

**SUPREME COURT OF THE STATE OF NEW YORK, COUNTY OF KINGS**

*Mok v. ATG Tickets US, LLC*, Index No. 505464/2024

**If You Paid an Order Processing Fee When Purchasing Tickets Online Through the Kings Theatre Website, Hudson Theatre Website, and/or Lyric Theatre Website, You May Be Entitled to a Payment From a Class Action Settlement.**

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

- A Settlement<sup>1</sup> has been reached in a class action lawsuit claiming that Defendant ATG Tickets US, LLC (“Defendant”), failed to timely disclose an Order Processing Fee for tickets purchased online through the Kings Theatre Website, Hudson Theatre Website, and Lyric Theatre Website, in alleged violation of New York Arts and Cultural Affairs Law (“ACAL”) § 25.07(4). Defendant denies that it violated any law. The Parties have agreed to the settlement to avoid the uncertainties and expenses associated with ongoing litigation.
- You may be included if you paid an Order Processing Fee when purchasing tickets online through the (i) Kings Theatre Website (<https://www.kingstheatre.com/>) from March 27, 2023 to and including March 12, 2024 (for seated tickets) or from March 27, 2023 to and including March 27, 2024 (for General Admission Pit tickets); (ii) Hudson Theatre Website (<https://www.thehudsonbroadway.com/>) from August 29, 2022 to and including March 12, 2024; and/or (iii) Lyric Theatre Website (<https://www.lyricbroadway.com/>) from August 29, 2022 to and including March 12, 2024.
- Read this notice carefully. Your legal rights are affected whether you act, or do not act.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>	
<b>SUBMIT A CLAIM FORM BY NOVEMBER 24, 2025</b>	This is the only way to receive a payment. You may file a claim online <a href="#">here</a> or mail your claim form to ATG Tickets Fee Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. By filing a claim form, you are giving up your rights to sue the Defendant about the claims alleged in the case.
<b>EXCLUDE YOURSELF BY SEPTEMBER 26, 2025</b>	You will receive no benefits, but you will retain any rights you currently have to sue the Defendant about the claims alleged in this case at your own expense.
<b>OBJECT BY SEPTEMBER 26, 2025</b>	Write to the Court explaining why you do not like the Settlement.

---

<sup>1</sup> Unless otherwise defined herein, all capitalized terms shall have the meaning set forth in the Settlement Agreement which can be viewed at [www.ATGTicketsfeesettlement.com](http://www.ATGTicketsfeesettlement.com).

<b>GO TO THE HEARING ON OCTOBER 23, 2025</b>	Ask to speak in Court about your opinion of the Settlement.
<b>DO NOTHING</b>	You will not get a share of the Settlement benefits and you will give up your rights to sue the Defendant about the claims alleged in the case.

These rights and options—**and the deadlines to exercise them**—are explained in this Notice.

## BASIC INFORMATION

### 1. Why was this Notice issued?

A Court authorized this notice because you have a right to know about a proposed Settlement of this class action lawsuit 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.

The case is called *Mok v. ATG Tickets US, LLC*, Index No. 505464/2024, pending in the Supreme Court of the State of New York, County of Kings. The person who sued is called the Plaintiff. The Defendant is ATG Tickets US, LLC.

### 2. What is a class action?

In a class action, one or more people called class representatives (in this case, Ho Ki Mok) sue on behalf of a group or a “class” of people who have similar claims. In a class action, the court resolves the issues for all class members, except for those who exclude themselves from the Settlement Class.

### 3. What is this lawsuit about?

This lawsuit claims that Defendant failed to timely disclose an Order Processing Fee for tickets purchased online through the Kings Theatre Website, Hudson Theatre Website, and Lyric Theatre Website, in alleged violation of ACAL § 25.07(4). Defendant denies that it violated any law. The Court has not determined who is right or if Defendant violated the law. Rather, the Parties have agreed to settle the lawsuit to avoid the uncertainties and expenses associated with ongoing litigation.

### 4. Why is there a Settlement?

The Court has not decided whether the Plaintiff or the Defendant should win this case. Instead, both sides have agreed to a Settlement. That way, they avoid the uncertainties and expenses associated with ongoing litigation, and Settlement Class Members will get compensation sooner rather than after the completion of a trial, if at all.

## WHO'S INCLUDED IN THE SETTLEMENT?

### 5. How do I know if I am in the Settlement Class?

The Court decided that everyone who fits the following description is a member of the **Settlement Class**:

All individuals in the United States who paid an Order Processing Fee when purchasing tickets online through the (i) Kings Theatre Website from March 27, 2023 to and including March 12, 2024 (for seated tickets) or from March 27, 2023 to and including March 27, 2024 (for General Admission Pit tickets); (ii) Hudson Theatre Website from August 29, 2022 to and including March 12, 2024; and/or (iii) Lyric Theatre Website from August 29, 2022 to and including March 12, 2024.

## THE SETTLEMENT BENEFITS

### 6. What does the Settlement provide?

**Monetary Relief.** Defendant will pay each Settlement Class Member who submits a valid and timely [Claim Form](#) a one-time cash payment consisting of one or more of the amounts listed below for each theatre that is applicable to each Settlement Class Member's Approved Claim:

- \$5.00 for Kings Theatre;
- \$3.00 for Hudson Theatre; and/or
- \$3.50 for Lyric Theatre.

Defendant will also separately pay notice and administration expenses, approved attorneys' fees and costs to Class Counsel, and a service award to the Class Representative. The Parties have agreed to a Settlement Cap totaling \$997,380.00. All payments for Approved Claims to the Settlement Class, together with notice and administrative expenses, approved attorneys' fees and costs to Class Counsel, and a service award to the Class Representative will be subject to this Settlement Cap.

**Prospective Relief.** Additionally, Defendant acknowledges that it has changed the purchase flows for tickets on the Kings Theatre Website, Hudson Theatre Website, and Lyric Theatre Website. Plaintiff acknowledges and agrees that the current purchase flows on the Kings Theatre Website, Hudson Theatre Website, and Lyric Theatre Website comply with all applicable law. Defendant agrees to comply with ACAL § 25.07(4) unless and until it is amended, repealed, or otherwise invalidated.

A detailed description of the settlement benefits can be found in the Settlement Agreement, a copy of which is accessible on the Settlement Website by clicking [here](#).

#### 7. How much will my payment be?

You **must** submit a timely and complete [Claim Form](#) (see instructions below) to receive a one-time cash payment consisting of one or more of the amounts listed below for each theatre that is applicable to each Settlement Class Member's Approved Claim:

- \$5.00 for Kings Theatre;
- \$3.00 for Hudson Theatre; and/or
- \$3.50 for Lyric Theatre.

#### 8. When will I get my payment?

The hearing to consider the fairness of the settlement is scheduled for October 23, 2025. If the Court approves the settlement, eligible Settlement Class Members whose claims were approved by the Settlement Administrator will receive their payment within 60 calendar days after the Effective Date of the Settlement Agreement. The payment will be made in the form you elect (PayPal, Venmo, Zelle, Virtual Prepaid Card, or check), and all checks will expire and become void 180 days after they are issued.

### HOW TO GET BENEFITS

#### 9. How do I get a payment?

If you are a Settlement Class Member and you want to get a payment, you **must** complete and submit a Claim Form by **November 24, 2025**. Claim Forms can be found and submitted by clicking [here](#), or by printing and mailing a paper Claim Form, copies of which are available for download [here](#). You must provide proof of your Settlement Class membership when filing a claim by providing the unique Notice ID and Confirmation Code on the notice you received by e-mail. If for some reason you did not receive this information, but believe you are a Settlement Class Member, please call 1-844-638-4134 to verify your identity and receive further information on how to file a claim. Failure to submit a timely Claim Form by the Claims Deadline will prevent you from receiving a settlement payment.

We also encourage you to submit your claim online. Not only is it easier and more secure, but it is completely free and takes only minutes.

### REMAINING IN THE SETTLEMENT

#### 10. What am I giving up if I stay in the Settlement Class?

If the Settlement becomes Final, you will give up your right to sue the Defendant and other Released Parties for the claims being resolved by this Settlement. The specific claims you are giving up against the Defendant are described in the Settlement Agreement. You will be "releasing" the Defendant and its affiliates, employees, and representatives as described in Section 1.29 of the Settlement Agreement. Unless you

exclude yourself (*see* Question 13), you are “releasing” the claims, regardless of whether you claim your settlement payment or not. The Settlement Agreement is available through the “court documents” link on the settlement website.

The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions you can talk to the lawyers listed in Question 11 for free or you can, of course, talk to your own lawyer at your own expense.

## THE LAWYERS REPRESENTING YOU

### 11. Do I have a lawyer in the case?

The Court has appointed Rachel Dapeer of Dapeer Law, P.A. and Philip L. Fraietta of Bursor & Fisher, P.A. to represent the Settlement Class. They are called “Class Counsel.” They believe, after conducting an investigation, that the Settlement Agreement is fair, reasonable, and in the best interests of the Settlement Class. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your own expense.

### 12. How will the lawyers be paid?

Class Counsel’s attorneys’ fees and costs will be separately paid by Defendant and awarded by the Court. Class Counsel will file a petition seeking no more than \$332,460.00, inclusive of reimbursement of their costs and expenses. The Court may award less than this amount.

Subject to approval by the Court, the Class Representative may be paid a service award of \$5,000.00 for her services in helping to bring and resolve this case. The Court may award less than this amount.

## EXCLUDING YOURSELF FROM THE SETTLEMENT

### 13. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must submit a request for exclusion by 11:59 p.m. EST on **September 26, 2025**. Requests for exclusion may be submitted either on the Settlement Website (via the online form accessible [here](#)) or by mailing or otherwise delivering a letter (or request for exclusion) stating that you want to be excluded from the *Mok v. ATG Tickets US, LLC*, Index No. 505464/2024 settlement. Your letter or request for exclusion must also include (a) your name, (b) your address, (c) a statement that you paid an Order Processing Fee for tickets purchased online through the (i) Kings Theatre Website from March 27, 2023 to and including March 12, 2024 (for seated tickets) or from March 27, 2023 to and including March 27, 2024 (for General Admission Pit tickets); (ii) Hudson Theatre Website from August 29, 2022 to and including March 12, 2024; and/or (iii) Lyric Theatre Website from August 29, 2022 to and including March 12, 2024, (d) your signature, (e) the name and number of

this case, and (f) a statement that you wish to be excluded. If you choose to submit a request for exclusion by mail, you must mail or deliver your exclusion request, postmarked no later than September 26, 2025, to the following address:

ATG Tickets Fee Settlement  
c/o Settlement Administrator  
Attn: Exclusion Requests  
P.O. Box 58220  
Philadelphia, PA 19102

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

No. Unless you exclude yourself, you give up any right to sue the Defendant for the claims being resolved by this Settlement.

**15. If I exclude myself, can I get anything from this Settlement?**

No. If you exclude yourself, you will not receive any payment from the Settlement.

**OBJECTING TO THE SETTLEMENT**

**16. How do I object to the Settlement?**

If you are a member of the Settlement Class, you can object to the Settlement if you do not 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 file with the Court a letter or brief stating that you object to the Settlement in *Mok v. ATG Tickets US, LLC*, Index No. 505464/2024 and identify all your reasons for your objections (including citations and supporting evidence) and attach any materials you rely on for your objections. Your letter or brief must also include the case name and number, your name, your address, the basis upon which you claim to be a member of the Settlement Class, the name and contact information of any and all attorneys representing, advising, or in any way assisting you in connection with your objection, and your signature. If you, or an attorney assisting you with your objection, have ever objected to any class action settlement where you or the objecting attorney has asked for or received payment in exchange for dismissal of the objection (or any related appeal) without modification to the settlement, you must include a statement in your objection identifying each such case by full case caption. You must also mail or deliver a copy of your letter or brief to Class Counsel and Defendant's Counsel listed below.

Class Counsel will file with the Court and post on this website its request for attorneys' fees by September 12, 2025.

If you want to appear and speak at the Final Approval Hearing to object to the Settlement, with or without a lawyer (explained below in answer to Question Number 20), you must say so in your letter or brief. You must file the objection with the Court

(or mail the objection to the Court) and mail a copy of the objection to Class Counsel and Defendant's Counsel, at the addresses below, postmarked no later than September 26, 2025.

<b>Court</b>	<b>Class Counsel</b>	<b>Defendant's Counsel</b>
Supreme Court of the State of New York, County of Kings 360 Adams Street, Courtroom 556 Brooklyn, NY 11201	Rachel Dapeer Dapeer Law, P.A. 156 W 56th St #902 New York, NY 10019 T: 917-456-9603  Philip Fraietta Bursor & Fisher, P.A. 1330 Avenue of the Americas New York, NY 10019 T: 646-837-7150	Prana A. Topper Matthew F. Bruno Manatt, Phelps & Phillips, LLP 7 Times Square New York, NY 10036 T: 212-790-4500

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

Objecting simply means telling the Court that you do not like something about the Settlement. You can object only if you remain a member of the Settlement Class. Excluding yourself from the Settlement Class is telling the Court that you do not want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

**THE COURT'S FINAL APPROVAL HEARING**

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

The Court will hold the Final Approval Hearing at 10:00 a.m. on October 23, 2025 in Courtroom 556 at the Supreme Court of the State of New York, County of Kings, 360 Adams Street, Brooklyn, NY 11201. The purpose of the hearing will be for the Court to determine whether to approve the Settlement as fair, reasonable, adequate, and in the best interests of the Settlement Class; to consider Class Counsel's request for attorneys' fees and expenses; and to consider the request for an incentive award to the Class Representative. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the Settlement.

The hearing may be postponed to a different date or time without notice, so it is a good idea to check for updates by visiting the Settlement Website at [www.ATGTicketsfeesettlement.com](http://www.ATGTicketsfeesettlement.com) or by calling 1-844-638-4134. If, however, you timely objected to the Settlement and advised the Court that you intend to appear and

Speak at the Final Approval Hearing, you will receive notice of any change in the date of the Final Approval Hearing.

**19. Do I have to come to the hearing?**

No. Class Counsel will answer any questions the Court may have. But you are welcome to come at your own expense. If you send an objection or comment, you do not have to come to Court to talk about it. As long as you filed and mailed your written objection on time, the Court will consider it. You may also pay another lawyer to attend, but it is not required.

**20. May I speak at the hearing?**

Yes. You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must include in your letter or brief objecting to the settlement a statement saying that it is your “Notice of Intent to Appear in *Mok v. ATG Tickets US, LLC*, Index No. 505464/2024”. It must include the case name and number, your name, address, telephone number and signature as well as the name and address of your lawyer, if one is appearing for you. Your objection and notice of intent to appear must be filed with the Court and postmarked no later than **September 26, 2025**, and be sent to the addresses listed in Question 16.

**GETTING MORE INFORMATION**

**21. Where do I get more information?**

This Notice summarizes the Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement at [www.ATGTicketsfeesettlement.com](http://www.ATGTicketsfeesettlement.com). You may also write with questions to ATG Tickets Fee Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. You can call the Settlement Administrator at 1-844-638-4134 or Class Counsel at 917-456-9603 or 646-837-7150, if you have any questions. Before doing so, however, please read this full Notice carefully. You may also find additional information elsewhere on the settlement website.