

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Pinter v. Land Air Sea Systems, Inc.

No. 1:22-cv-00185-WFK-MMH

U.S. District Court for the Eastern District of New York

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

If you are a person in the United States who purchased one or more of Land Air Sea System's products from Land Air Sea System's website or from Amazon, between January 12, 2018 and January 12, 2022, a class action settlement may affect your rights.

- A proposed settlement has been reached in *Pinter v. Land Air Sea Systems, Inc.*, No. 1:22-cv-00185-WFK-MMH, involving allegations that the Defendant, Land Air Sea Systems, Inc., sold products that were falsely represented to have been "Made in the USA" or "Manufactured in the USA." Defendant denies all allegations and claims asserted against it, and is settling the action to avoid the risk, burden, and expense of continued litigation.
- If you are included in the Settlement Class, your legal rights are affected regardless of whether you do or do not act. Read this notice carefully. For complete details, visit www.GPStrackersettlement.com or call toll-free 1-855-450-4455.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

SUBMIT A CLAIM FORM BY: MARCH 4, 2026	Submitting a valid Claim Form is the only way to receive a payment from the Settlement.
EXCLUDE YOURSELF FROM THE SETTLEMENT BY: MARCH 4, 2026	If you exclude yourself from this Settlement, you will not receive any benefits from the Settlement, but you also will not release your claims against the Defendant. This is the only option that allows you to be part of any other lawsuit against Defendant for the legal claims resolved by this Settlement. If you exclude yourself from the Settlement, you may not object to the Settlement.
OBJECT TO THE SETTLEMENT BY: MARCH 4, 2026	To object to this Settlement, you can write to the Court with reasons why you do not agree with the Settlement. You may ask the Court for permission for you or your attorney to speak about your objection at the Final Fairness Hearing at your own expense.
DO NOTHING	If you do nothing, you will not receive any payment from the Settlement. You will also give up certain legal rights.

Questions? Visit GPStrackersettlement.com or call toll-free 1-855-450-4455

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BASIC INFORMATION

1. Why is this Notice being provided?

The Court directed that this Notice be provided because you have a right to know about a proposed settlement that has been reached in this class action lawsuit and about all your options before the Court decides whether to grant final approval of the Settlement. If the Court approves the Settlement, and after objections or appeals, if any, are resolved, the Claims Administrator appointed by the Court will distribute the Settlement payments to Class Members who submitted a valid and timely Claim Form. This Notice explains the lawsuit, the Settlement, your legal rights, what payments are available, who is eligible for them, and how to get them.

The Court overseeing this Litigation is the United States District Court for the Eastern District of New York. The action is captioned *Pinter v. Land Air Sea Systems, Inc.*, No. 1:22-cv-00185-WFK-MMH. The Plaintiff who brought the lawsuit in this action Mark Pinter, and the Defendant is Land Air Sea Systems, Inc.

2. What is this lawsuit about?

The Plaintiff alleges that Defendant sold products that were falsely represented to have been “Made in the USA” or “Manufactured in the USA” in violation of various state laws. The Defendant denies all allegations and claims asserted against it, and is settling the lawsuit to avoid the risk, burden, and expense of continued litigation.

For more information and to review the complaint filed in this action, visit www.GPStrackersettlement.com.

3. What is a class action Settlement?

In a class action, one or more people called Plaintiff or Plaintiffs sue on behalf of people who have similar claims. Together, these people are called a Settlement Class or Class Members. One Court and one judge resolve the issues for all Class Members, except for those individuals who exclude themselves from the Settlement Class.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiff or the Defendant (collectively, the “Parties”). Instead, the Parties have agreed to a Settlement to avoid the risks and costs of lengthy and uncertain litigation and the uncertainty of a trial and appeals. The Settlement allows Class Members to obtain a payment without further delay. Plaintiff and Plaintiff’s attorneys (“Class Counsel”) believe that the Settlement is in the best interest of all Class Members. This Settlement does not mean that the Defendant did anything wrong.

WHO IS INCLUDED IN THE SETTLEMENT?

5. How do I know if I am part of the Settlement?

You are a member of the Settlement Class if you are a person in the United States who purchased one or more of Land Air Sea System’s products from Land Air Sea System’s website or from Amazon, between January 12, 2018 and January 12, 2022.

If you received notice of this class action Settlement via email, you may be eligible to receive payment from the Settlement. If you are still not sure whether you are included, you can contact the Claims Administrator by calling toll-free at 1-855-450-4455 or by visiting the Settlement Website at www.GPStrackersettlement.com.

6. Are there exceptions to being included in the Settlement?

Yes. Excluded from the Settlement Class are: (1) the Court, Court employees, and members of their respective families; and (2) persons who properly execute a timely request for exclusion from the Class; and (3) owners, officers, directors, or employees of Defendant or any related entities.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

7. What does the Settlement provide?

Under the Settlement, the Defendant will pay **\$1,300,000.00** into the Settlement Fund, which will be used to pay: (i) Class Members’ claims, for which each Class Member shall be entitled to a *pro rata* share of the Net Settlement Fund, **up to a maximum of \$45.00** for each of Land Air Sea System’s products purchased between January 12, 2018, and January 12, 2022; (ii) a Service Award to the Class Representative in the amount approved by the Court; (iii) total Fee Awards to Class Counsel, including attorney’s fees plus Class Counsel’s reasonable expenses and costs, to the extent approved by the Court; (iv) all Administrative Fees, including Class Notice and settlement administration costs; and (v) any other payments, costs or expenses that arise directly in connection with this Settlement.

Please visit www.GPStrackersettlement.com for complete information about the Settlement benefits.

8. Which products are included in the Settlement?

All Land Air Sea System’s products purchased in the United States, from either Defendant’s website or from Amazon, between January 12, 2018, and January 12, 2022, are included in the Settlement.

HOW TO GET BENEFITS—SUBMITTING A CLAIM FORM

9. How do I submit a Claim Form in this Settlement?

Submitting a Claim Form is the only way to be eligible to receive payment under the Settlement.

You can submit a Claim Form and provide supporting documentation online at www.GPStrackersettlement.com. The deadline to submit a Claim Form is **March 4, 2026**.

You can also mail your completed Claim Form to the Claims Administrator at: Land Air Sea Systems Settlement, Attn: Claim Forms, 1650 Arch Street, Suite 2210, Philadelphia, PA, 19103.

If you are submitting your Claim Form by mail, it must be sent to the address above and postmarked no later than **March 4, 2026**.

10. How do I obtain a Claim Form?

You can obtain a Claim Form in any of the following ways:

1. Download or print the Claim Form available at www.GPStrackersettlement.com;
2. Call the Claims Administrator and request that a Claim Form be mailed to you;
3. Write to the Claims Administrator to request a Claim Form; or
4. Email the Claims Administrator to request a Claim Form.

Toll-Free: 1-855-450-4455

Mail: Land Air Sea Systems Settlement, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103

Email: info@GPStrackersettlement.com

11. How will claims be decided?

The Claims Administrator will decide whether the information provided on the Claim Form is complete and valid. The Claims Administrator may require additional information from any claimant. If the Claims Administrator requires additional information from you and you do not provide it in a timely manner, your claim may be denied, and you will not receive a payment.

12. When will I get my payment?

The Court will hold a Final Fairness Hearing at 12 p.m. EST on March 18, 2026 to decide whether to approve the Settlement. Even if the Court approves the Settlement, there may be appeals, and resolving them may take additional time. It also takes time for all the Claim Forms to be processed, depending on the number of claims submitted and whether any appeals are filed. Please be patient. If you have further questions regarding payment timing, you may contact the Claims Administrator by emailing info@GPStrackersettlement.com.

REMAINING IN THE SETTLEMENT

13. Do I need to do anything to remain in the Settlement?

You do not have to do anything to remain in the Settlement, but if you want to receive a payment from the Settlement you must submit a Claim Form online or by mail postmarked by **March 4, 2026**.

If you do nothing, you will **not** receive a Settlement Payment and you will also give up certain legal rights.

14. What am I giving up as part of the Settlement?

If the Settlement becomes final, you will give up your right to sue the Defendant for the claims being resolved by this Settlement. The specific claims you are giving up against the Defendant and the claims you are releasing are described in the Settlement Agreement, available at: www.GPStrackersettlement.com.

The Settlement Agreement describes the Released Claims with specific descriptions, so read it carefully. If you have any questions about what claims you are giving up and which parties you are releasing, you can talk to the law firms listed in **Question 18** for free or you can, of course, talk to your own lawyer at your own expense.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want any benefits from this Settlement, and you want to keep the right to sue the Defendant about the legal issues resolved by this Settlement, then you must take steps to get out of the Settlement Class. This is called excluding yourself from – or is sometimes referred to as “opting out” of – the Settlement Class.

15. If I exclude myself, can I still get payment from the Settlement?

No. If you exclude yourself from the Settlement, you will not be eligible to receive a payment, but you will not be bound by any judgment in this case.

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

No. Unless you exclude yourself from the Settlement, you give up any right to sue the Defendant for the claims that this Settlement resolves. You must exclude yourself from the Settlement Class to start your own lawsuit or to be part of any different lawsuit relating to the claims in this case.

17. How do I get out of the Settlement?

Any Class Member who wishes to exclude themselves from the Settlement must submit a written request to opt-out to the Claims Administrator by mail at: **Land Air Sea Systems Settlement, Attn: Exclusions, P.O. Box 58220, Philadelphia, PA 19102**, or must be submitted online at www.GPStrackersettlement.com.

Opt-Out requests submitted by mail must be postmarked no later than **March 4, 2026**. Opt-out requests submitted online must be submitted on or before **March 4, 2026**.

Written requests to opt-out of the Settlement must:

- i. Include the full name, current address, email address, and phone number of the person seeking exclusion from the Settlement;
- ii. Include the name and number of this case: *Pinter v. Land Air Sea Systems, Inc.*, No. 1:22-cv-00185-WFK-MMH;
- iii. Be personally signed by the person seeking exclusion;
- iv. Include a statement clearly indicating the person’s intent to be excluded from the Settlement;

“Mass” or “class” exclusion requests seeking exclusion on behalf of more than one person are **not** permitted.

THE LAWYERS REPRESENTING YOU

18. Do I have a lawyer in this case?

Yes. The Court appointed the following attorneys as “Class Counsel” to represent the Settlement Class:

Class Counsel

Todd S. Garber
Bradley F. Silverman
Finkelstein, Blankinship, Frei-Pearson & Garber, LLP
1 North Broadway, Suite 900
White Plains, New York 10601

You will not be charged for contacting Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

19. How will Class Counsel be paid?

Class Counsel may apply to the Court for an award of attorneys' fees and expenses up to 30% of the Settlement Fund, plus reasonable litigation costs and expenses incurred by Class Counsel in this case, which must be approved by the Court. Class Counsel may also apply to the Court on behalf of Plaintiff Mark Pinter for an order granting a Service Award in amount of \$5,000, for his efforts on behalf of the Class.

OBJECTING TO THE SETTLEMENT

20. How do I tell the Court that I do not like the Settlement?

To object to the Settlement Agreement or any terms of it, the person or entity making the objection must be a member of the Settlement Class, must not have requested to be excluded from the Settlement, and must timely mail a copy of that objection with the requisite postmark to Class Counsel and Defendant's Counsel no later than **March 4, 2026**.

The notice of objection must state:

- i. the case name and number;
- ii. the basis for, and an explanation of the objection;
- iii. the name, address, telephone number, and email address of the Class Member making the objection; and
- iv. a statement of whether the Class Member intends to appear at the Final Fairness Hearing with or without counsel.
- v. In addition, any objection must be personally signed by the Class Member.

Class Members who fail to file and serve timely and proper written objections shall be deemed to have waived any objections and shall be foreclosed from making any objection (whether by appeal or otherwise) to the Settlement Agreement. The Parties may file a response to any objections no later than seven (7) calendar days before the Final Fairness Hearing.

Class Counsel	Defendant's Counsel
Todd S. Garber Bradley F. Silverman Finkelstein, Blankinship, Frei-Pearson & Garber, LLP 1 North Broadway, Suite 900 White Plains, New York 10601	Diego Pérez Ara Kathryn M. Decker León Cosgrove Jiménez, LLP One World Trade Center 85th Floor, Suite 12 New York, New York 10007

Any Settlement Class Member who fails to object to the Settlement in the manner described herein and pursuant to the Settlement Agreement shall be deemed to have waived any such objection, shall not be permitted to object to any terms of or approval of the Settlement at the Final Fairness Hearing, and shall be precluded from seeking any review of the Settlement or the terms of this Settlement Agreement by appeal or any other means.

21. What is the difference between objecting to and excluding myself from the Settlement?

Objecting is telling the Court that you do not like something about the Settlement. Excluding yourself is telling the Court that you do not want to be part of the Class in this Settlement. If you exclude yourself from the Settlement, you have no basis to object or submit a Claim Form because the Settlement no longer affects you.

THE COURT'S FINAL FAIRNESS 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. You cannot speak at the hearing if you exclude yourself from the Settlement.

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

The Court will hold a Final Approval Hearing at 12 p.m. EST, on March 18, 2026, in Courtroom 6H N located at 225 Cadman Plaza East, Brooklyn, New York 11201. At the hearing, the Court will consider whether the proposed Settlement is fair, reasonable, and adequate. The Court may also consider the award of attorneys' fees and expenses and any service award for the Plaintiff.

The Court will take into consideration any timely sent written objections and may also listen to anyone who has requested to speak at the hearing (*Refer to Question 20*).

23. Do I have to come to the Final Fairness Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend the hearing at your own expense. If you file an objection, you do not have to come to Court to talk about it. You may also hire your own lawyer to attend, at your own expense, but you are not required to do so.

24. May I speak at the Final Fairness Hearing?

Yes, you may ask the Court for permission to speak at the Final Fairness Hearing. To do so, you must follow the instructions provided in **Question 20** above. You cannot speak at the hearing if you exclude yourself from the Settlement.

IF YOU DO NOTHING

25. What happens if I do nothing?

If you do nothing, you will not receive any payment from the Settlement. If the Court approves the Settlement, and you do nothing, you will be bound by the Settlement Agreement. This means you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Defendant or Released Parties about the issues involved in this lawsuit, resolved by this Settlement, and released by the Settlement Agreement.

GETTING MORE INFORMATION

26. Are more details about the Settlement available?

Yes. This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement, which is available at www.GPStrackersettlement.com.

27. How do I get more information?

For more information, please visit www.GPStrackersettlement.com or call toll-free 1-855-450-4455. You can also contact the Claims Administrator by mail: Land Air Sea Systems Settlement, 1650 Arch Street,

Suite 2210, Philadelphia, PA 19103, or by email: info@GPStrackersettlement.com.

Please do not call the Court or the Clerk of the Court for additional information.