

**SUPERIOR COURT OF NEW JERSEY
CAMDEN DIVISION**

IF YOU WERE A MEMBER OF AAA SOUTH JERSEY, INC. SINCE JANUARY 31, 2015 AND RENEWED YOUR MEMBERSHIP AT SOME POINT DURING THE NINETY (90) DAYS FOLLOWING THE STATED EXPIRATION OF YOUR ANNUAL MEMBERSHIP

**YOU MAY BE ENTITLED TO A CASH PAYMENT
OR FREE EXTENSION OF CURRENT MEMBERSHIP TERM**

THIS NOTICE AFFECTS YOUR RIGHTS.

*A New Jersey State Court authorized this notice.
This is not a solicitation from a lawyer*

PLEASE READ THIS NOTICE AND THE CLAIM FORM CAREFULLY

- A proposed statewide settlement has been reached in a class action lawsuit involving membership renewal terms for certain members of AAA South Jersey, Inc. (“AAA”). You may be a class member in the proposed settlement and may be entitled to participate in the proposed settlement.
- The Superior Court of New Jersey, Camden County, Law Division (the “Court”) has ordered the issuance of this notice in the lawsuit entitled *Wilson v. AAA South Jersey, Inc.*, CAM-L-004502-17. AAA denies it did anything wrong and has defended itself throughout the lawsuit. The Court has not decided who is right. Both sides have agreed to settle the dispute to avoid burdensome and costly litigation.
- You may be a class member in the proposed settlement and may be entitled to participate in the proposed settlement, if it is finally approved, if you purchased a membership renewal between January 31, 2015 and May 10, 2019. If you are a current member, you may be eligible to obtain either \$11 or a free 2-month extension of your current membership and, if you are a former member, you may be eligible to obtain \$11, if you qualify and submit a valid Claim Form.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM	This is the only way to get a relief. Postmark or submit your Claim Form by September 9, 2019.
EXCLUDE YOURSELF	Get no settlement benefits. Remove yourself from both the settlement and the lawsuit. Postmark your exclusion request by July 20, 2019.
OBJECT	Write to the Court about why you don’t like the settlement. File and serve your objection by July 20, 2019.
GO TO A HEARING	Ask to speak in Court about the fairness of the settlement.
DO NOTHING	Get no cash payment or membership extension. Give up your rights.

- Your rights and options — and the deadlines to exercise them — are explained in this notice.
- The Court in charge of this litigation still has to decide whether to approve the settlement of this case. Payment will be made if the Court approves the settlement and after any appeals are resolved. Please be patient.

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BASIC INFORMATION

1. Why is there a Notice?

A Court authorized this notice because you have a right to know about the proposed Settlement of a class action lawsuit known as *Wilson v. AAA South Jersey, Inc.*, CAM-L-004502-17 pending in the Superior Court of New Jersey and about all of your options before the Court decides whether to give final approval to the Settlement. This notice explains the lawsuit, the Settlement, and your legal rights.

Judge Sherri L. Schweitzer of the Superior Court of New Jersey, Camden County, Law Division, is overseeing this case. The people who sued are called the “Plaintiffs.” AAA South Jersey, Inc. is the “Defendant.”

2. What is this Lawsuit About?

A proposed settlement has been reached in a class action lawsuit about the payment for the membership annual term. The Plaintiff in the lawsuit claims that AAA did not disclose its practice of backdating its annual membership period to the date a member’s previous term period expires, rather than the date the member renews his or her membership.

AAA has filed its answer denying the claims of Plaintiff, and strongly denies all of Plaintiff’s claims, denies all allegations of wrongdoing, fault, liability or damage of any kind to Plaintiff or the Settlement Class, denies that it acted improperly or wrongfully in any way, and is entering into this settlement to avoid burdensome and costly litigation. The settlement is not an admission of wrongdoing.

The Plaintiff’s Complaint, the Joint Stipulation of Settlement (“Settlement Agreement”), and other case-related documents are posted on the website, www.aaasouthjerseysettlement.com. The Settlement resolves the lawsuit. The Court has not decided who is right.

3. Who is included in the Settlement Class?

You are a member of the Class if you were a member of AAA South Jersey and renewed your membership at some point during the ninety (90) days following the stated expiration of your prior annual membership, as set forth on the membership card and/or membership documents from January 31, 2015 through May 10, 2019.

The following persons are excluded from the Settlement Class: (i) those with claims for any personal injuries or property damage that arose from the use of the memberships; (ii) Defendant and its officers, directors and employees; (iii) any Settlement Class Member who files a valid and timely Request for Exclusion; and (iv) the Judge(s) to whom the Action is assigned and any members of his/her/their immediate families.

SETTLEMENT BENEFITS – WHAT YOU MAY GET

4. Cash from the claims process.

AAA will pay Class Members’ claims, administrative costs, attorneys’ fees and expenses and a service award for the named Plaintiff. You may obtain a cash payment of \$11.00 per membership or a free 2-month extension of your membership if you are a current member. Former members are eligible for a cash payment of \$11.00.

5. What else does the settlement provide?

As part of the consideration for the Settlement Agreement, AAA has agreed to modify its current contracts and advertising to include language to clearly set forth its policy regarding the timing of the start date for an annual membership that is renewed during the ninety (90) days following the completion of the prior one (1) year term, and disclosing that AAA will date the renewal of the annual membership period to commence on the date a member’s previous term period expired, rather than the date the member renews his or her membership.

HOW YOU GET A CASH PAYMENT – SUBMITTING A CLAIM FORM

6. How can I get a payment or membership extension?

You must return a Claim Form to get a cash payment or membership extension. Claim Forms may be filed online at www.aaasouthjerseysettlement.com or you may request a Claim Form by calling 1-866-274-4004.

7. How do I send in a claim?

The Claim Form is simple and easy to complete.

The Claim Form requires that you provide:

1. Your mailing address and contact information;
2. Your membership number;
3. A check in the box indicating the relief you choose;
4. Your signature affirming that the information provided is true and correct.

Please return a Claim Form if you think that you have a claim. Returning a Claim Form is the only way to receive a cash payment from this settlement. No claimant may submit more than one Claim Form, and two or more claimants may not submit Claim Forms for the same membership.

The Settlement Administrator may request additional information if the Claim Form is insufficient to process your claim. Failure to provide any requested documentation may result in the denial of your claim and may limit the type of remedy you receive.

8. When is the Claim Form due?

If you mail your Claim Form, it must be postmarked no later than September 9, 2019 to the Settlement Administrator: *Wilson v. AAA South Jersey, Inc.*, c/o Strategic Claims Services, 600 N. Jackson Street, Suite 205, Media, PA 19063.

If you submit your Claim Form on the settlement website at www.aaasouthjerseysettlement.com, it must be submitted no later than September 9, 2019.

9. Who decides my claim?

The Claim Forms will be reviewed by an independent Settlement Administrator according to criteria agreed to by the parties. The Settlement Administrator may contact you or other persons listed in your Claim Form if it needs additional information or otherwise wants to verify information in your Claim Form. The decision of the Settlement Administrator is a final decision.

10. When would I get my payment?

The Court will hold a Final Fairness Hearing at 1:30 p.m. on August 19, 2019 in Camden, New Jersey 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. Please be patient. If there are no appeals or other delays, you should be sent your cash payment within 75 days after the Claim Form submission deadline.

11. What happens if I do nothing at all?

You must timely return a valid Claim Form to receive a cash payment or membership extension. If you do nothing, you will get no money or other benefit from the settlement. But, unless you exclude yourself, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against AAA about the

legal issues in this case.

EXCLUDING YOURSELF FROM THE SETTLEMENT

12. How do I get out of the settlement?

If you do not wish to be included in the Class and receive settlement benefits, you must send a letter stating that you want to be excluded from this lawsuit. Be sure to include your name, address, email address, telephone number, and your signature. You must mail your exclusion request to:

Wilson v. AAA South Jersey, Inc.
c/o Strategic Claims Services
600 N. Jackson Street, Suite 205
Media, PA 19063

It must be post-marked no later than July 20, 2019. If you asked to be excluded, you will not get any settlement payment, and you cannot object to the settlement. You will not be legally bound by anything that happens in this lawsuit. You may be able to sue (or continue to sue) AAA in the future.

If you have a pending lawsuit against AAA, speak to your lawyer immediately. You may need to exclude yourself from this lawsuit in order to continue your own lawsuit. Remember, the exclusion date is July 20, 2019.

THE LAWYERS REPRESENTING YOU

13. Do I have lawyers in this case?

The Court appointed the law firm of Shepherd, Finkelman, Miller & Shah, LLP to represent you and other class members. These lawyers are called Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How will the lawyers be paid?

Class Counsel will ask the Court to award them attorneys' fees and expenses of \$75,000.

The named plaintiff will also ask the Court to award him an amount not to exceed \$2,000 for his time and effort acting as Plaintiff and for his willingness to bring this litigation and act on behalf of consumers. These amounts, if approved by the Court, will not diminish the benefits available to Class Members in any way.

The costs to administer the settlement, to review Claim Forms, and notify Class Members about this settlement will be paid separately by AAA and will not diminish the benefits available to Class Members in any way.

OBJECTING TO THE SETTLEMENT

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

If you are a Class Member, you can object to the settlement if you do not like any part of it and the Court will consider your views. To object, you must file an objection with the Court saying that you object to the settlement in *Wilson v. AAA South Jersey, Inc.*, CAM-L-004502-17. The written objection must include: (a) a heading which refers to the Action; (b) your name, address, telephone number and, if represented by counsel, your counsel's information; (c) a statement that you had a membership renewed during the period of time described in this notice; (d) a statement whether you intend to appear at the Final Approval Hearing, either in person or through counsel; (e) a statement of the objection and the grounds supporting the objection; (f) copies of any papers, briefs, or other documents upon which the objection is based; (g) the name and case number of all

objections to class action settlements made by you and/or your counsel in the past five (5) years; and (h) your signature. This objection must be filed with the Court and served on Class Counsel and AAA's Counsel no later than July 20, 2019. Send your objection to:

Clerk of the Court Superior Court of New Jersey Camden County Law Division 101 South 5th Street Camden, NJ 08103	James C. Shah Shepherd, Finkelman, Miller & Shah, LLP 475 White Horse Pike Collingswood, NJ 08107	Sean X. Kelly Marks, O'Neill, O'Brien, Doherty & Kelly, P.C. Cherry Tree Corporate Center 535 Route 38 East, Suite 501 Cherry Hill, NJ 08002
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16. What is the difference between objecting and excluding?

Objecting is telling the Court that you do not like something about the settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you do not want to be part of the Class or the lawsuit. You cannot request exclusion **and** object to the settlement. If you exclude yourself, you have no basis to object because the case no longer affects you.

RELEASE OF CLASS MEMBERS' CLAIMS AND DISMISSAL OF LAWSUIT

17. In return for these benefits, what am I giving up?

If the Court approves the proposed settlement and you do not request to be excluded from the Class, you must release (give up) all claims that are subject to the Release described and identified in Section IX of the Settlement Agreement, and the case will be dismissed on the merits and with prejudice. **If you remain in the Class, you may not assert any of those claims in any other lawsuit or proceeding. This includes any other lawsuit or proceeding already in progress.**

The Settlement Agreement is available at www.aaasouthjerseysettlement.com. The Settlement Agreement provides more detail regarding the release and describes the released claims with specific descriptions in necessary, accurate legal terminology, so read it carefully. You can talk to the law firm representing the Class listed above in Question 13 for free, or you can, at your own expense, talk to your own lawyer if you have any questions about the released claims or what they mean.

THE FINAL APPROVAL HEARING

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

The Judge will hold a Final Approval Hearing at 1:30 p.m. on August 19, 2019 at the Superior Court of New Jersey, Camden County Law Division, 101 South 5th Street, Camden, NJ 08103 in Courtroom 53. At this hearing, the Judge will consider whether the settlement is fair, reasonable and adequate. If there are objections, the Judge will consider them. The Judge will listen to people who have asked to speak at the hearing. After the hearing, the Judge will decide whether to approve the settlement. We do not know how long this decision will take.

19. Do I have to come to the hearing?

No. Class Counsel will answer questions the Judge may have. But, you are welcome to come at your own expense. If you submit an objection, you do not have to come to the Court to talk about it. As long as you deliver your written objection on time, the Judge will consider it. You may also pay your own lawyer to attend, but it is not necessary.

20. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must file with the Court a "Notice of Intention to Appear in *Wilson v. AAA South Jersey, Inc.*, CAM-L-004502-17. Be sure to include your name, address, telephone number, your signature and a statement that you are a member of the Class (*i.e.*, that you had a membership renewed during the period of time described in this notice). Your Notice of Intention to Appear must be filed no later than July 20, 2019, and be provided to the Clerk of the Court, Class Counsel, and Defense Counsel at the addresses listed in Question 15 above.

GETTING MORE INFORMATION

21. Are there more details about the settlement?

This notice summarizes the proposed settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement by writing to the Settlement Administrator or on the internet at www.aaasouthjerseysettlement.com.

If you have questions about how to complete a Claim Form, you can call the Settlement Administrator at 1-866-274-4004.

PLEASE DO NOT CALL OR WRITE TO THE COURT FOR INFORMATION OR ADVICE.

DATED: MAY 10, 2019

BY ORDER OF THE SUPERIOR COURT OF
NEW JERSEY, CAMDEN COUNTY, LAW
DIVISION