

SUPREME COURT OF THE STATE OF NEW YORK, COUNTY OF NEW YORK
Valcarcel v. Beyond Illusion, LLC d/b/a Museum of Illusions New York, et al.,
Index No. 655436/2024

If You Paid A Processing Fee To Purchase Tickets Online Through The Museum of Illusions New York Website From August 29, 2022, To And Through April 30, 2024, 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 Settlement¹ has been reached in a class action lawsuit claiming that Defendants Beyond Illusion, LLC d/b/a Museum of Illusions New York and RP Illusions Corp. (“Defendants”), failed to timely disclose a Processing Fee for tickets purchased online through the Museum of Illusions New York Website, in alleged violation of New York Arts and Cultural Affairs Law (“ACAL”) § 25.07(4). Defendants deny that they 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 a Processing Fee to purchase tickets online through the Museum of Illusions New York Website from August 29, 2022, to and through April 30, 2024.
- Read this notice carefully. Your legal rights are affected whether you act, or don’t act.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM BY JANUARY 2, 2026	This is the only way to receive a payment. You may file a claim here www.MuseumOfIllusionsNewYorkTicketFeeSettlement.com or mail your claim form to Museum of Illusions New York Ticket 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 Defendants about the claims alleged in the case.
EXCLUDE YOURSELF BY OCTOBER 17, 2025	You will receive no benefits, but you will retain any rights you currently have to sue the Defendants about the claims alleged in this case at your own expense.
OBJECT BY OCTOBER 17, 2025	Write to the Court explaining why you don’t like the Settlement.
GO TO THE HEARING ON NOVEMBER 17, 2025	Ask to speak in Court about your opinion of the Settlement.
DO NOTHING	You won’t get a share of the Settlement benefits and you will give up your rights to sue the Defendants about the claims alleged in the case.

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

¹ Unless otherwise defined herein, all capitalized terms shall have the meaning set forth in the Settlement Agreement which can be viewed at www.MuseumOfIllusionsNewYorkTicketFeeSettlement.com.

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 *Valcarcel v. Beyond Illusion, LLC d/b/a Museum of Illusions New York and RP Illusions Corp.*, Index No. 655436/2024, pending in the Supreme Court of the State of New York, County of New York. The person who sued, Barabara Valcarcel, is called the Plaintiff. The Defendants are Beyond Illusion, LLC d/b/a Museum of Illusions New York and RP Illusions Corp.

2. What is a class action?

In a class action, one or more people called class representatives (in this case, Barbara Valcarcel) 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 Defendants failed to timely disclose a Processing Fee for tickets purchased online through the Museum of Illusions New York Website, in alleged violation of ACAL § 25.07(4). Defendants deny that they violated any law. The Court has not determined who is right or if Defendants 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 Defendants 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:

QUESTIONS? CALL 1-844-976-4121 TOLL FREE, OR VISIT
WWW.MUSEUMOFILLUSIONSNEWYORKTICKETFEESSETTLEMENT.COM

All individuals who paid a Processing Fee in connection with purchasing tickets online through the Museum of Illusions New York Website from August 29, 2022, to and through April 30, 2024.

THE SETTLEMENT BENEFITS

6. What does the Settlement provide?

Monetary Relief. A Settlement Fund has been created totaling \$580,721.00. Payments to Settlement Class Members, the cost to administer the Settlement, the cost to inform people about the Settlement, attorneys' fees (inclusive of litigation costs), and an award to the Class Representative will also come out of this fund (*see* Question 12).

Prospective Relief. Additionally, Defendants acknowledge that they have changed the purchase flow for tickets purchased online through the Museum of Illusions New York Website. Plaintiff acknowledges and agrees that the current purchase flow complies with all applicable law. Defendants agree 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 visiting www.MuseumOfIllusionsNewYorkTicketFeeSettlement.com.

7. How much will my payment be?

To receive a *pro rata* share of the Settlement Fund, which will be based on the total amount of Processing Fees you paid in connection with tickets purchased online through the Museum of Illusions New York Website from August 29, 2022, to and through April 30, 2024, you **must** submit a timely and complete Claim Form **no later than January 2, 2026**. You can file a Claim Form by visiting the website at www.MuseumOfIllusionsNewYorkTicketFeeSettlement.com. Your payment will be made by PayPal, Venmo, Zelle, Virtual Prepaid Card, or check, at your election. Claim Forms must be submitted online by 11:59 p.m. EST on January 2, 2026, or postmarked and mailed by January 2, 2026.

8. When will I get my payment?

The hearing to consider the fairness of the settlement is scheduled for November 17, 2025. If the Court approves the settlement, eligible Settlement Class Members whose claims were approved by the Settlement Administrator will receive their payment 90 calendar days after the Final Judgment becomes Final. 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 **January 2, 2026**. Claim Forms can be found and submitted by visiting the Submit Claim page of the website, or by printing and mailing a paper Claim Form, copies of which are available for download on the Important Documents page of the website. 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 email. If for some reason you did not receive this information, but believe you are a Settlement Class Member, please call 1-844-976-4121 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 from the Settlement Fund.

We also encourage you to submit your claim on-line. 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 Defendants and other Released Parties for the claims being resolved by this Settlement. The specific claims you are giving up against the Defendants are described in the Settlement Agreement. You will be “releasing” the Defendants and their affiliates, employees, and representatives as described in Section 1.32 of the Settlement Agreement. Unless you exclude yourself (*see* Question 13), you are “releasing” the claims, regardless of whether you claim your electronic payment or not. As noted above, 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 if you have questions.

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in the case?

The Court has appointed Mark S. Reich of Levi & Korsinsky LLP to represent the Settlement Class. They are called “Class Counsel.” Class Counsel believes, after conducting an investigation, that the Settlement Agreement is fair, reasonable, and in

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WWW.MUSEUMOFILLUSIONSNEWYORKTICKETFEESSETTLEMENT.COM

the best interests of the Settlement Class. You will not be charged for this lawyer. 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 paid out of the Settlement Fund in an amount to be determined by the Court. Class Counsel will file a fee petition seeking no more than one-third of the Settlement Fund, inclusive of reimbursement of their costs and expenses. The Court may award less than this amount. Under the Settlement Agreement, any amount awarded to Class Counsel will be paid out of the Settlement Fund.

Subject to approval by the Court, the Class Representative may be paid a service award of \$5,000 from the Settlement Fund 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 October 17, 2025. Requests for exclusion may be submitted either on the Settlement Website (via the online form accessible via the Opt-Out page) or by mailing or otherwise delivering a letter (or request for exclusion) stating that you want to be excluded from the *Valcarcel v. Beyond Illusion, LLC d/b/a Museum of Illusions New York and RP Illusions Corp.*, Index No. 655436/2024 settlement. Your letter or request for exclusion must also include (i) your name, (ii) your address, (iii) a statement that you paid a Processing Fee in connection with purchasing tickets online through the Museum of Illusions New York Website from August 29, 2022, to and through April 30, 2024, (iv) your signature, (v) the name and number of this case, and (vi) 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 October 17, 2025, to the following address:

Museum of Illusions New York Ticket Fee Settlement Administrator
Attn: Exclusions
P.O. Box 58220
Philadelphia, PA 19102

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

No. Unless you exclude yourself, you give up any right to sue the Defendants 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 Fund.

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 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 file with the Court a letter or brief stating that you object to the Settlement in *Valcarcel v. Beyond Illusion, LLC d/b/a Museum of Illusions New York and RP Illusions Corp.*, Index No. 655436/2024 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 Defendants' Counsel listed below.

Class Counsel will file with the Court and post on this website its request for attorneys' fees by **October 2, 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 Defendants' Counsel, at the addresses below, postmarked no later than **October 17, 2025**.

Court	Class Counsel	Defendants' Counsel
Supreme Court of the State of New York, County of New York 60 Centre Street, Courtroom 232 New York, NY 10007	Mark S. Reich Levi & Korsinsky LLP 33 Whitehall Street, 17th Floor New York, NY 10006	Prana A. Topper Manatt, Phelps & Phillips, LLP 7 Times Square New York, NY 10036

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

Objecting simply means telling the Court that you don't 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 don't 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 November 17, 2025 in Courtroom 232 at the Supreme Court of the State of New York, County of New York, 60 Centre Street, New York, NY 10007. 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.MuseumOfIllusionsNewYorkTicketFeeSettlement.com or by calling 1-844-976-4121. 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 don't 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's 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 called *Valcarcel v. Beyond Illusion, LLC d/b/a Museum of Illusions New York and RP Illusions Corp.*, Index No. 655436/2024." 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 **October 17, 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.MuseumOfIllusionsNewYorkTicketFeeSettlement.com. You may also write with questions to Museum of Illusions New York Ticket Fee Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. You can call the Settlement Administrator at 1-844-976-4121 or Class Counsel at 1-212-363-7500, 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.