## COMMONWEALTH OF MASSACHUSETTS

**County of Plymouth The Superior Court** 

Mark Bland, Sr., on behalf of himself and all others
similarly situated,

Plaintiff,

V.

Great Lakes Educational Loan Services, Inc.,

Defendant.

# NOTICE REGARDING RIGHT TO BENEFIT FROM CLASS ACTION SETTLEMENT

A Settlement Agreement has been reached in a class action lawsuit alleging that Great Lakes Educational Loan Services, Inc. ("Great Lakes") violated Massachusetts law by initiating in excess of two communications via telephone in a seven-day period to Massachusetts consumers to collect a debt. If you received a postcard Notice, Great Lakes' records show that you may be a Class Member under the Settlement Agreement reached in the case.

A Settlement Fund of \$1,275,000 has been established to pay valid claims, attorneys' fees, costs, any incentive award to the Settlement Class Representative (Mark Bland, Sr.) and settlement administration costs. You may be entitled to receive an equal share of the Settlement Fund. The final payment amount will depend on the total number of valid and timely claims filed by all Class Members. Your legal rights are affected whether you act or don't act, so <u>read this Notice carefully</u>.

YOUR OPTIONS	
Option 1: Submit a Claim Form	Complete and submit a Claim Form and receive an equal share of the Settlement Fund.
Deadline: February 27, 2023	By completing and submitting a Claim Form, you may recover an equal share of the
	Settlement Fund. This is the only way to claim and receive from the Fund.
Option 2: Object	Object to the terms of the Settlement Agreement.
Deadline: February 27, 2023	You may object to the terms of the Settlement Agreement and have your objections heard at
	the April 6, 2023, Final Approval Hearing.
Option 3: Do nothing	Do nothing.
	If you do not take any action, you will be bound by the Settlement Agreement, but you will
	not receive any payment under the Settlement Agreement.

#### 1. What is this lawsuit about?

In the lawsuit, the Plaintiff alleges that Great Lakes violated the Massachusetts Consumer Protection Act, M.G.L. c. 93A § 2, et seq. ("MCPA"), and the Massachusetts Debt Collection Regulations, 940 CMR § 7.00, et seq. ("MDCR"), by initiating a communication via telephone regarding a debt in excess of two such communications in a seven-day period to Plaintiff and other Massachusetts consumers.

Great Lakes denies any wrongdoing and denies that that it violated the MCPA, the MDCR, or any other law.

Both sides have agreed to settle the lawsuit to avoid the cost, delay, and uncertainty of further litigation.

You can read Plaintiff's Complaint, Defendant's Answer and Affirmative Defenses, the Settlement Agreement, other case documents, and submit a Claim Form at <a href="https://www.BlandGreatLakes.com">www.BlandGreatLakes.com</a>.

#### 2. Why is this a class action?

In a class action, a class representative (in this case Plaintiff Mark Bland, Sr.) sues on behalf of a group (or a "Class") of people. Here, the class representative sued on behalf of people who have similar claims regarding allegedly excessive debt collection calls.

### 3. Why is there a Settlement?

To avoid the cost, risk, and delay of litigation, the Parties reached a settlement agreement as to Plaintiff and the Class claims.

#### 4. How do I know if I am a part of the Settlement?

For settlement purposes only, the Court has certified a Settlement Class consisting of all people who meet the following definition:

All Persons residing or living in the Commonwealth of Massachusetts at any point during the Class Period to whom Great Lakes, within the Class Period, initiated in excess of two communications via telephone in a seven-day period regarding a debt to their residence, cellular telephone, or other provided telephone number.

If you are included in the Settlement Class, you are part of the Settlement.

### 5. How do I recover?

Submit a Claim Form. This is the only way to get a payment. You have the right as a member of the Settlement Class to receive an equal share of the Settlement Fund.

The final payment amount will depend on the total number of valid and timely claims filed by all Class Members. Each claiming Class Member will be entitled to an equal share of the Settlement Fund, after deductions from the fund for settlement administration costs, attorneys' fees and expenses, and any incentive award to the Settlement Class Representative. You can submit a Claim Form online at www.BlandGreatLakes.com. Or, you can download the Claim Form online and mail it to:

Bland v. Great Lakes Settlement Administrator P.O. Box 6188 Novato, CA 94948-6188

All Claim Forms must be postmarked or filed online no later than **February 27, 2023**.

After all Valid Claim Forms are counted, and the Settlement is given final approval by the Court, the Settlement Administrator will provide (through one or more rounds of Settlement Checks) each claiming Settlement Class Member their share of the Settlement Fund after the deductions above. Any excess Settlement Funds from uncashed Settlement Checks or because of any other reason will be provided to a charitable organization.

### 6. What am I giving up to receive these benefits?

All of the Court's orders will apply to you, and you give a "release" for any claims covered by the Settlement Agreement, including claims arising from the allegedly excessive telephone calls to you. A release means you cannot sue or be part of any other lawsuit against Great Lakes and the Released Parties about the claims or issues in this lawsuit, and you will be bound by the Settlement Agreement.

### 7. How much will the Class Representative receive?

The Settlement Class Representative will receive their portion of the Settlement as a Class Member and an incentive award for having pursued this Action. Any incentive payment is subject to Court approval. The Settlement Class Representative will request an incentive award of \$12,000.

### 8. Do I have a lawyer in this case?

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

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

#### 9. How do I object?

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

Objections must be filed with the Clerk of the Court and delivered, or postmarked, no later than February 27, 2023.

The Court's address is:

Plymouth County Superior Court 72 Belmont Street, Brockton, MA 02301 Attn: Clerk of the Court

#### The Final Approval Hearing

The Court will hold a Final Approval Hearing on **April 6, 2023, at 2:00 p.m.,** in Plymouth County Superior Court, 72 Belmont Street, Brockton, MA 02301. The purpose of the hearing will be for the Court to determine whether the proposed Settlement is fair, reasonable, and adequate and in the best interests of the Class and to rule on applications for compensation for Class Counsel and an incentive award for the Settlement Class Representative. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the proposed Settlement.

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

### **FOR MORE INFORMATION**

Additional information and documents, including case documents, are available at <a href="www.BlandGreatLakes.com">www.BlandGreatLakes.com</a>, or you can call 1-844-787-0184.