

CHRISTINA ATTERBURY, Individually and on behalf of all others similarly situated, Plaintiff, v. EARN COMPANY, <i>et al.</i> , Defendants.	COURT OF COMMON PLEAS PHILADELPHIA COUNTY CIVIL ACTION APRIL TERM 2021 NO. 00637
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NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

You may be entitled to receive a settlement payment and other benefits in connection with a class action against Earn Company, Earn Finance Company LLC, Credit Exterminators Inc., and related parties.

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

- This settlement resolves a lawsuit over whether Defendants Earn Company, Earn Finance Company LLC, Credit Exterminators Inc., Sprinkle of Jesus Corp., Casey Olivera a.k.a. Dana Chanel, Donnell Morris a.k.a. Prince Donnell, Cassandra Olivera a.k.a. April, Nakia Rattray a.k.a. Uncle Majic the Hip Hop Magician, violated the Credit Repair Organizations Act, 15 U.S.C. § 1679 *et seq.*
- Defendants deny and dispute the claims asserted in the Litigation. The parties disagree about whether any money (and if so, how much) could have been awarded to you if the Plaintiffs were to prevail at trial. Indeed, due to their insolvency, Defendants likely would not be able to pay a judgment if Plaintiff prevails, and the bankruptcies would be likely. The settlement avoids the costs and risks to members of the Class like you from continuing with the lawsuit, and it provides some relief to the Class, which is better than the likely alternative, which is none.
- This settlement will provide a gross fund of \$125,000.00, payable over a period of about two years, to be used for distribution to Class Members, payment of administrative costs, Class Counsel expenses, and a service award to Plaintiff.
- Your rights are affected whether you act or not. Read this notice carefully.

Your Legal Rights and Options in this Settlement:	
Do Nothing	If the settlement is approved by the Court as presented, you will also be paid a proportionate share of the net settlement proceeds. The payment will be sent to you by check unless you select an electronic payment method on the case website: www.CreditExterminatorsClassAction.com .
Object	Write to the Court about why you don't like the settlement and do not want it approved. Act by December 26, 2026 .
Go to a Hearing	Ask to speak in Court about the fairness of the settlement at the hearing scheduled for January 20, 2027, at 10:00 a.m. in Courtroom 636.

- These rights and options – **and the deadlines to exercise them** – are explained in this notice.
- The Court in charge of this case still has to decide whether to approve the settlement. Payments will be made in approximately two years after the Court approves the settlement and after any appeals are resolved. Please be patient.
- For more information, visit the website www.CreditExterminatorsClassAction.com

WHAT THIS NOTICE CONTAINS

	<u>Page</u>
BASIC INFORMATION	3
1. Why did I get this notice?	3
2. What is this lawsuit about?	3
3. Why is this a class action?	3
4. Why is there a settlement?	3
WHO IS IN THE SETTLEMENT	3
5. How do I know that I am part of the settlement?.....	3
THE SETTLEMENT BENEFITS – WHAT YOU GET	4
6. What does the settlement provide for me?.....	4
HOW YOU GET THE BENEFITS OF THE SETTLEMENT	4
7. Do I need to do anything to get a payment?	4
8. When is the hearing on final approval of the proposed settlement?	4
THE LAWYERS REPRESENTING YOU	4
9. Do I have a lawyer in this case?.....	4
10. How will the lawyers and Class Representative be paid?.....	4
OBJECTING TO THE SETTLEMENT	4
11. How do I tell the Court that I don't like the settlement?	4
THE COURT'S FAIRNESS HEARING	5
12. When and where will the Court decide whether to approve the settlement?	5
13. Do I have to come to the hearing?	5
14. May I speak at the hearing?	5
IF YOU DO NOTHING	5
15. What happens if I do nothing at all?	5
GETTING MORE INFORMATION	5
16. Are there more details about the settlement?	5

BASIC INFORMATION

1. Why did I get this notice?

The Court approved this notice because you have a right to know about a proposed settlement of a class action lawsuit, and about all of your options, before the Court decides whether to approve the settlement. If the Court approves it and appeals (if any) are resolved, the Settlement Administrator will make the payments the settlement allows.

The Court in charge of the case is the Court of Common Pleas of Philadelphia County, Pennsylvania, and the case is known as *Christina Atterbury, individually and on behalf of all others similarly situated, v. Earn Company, et al.*, No. 210400637. The person suing is Christina Warner née Atterbury, also called the “Class Representative.” The companies and individuals being sued, Earn Company, Earn Finance Company LLC, Credit Exterminators Inc., Sprinkle of Jesus Corp., Casey Olivera a.k.a. Dana Chanel, Donnell Morris a.k.a. Prince Donnell, Cassandra Olivera a.k.a. April, Nakia Rattray a.k.a. Uncle Majic the Hip Hop Magician, Earn Finance Company LLC, Sprinkle of Jesus Corp., and Credit Exterminators Inc. are called the Defendants.

This package explains the lawsuit, the settlement, your legal rights, what benefits are available, who is eligible, and how to get them.

The Defendants’ records reflect that you entered into a Credit Repair Services Agreement with Earn Company, Earn Finance Company LLC, or Credit Exterminators Inc. on or after February 10, 2016. The Defendants’ conduct in the credit repair business forms the basis for this lawsuit.

2. What is this lawsuit about?

The lawsuit claims that the Defendants violated federal law by using contracts that contained illegal provisions and that charge unlawful upfront fees prohibited by the CROA. The Defendants deny that they violated any law and assert other defenses.

3. Why is this a class action?

In a class action, one or more people called Class Representatives sue on behalf of all people who have similar claims. All these people are “Class Members,” and grouped together are a “Class.” One court resolves the issues for all Class Members. The Defendants have challenged whether this case should proceed as a class action, but the Court, by Order dated April 18, 2023, certified this matter as a class action. This is a notice that the class action suit has been resolved, subject to court approval.

4. Why is there a settlement?

Plaintiff believes that even if she prevails at trial, there is a substantial likelihood that Defendants would not be able to pay the judgment, as they appear to be insolvent and have indicated they would likely file for bankruptcy. Defendants believe the claims asserted in the case are without substantial merit, and that Plaintiffs may have recovered less or nothing if there had been a trial. But, there has been no trial. Instead, both sides agreed to a settlement. That way, Defendants avoid bankruptcy and the expense of further litigation, and Class Members like yourself will get some compensation, which is better than any alternative remedy that might be available after trial or in bankruptcy. The Class Representative and her attorneys think the settlement is best for all Class Members.

WHO IS IN THE SETTLEMENT

5. How do I know that I am part of the settlement?

If you received this Notice, Defendant’s records reflect that you are a member of the Class, which includes persons who entered into a Credit Repair Services Agreement with Earn Company, Earn Finance Company LLC, or Credit Exterminators Inc. on or after February 10, 2016.

THE SETTLEMENT BENEFITS – WHAT YOU GET

6. What does the settlement provide for me?

Defendants have agreed to create a Settlement Fund of \$125,000.00, which will be paid through a payment plan over a period of approximately two years following an order of final approval of class settlement. Approved Class Counsel expenses, a service award for the Class Representative, and expenses of settlement administration will be paid from that fund. Then, the Net Fund that remains will be distributed to the members of the Class. Payments are expected to be about \$60.00 per Class Member.

HOW YOU GET THE BENEFITS OF THE SETTLEMENT

7. Do I need to do anything to get a payment?

No. You do not need to do anything further to remain in the Class. You will get a payment automatically, assuming court approval of the settlement.

8. When is the hearing on final approval of the proposed settlement?

The Court will hold a hearing on January 20, 2027, at 10:00 a.m. in Courtroom 636 to decide whether to approve the settlement. After the Court rules on whether to approve the class settlement, there may be appeals. Resolving an appeal can take time, often more than a year. If settlement is approved, Defendants' payment plan requires payments over a two-year period. Please be patient.

THE LAWYERS REPRESENTING YOU

9. Do I have a lawyer in this case?

The Court has approved the following lawyers and law firms to represent you and other Class Members: Cary L. Flitter, Andrew M. Milz, Jody Thomas López-Jacobs, and Edward M. Flitter, along with the law firm of Flitter Milz, P.C. These lawyers are called Class Counsel. You will not be charged individually for these lawyers. If you want to be represented by your own lawyer, you may hire a firm at your own expense.

10. How will the lawyers and Class Representative be paid?

Class Counsel have not been paid for their time or services since the filing of this case in April 2021. As part of the class settlement, Plaintiff does not seek reimbursement of attorney fees. However, Plaintiff will ask for reimbursement of their litigation expenses, which is approximately \$24,000. Plaintiff will also ask the Court to approve a \$1,000.00 service award for her time and effort in bringing this case. Class Counsel's litigation expenses and the service award will be paid out of the Settlement Fund.

OBJECTING TO THE SETTLEMENT

11. How do I tell the Court that I don't like the settlement?

If you are a Class Member, you can object to the settlement if you don't like any part of it. You should state why you object and why you think the Court should not approve the settlement. The Court will consider your views. To object, you must mail a written letter to the Settlement Administrator, Class Counsel, and Defendants' counsel at the addresses provided below no later than December 26, 2026, saying that you object to the Settlement in *Atterbury v. Earn Company*, No. 210400637. Any objection should state the reasons for the objection and why you think the Court should not approve the settlement. The objection must also include your name, address, telephone number, email address (if available), and your signature. The objection must be mailed no later than December 26, 2026, to all three of the following:

Settlement Administrator	Class Counsel	Defendants' Counsel
Atterbury v. Earn Company c/o Settlement Administrator P O Box 23678 Jacksonville, FL 32241	FLITTER MILZ, P.C. 450 N Narberth Ave Suite 101 Narberth, PA 19072	DAILEY LLP 1650 Market St Suite 3600 Philadelphia, PA 19103

THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the settlement. You may attend and you may ask to speak, but you don't have to. Attendance is not required or expected unless you have advised that you intend to appear or have your lawyer appear.

12. When and where will the Court decide whether to approve the settlement?

The Court will hold a Fairness Hearing on January 20, 2027, at 10:00 a.m. in Courtroom 636. At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate and meets the test for class action settlements. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the hearing. The Court will also determine the Class Representative Service Award and Class Counsel expenses. Following the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

13. 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 file an objection, you don't have to come to Court to talk about it, but you may. As long as you properly mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, if you wish.

14. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing.

IF YOU DO NOTHING

15. What happens if I do nothing at all?

If the Court gives final approval to the settlement, you will receive a settlement payment as provided in the Class Action Settlement Agreement.

GETTING MORE INFORMATION

16. Are there more details about the settlement?

This notice summarizes the proposed settlement. The pleadings and other records in this litigation, including a copy of the Settlement Agreement, may be examined at any time during regular office hours at the Court of Common Pleas of Philadelphia County. Select case records and a copy of the full Settlement Agreement may also be viewed on the website related to this case: www.CreditExterminatorsClassAction.com. You may also call or write to the following:

The Settlement Administrator:
Atterbury v. Earn Company
c/o Settlement Administrator
P.O. Box 23678
Jacksonville, FL 32241
info@CreditExterminatorsClassAction.com

Class Counsel:
FLITTER MILZ, P.C.
450 N. Narberth Avenue, Suite 101
Narberth, PA 19072
888-668-1225
consumers@consumerslaw.com

Please **do not** call the Court, the Defendants, or the Defendants' counsel.