

United States District Court for the Eastern District of North Carolina

*Hank Bland, Kendall Jackson, and Luetta Innis, on behalf of themselves and all others similarly situated v. Carolina Lease Management Group, LLC, and CTH Rentals, LLC*

Case No. 4:22-cv-33-BO

# Class Action Notice

*Authorized by the U.S. District Court for the Eastern District of North Carolina*

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Did you enter a rent-to-own agreement for a storage building with Carolina Lease Management Group & they tried to collect from you on or after March 10, 2018?

There is a \$6.998 million settlement of a lawsuit.

You may be entitled to money.

If you want to be part of the class action, you do not need to do anything.

If not, you need to opt out by October 13, 2025.

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Important things to know:

- If you take no action, you will be bound by the settlement, and your rights will be affected.
- You can learn more and find Court documents at:  
[www.bland-clmgsettlement.com](http://www.bland-clmgsettlement.com).

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# About This Notice

## Why did I get this notice?

A case was filed, *Bland, et al. v. Carolina Lease Management Group, et al.*, that was brought on behalf of people who entered rent-to-own contracts with Carolina Lease Management Group (CLMG) and from whom CLMG tried to collect money. **You received this notice because you may be a member of the group of people affected, called the “class.”** This notice gives you a summary of the terms of the proposed agreement, explains what rights class members have, and helps class members make decisions about what action to take.

## What do I do next?

Read this notice to understand the settlement and to determine if you are a class member. Then, decide which of these actions you want to take:

| Options                                       | What each option means:   |
|---|---|
| <b>Do Nothing (or advise of payment info)</b> | You will receive a check at the address where you received this notice. You will be bound by the settlement. If you’d like payment in another form, you can submit that information on the website. |
| <b>Opt Out</b>                                | Get no payment. Allows you to bring another lawsuit against Carolina Lease Management Group and/or CTH Rentals about the same issues.   |
| <b>Object</b>                                 | Tell the Court why you don’t like the settlement.   |

Read on to understand the specifics of the settlement and what each choice would mean for you.

## What are the most important dates?

Your deadline to object: **October 7, 2025**

Your deadline to opt out: **October 13, 2025**

Settlement approval hearing: **October 28, 2025**

# Learning About the Lawsuit

## What is this lawsuit about?

Hank Bland, Kendall Jackson, and Luetta Inniss filed a lawsuit in 2022 claiming that Carolina Lease Management Group, LLC, and CTH Rentals, LLC, violated North Carolina laws regarding how much they could charge on rent-to-own agreements.

Carolina Lease Management Group and CTH Rentals deny that they did anything wrong.

### Where can I learn more?

You can get a complete copy of the proposed settlement and other key documents in this lawsuit at:

[www.bland-clmgsettlement.com](http://www.bland-clmgsettlement.com)

## Why is there a settlement in this lawsuit?

In April 2025, the parties agreed to settle, which means they have reached an agreement to resolve the lawsuit. Both sides want to avoid the cost and risk of continuing the case in court.

The settlement is for the people who brought the case and all members of the settlement class. The Court has not decided this case in favor of either side.

### What is a class action settlement?

A class action settlement is an agreement between the parties to resolve and end the case. Settlements can provide money to class members and changes to the practices that caused the harm.

## What happens next in this lawsuit?

The Court will hold a Fairness Hearing to decide whether to approve the proposed settlement. The hearing will be held at:

**Where:** United States Courthouse, 306 East Main Street, Elizabeth City, NC 27909.

**When:** October 28, 2025, at 11:00 a.m.

The Court has directed the parties to send you this notice about the

proposed settlement. Because the settlement of a class action decides the rights of all members of the proposed class, the Court must give final approval to the settlement before it can take effect. Payments will only be made if the Court approves the settlement.

You don't have to attend the hearing, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the settlement. If the Court does not approve the settlement, it will not take effect and the lawsuit will continue. The date of the hearing may change without further notice to members of the class. To learn more and confirm the hearing date, go to [www.bland-clmgsettlement.com](http://www.bland-clmgsettlement.com).

## Learning About the Settlement

### What does the settlement provide?

Carolina Lease Management Group and CTH Rentals have agreed to pay \$6,998,328.87 into a settlement fund. This money will be divided among the class members and will also be used to pay for costs and lawyer fees approved by the Court, and for the cost of administering this settlement. Members of the settlement class will "release" their claims as part of the settlement, which means they cannot sue Carolina Lease Management Group or CTH Rentals for the same issues and legal violations raised in this lawsuit. The full terms of the release can be found at [www.bland-clmgsettlement.com](http://www.bland-clmgsettlement.com).

The settlement also requires Carolina Lease Management Group to stop all debt collection and lawsuits on class member accounts related to this case and to cancel any judgments on these accounts.

The settlement also provides that the Court will be asked to approve payments of \$10,000 to the consumers who brought this lawsuit, Hank Bland, Kendall Jackson, and Luetta Inniss, to compensate them for their work on the case. These are called "service payments."

If there is money left over after all payments are made, it will be donated to North Carolina Justice Center, if the Court approves.

## How much will my payment be?

Your payment amount will depend on the following factors:

- The amount you paid to CLMG on or after March 10, 2018, on the rent-to-own contract.
- The amounts that other class members paid to CLMG on or after March 10, 2018, on their rent-to-own contracts.
- The amount of the lawyer fees, costs, and service payments approved by the Court.

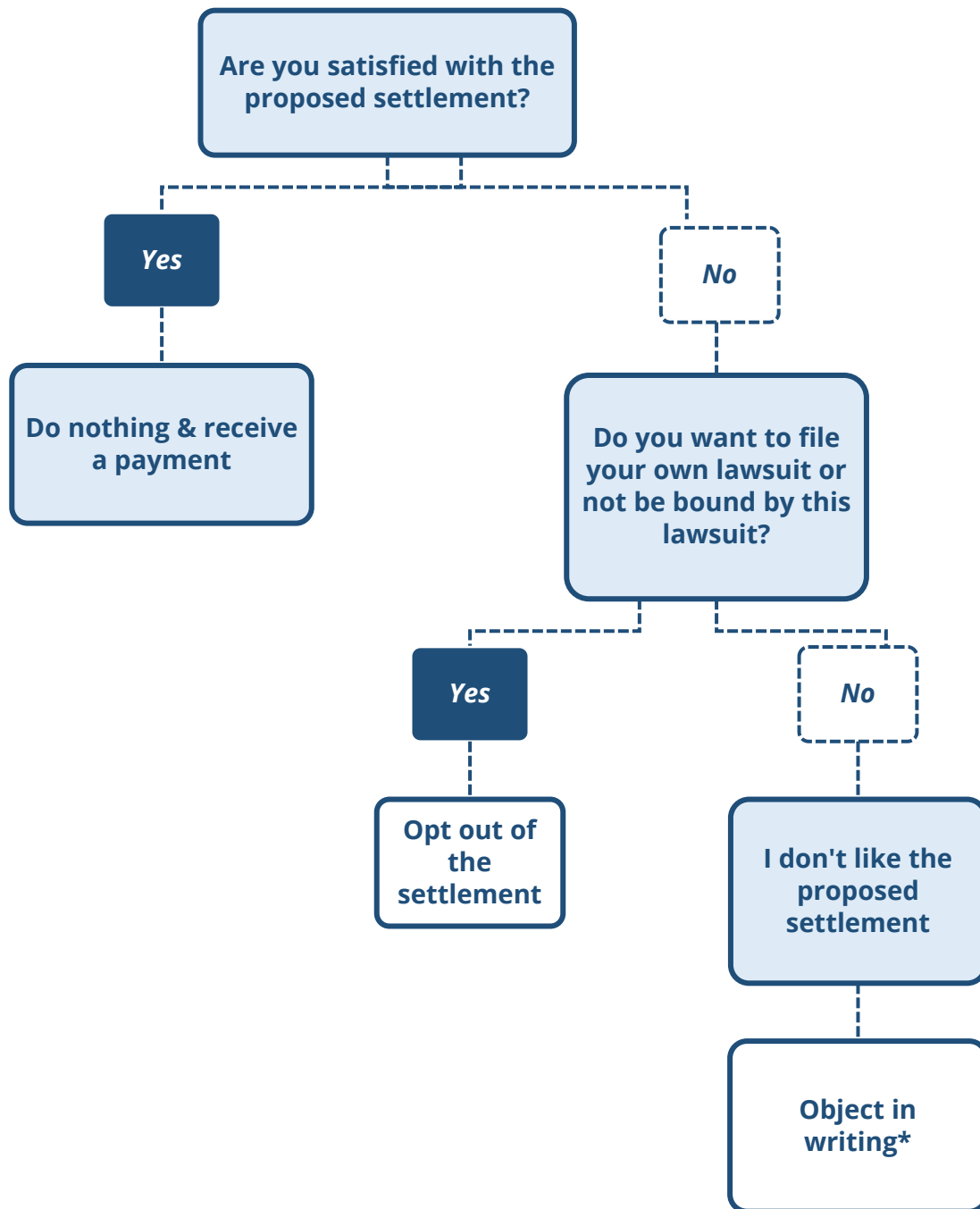
## Deciding What to Do

### How do I weigh my options?

You have three options. You can do nothing and stay in the settlement, you can opt out of the settlement, or you can object to the settlement. This chart shows how your rights are affected by each option:

|   | <b>Do nothing</b> | <b>Opt out</b> | <b>Object</b> |
|---|-------------------|----------------|---------------|
| <b>Can I receive settlement money if I . . .</b>          | YES               | NO             | YES           |
| <b>Am I bound by the terms of this lawsuit if I . . .</b> | YES               | NO             | YES           |
| <b>Can I pursue my own case if I . . .</b>                | NO                | YES            | NO            |
| <b>Will the class lawyers represent me if I . . .</b>     | YES               | NO             | NO            |

## What is the best path for me?



*\*You can object to the settlement AND receive payment.*

## How do I get a payment if I am a class member?

If you wish to receive a check mailed to the address where you received the postcard letting you know about this settlement, you can do nothing. If you wish to receive a payment by some other method, you can make that request on [www.bland-clmgsettlement.com](http://www.bland-clmgsettlement.com) by October 28, 2025.

## Do I have a lawyer in this lawsuit?

In a class action, the court appoints lawyers to work on the case and represent the interests of all the class members. For this settlement, the Court has appointed the following lawyers.

**Your lawyers:** Adrian Lapas, Lapas Offices, PLLC and Charles Delbaum and Jennifer Wagner, National Consumer Law Center. These are the lawyers who negotiated this settlement on your behalf.

If you want to be represented by your own lawyer, you may hire one at your own expense.

## Do I have to pay the lawyers in this lawsuit?

Lawyers' fees and costs will be paid from the Settlement Fund. **You will not have to pay the lawyers directly.**

To date, your lawyers have not been paid any money for their work or the expenses that they have paid for the case. To pay for some of their time and risk in bringing this case without any guarantee of payment unless they were successful, your lawyers will request, as part of the final approval of this Settlement, that the Court approve a payment of up to \$2,309,448.53 total in attorneys' fees plus the reimbursement of out-of-pocket expenses.

Lawyers' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the lawyers' fees even if you think the settlement terms are fair.



# Opting Out

## What if I don't want to be part of this settlement?

You can opt out. If you do, you will not receive payment and cannot object to the settlement. However, you will not be bound or affected by anything that happens in this lawsuit and may be able to file your own case.

## How do I opt out?

To opt out of the settlement, you must complete the opt-out form available on the case website, [www.bland-clmgsettlement.com](http://www.bland-clmgsettlement.com), and mail it by October 13, 2025, to the Settlement Administrator at:

Bland v. CLMG Class Action  
c/o Settlement Administrator  
PO Box 23680  
Jacksonville, FL 32241-3680  
(800) 351-1745

Be sure to include your name, address, telephone number, and signature.

# Objecting

## What if I disagree with the settlement?

If you disagree with any part of the settlement (including the lawyers' fees) but don't want to opt out, you may object. You must give reasons why you think the Court should not approve the settlement and say whether your objection applies to just you, a part of the class, or the entire class. The Court will consider your views. The Court can only approve or deny the settlement — it cannot change the terms of the settlement. You may, but don't have to, hire your own lawyer to help you.

To object, you must send a letter to the Court that:

- (1) is postmarked by October 7, 2025;
- (2) includes the case name and number: *Bland v. Carolina Lease Management Group, LLC*, 4:22-cv-33-BO (E.D.N.C.);
- (3) includes your full name, address and telephone number, and email address (if you have one);
- (4) states the reasons for your objection;
- (5) says whether either you or your lawyer intend to appear at the final approval hearing and your lawyer's name;
- (6) is signed by you.

Mail the letter to:

United States District Court  
Eastern District of North Carolina  
c/o Clerk of Court  
Post Office Box 25670  
Raleigh, NC 27611

## Key Resources

### How do I get more information?

This notice is a summary of the proposed settlement. The complete settlement with all its terms can be found on the case website. To get a copy of the settlement agreement or get answers to your questions:

- contact the Settlement Administrator (information below)
- visit the case website at [www.bland-clmgsettlement.com](http://www.bland-clmgsettlement.com)

| Resource                        | Contact Information   |
|---------------------------------|---|
| <b>Case website</b>             | <a href="http://www.bland-clmgsettlement.com">www.bland-clmgsettlement.com</a>  |
| <b>Settlement Administrator</b> | Bland v. CLMG Class Action<br>c/o Settlement Administrator<br>PO Box 23680<br>Jacksonville, FL 32241-3680<br>(800) 351-1745 |

|                     |  |
|---------------------|--|
| <b>Your Lawyers</b> | <p>Adrian M. Lapas<br/>Lapas Law Offices, PLLC<br/>P.O. Box 10688<br/>Goldsboro, NC 27532</p> <p>Charles Delbaum<br/>Jennifer Wagner<br/>National Consumer Law Center<br/>7 Winthrop Square<br/>Boston, MA 02110</p> |
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