

Electronically Received 07/02/2026 02:10 PM

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Simon Franzini (Cal. Bar No. 287631)
simon@dovel.com
Martin Brenner (Cal. Bar No. 333540)
martin@dovel.com
DOVEL & LUNER, LLP
201 Santa Monica Blvd., Suite 600
Santa Monica, California 90401
Telephone: (310) 656-7066
Facsimile: +1 (310) 656-7069

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

ANDREA VELAZQUEZ, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

FESTIVAL FUN PARKS, LLC,

Defendant.

Case No. 24STCV20667

~~PROPOSED~~ ORDER GRANTING
PLAINTIFF'S UNOPPOSED MOTION
FOR CONDITIONAL CLASS
CERTIFICATION AND PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT
*[Case assigned for all purposes to Hon. Elihu
M. Berle Dept. SS6]*

FILED
Superior Court of California
County of Los Angeles
07/06/2026
David W. Slayton, Executive Officer / Clerk of Court
By: B. Cumplido Deputy

1 The Court, having considered Plaintiff's Unopposed Motion for Conditional Class
2 Certification and Preliminary Approval of Class Action Settlement and all supplements thereto
3 (collectively, the "Motion") and the Settlement Agreement dated May 13, 2026 (the "Settlement
4 Agreement") filed with the supplemental brief, rules as follows:

5 1. Defined terms in this Order shall have the same meaning given to such terms in
6 the Settlement Agreement.

7 2. **Conditional Settlement Class**: This Court finds on a preliminary basis that the
8 class as defined in the Settlement Agreement ("Settlement Class") meets all requirements for
9 certification of a settlement class under Section 382 of the Code of Civil Procedure, Rule 3.769
10 of the California Rules of Court, and applicable case law. Accordingly, the Court provisionally
11 certifies the Settlement Class, which is defined as "all persons residing in the United States who
12 purchased admission tickets from www.ragingwaters.com between June 1, 2020, and June 22,
13 2026, and paid a 'Processing Fee.'"

14 3. The certification of a preliminary Settlement Class under this Order is for
15 settlement purposes only. Certification shall not constitute, nor be construed as, an admission by
16 Defendant that any other proposed or certified class action is appropriate for class treatment.

17 4. The Court provisionally finds that the members of the Settlement Class are
18 ascertainable, that the members of the Settlement Class are so numerous that joinder of all
19 members would be impracticable, that there are multiple issues of law and fact common to the
20 claims of the Settlement Class Members and that these common issues predominate over any
21 issues affecting only individual members of the Settlement Class, that the claims of the named
22 Plaintiff are typical of the claims of the Settlement Class, that in prosecuting this action and
23 negotiating and entering into the Settlement Agreement, the named Plaintiff and her counsel
24 have fairly and adequately protected the interests of the Settlement Class and will adequately
25 represent the Settlement Class in connection with the Settlement, and that a class action is
26 superior to other methods available for adjudicating the controversy.

27 5. **Fair, Reasonable, and Adequate**: The Court has reviewed the Settlement
28 Agreement and finds that the settlement memorialized therein falls within the range of

1 reasonably and potential final approval, thereby meeting the requirements for preliminary
2 approval. The Court finds that the Settlement resulted from arm's-length negotiations between
3 the Parties and their well-informed and experienced counsel. These negotiations were assisted by
4 an experienced and neutral mediator, Mr. Bruce Friedman of JAMS. The Settlement itself
5 provides direct relief to Settlement Class Members in the form of a non-reversionary cash
6 common fund, which will be used to pay valid and timely Claims submitted by Settlement Class
7 Members, attorneys' fees, litigation costs, an incentive award, and settlement notice and
8 administration costs. In short, the Settlement appears fair, reasonable, adequate, and within the
9 range of possible final approval, and thus, notice to members of the Settlement Class should
10 issue as directed below.

11 6. **Class Counsel and Class Representative:** The Court provisionally appoints
12 Andrea Velazquez as the representative of the Settlement Class ("Class Representative"). And,
13 for purposes of settlement, the Court provisionally finds that counsel for the Settlement Class—
14 Simon Franzini, Martin Brenner, and Grace Bennett of Dovel & Luner LLP—are qualified,
15 experienced, and skilled attorneys capable of adequately representing the Settlement Class, and
16 they are provisionally approved as Class Counsel.

17 7. **Settlement Administrator:** The Court appoints the Angeion Group as the
18 Settlement and Claims Administrator under the terms of the Settlement Agreement. The
19 Settlement Administrator is directed to disseminate notice in the manner described in the
20 Settlement Agreement.

21 8. **Class Notice:** The Court has reviewed and approves the form and content of the
22 notices attached to this Order as Exhibit A-1, Exhibit A-2, Exhibit A-3, Exhibit B, and Exhibit C.
23 The Court finds that the notice prescribed in the Settlement Agreement meets the requirements of
24 Rule 3.769(f) of the California Rules of Court and due process, is the best notice practicable
25 under the circumstances, constitutes due and sufficient notice to all persons entitled thereto, and
26 complies with the requirements of the California Constitution, the Constitution of the United
27 States, and all other applicable laws. The Settlement Administrator shall carry out the notice plan
28 as laid out in the Settlement.

1 9. **Claims Process, Objections, and Requests for Exclusion:** The Court has
2 reviewed and approves the content of the proposed Claim Form, attached to this Order as Exhibit
3 D. The Court also approves the claims procedures set forth in the Settlement. The Court also
4 hereby approves and adopts the procedures, deadlines, and manner governing all requests to be
5 excluded from the Settlement Class, and for objecting to the Settlement Agreement, as provided
6 for in the Settlement Agreement.

7 10. **Schedule for Settlement Administration:** The Court hereby sets the following
8 dates and deadlines:

- 9 a. Defendant shall provide to the Settlement Administrator the Class data necessary
10 to give Notice no later than July 13, 2026.
- 11 b. The Notice Date, or the deadline for sending the Notice to Settlement Class
12 Members, as required under the terms of the Settlement Agreement, shall be July
13 27, 2026.
- 14 c. The deadline for Settlement Class Members to opt out of or object to the
15 Settlement Agreement shall be September 28, 2026.
- 16 d. Per the Settlement Agreement, the deadline for Settlement Class Members to file
17 a Claim for cash relief shall be 120 days after the Notice Date, which falls on
18 November 24, 2026.
- 19 e. The Motion for Final Approval, including evidence in support of Class Counsel's
20 requested attorneys' fees and costs, and Plaintiff's requested incentive award,
21 shall be filed no later than August 28, 2026.
- 22 f. No later than October 26, 2026, Class Counsel shall provide the Court with any
23 responses to any written objections made by Settlement Class Members.
- 24 g. No later than October 26, 2026, the Settlement Administrator shall provide the
25 Court with a declaration explaining the outcome of Notice.
- 26 h. The Final Approval Hearing date shall be on November 9, 2026 at 9:00 a.m. in
27 Department 6 of this Court.

1 11. **Final Approval Hearing:** At the Final Approval Hearing, the Court shall
2 consider whether to grant final approval to the Settlement, consider any application by Class
3 Counsel for attorneys' fees and reimbursement of expenses, and consider any request for an
4 incentive award to the named Plaintiff. The Court may postpone, adjourn, or continue the
5 Hearing without further notice to the Settlement Class.

6 12. **Stay of Proceedings:** All proceedings in this action are stayed pending Final
7 Approval of the Settlement, except as may be necessary to effectuate the Settlement or comply
8 with its terms.

9 13. **Other Provisions:** Pending Final Approval of the Settlement, all Settlement Class
10 Members are prohibited from commencing any action or other proceeding against Defendant (or
11 any released party) that asserts the same claims regarding Defendant's pricing and fee
12 disclosures as asserted in this action. If for any reason the settlement is not approved or
13 consummated for any reason whatsoever, the Settlement Agreement and all proceedings in
14 connection therewith shall terminate without prejudice to the status quo ante and rights of the
15 Parties to the action as they existed prior to the date of the execution of the Settlement
16 Agreement, unless otherwise provided in the Settlement Agreement.

17 14. **Continued Jurisdiction:** The Court exerts exclusive and continuing jurisdiction
18 over the claims and issues in this litigation and specifically over all aspects related to the
19 proposed Settlement.

20
21 Good cause appearing therefore, IT IS SO ORDERED.



Elihu M. Berle

22
23 DATED: July 6 , 2026

Elihu M. Berle / Judge

Honorable Elihu M. Berle
Judge of the Superior Court
For the County of Los Angeles

EXHIBIT A-1

TO: «Settlement Class Member Email Address»
FROM: Raging Waters Settlement Administrator
RE: LEGAL NOTICE OF CLASS ACTION SETTLEMENT – *Velazquez v. Festival Fun Parks, LLC*

«FIRST NAME» «LAST NAME»
Notice ID: «Notice ID»
Confirmation Code: «Confirmation Code»

**TO ALL PERSONS RESIDING IN THE UNITED STATES WHO PURCHASED ADMISSION
TICKETS FROM WWW.RAGINGWATERS.COM BETWEEN JUNE 1, 2020, AND JUNE 22, 2026, AND
PAID A “PROCESSING FEE.”**

Para obtener información en español, visite www.RagingWatersSettlement.com.

**Read This Notice Carefully. You Could Receive Compensation From This Class Action Settlement.
This Court-Authorized Notice describes your rights and gives information about the proposed settlement.
This notice is only a summary. Details of the settlement are available at www.RagingWatersSettlement.com
or by writing to or calling the Class Action Settlement Administrator at the address or toll-free number
below.**

What Is This Case About?

In the lawsuit entitled *Velazquez v. Festival Fun Parks, LLC*, Case No. 24STCV20667 filed in the Superior Court of the State of California County of Los Angeles, plaintiff Andrea Velazquez (“Plaintiff” or “Class Representative”), on behalf of herself and a proposed class, alleges that Defendant unlawfully used “drip pricing” by failing to adequately disclose a mandatory processing fee that was added near the end of the checkout process when purchasing admissions tickets from www.ragingwaters.com. Defendant denies that it has done anything wrong and believes its disclosures were accurate and lawful. The lawsuit seeks money damages, as well as attorneys’ fees and costs. The Court has not ruled on the merits of the claims or Defendant’s defenses.

Who Is A Settlement Class Member?

The Settlement includes all persons residing in the United States who purchased admission tickets from www.ragingwaters.com between June 1, 2020, and June 22, 2026, and paid a “Processing Fee” (“Settlement Class Members”). Excluded from the Settlement Class are all persons who validly opt out of the settlement in a timely manner; governmental entities; counsel of record (and their respective law firms) for the Parties; Defendant and any of its parents, affiliates, subsidiaries, independent service providers and all of their respective officers and directors; the presiding judge in the Action or judicial officer presiding over the matter, and all of their immediate families and judicial staff; and any natural person or entity that entered into a release with Defendant prior to the Effective Date arising from the disclosure of the processing fees underlying the claims in the operative complaint in the Action. You are receiving this notice because Festival Fun Parks’s records indicate that you were charged a processing fee when purchasing admissions tickets on www.ragingwaters.com during the class period. You are therefore likely a Settlement Class Member eligible to receive relief under this class action Settlement.

What Are The Terms Of The Settlement?

Under the Settlement, Festival Fun Parks has agreed to pay \$850,000 into a Settlement Fund to pay: (a) cash Settlement Payments to Settlement Class Members who submit valid claims; (b) reimbursement of litigation costs

to Class Counsel (subject to Court approval and estimated to be \$13,965.86); (c) settlement notice and administration expenses (subject to Court approval and estimated to be \$67,000); (d) attorneys' fees (subject to Court approval and estimated to be \$283,333.33); and (e) a Class Representative service award (subject to Court approval and estimated to be \$2,500). Settlement Class Members who wish to receive a Settlement Payment through the Settlement must submit a Claim Form **no later than November 24, 2026**. The amount of the Settlement Payment will depend on the proportion of the total processing fees paid by each claimant, the number of eligible claimants, and other expenses associated with the Settlement.

More information about the benefits available under the Settlement is available at www.RagingWatersSettlement.com.

How Do I Submit A Claim Form?

To receive a Settlement Payment, you must submit a signed and completed Claim Form online to the Class Action Settlement Administrator by **no later than November 24, 2026**. Claim Forms may also be submitted to the Class Action Settlement Administrator by mail if postmarked **no later than November 24, 2026**. The Claim Form is available at www.RagingWatersSettlement.com.

What Are My Other Options?

If you **Do Nothing**, you will not receive a Settlement Payment, and you will be legally bound by any judgment approving the Settlement. Per the Settlement Agreement, you will release "all claims and causes of action that were alleged in the operative complaint, or which arise from the same facts alleged in the operative complaint in the Action." The operative complaint may be found at www.RagingWatersSettlement.com.

If you do not want to be legally bound by the Settlement, you may opt out of the Settlement by sending a request for exclusion to the Class Action Settlement Administrator **no later than September 28, 2026**. If you exclude yourself from the Settlement, you will not receive a Settlement Payment.

If you stay in the Settlement (i.e., do not exclude yourself from the Settlement), you may object to the Settlement by writing to the Class Action Settlement Administrator explaining why you do not like the Settlement by **no later than September 28, 2026**. You will be bound by the Settlement if your objection is rejected and will still receive a Settlement Benefit. Additional information about opting out of or objecting to the Settlement is available at www.RagingWatersSettlement.com.

Final Approval Hearing

The Court will hold a hearing in this case to consider whether to approve the Settlement on November 9, 2026, at 9:00 a.m. in Department 6 at the Spring Street Courthouse, 312 N. Spring Street, Los Angeles, CA 90012. The date of the Final Approval Hearing may change without further notice to the class. Settlement Class Members should be advised to check the settlement website to confirm that the date has not been changed and whether the hearing may be held virtually.

THIS NOTICE IS ONLY A SUMMARY. MORE INFORMATION ABOUT THE LAWSUIT AND THE PRECISE TERMS AND CONDITIONS OF THE SETTLEMENT IS AVAILABLE AT

WWW.RAGINGWATERSSETTLEMENT.COM, OR BY WRITING OR CALLING THE CLASS ACTION SETTLEMENT ADMINISTRATOR AT VELAZQUEZ V. FESTIVAL FUN PARKS, 1650 ARCH STREET, SUITE 2210, PHILADELPHIA, PA 19103 OR (888) 558-4218 (TOLL-FREE), OR CLASS COUNSEL AT DOVEL & LUNER, LLP, WHOSE CONTACT INFORMATION CAN BE FOUND BELOW.

<u>Dovel & Luner, LLP</u>
Simon Franzini Martin Brenner Grace Bennett DOVEL & LUNER, LLP 201 Santa Monica Blvd., Suite 600 Santa Monica, California 90401 RagingWatersSettlement@dovel.com

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

[Unsubscribe](#)

EXHIBIT A-2

TO: « Settlement Class Member Email Address »
FROM: Raging Waters Settlement Administrator
RE: REMINDER: WILL YOU SUBMIT A CLAIM IN THE RAGING WATERS SETTLEMENT?

«FIRST NAME» «LAST NAME»
Notice ID: «Notice ID»
Confirmation Code: «Confirmation Code»

REMINDER

The Deadline to Submit a Claim Form in the Raging Waters Class Action Settlement is November 24, 2026.

Para obtener información en español, visite www.RagingWatersSettlement.com.

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

You were previously sent notice about the class action settlement in *Velazquez v. Festival Fun Parks, LLC*, Case No. 24STCV20667 (Los Angeles Super. Ct.). You are eligible to submit a Claim Form to receive a cash Settlement Payment. The amount of the Settlement Payment will depend on the proportion of the total processing fees paid by each Eligible Claimant during the Class Period, the number of Eligible Claimants, and other expenses associated with the Settlement.

DO YOU WANT TO RECEIVE A SETTLEMENT PAYMENT?

Click below to submit your Claim Form before the November 24, 2026, deadline.

[CLAIM MY PAYMENT](#)

You can also visit www.RagingWatersSettlement.com to download a Claim Form to submit by mail. The completed Claim Form must be submitted online or mailed, **postmarked by November 24, 2026**.

HOW DO I GET MORE INFORMATION?

For more information, you can visit www.RagingWatersSettlement.com, or contact the Settlement Administrator:

Address:

Velazquez v. Festival Fun Parks
1650 Arch Street, Suite 2210
Philadelphia, PA 19103

Email:

info@ragingwaterssettlement.com

Call Toll-Free:
(888) 558-4218

You may also contact Class Counsel:

Dovel & Luner, LLP

Simon Franzini
Martin Brenner
Grace Bennett
DOVEL & LUNER, LLP
201 Santa Monica Blvd., Suite 600
Santa Monica, California 90401
RagingWatersSettlement@dovel.com

**PLEASE DO NOT CONTACT THE COURT OR THE COURT CLERK'S OFFICE REGARDING THIS
NOTICE.**

[Unsubscribe](#)

EXHIBIT A-3

TO: « Settlement Class Member Email Address »
FROM: Raging Waters Settlement Administrator
RE: FINAL REMINDER: THE DEADLINE TO SUBMIT A CLAIM IN THE RAGING WATERS
SETTLEMENT IS APPROACHING

«FIRST NAME» «LAST NAME»
Notice ID: «Notice ID»
Confirmation Code: «Confirmation Code»

FINAL REMINDER

The Deadline to Submit a Claim Form in the Raging Waters Class Action Settlement is November 24, 2026.

Para obtener información en español, visite www.RagingWatersSettlement.com.

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

You were previously sent notice about the class action settlement in *Velazquez v. Festival Fun Parks, LLC*, Case No. 24STCV20667 (Los Angeles Super. Ct.). The deadline to submit a Claim Form to receive a cash Settlement Payment is coming up on November 24, 2026. The amount of the Settlement Payment will depend on the proportion of the total processing fees paid by each Eligible Claimant, the number of Eligible Claimants, and other expenses associated with the Settlement.

DO YOU WANT TO RECEIVE A SETTLEMENT PAYMENT?

Click below to submit your Claim Form before the November 24, 2026, deadline.

[CLAIM MY PAYMENT](#)

You can also visit www.RagingWatersSettlement.com to download a Claim Form to submit by mail. The completed Claim Form must be submitted online or mailed, **postmarked by November 24, 2026**.

HOW DO I GET MORE INFORMATION?

For more information, you can visit www.RagingWatersSettlement.com, or contact the Settlement Administrator:

Address:

Velazquez v. Festival Fun Parks
1650 Arch Street, Suite 2210
Philadelphia, PA 19103

Email:

info@ragingwaterssettlement.com

Call Toll-Free:

(888) 558-4218

You may also contact Class Counsel:

Dovel & Luner, LLP

Simon Franzini
Martin Brenner
Grace Bennett
DOVEL & LUNER, LLP
201 Santa Monica Blvd., Suite 600
Santa Monica, California 90401
RagingWatersSettlement@dovel.com

**PLEASE DO NOT CONTACT THE COURT OR THE COURT CLERK'S OFFICE REGARDING THIS
NOTICE.**

[Unsubscribe](#)

EXHIBIT B

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

Andrea Velazquez v. Festival Fun Parks, LLC, Case No. 24STCV20667

**TO ALL PERSONS RESIDING IN THE UNITED STATES WHO PURCHASED
ADMISSION TICKETS FROM WWW.RAGINGWATERS.COM, BETWEEN JUNE 1,
2020, AND JUNE 22, 2026, AND PAID A “PROCESSING FEE.”**

Para obtener información en español, visite www.RagingWatersSettlement.com.

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

- The Settlement resolves a lawsuit alleging that Defendant used drip pricing by failing to adequately disclose a mandatory processing fee that was added near the end of the checkout process when purchasing admission tickets from www.ragingwaters.com
- The two sides disagree on whether Plaintiff and the Settlement Class could have prevailed at trial. By entering into the Settlement, Defendant has not conceded the truth or validity of any of the claims against it and denies any liability or wrongdoing
- Defendant has agreed to pay settlement benefits, and other expenses, as described below, to fully resolve and release certain claims of all persons residing in the United States who purchased admission tickets from www.ragingwaters.com between June 1, 2020, and June 22, 2026, and paid a “Processing Fee.”
- Under the Settlement, Settlement Class Members who submit a timely and valid claim are entitled to a cash Settlement Payment.
- Settlement Class Members who wish to receive a Settlement Payment through the Settlement must submit a Claim Form, as instructed below. Settlement Class Members who made more than one purchase during the Class Period only need to submit one Claim Form to receive their Settlement Payment.
- Your legal rights may be affected whether you act, or don’t act. Read this Notice carefully.

Your Legal Rights and Options in This Settlement:	
DO NOTHING	If you do nothing, you will not receive a Settlement Payment, and you will be legally bound by any judgment approving the Settlement. Per the Settlement Agreement, by doing nothing, you release “all claims and causes of action that were alleged in the operative complaint, or which arise from the same facts alleged in the operative complaint in the Action” against Defendant. The operative complaint is available at www.RagingWatersSettlement.com
SUBMIT A CLAIM FORM DEADLINE: November 24, 2026	If you submit a valid Claim Form by November 24, 2026, you will receive a cash Settlement Payment in the form of a check or electronic payment. If you placed more than one order during the Class Period, you need only submit one Claim Form to receive your Settlement Payment. The amount of the Settlement Payment will depend on the proportion of total processing fees paid by each claimant, the number of eligible claimants, and other expenses associated with the Settlement. Per the Settlement Agreement, by submitting a Claim Form, you release “all claims and causes of action that were alleged in the operative complaint, or which arise from the same facts alleged in the operative complaint in the Action” against Defendant. The operative complaint is available at www.RagingWatersSettlement.com .
EXCLUDE YOURSELF FROM THE CASE DEADLINE: SEPTEMBER 28, 2026	This is the only option that allows you to sue Defendant on your own regarding the legal claims in this case, but you will not receive compensation under the Settlement. The deadline for excluding yourself is September 28, 2026.
OBJECT TO THE SETTLEMENT DEADLINE: SEPTEMBER 28, 2026	Write to the Court about why you do not like the Settlement. A Settlement Class Member who objects still remains in the Settlement Class and will receive a Settlement Benefit if they submit a valid and timely Claim Form. The deadline for objecting is September 28, 2026.

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court in charge of this case must still decide whether to approve the Settlement. Settlement Benefits will be issued if the Court approves the Settlement and after appeals are resolved, if any.

BASIC INFORMATION

1. Why was this notice issued?

This notice was issued because a court has conditionally “certified” this case as a class action lawsuit for settlement purposes only and your rights may be affected. If you purchased admission tickets from ragingwaters.com between June 1, 2020, and June 22, 2026, while residing in the United States and paid a processing fee, you may have legal rights and options in this case. This Notice explains all of these issues. The Superior Court of the State of California for the County of Los Angeles is overseeing this class action. The case is known as *Andrea Velazquez v. Festival Fun Parks, LLC*, Case No. 24STCV20667 (the “Action”). The person who sued is called the Plaintiff. The company they sued is called the Defendant.

QUESTIONS? CALL (888) 558-4218 TOLL-FREE OR VISIT WWW.RAGINGWATERSSETTLEMENT.COM

2. Why is this a class action?

In a class action, one or more people, called “Class Representatives” (in this case Andrea Velazquez, the named “Plaintiff”), sue on behalf of all people who have similar claims. Together, these people are called a Class or Class Members. One court resolves the issues for all Class Members, except for those who exclude themselves from the Class. Here, the Court has certified a class action for settlement purposes only (the “Settlement Class”). More information about why this is a class action can be found in the Court’s Preliminary Approval Order, which is available at www.RagingWatersSettlement.com.

3. Why is there a settlement?

The Court did not decide in favor of Plaintiff or Defendant. Plaintiff thinks she would have prevailed at trial. Defendant thinks the Plaintiff would not have won anything from a trial. But there was no trial. Instead, both sides agreed to this Settlement. That way, both sides avoid the risk and cost of a trial, and the Settlement Class Members will receive compensation. The Class Representative and her attorneys think the Settlement is best for all Class Members.

THE CLAIMS IN THE LAWSUIT

4. What is the lawsuit about?

The lawsuit claims that Defendant violated California’s Unfair Competition Law by drip pricing. Plaintiff alleges that Defendant used drip pricing by failing to adequately disclose a mandatory processing fee that was added near the end of the checkout process when purchasing admission tickets on Defendant’s website. The lawsuit also asserts a quasi-contract/unjust enrichment claim based on the same conduct. Defendant denies any liability or wrongdoing. More information can be found in the Class Action Complaint, available at www.RagingWatersSettlement.com.

MEMBERS OF THE SETTLEMENT CLASS

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

The Court has certified this case for settlement purposes only as a class action. The Settlement Class consists of all persons residing in the United States who purchased admission tickets from www.ragingwaters.com between June 1, 2020, and June 22, 2026, and paid a “Processing Fee.”

Excluded from the Settlement Class are all persons who validly opt out of the Settlement in a timely manner; governmental entities; the Parties’ lawyers (and their respective law firms); Defendant and any of its parents, affiliates, subsidiaries, independent service providers and all of their respective employees, officers and directors; the presiding judge in the Action or judicial officer presiding over the matter, and all of their immediate families and judicial staff; and any natural person or entity that entered into a release with Defendant prior to the Court’s final approval of this Settlement arising from the same processing fee allegations on the Defendant’s website, ragingwaters.com, underlying the claims in the operative complaint in the Action.

THE SETTLEMENT BENEFITS

6. What does the Settlement provide?

Under the Settlement, Festival Fun Parks has agreed to pay \$850,000 into a Settlement Fund to pay: (a) cash Settlement Payments to Settlement Class Members who submit valid claims; (b) reimbursement of litigation costs to Class Counsel (subject to Court approval and estimated to be \$13,965.86); (c) settlement notice and administration expenses (subject to Court approval and estimated to be \$67,000); (d) attorneys’ fees (subject to Court approval and estimated to be \$283,333.33); and (e) a Class Representative service

award (subject to Court approval and estimated to be \$2,500). Settlement Class Members may choose to receive their Settlement Payment through an electronic payment or through a mailed check.

7. How much will my payment be?

The amount of the Settlement Payment will depend on the proportion of the total processing fees paid by each Eligible Claimant, the number of Eligible Claimants, and other expenses associated with the Settlement. After any Court-approved reimbursements of litigation costs, settlement notice and administration expenses, attorneys' fees, and Class Representative service awards, the remainder of the Settlement Fund will be distributed to Settlement Class Members who submit a timely and valid claim based on the proportion each Eligible Claimant paid of the total processing fees collected by Defendant from Settlement Class Members during the Class Period.

8. What am I giving up to stay in the Settlement Class?

Unless you exclude yourself from the Settlement, you will be part of the Settlement Class, and you will be bound by the release of claims in the Settlement. This means that, if the Settlement is approved, you cannot sue, continue to sue, or be part of any other lawsuit against Defendant or a related released party asserting a Released Claim. The released claims include "all claims and causes of action that were alleged in the operative complaint, or which arise from the same facts alleged in the operative complaint." The operative Class Action Complaint is available at www.RagingWatersSettlement.com. It also means that all the Court's orders will apply to you and legally bind you. If you sign the Claim Form or do nothing, you will agree to release Defendant from any and all claims under federal and state law that arise from or relate to the allegations concerning Defendant's processing fees at issue in this action.

THE LAWYERS REPRESENTING YOU

9. Do I have a lawyer in this case?

Yes. The Court has appointed Dovel & Luner, LLP as Class Counsel to represent you and the Settlement Class in this case. The lawyers at Dovel & Luner LLP have experience handling similar cases. More information about the lawyers and their law firm is available at <https://www.dovel.com>.

10. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is representing you and all the other members of the Settlement Class. If you want someone other than Class Counsel to speak for you, you may hire your own lawyer at your own expense.

11. How will the lawyers be paid?

Class Counsel may file a request for attorneys' fees they sustained in litigating this case. Class Counsel will request no more than \$283,333.33 attorneys' fees. Class Counsel may also request reimbursement of litigation expenses of \$13,965.86. Class Counsel may also ask the Court to approve an incentive award of up to \$2,500 to the Class Representative for her service as a Class Representative. The Court may award less than the amounts requested.

HOW TO RECEIVE YOUR SETTLEMENT PAYMENT

12. How can I get compensation under the Settlement?

To receive the Settlement Payment, you must submit a valid Claim Form. Settlement Class Members who placed more than one order during the Class Period only need to submit one Claim Form to receive their Settlement Payment. Settlement Class Members who do not submit a valid Claim Form by November 24, 2026, will not receive a Settlement Payment. A Claim Form is available on the internet at

www.RagingWatersSettlement.com. Read the instructions carefully, fill out the form, sign it, and submit it online no later than November 24, 2026. You may also print out a Claim Form and submit it by mail if postmarked by no later than November 24, 2026. If you choose to mail your Claim Form, you must mail it to the Class Action Settlement Administrator at the following address:

Velazquez v. Festival Fun Parks
Attn: Claim Forms
1650 Arch Street, Suite 2210
Philadelphia, PA 19103

To receive a Settlement Payment, each Settlement Class Member must attest under penalty of perjury that they were a United States resident who purchased admission tickets from www.ragingwaters.com between June 1, 2020, and June 22, 2026, and paid a processing fee. Settlement Class Members must also attest under penalty of perjury that the information they supplied in the Claim Form is true and correct to the best of the Settlement Class Member's knowledge. Failure to timely submit a valid Claim Form with all requested information will result in the Settlement Class Member not receiving a Settlement Payment.

13. When would I receive compensation?

The Court will hold a hearing on November 9, 2026, at 9:00 a.m., to decide whether to approve the Settlement. If the Court approves the Settlement, after that, there may be appeals. It is always uncertain whether these appeals can be resolved, and resolving them can take time, perhaps more than a year. Settlement Payments will be distributed after the Settlement is finally approved and all appeals (if any) have been resolved in favor of the Settlement. The progress of the Settlement will be updated through information posted at www.RagingWatersSettlement.com. Please be patient.

EXCLUDING YOURSELF FROM THE SETTLEMENT

14. How do I get out of the Settlement?

If you do not want a Settlement Payment under this Settlement, and you want to keep the right to sue or continue to sue Defendant regarding the alleged processing fees that are the subject of the Action, then you must take steps to get out of the Settlement Class. This is called excluding yourself from, or opting out of, the Settlement Class.

To exclude yourself from the Settlement, you must send a letter by mail to the Class Action Settlement Administrator that (a) states your name, address, and phone number; (b) is personally signed by you, and not your attorney or anyone acting on your behalf; and (c) includes a statement unambiguously requesting to be excluded from the Settlement and identifying the case name and number, such as "I request to be excluded from the class settlement in *Andrea Velazquez v. Festival Fun Parks, LLC*, Case No. 24STCV20667." No request for exclusion will be valid unless all of the information described above is included.

You must mail your exclusion request postmarked no later than September 28, 2026, to the Class Action Settlement Administrator at the following address:

Velazquez v. Festival Fun Parks
Attn: Exclusions
P.O. Box 58220
Philadelphia, PA 19102

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

No. If you do not exclude yourself, you give up any right to sue (or continue to sue) Defendant for the claims that this Settlement resolves.

QUESTIONS? CALL (888) 558-4218 TOLL-FREE OR VISIT WWW.RAGINGWATERSSETTLEMENT.COM

16. If I exclude myself, can I get compensation under this Settlement?

No. If you ask to be excluded, you will not get any compensation under the Settlement, and you cannot object to the Settlement.

OBJECTING TO THE SETTLEMENT

17. How do I tell the Court that I do not agree with the Settlement?

You can ask the Court to deny approval of the Settlement by filing an objection. You can't 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, you must object. A Settlement Class Member who objects still remains in the Settlement Class and must timely submit a Claim Form in order to obtain a Settlement Payment.

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 ("*Andrea Velazquez v. Festival Fun Parks, LLC*, Case No. 24STCV20667"), and (b) be mailed to the Settlement Administrator postmarked on or before September 28, 2026.

Velazquez v. Festival Fun Parks
Attn: Objections
P.O. Box 58220
Philadelphia, PA 19102

Written objections must also contain: (1) your full name, address, and telephone number; (2) a written statement of all grounds for the objection accompanied by any legal support for the objection (if any); (3) copies of any papers, briefs or other documents upon which the objection is based (if any); (4) a list of all persons who will be called to testify in support of the objection (if any); (5) a statement of whether you or your counsel intend to appear at the Final Approval Hearing; (6) proof of membership in the Class or a signed statement attesting under penalty of perjury that you paid a processing fee when purchasing admission tickets from the Raging Waters Website during the Class Period; and (7) your signature and your attorney's signature (if any).

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

Objecting means telling the Court that you do not like something about the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself from the Settlement means that you do not want to be part of the Settlement Class. If you exclude yourself, then you have no basis to object to the Settlement.

A Settlement Class Member who objects still remains in the Settlement Class and is eligible to receive a Settlement Payment.

IF YOU DO NOTHING

19. What happens if I do nothing at all?

If you do nothing, and the Court finally approves the settlement, you will remain a member of the Settlement Class and you will give up your right to sue Defendant. You will not receive a Settlement Payment.

THE COURT'S FINAL APPROVAL HEARING

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

The Court will hold a Final Approval Hearing at 9:00 a.m. on November 9, 2026, in Department 6 at the Spring Street Courthouse, 312 N. Spring Street, Los Angeles, CA 90012. At this hearing, the Court will consider whether the Settlement is fair, reasonable and adequate. If there are valid objections that comply with the requirements herein, the Court also will consider them and will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay to Class Counsel and the Class Representative.

The date of the Final Approval Hearing may change without further notice to the Settlement Class. Settlement Class Members should check the Settlement Website to confirm that the date has not been changed and whether the hearing may proceed virtually.

21. Do I have to come to the hearing?

No. Class Counsel will appear on behalf of the Settlement Class. But, you are welcome to come, or have your own lawyer appear, at your own expense.

22. May I speak at the hearing?

You, or any lawyer you retain, may speak at the Final Approval Hearing, if you or the lawyer you retain appears at the hearing and requests an opportunity to speak.

TAX CONSEQUENCES

23. Do I have to pay taxes on money received under this settlement?

None of Defendant, Class Counsel, or the Class Action Settlement Administrator is able provide any advice or guidance regarding the tax consequences of the Settlement as to any Settlement Class Member. Settlement Class Members should consult their own tax advisors regarding the tax consequences of the Settlement and any tax reporting obligations with respect thereto. Each Settlement Class Member is responsible for his/her taxes or tax reporting and other obligations respecting the Settlement, if any.

GETTING MORE INFORMATION

24. Is this the entire Settlement?

No. This notice is only a summary of the proposed Settlement. More information about the lawsuit and the precise terms and conditions of the Settlement is available at www.RagingWatersSettlement.com, or by calling toll-free (888) 558-4218, or by writing to the Class Action Settlement Administrator at Velazquez v. Festival Fun Parks, 1650 Arch Street, Suite 2210, Philadelphia, PA 19102, or by visiting the Court to review the case's docket at Spring Street Courthouse, 312 N. Spring Street, Los Angeles, CA 90012, between 8:30 a.m. and 4:30 p.m., Monday through Friday, excluding court holidays. The Los Angeles Superior Court recommends making an appointment online before visiting a courthouse for copies of documents. You may also contact Class Counsel using the information listed below:

Dovel & Luner, LLP

Simon Franzini
Martin Brenner
Grace Bennett

DOVEL & LUNER, LLP
201 Santa Monica Blvd., Suite 600
Santa Monica, California 90401
RagingWatersSettlement@dovel.com

**Please do not telephone the Court or the Court Clerk's Office to inquire about
this Settlement or the Claims Process.**

EXHIBIT C

COURT ORDERED LEGAL NOTICE

Para obtener información en español, visite

www.RagingWatersSettlement.com.

If you purchased admission tickets from www.ragingwaters.com while residing in the United States between June 1, 2020, and June 22, 2026, and paid a

“Processing Fee,” you may be entitled to a cash payment from a class action settlement.

You must complete and return the enclosed Claim Form by November 24, 2026 to receive a cash payment.

Questions?

Visit www.RagingWatersSettlement.com or call toll-free (888) 558-4218.

Velazquez v. Festival Fun Parks, LLC
1650 Arch Street, Suite 2210
Philadelphia, PA 19102

«Notice ID»

Postal Service: Please do not mark barcode

Notice ID: «Notice ID»
Confirmation Code: «Confirmation Code»

«FULL_NAME»
«CF_CARE_OF_NAME»
«CF_ADDRESS_1»
«CF_ADDRESS_2»
«CF_CITY», «CF_STATE» «CF_ZIP»
«CF_COUNTRY»

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Velazquez v. Festival Fun Parks, LLC, No. 24STCV20667

A class action settlement has been reached in the above referenced lawsuit entitling members of the Settlement Class who make a claim to a cash payment. The amount of the Settlement Payment will depend on the proportion of the total processing fees paid by each claimant, the number of eligible claimants, and other expenses associated with the Settlement. Festival Fun Parks denies that it violated any law and denies any wrongdoing, but has agreed to the settlement to avoid the uncertainties and expenses associated with continuing the case. The Court has not decided the merits of the case. This Notice is a summary of the Settlement. We encourage you to learn more about the settlement, including key terms regarding release claims, at www.RagingWatersSettlement.com

What Is This Case About? The Settlement resolves a lawsuit claiming that Festival Fun Parks used drip pricing and charged a mandatory processing fee that was not disclosed until late in the checkout process.

Who Is A Settlement Class Member? The Settlement includes persons residing in the United States who purchased admission tickets from www.ragingwaters.com between June 1, 2020, and June 22, 2026, and paid a "Processing Fee." Based on Festival Fun Parks's data, you may be a Settlement Class Member. Certain people, including those who opt out of the Settlement or previously released their claims against Defendant, are excluded. Learn more at www.RagingWatersSettlement.com

Settlement Terms. Under the Settlement, Festival Fun Parks has agreed to pay \$850,000 into a Settlement Fund. Settlement Class Members who submit a valid and timely Claim Form are eligible to receive a cash payment from the Settlement Fund after certain Court-approved costs and expenses (including settlement notice and administrative costs, reimbursement of litigation expenses, attorneys' fees, and a Class Representative service award) are deducted. The amount of the cash payment will depend on the number of eligible claimants and the proportion each eligible claimant paid of the total processing fees collected by Defendant from Settlement Class Members during the relevant time period. Learn more at www.RagingWatersSettlement.com

How Do I Submit A Claim Form? You must timely complete and mail the attached Claim Form or complete and submit the Claim Form online at www.RagingWatersSettlement.com. To be considered, Claim Forms must be submitted or postmarked by November 24, 2026.

What Are My Other Options? If you do not want to be legally bound by the Settlement, you must exclude yourself by September 28, 2026. Unless you exclude yourself, you will not be able to sue or continue to sue Festival Fun Parks for any claims that are released as part of the Settlement. If you stay in the Settlement (i.e., don't exclude yourself), you may object to it and speak at the hearing—at your own cost—but you don't have to. Objections are due by September 28, 2026. Learn more about objecting or excluding yourself and the released claims at www.RagingWatersSettlement.com. The Court will hold a hearing at 9:00 a.m. on November 9, 2026, to consider whether to finally approve the Settlement. Class Counsel's request for attorneys' fees and litigation costs, and a Service Award for the Class Representative. More details and the full terms of the proposed Settlement are available at www.RagingWatersSettlement.com

NOTICE ID: «NOTICE ID» «FIRST NAME» «LAST NAME» «ADDRESS»	RAGING WATERS CLAIM FORM	«Barcode»
---	--------------------------	-----------

1. ADDRESS CORRECTION (use the fields below to provide updated address information)

Street: _____

City: _____ State: _____ Zip Code: _____

2. SELECT FROM ONE OF THE FOLLOWING PAYMENT OPTIONS:

☐ PayPal ☐ Venmo ☐ Zelle ☐ Virtual Prepaid Card ☐ Check

Please provide the email address or phone number associated with your PayPal, Venmo, or Zelle account, or an email address for the Virtual Prepaid card: _____

3. **AFFIRMATION (required):** By signing below, I affirm that the information on this Claim form is true, accurate, and complete to the best of my knowledge, information, and belief. I certify that I am a member of the Settlement Class and have not submitted a request to exclude myself from the Settlement. I understand that, upon the Effective Date, I will have waived any Released Claims against the Released Parties, as defined in the Settlement Agreement. I understand that, to be considered, this Claim Form must be submitted online or postmarked by **November 24, 2026**.

Signature: _____ Printed Name: _____ Date: ____/____/____

POSTAGE
PREPAID
MARK

Velazquez v. Festival Fun Parks
Attn: Claim Forms
1650 Arch Street, Suite 2210
Philadelphia, PA 19102

EXHIBIT D

**Your claim form
must be submitted
online or
postmarked by:
November 24, 2026**

**Superior Court of the State of California
for the County of Los Angeles**

Andrea Velazquez v. Festival Fun Parks, LLC
Case No. 24STCV20667

FFP-Claim

Claim Form

**RAGING WATERS SETTLEMENT
CLAIM FORM FOR SETTLEMENT PAYMENT**

INSTRUCTIONS

Para obtener información en español, visite www.RagingWatersSettlement.com

This class action alleges that Defendant violated California state laws by drip pricing and adding a mandatory processing fee near the end of the checkout process. Defendant denies these allegations.

The Settlement Class includes all persons residing in the United States who purchased admission tickets from www.ragingwaters.com between June 1, 2020, and June 22, 2026, and paid a “Processing Fee.”

If you wish to receive a Settlement Payment you must submit a valid Claim no later than November 24, 2026. If you placed more than one order during the Class Period, you need only submit one Claim Form to receive your Settlement Payment.

Settlement Payments will be mailed to you by check or sent through digital payment. Please ensure you provide a current, valid mailing address, email address, and mobile phone number with your Claim submission. If the mailing address, email address, or mobile phone number you include with your submission becomes invalid for any reason, it is your responsibility to provide accurate updated contact information to the Settlement Administrator to receive a payment.

The information provided on this Claim Form will be used solely by the Court-approved Settlement Administrator for the purposes of administering the Settlement and will not be provided to any third party or sold for marketing purposes.

SUBMITTING YOUR CLAIM FORM

Claim Forms may be submitted online at **www.RagingWatersSettlement.com** by **November 24, 2026**, or completed and mailed **postmarked no later than November 24, 2026** to:

Velazquez v. Festival Fun Parks
Attn: Claim Forms
1650 Arch Street, Suite 2210
Philadelphia, PA 19103

If you have any questions, please contact the Settlement Administrator by email at info@ragingwaterssettlement.com or by mail at the address listed above.

Your claim form
must be submitted
online or
postmarked by:
November 24, 2026

Superior Court of the State of California
for the County of Los Angeles

Andrea Velazquez v. Festival Fun Parks, LLC
Case No. 24STCV20667

FFP-Claim

Claim Form

I. YOUR CONTACT INFORMATION AND MAILING ADDRESS

First Name

Last Name

Street Address

City

State

Zip Code

Email Address

Phone Number

Notice ID (if you received a Notice)

Please ensure you provide a current, valid mailing address, email address, and mobile phone number with your Claim submission. If the mailing address, email address, or mobile phone number you include with your submission becomes invalid for any reason, it is your responsibility to provide the Settlement Administrator with a current, valid mailing address, email address, and mobile phone number for payment. The current address you provide here does not need to be the same address you used for your purchase(s) from www.ragingwaters.com.

II. PAYMENT SELECTION

Please select **one** of the following payment options:

☐ **Prepaid Mastercard** - Enter an email address to receive the Prepaid Mastercard: _____

☐ **PayPal** - Enter your PayPal email address: _____

☐ **Venmo** - Enter the mobile number associated with your account: ____ - ____ - ____

☐ **Zelle** - Enter the email address or mobile number associated with your account: _____

☐ **Physical Check** - Payment will be mailed to the address provided above.

III. CERTIFICATION

By signing this Claim submission, I certify, under penalty of perjury under the laws of the United States, that the information included with this Claim submission is true, accurate, and complete to the best of my knowledge, information, and belief. If I am submitting this Claim submission on behalf of a Claimant, I certify that I am authorized to submit this Claim submission on the individual's behalf. I am, or the individual on whose behalf I am submitting this Claim submission is, a member of the Settlement Class, and have not submitted a request to exclude myself, or "opt out of," the Settlement. I agree to furnish additional information regarding this Claim if so requested to do so by the Settlement Administrator. **By signing below, I agree and consent to be communicated with electronically via email and/or mobile phone text about the settlement (message & data rates may apply).**

Signature: _____ Printed Name: _____ Date: ____ / ____ / ____