL 33128, or by filing them in person at any location of the United States District Court for the Southern District of Florida; and (c) be filed or **postmarked on or before December 15, 2025**.

An objection must:

- be in writing;
- include the objector's full name, current address, and current telephone number;
- include documentation or attestation sufficient to establish membership in the Settlement Class;
- be signed by the person filing the objection, or his attorney;
- state, in detail, the factual and legal grounds for the objection;
- state any objections filed by the objector in the last seven years (case name, name of court and result of objection);
- attach any document the Court should review in considering the objection and ruling on the Motion;
- provide dates for availability to Class Counsel for the Settlement Class Member's deposition;
- include a request to appear at the Final Approval Hearing, if the objector; and
- state that the objector intends to appear at the Final Approval Hearing.

You do not need to attend or speak at the Final Approval Hearing (described in **Question 18** below) for your comments or objections to be considered. If you would like to speak at the Final Approval Hearing about your comments or objections to the settlement, you must add to your objection a statement that you intend to appear and speak at the hearing (for example, by stating "This is my Notice of Intention to Appear in *Matus v. Sport Squad, Inc. d/b/a JOOLA*, Case No. 24-cv-60954-DSL (S.D. Fla.)").

You will have no right to speak at the Final Approval Hearing about the settlement if you choose to exclude yourself from the settlement, because the settlement no longer affects you if you opt out.

THE COURT'S FINAL APPROVAL HEARING

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

The Court will hold a Final Approval Hearing on **January 27, 2026, at 2:00 p.m. EST** in Courtroom 202A at the United States District Court located at 299 East Broward Boulevard, Fort Lauderdale, Florida 33301. At the Final Approval Hearing, the Court will consider the proposed settlement with JOOLA and determine whether it is fair, reasonable, and adequate. The Court will

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also consider the request for attorneys' fees and litigation expenses, and for payment of other administrative expenses. If there are written comments or objections, the Court will consider them. The Court will decide whether to allow people who have raised objections or comments to speak at the hearing. After the Final Approval Hearing, the Court will separately decide whether to approve the settlement. The Court may reschedule the Final Approval Hearing or change any of the deadlines described in this Notice. Please check www.SportSquadPaddleSettlement.com, for news of any such changes.

19. Do I have to come to the Final Approval Hearing?

No. Class Counsel will be present at the Final Approval Hearing to answer any questions the Court may have. You are welcome to come at your own expense. If you send comments or objections to the proposed settlement, you do not have to come to Court to talk about them. If you mailed your written comments or objections on time, the Court will consider them. You may also pay your own lawyer to attend, but such attendance is not necessary.

IF YOU DO NOTHING

20. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will be bound by the settlement. If you are a Settlement Class Member and you submit a timely claims form and return your Gen 3 Paddle to JOOLA, you will receive the benefits of the settlement at a time to be determined by the Court. Any claims you might have against the Defendant for the allegations in this case relating to the JOOLA Gen 3 Paddle will be released. This means that if you do nothing, you will not be able to collect any damages from the Defendant for claims as alleged in this lawsuit (or any other lawsuit).

GETTING MORE INFORMATION

21. Are more details about the settlement available?

Yes. This Notice summarizes the proposed settlement with the Defendant. More details about the settlement are available in the proposed Settlement Agreement itself. You can see a copy of the Settlement Agreement at www.SportSquadPaddleSettlement.com.

22. How do I get more information or what if I no longer live at my address?

The website www.SportSquadPaddleSettlement.com provides answers to common questions about the lawsuit, the settlement, how to update your address and other information to help you determine whether you are a Settlement Class Member, whether you are eligible for a payment,

Questions? Visit www.SportSquadPaddleSettlement.com or call toll-free (833) 621-6134

and when Settlement Funds will be distributed. You may also call or write to the Settlement Administrator with your questions at:

Matus v. Sport Squad
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150-5391
Phone: **(833) 621-6134**

PLEASE DO NOT CONTACT THE COURT. YOU SHOULD DIRECT ANY QUESTIONS YOU MAY HAVE ABOUT THIS NOTICE OR THE PARTIAL SETTLEMENTS TO THE SETTLEMENT ADMINISTRATOR OR TO CLASS COUNSEL.

You may also seek the advice and counsel of your own attorney at your own expense, if you desire.