

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA**

Lisa VanDeBoe. v. UPP Global, LLC d/b/a Florida Parking Co.
Case No: 24-001908-CI

NOTICE OF CLASS ACTION SETTLEMENT

A court authorized this Notice.

This is not a solicitation from an attorney.

You are not being sued.

PLEASE READ THIS NOTICE CAREFULLY

A settlement has been reached in the case of *Lisa VanDeBoe. v. UPP Global, LLC d/b/a Florida Parking Co.*, Case No: 24-001908-CI (Fla. 6th Circuit). This Notice explains: (1) the terms of the Settlement; (2) who is a member of the Class; (3) how payments will be made; (4) how to object to the Settlement; (5) how to opt out of the Settlement; and (6) how to get more information.

You are receiving this Notice because the Parties believe that you are a member of the Settlement Class and would be entitled to benefits under this Settlement.

What is a Class Action?

A class action is a lawsuit in which one or more individuals bring claims on behalf of other persons or entities. These persons or entities are referred to as a “Class” or “Class Members.” In a certified class action, the Court resolves certain issues, legal claims, and/or defenses for all Class Members in a single action, except for those persons or entities who timely request to be excluded from the Class.

What is this Class Action About?

Florida Parking Co. operating private parking lots throughout the State of Florida. When a customer fails to pay for parking or when they stay beyond the paid period, Florida Parking leaves a paper Notice on the vehicle titled “Citation” and imposing a fee, normally \$63.00. Plaintiff filed a lawsuit claiming that the Citations violated the Florida’s Consumer Collection Practices Act, Fla. Stat. § 559 *et. seq.* Specifically, Plaintiff challenged Defendant’s Citation’s because they contained misrepresentations regarding the consequences of failure to pay (affect credit rating, vehicle registration, license renewal, and ability to rent a vehicle) and because the use of the words “Citation” and “fine” gave the appearance that the Notice may have been issued by or affiliated with a governmental entity.

The parties have entered into a Class Action Settlement to resolve the claims. The Settlement is not an admission of liability or wrongdoing. Defendant maintains that it complied with applicable laws, denies that it acted wrongfully or unlawfully, and continues to deny and dispute Plaintiff’s allegations and claims. You are receiving this Notice because Defendants’ records indicate that you paid a parking Citation during the class period and are a member of the Settlement Class.

The Court will conduct a Final Approval Hearing on **October 13, 2025 at 10:00 a.m.**, to decide whether to grant Final Approval of the proposed Settlement. You need not attend. If approved by the Court, Settlement Payments will be automatically issued.

What are the Settlement Terms?

A \$650,000.00 Common Fund will be created to cover all costs of this Settlement, with \$424,600.00 to be used for payments to class members and the remaining \$225,400.00 to be used to cover the Administration Costs, Notice Costs, Class Counsel's Attorneys' Fees and Litigation Expenses, and a Service Award of \$10,000 to be paid to the Named Plaintiff, if approved by the Court.

Settlement Payment amounts depend on whether the customer paid to park and paid the Citation or just paid the Citation. Every Paid Parking Class Member that does not opt out will automatically receive a Settlement Payment equal to approximately 70% of their Citation payment or \$44.00 ($\$63 \times .70 = \44). Each Unpaid Parking Class Member that does not opt out will automatically receive a Settlement Payment equal to approximately 25% of their Citation payment or \$15.75 ($\$63 \times .25 = \15.75).

Additionally, Defendant is no longer issuing citations which contain the allegedly misleading terms.

In exchange for these Settlement Payments, Plaintiff and the Members of the Settlement Class, which does not include anyone who requests to opt out of the Class after receiving a Notice, agree to release all claims made in the lawsuit or involving parking citations or notices issued by Defendants. Class Members do not need to submit a claim. Payments will be made to the same addresses used for this Notice. You may update your address with the claim administrator through the Settlement website: ParkingCitationSettlement.com

You are not required to accept this Settlement. If you wish, you may object to the terms of the Settlement if you comply with the requirements set forth below. Or, you may opt-out of the Class action if you comply with the opt-out requirements set forth below.

How Do I Know if I'm a Member of the Settlement Class?

You are a member of the Settlement Class if you: (1) parked in one of Defendant's parking lots; (2) received a citation/notice from Defendant; and (3) paid the Citation. The formal Class Definition is as follows:

All persons in the State of Florida who paid Defendant for a parking Notice issued between April 30, 2022 and April 30, 2024.

Excluded from the Settlement Class are any Judge and members of their staff to whom the case is assigned and any Settlement Class Member who opts-out of the Settlement.

Objecting to the Terms of the Settlement

The full terms of the Settlement Agreement can be found on the Settlement Website at info@ParkingCitationSettlement.com. If you think the terms of the Settlement are not fair, reasonable, or adequate, you can file a Notice of Intent to object to the terms of the Settlement. Objections must be filed in Court or postmarked by mail no later than **October 8, 2025**. To properly object to the terms of the Settlement, you must file any objection via the Court's electronic filing system if you are represented by own counsel (at your cost) or, if you are not represented by counsel, you must send any objection to Defendant's Counsel and Class Counsel via first-class mail, postage prepaid, at the addresses shown below:

Defendant's Counsel at:

Joseph P. Kenny WEBER, CRABB & WEIN, P.A. 5453 Central Avenue St. Petersburg, FL 33710	Tom K. Schulte HUNTON ANDREWS KURTH LLP 333 S.E. 2nd Avenue, Suite 2400 Miami, Florida 33131
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Class Counsel at:

Brian W. Warwick Christopher Brochu VARNELL & WARWICK, P.A. 400 N. Ashley Drive, Suite 1900 Tampa, FL 33602

A valid Notice of Intent to object must:

1. State name of the case and case number;
2. State your full name, current address, and telephone number;
3. State that you have reviewed the Settlement Class definition and that you understand that you are a Settlement Class Member;
4. State your objection(s), include a statement as to whether each objection applies only to the objector, to a specific subset of the Settlement Class, or to the entire Settlement Class,
5. State with specificity the grounds for each objection, including any evidence and legal authority you wish to bring to the Court's attention;
6. Enclose or provide copies of any documents you want the Court to consider;
7. Identify your counsel, if any;
8. State whether you or your counsel (if represented) if any intends to appear at the Final Approval Hearing; and
9. List all other objections submitted by you and your counsel (if represented) to any class action settlements submitted in any court in the United States in the previous five (5) years, or state that you and your counsel (if represented) have not objected to any class action settlements in the previous five (5) years.
10. Be signed by you or your counsel (if represented).

If you or your counsel (if represented) intend to request permission to address the Court at the Final Approval Hearing, you or your counsel (if represented) must file your Notice of Intent with the Clerk of the Court at least five (5) days prior the hearing.

Any Notice of Intent that is not postmarked by the deadline set forth above or that does not comport with the requirements listed above may waive the right to object and be heard at the Final Approval Hearing.

Opt-Out of the Settlement Class

You may also choose to opt out of the Settlement by making a request by **September 28, 2025**. To opt out of the Settlement, you must simply email the Settlement Administrator at info@ParkingCitationSettlement.com requesting “to be excluded from the class action settlement in *Lisa VanDeBoe. v. UPP Global, LLC d/b/a Florida Parking Co.*, Case No: 24-001908-CI.”

If you choose to opt out of the Settlement and exclude yourself from the Settlement Class, then you will not receive any Settlement payment but will retain your legal claims, if any, against the Defendant.

Who Is Representing the Settlement Class?

The Circuit Court has appointed Named Plaintiff Lisa VanDeBoe to be the Class representative. The Circuit Court has also appointed the following attorneys to be Class Counsel for the Settlement Class Members:

Brian W. Warwick Janet R. Varnell Christopher J. Brochu Pamela G. Levinson Jeffrey L. Newsome VARNELL & WARWICK, P.A. 400 N Ashley Drive, Suite 1900 Tampa, Florida 33602 Telephone: (352) 753-8600 Website: www.vandwlaw.com bwarwick@vandwlaw.com jvarnell@vandwlaw.com cbrochu@vandwlaw.com plevinson@vandwlaw.com jnewsome@vandwlaw.com
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These attorneys are experienced in handling class action lawsuits. More information about Class Counsel is available on their website above. Class Counsel will seek approval from the Court for payment of attorney fees and litigation costs from the Common Fund in an amount equal to 30% of the fund or \$195,000.00.

Class Counsel will also request approval of a Service Award in the amount of \$10,000 to be paid to Plaintiff VanDeBoe for her service on behalf of the Class. The Service Award is designed to reward the Named Plaintiff for securing the Settlement relief for the Settlement Class Members, and to acknowledge

the time spent by the Plaintiff in sitting for depositions, producing documents, responding to discovery requests, participating in the case and mediation, and prosecuting their claims for the benefit of the Settlement Class. You will not be personally responsible to pay Class Counsel for any fees, costs, or expenses incurred in connection with this case.

What Claim(s) Are Settlement Class Members Releasing?

As a part of the Settlement, Settlement Class Members are releasing any and all claims related to allegations about the collection of fees or amounts in connection with parking notices or citations issued during the class period. The full terms of the Release can be found in the Settlement Agreement which is available on the Settlement Website at: ParkingCitationSettlement.com

How Can I Learn More About This Lawsuit and This Settlement?

If you have any questions about this lawsuit, the Settlement, or anything else in this Notice, please visit the Settlement Website at: ParkingCitationSettlement.com

This Settlement Website, ParkingCitationSettlement.com will provide:

1. The full terms of the Settlement Agreement;
2. Information and requirements for submitting a Claim, requesting exclusion, or filing a Notice of Intent to object to the terms of the Settlement;
3. Copies of the complaint filed by the Plaintiff in this lawsuit as well as other important orders from the Circuit Court that were issued during the case prior to the Settlement; and
4. Other information about the case.

If you have any questions, you may contact the Settlement Administrator via email at info@ParkingCitationSettlement.com, via phone at 800-566-0610 or via USPS Mail at:

VanDeBoe v UPP Global
c/o Settlement Administrator
PO Box 23459
Jacksonville, FL 32241

You may also contact Class Counsel, whose contact information and website are listed above. Please do not contact Defendant or Defendant's Counsel about this case or proposed Settlement.

PLEASE DO NOT TELEPHONE OR CONTACT THE CIRCUIT COURT OR THE CLERK OF THE CIRCUIT COURT REGARDING THIS NOTICE.

DONE AND ORDERED in Chambers, Clearwater, Pinellas County, Florida, this 11th day of August, 2025.

Approved by:
JUDGE PATRICIA A. MUSCARELLA
FLORIDA CIRCUIT COURT JUDGE