

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

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

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

A Settlement Agreement has been reached in a class action lawsuit alleging that National Tenant Network, Inc. (“NTN”) and LCIJ, Inc. (“LCIJ,” and together with NTN, “Defendants”), unlawfully sent consumer reports in the form of postcards addressed to suspected landlords that contained information about a resident’s prior eviction filing in alleged violation of the Fair Credit Reporting Act (“FCRA”).

A settlement fund of no less than \$1,625,000 has been agreed upon, which, after deducting attorneys’ fees, costs, an incentive award to the Class Representative (Vanessa Clermont) and settlement administration costs, will be used to pay Class Members who submit Valid Claims. Each Class Member will receive an equal share of the Settlement Fund. Cash payment amounts will depend on the total number of Valid Claims filed by Class Members and the amount of money remaining in the fund after making the deductions listed above. Your legal rights are affected whether you act or don’t act, so read this notice carefully.

Visit www.NTNPostcardSettlement.com for more information and for updates.

Your Legal Rights and Options	
Option 1: Submit a Claim Form Deadline: September 22, 2026	Complete and submit a Claim Form and receive a share of the Settlement Fund By completing and submitting a Claim Form you may recover a pro-rata share of the Settlement Fund. This is the only way to claim and receive money from the Fund.
Option 2: Ask to be Excluded Deadline: September 22, 2026	Get out of this lawsuit and get no benefits from it You may ask to be excluded from the lawsuit. By excluding yourself, you remove yourself from the Class, receive no rights under the settlement and you keep the right to sue on your own.
Option 3: Object to the Settlement Deadline: September 22, 2026	Object to the terms of the Settlement Agreement You may object to the terms of the Settlement Agreement and have your objections heard at the December 8, 2026 Final Approval Hearing.

Questions? Go to www.NTNPostcardSettlement.com or call 1-877-309-9778

1. What is this lawsuit about?

Plaintiff Vanessa Clermont (“Clermont” or “Plaintiff”) claims that Defendants violated the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.* (“FCRA”), by sending alleged consumer reports in the form of postcards addressed to landlords that contained information about a resident’s prior eviction filing. Specifically, the postcards stated that a resident “had a previous eviction filing” and “NTN would have warned you about trouble tenants like this BEFORE they became YOUR residents.” The FCRA carries statutory damages for willful violations of \$100 to \$1,000.

NTN and LCIJ each deny any wrongdoing, deny that the postcards at issue constitute “consumer reports” under the FCRA, and deny that they violated the FCRA or any other law or otherwise have any liability to Plaintiff or any other person as alleged in the lawsuit.

The case is titled *Clermont v. National Tenant Network, Inc. & LCIJ, Inc.*, Case No: 2:23-cv-03545-MCA-LDW, and it is pending in the United States District Court for the District of New Jersey.

You can read Plaintiff’s Complaint, Defendants’ Answers to the Complaint, and other case documents at www.NTNPostcardSettlement.com.

2. Why is this a class action?

In a class action, a Class Representative (in this case, Plaintiff Vanessa Clermont) sues on behalf of a group (or a “Class”) of people who have similar claims. Here, the Class Representative sues on behalf of people who were the subjects of substantially similar postcards that were addressed to landlords that stated that a resident “had a previous eviction filing” and “NTN would have warned you about trouble tenants like this BEFORE they became YOUR residents.” 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.

3. How do I know if I am a part of the Class?

The Court certified the following definition of a Class: “All persons who were the subject of Defendants National Tenant Network, Inc.’s and LCIJ, Inc.’s postcards, substantially similar to the postcard concerning Plaintiff, sent during the applicable FCRA statute of limitations period, 15 U.S.C. § 1681p, as determined by whether and when the person that was the subject of one of Defendants’ postcards discovered that it was sent.”

The Class Period covers the period from June 30, 2018 to December 3, 2023.

4. How do I recover?

Submit a Claim Form. This is the only way to get a payment. If you are a member of the Class and submit a Valid Claim Form, you are entitled to receive a share of the Settlement Fund.

The final cash payment will depend on a number of factors, including the total number of valid and timely claims filed by all Class Members as determined by the Settlement Administrator. Each claiming Class Member will be entitled to an equal share of the Settlement Fund after deductions from the fund for administrative costs, attorneys’ fees and expenses, and any incentive award to the plaintiff.

You can submit a claim form online at www.NTNPostcardSettlement.com or, you can download Claim Form and mail it to:

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Clermont v NTN
Settlement Administrator
PO Box 5870
Portland, OR 97228-5870

All claim forms must be postmarked or filed online no later than **11:59 p.m. PST on September 22, 2026**.

After all Valid Claim forms are counted, and the settlement is given final approval by the Court, the Settlement Administrator will provide each claiming Class Member their share of the Settlement Fund after the deductions above. Any excess settlement funds or benefit checks not cashed by Class Members will be provided to a charitable organization.

5. What am I giving up to receive these benefits?

By staying in the Class, all of the Court's orders will apply to you, you give a "release" for any claims arising from the NTN Postcards concerning Class Members sent between June 30, 2018 to December 3, 2023. A release means you cannot sue or be part of any other lawsuit against NTN, LCIJ and/or the Released Parties (as defined in the Settlement Agreement) about the claims or issues in this lawsuit and you will be bound by the Settlement Agreement.

6. How much will the Class Representatives receive?

The Class Representative will receive her portion of the settlement as a Class Member and an incentive award for having pursued this action. Any incentive payment is subject to Court approval. The Class Representative will request an Incentive Award of up to \$20,000.00.

7. Do I have a lawyer in this case?

To represent the Class, the Court has appointed attorneys with the law firm of Lemberg Law, LLC, 43 Danbury Road, Wilton, CT 06897 as "Class Counsel."

Class Counsel will request an award of attorneys' fees of up to 33% of the Settlement Fund and for reimbursement of their expenses. Any attorneys' fee and expense award is subject to Court approval. You may hire your own attorney, but only at your own expense.

8. I don't want to be part of this case. How do I ask to be excluded?

If you don't want a payment from this settlement or to be bound by any of the Court's decisions, but you want to keep the right to individually sue the Defendants about the issues in this case, then you must take steps to get out of the settlement. This is called excluding yourself, or "opting out" of the Class. To request to exclude yourself, you must send a letter by mail with (a) the Requester's full name, address, and the name of the Action and telephone number; and (b) the Requester's personal and original signature, or the original signature of a person previously authorized by law, such as a trustee, guardian, or person acting under a valid power of attorney, to act on behalf of the Requester; and (c) state unequivocally that the Requester desires to be excluded from the Class.

You must mail your exclusion request postmarked no later than **September 22, 2026** to:

Clermont v NTN
Settlement Administrator
PO Box 5870
Portland, OR 97228-5870

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9. How do I object?

Any Class Member who has not requested to be excluded from the Class may object to the Settlement. In order to exercise this right, you must submit your objection to the Court by the Objection Deadline. Your objection must (i) set forth the Class Member's full name, current address, and telephone number; (ii) contain the Class Member's original signature or the signature of counsel for the Class Member; (iii) state that the Class Member objects to the Settlement, in whole or in part; (iv) set forth the complete legal and factual bases for the Objection; (v) provide copies of any documents that the Class Member wishes to submit in support of his/her position; and (vi) state whether the objecting Class Member intends on appearing at the Final Approval Hearing either pro se or through counsel and whether the objecting Class Member plans on offering testimony at the Final Approval Hearing. Any Class Member that fails to object in the manner set forth herein shall be foreclosed from making such objection or opposition, by appeal, collateral attack, or otherwise and shall be bound by all of the terms of this Settlement upon Final Approval and by all proceedings, orders and judgments, including but not limited to the Release in this Action.

Objections must be filed with the Clerk of the Court no later than **September 22, 2026** and must be mailed to Class Counsel, NTN's counsel, LCIJ's counsel, and the Settlement Administrator no later than **September 22, 2026**.

Court	Class Counsel	NTN's Counsel
Clerk of the Court Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, NJ 07102	Lemberg Law 43 Danbury Road Wilton, CT 06897	Clausen Miller, P.C. 100 Campus Drive Florham Park, NJ 07932
LCIJ's Counsel	Settlement Administrator	
Hinshaw & Culbertson LLP 151 N. Franklin St., Suite 2500 Chicago, IL 60606	Clermont v NTN Settlement Administrator PO Box 5870 Portland, OR 97228-5870	

THE FAIRNESS HEARING

The Court will hold a Final Approval Hearing on **December 8, 2026, at 2:00 p.m.** in the courtroom of Judge Madeline Cox Arleo, U.S. Courthouse, 50 Walnut Street, Courtroom MLK 4A, Newark, NJ 07102. The purpose of the hearing will be for the Court to determine whether the proposed settlement is fair, reasonable, and adequate and in the best interests of the Class and to rule on applications for compensation for Class Counsel and an incentive award for the Class Representative. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the proposed settlement.

YOU ARE **NOT** REQUIRED TO ATTEND THIS HEARING TO BENEFIT FROM THIS SETTLEMENT. The hearing may be postponed to a later date without notice.

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FOR MORE INFORMATION

Additional information and documents, including case documents, are available at www.NTNPostcardSettlement.com, or you can call toll-free 1-877-309-9778 (recorded information only) or write to Clermont v NTN, Settlement Administrator, PO Box 5870, Portland, OR 97228-5870.

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