

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

If you were sent one or more letter(s) from Defendant FirstStates Financial Services Corp. from July 19, 2016 through August 18, 2018, you could get a payment from a class action settlement.

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

- A settlement will provide a Settlement Fund of \$400,000 to pay people who were sent a letter from FirstStates Financial Services Corp. between July 19, 2016 and August 18, 2018.
- The settlement resolves a lawsuit over whether FirstStates Financial Services Corp. (“Defendant”) failed to comply with legal requirements sending letters seeking to recover alleged debt. The settlement avoids costs and risks to you from continuing the lawsuit; pays money to people like you; and releases Defendant from liability.
- The two sides disagree on how much money could have been won if this case went to trial.
- The parties estimate that each class member will receive approximately \$80.00 from the Settlement Fund.
- Lawyers for the class members will ask the Court for approximately one-third of the Settlement Fund to be paid by Defendant—as fees and expenses for investigating the facts, litigating the case, and negotiating the settlement—and for \$10,000 to be paid to the Class Representative for his services.
- Your legal rights are affected whether you act, or don’t act. Read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:	
DO NOTHING	Receive a payment under the settlement.
EXCLUDE YOURSELF	Get no payment. This is the only option that allows you to ever be part of any other lawsuit against FirstStates about the legal claims in this case.
OBJECT	Write to the Court about why you don’t like the settlement.
GO TO A HEARING	Ask to speak in Court about the fairness of the settlement.

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

QUESTIONS? CALL 1-866-473-1092 TOLL FREE OR VISIT www.FirstStatesSettlement.com

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BASIC INFORMATION

1. What is contained in this notice package?

If you are a member of the class of persons described in section 5 below, you may be eligible to receive a payment from a class action settlement. This package explains the lawsuit, the settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

You have a right to know about the proposed settlement of a class action lawsuit, and about all of your options, before the Court decides whether to approve the settlement. If the Court approves it, and after objections and appeals are resolved, an administrator appointed by the Court will make the payments that the settlement allows. You will be informed of the progress of the settlement.

The Court in charge of the case is the United States District Court for the District of New Jersey. This class action is *LaMonaca v. FirstStates Financial Services Corp.* The person who sued is called the Plaintiff, and the company he sued, FirstStates Financial Services Corp., is called the Defendant.

2. What is this lawsuit about?

The lawsuit claimed that Defendant failed to comply with the federal Fair Debt Collection Practices Act and state law by attempting to collect debt for which Plaintiff alleges there was no basis in contract or law. Defendant denies that it did anything wrong. The Complaint and Answer to the Complaint are available on the settlement website: www.firststatessettlement.com.

3. Why is this a class action?

In a class action, one or more people called Class Representative (in this case Vincent A. LaMonaca), sue on behalf of people who have similar claims. All these people are a Class or Class Members. One court resolves the issues for all Class Members, except for those who exclude themselves from the Class. U.S. District Judge Noel L. Hillman oversees this class action.

4. Why is there a settlement?

The Court did not decide in favor of the Plaintiff or the Defendant. There was no trial. Instead, both sides agreed to a settlement after vigorous pre-trial litigation, including motion practice, discovery, and mediation sessions in front of a professional mediator in Philadelphia, PA. By reaching a settlement agreement (which is available at www.firststatessettlement.com), the parties avoid the cost of a trial, and the people affected will get compensation. The Class Representative and the attorneys think the settlement is best for all Class Members.

WHO IS IN THE SETTLEMENT

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

You are receiving this notice because, according to Defendant's records, you were sent one or more letter(s) from Defendant FirstStates Financial Services Corp. in a form substantially similar to the FirstStates Letter attached to the Complaint as Exhibit A.

6. Are there exceptions to being included?

You are not a Class Member if you are an employee, officer, director, legal representative, or agent of the Defendant.

7. I'm still not sure if I am included.

If you are still not sure whether you are included, you can ask for free help. You can call 1-866-473-1092 or visit www.firststatessettlement.com for more information.

QUESTIONS? CALL 1-866-473-1092 TOLL FREE OR VISIT www.FirstStatesSettlement.com

THE SETTLEMENT BENEFITS—WHAT YOU GET

8. What does the settlement provide?

Defendant has agreed to create a \$400,000 fund from which each Class Member who does not exclude him or herself from the settlement will be mailed a check.

9. When would I get my payment?

The Court will hold a hearing on June 16, 2021, at 1:00 p.m. at the United States District Court for the District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, NJ 08101, Courtroom 3A, to decide whether to approve the settlement. If Judge Hillman approves the settlement after that, there may be appeals. It's always uncertain what the outcome of any appeals will be, and resolving them can take time, perhaps more than a year. Please be patient.

EXCLUDING YOURSELF FROM THE SETTLEMENT

10. What am I giving up to get a payment or stay in the Class?

Unless you exclude yourself, you are staying in the Class, and that means that you can't sue, continue to sue, or be part of any other lawsuit against the Defendant about the legal issues in this case. It also means that all of the Court's orders will apply to you and legally bind you.

If you don't want a payment from this settlement, but you want to keep the right to sue or continue to sue any of the Defendant on your own, about the legal issues in this case, then you must take steps to get out. This is called excluding yourself—or is sometimes referred to as opting out of the Class.

11. How do I get out of the settlement?

To exclude yourself from the settlement, you must send a letter by mail saying that you want to be excluded from *LaMonaca v. FirstStates Financial Services Corp.* Be sure to include your name, address, telephone number, and your signature. You must mail your exclusion request postmarked no later than **May 18, 2021** to:

LaMonaca v. FirstStates Financial – Exclusion Request
c/o Settlement Administrator
PO Box 23680
Jacksonville, FL 32241

If you ask 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) the Defendant in the future.

12. If I don't exclude myself, can I sue Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Defendant for the claims that this settlement resolves. If you have a pending lawsuit, speak to your lawyer in that case immediately. You must exclude yourself from this Class to continue your own lawsuit. Remember, the exclusion deadline is **May 18, 2021**.

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

No. If you exclude yourself, you will not receive money from this settlement. But you may sue, continue to sue, or be part of a different lawsuit against Defendant.

QUESTIONS? CALL 1-866-473-1092 TOLL FREE OR VISIT www.FirstStatesSettlement.com

THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in this case?

The law firm of Francis Mailman Soumilas, P.C. in Philadelphia, PA represents you and other Class Members. The contact information for this law firm is:

FRANCIS MAILMAN SOUMILAS, P.C.
1600 Market Street, Suite 2510
Philadelphia, PA 19103

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

15. How will the lawyers be paid?

Class Counsel will ask the Court to approve payment to them of approximately one-third of the Settlement Fund for attorneys' fees and expenses. The attorneys' fees would pay Class Counsel for investigating the facts, litigating the case, and negotiating the settlement. The Court may award less than this amount. Defendant has agreed not to oppose the request for fees and expenses. The costs of administering the settlement will be paid separately by the Defendant.

OBJECTING TO THE SETTLEMENT

16. How do I tell the Court that I don't like the settlement?

If you're a Class Member, you can object to the settlement if you don't like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must send a letter saying that you object to the settlement in *LaMonaca v. FirstStates Financial Services Co.* Be sure to include: your name, the city and state in which you live, your telephone number, the reasons you object to the settlement; whether you plan to come to the Fairness Hearing and you (or anyone else) want to speak; if you have a lawyer (who is not one of the lawyers for the class), the name of the lawyer(s) representing you; and if they exist, any agreements relating to your objection or the process of objecting. You must sign the letter yourself – an attorney or other representative cannot sign for you.

Your objection must be received by the Clerk of Court at the following address no later than **May 18, 2021**. You should also send copies of your objection to Counsel at the following addresses:

COURT	CLASS COUNSEL	DEFENSE COUNSEL
Clerk of Court U.S. District Court District of New Jersey Mitchell H. Cohen Building & U.S. Courthouse 4th & Cooper Streets Camden, NJ 08101	Francis Mailman Soumilas, P.C. 1600 Market Street Suite 2510 Philadelphia, PA 19103	Deasey, Mahoney & Valentini, Ltd. 103 Chesley Drive, Suite 101 Media, PA 19063

17. What's the difference between objecting and excluding?

Objecting is simply telling the Court that you don't like something about the settlement. You can only object if you stay in the Class.

Excluding yourself is telling the Court that you don't want to be part of the Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

QUESTIONS? CALL 1-866-473-1092 TOLL FREE OR VISIT www.FirstStatesSettlement.com

THE COURT'S 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 don't have to.

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

The Court will hold a Fairness Hearing at 1:00 p.m. on June 16, 2021, at the United States District Court for the District of New Jersey, United States Courthouse, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, NJ 08101, Courtroom 3A. At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate and whether the requested payments to Class Counsel and Class Representatives are proper. If there are objections, the Court will consider them. Judge Hillman will listen to people who have asked to speak at the hearing. After the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

19. Do I have to come to the hearing?

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

20. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. If you plan to speak at the hearing because you don't like the settlement, you must also send a letter as described in Section 16. You cannot speak at the hearing if you excluded yourself.

IF YOU DO NOTHING

21. What happens if I do nothing at all?

If you do nothing, you'll still receive money from this settlement. But, unless you exclude yourself, you won't be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendant about the legal issues in this case, ever again.

GETTING MORE INFORMATION

22. How do I get more information?

This notice summarizes the proposed settlement. More details—including the Settlement Agreement, the Complaint and Answer, answers to common questions, plus other information to help you determine whether you are a Class Member and whether you are eligible for payment—are available at www.firststatessettlement.com. You can also request this information by calling 1-866-473-1092 toll free or writing to the Settlement Administrator at LaMonaca v. FirstStates Financial., c/o Settlement Administrator, PO Box 23680, Jacksonville, FL 32241. You may also speak to one of the attorneys working on this class action by calling: 1-877-735-8600 or emailing the attorneys at the following address: info@consumerlawfirm.com.