

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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In re PAYMENT CARD INTERCHANGE	:	MDL No. 1720(MKB)(JAM)
FEE AND MERCHANT DISCOUNT	:	
ANTITRUST LITIGATION	:	Civil No. 05-5075(MKB)(JAM)
_____	:	
This Document Relates To:	:	RULE 23(b)(3) CLASS PLAINTIFFS’
	:	NOTICE OF MOTION AND MOTION FOR
ALL ACTIONS.	:	INITIAL, PARTIAL DISTRIBUTION OF
	:	SETTLEMENT FUNDS
_____	:	
	X	

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that on a date to be determined, in the courtroom of the Honorable Margo K. Brodie, Courtroom 6F, United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, Rule 23(b)(3) Class Plaintiffs, by and through their undersigned attorneys, will and hereby do move this Court for an order for initial, partial distribution of settlement funds.

This motion is based upon this notice of motion and motion, the memorandum of points and authorities in support thereof, the accompanying declarations of Cameron R. Azari and Loree Kovach in support thereof, and such other matters and arguments as the Court may consider in the hearing of this motion.

DATED: August 20, 2025

Respectfully submitted,

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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FEE AND MERCHANT DISCOUNT	:	
ANTITRUST LITIGATION	:	Civil No. 05-5075(MKB)(JAM)
	:	
	:	MEMORANDUM OF LAW IN SUPPORT
This Document Relates To:	:	OF RULE 23(b)(3) CLASS COUNSEL'S
	:	MOTION FOR INITIAL, PARTIAL
ALL ACTIONS.	:	DISTRIBUTION OF SETTLEMENT FUNDS
	:	
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I. INTRODUCTION

On December 16, 2019, the Court granted final approval to this settlement which provides a pro rata distribution of an approximately \$5.5 billion settlement funds to merchants that accepted Visa or Mastercard between 2004 and early 2019. ECF 7257-2 at Appendix I. Following the Second Circuit’s affirmance of the settlement, the Court-Appointed Class Administrator (“Epiq” or “Administrator”) mailed, over several mailings, nearly 38 million claim forms to likely class members.¹ The Court also approved an extensive education-and-outreach campaign, which Epiq and (W)rightOn Communications (“(W)rightOn”), a public-relations firm, conducted at the direction of Rule 23(b)(3) Class Counsel (“Class Counsel”). *See* ECF 8984; text-entry Order (Oct. 12, 2023) (granting funding request). These merchant-outreach efforts resulted in nearly 1.5 million claims filed, representing approximately 45% of the interchange fees identified in Epiq’s records.

Because of certain outstanding legal disputes regarding payment facilitators (“PayFacs”) and Branded Operators, and outstanding challenges to fee amounts or ownership of claims, full payment of claims cannot be accomplished at this time.² After considerable discussion and analysis with Epiq, Class Counsel respectfully request that this Court authorize an initial, partial distribution of the settlement fund to those claimants that are not likely to be impacted by the outstanding legal issues and whose claims are not otherwise in process or potentially subject to future audits.

Specifically, the requested initial, partial distribution (the “Proposed Distribution”) provides partial payment to merchants that accepted Epiq’s estimate of Interchange Fees paid, whose claims are not subject to appeals, ownership or valuation disputes, or future audits and whose partial payment would be at least \$5.00 (“Proposed Distributees”). Kovach Decl., ¶¶16,

¹ Declaration of Cameron R. Azari (“Azari Decl.”), ¶4, filed concurrently herewith.

² Declaration of Loree Kovach (“Kovach Decl.”), ¶15, filed concurrently herewith.

18. The Proposed Distribution would disburse approximately \$426 million to these merchants. *Id.* ¶28.

II. CLAIMS ADMINISTRATION PROCESS

A. The Plan of Administration and Distribution Calls for a Pro Rata Distribution of the Settlement Fund to Class Members

Under the approved Plan of Administration and Distribution, merchants that submitted timely claims would receive settlement payments equal to their pro rata share of the settlement fund, based on their Interchange Fees Paid relative to Interchange Fees Paid by all valid Claimants. ECF 7257-2 at I-2.³ The plan contemplates that a merchant's Interchange Fees Paid are to be calculated primarily based on the interchange fees that the merchant paid on its Visa transactions. *Id.* at I-3. In the event that a merchant is dissatisfied with the data that the Administrator attributed to it, the Administrator may request additional information from the merchant, so as to assist the Administrator in locating the merchant's data in its database. Finally, the plan gives merchants the option to provide their own information to supplement the data that the Administrator was able to locate based on identifying information associated with the merchant. *Id.* at I-5. If the merchant is still dissatisfied with the fees attributed to it, it may appeal the Administrator's determination to the Special Master, and ultimately to this Court.

B. Epiq and Class Counsel Conducted an Extensive Notice and Publicity Campaign

As previewed in the Court-approved Notice Plan (ECF 7257-2 at Appendix F & ECF 7361), Epiq and Class Counsel conducted an extensive notice and publicity campaign, both at the time of preliminary approval and continuing throughout the claims-administration process. Azari Decl., ¶¶7-14. The process began with Epiq working with the data it obtained from the Defendants and others to compile a database of merchants that were likely to have accepted Visa and

³ For purposes of this motion, capitalized terms have the meanings given to them in the Definitive Amended and Superseding Class Settlement Agreement.

Mastercard during the fifteen-year class period.⁴ *Id.*, ¶8. Through a months-long process, Epiq sorted through over 221 million merchant records to create a population of approximately 16 million likely class members. *Id.* Notice was provided to this population in 2019. *Id.*

Starting in December of 2023, Epiq mailed more than 38 million Claim Forms, initially to the 16 million merchants identified above and later to additional merchants identified in data. *Id.*, ¶¶8, 11 (referencing Aug. 8, 2024 text-entry Order regarding ECF 9380). Many of the Claim Forms were prepopulated with merchant-identifying information and estimated Interchange Fees Paid and QR-code links to take the merchant to an online Merchant Portal that in many cases allowed the merchant to view its data and take various actions related to its claim. *Id.*, ¶19. The claim forms were designed in conjunction with (W)rightOn – an award-winning public-relations firm that Class Counsel engaged to assist in the claims process – to provide necessary information to merchants in an official yet accessible and concise manner. *Id.*, ¶52.

Epiq also maintained a Settlement Website (PaymentCardSettlement.com), which it adapted to be consistent with the education-and-outreach campaign that Epiq, (W)rightOn, and Class Counsel were conducting. In addition to containing the Merchant Portal, the Settlement Website was the main source of official settlement information to merchants, and as of August 11, 2025, had more than 24 million individual page visits. *Id.*, ¶60.

While sending the Claims Forms via First Class Mail, Epiq simultaneously conducted an extensive paid-media campaign calculated to reach members of the Class. The paid-media campaign included 171 separate print publication units, with a combined circulation of more than 11.2 million and more than 1.2 billion internet impressions by adults. *Id.*, ¶13. To reach potential merchants whose native language is not English, Epiq purchased media in seven additional languages. *Id.* The paid-media campaign included ads on streaming radio, internet banners, and leading social media platforms, such as Facebook, Instagram, and TikTok. *Id.*, ¶¶10, 36-51, 64.

⁴ Epiq was also able to make use of the data work that it performed from the time of the 2012 settlement to the Second Circuit's reversal of that settlement.

In addition to assisting with the design of the claim forms, (W)rightOn provided outreach and educational support throughout the claims period. *Id.*, ¶¶52-56. This support included creating a “brand” for the settlement and ensuring that communications from Epiq and Class Counsel adhered to accurate messages that were designed to increase awareness of and participation in the settlement. (W)rightOn also arranged for media appearances for selected Class Representatives, other members of the class, and Class Counsel to raise awareness of the settlement in the merchant community. *Id.* (W)rightOn’s campaign generated more than 70 million impressions from media mentions, social-media-influencer posts, and trade-association communications. *Id.*, ¶55.

Throughout the claims period, Class Counsel and Epiq fielded inquiries from large and small merchants regarding the claims process. Epiq staffed a call center to handle routine merchant questions, which could be escalated to more senior Epiq employees or Class Counsel as appropriate. *See id.*, ¶¶61-62. Class Counsel communicated repeatedly with merchants and their representatives by e-mail, telephone, and video conference, sometimes independently and other times together with Epiq, depending on the nature of the merchant’s issue. Class Counsel believe that this extensive notice and publicity campaign is a significant cause of the positive claims results, reflecting claims representing approximately 45% of the interchange fees in Epiq’s database.

C. A Large Number of Class Members, Representing a Large Portion of the Transaction Volume in the Class Period, Submitted Claims

The settlement generated a high level of engagement among merchants. As of August 12, 2025, over 1.1 million registrants – corresponding to over 2 million Tax Identification Numbers (“TINs”) – registered a merchant account. Kovach Decl., ¶8. The 2 million TINs linked to merchant accounts include only those who had verified their connection to those TINs, either through Epiq’s own records or with supplemental information provided by the claimant. *Id.*, ¶7. As of August 12, claims were submitted for the majority – approximately 1.4 million – of these

TINs.⁵ *Id.*, ¶8; *see also infra* §III.A. The TINs for which claims were submitted represented more than 45% of the interchange fee volume in Epiq’s database. *Id.*

After class members verified that they had authority for their respective TINs, they had the ability to challenge Epiq’s calculation of their respective Interchange Fees Paid total. They could do so through a multi-step process. *Id.*, ¶10. The first step was to submit a “research request,” whereby they provided information to Epiq, which Epiq then used to attempt to find additional Interchange Fees Paid for that TIN in its database. *Id.* If this first step was unsuccessful or the merchant remained dissatisfied, the merchant was given an opportunity to provide its own data, for which Epiq retains the right to request verification. *Id.*, ¶11.

D. Pending Appeals Make a Complete Distribution at This Time Impractical

Two legal disputes – currently pending before the Second Circuit – affect Epiq’s ability to make complete payments to the class at this time. The first involves PayFacs and poses the question of whether PayFacs, such as Square or Intuit, or the merchant that takes payment through them “accepted” cards and thus is a member of the class. *See* ECF 9308. The second legal dispute poses a similar class-membership question as between upstream oil companies – such as Shell and Texaco – and the fuel retailers (so-called “Branded Operators”) that interact with and sell fuel to the end consumer. ECF 9406.

Because of these appeals – and the associated uncertainty regarding certain merchants’ class membership – the Court ordered Class Counsel to establish trust accounts with settlement funds attributable to, respectively Branded Operators and PayFacs merchants. ECF 9384; ECF 9450. Determining the precise interchange-fee volume of Branded Operators and PayFacs merchants is not a straightforward task. There is still uncertainty surrounding the precise volume

⁵ Some of the TINs for which claims were not filed were “in conflict” (more than one filer claimed a connection to the TIN). Others had not yet provided sufficient proof of authority that they could act for the TIN. Still others were linked to a registered account but the registrant did not file the claim.

of Interchange Fees Paid that will be claimed by the parties to the PayFacs and Branded Operator disputes. Kovach Decl., ¶¶12-14.

With respect to the PayFacs, for example, the data provided by the Defendants does not contain a distinct identifier for “PayFac merchant.” Kovach Decl., ¶12.d. As a result, Epiq must necessarily rely on proxy methods of identification, such as searching for TINs associated with the payment facilitators themselves, which are by their nature imprecise. *See id.*, ¶12.e. In addition, the resolution of the PayFacs dispute will affect the necessary holdback amount because the interchange-fee volume for filed claims is likely to be greater if the PayFacs are determined to be class members than if the PayFacs merchants are determined to be in the class. *Id.*, ¶¶12.g-h. Because the timing and result of the resolution of this dispute is unknown at this time, Epiq must hold back funds based on the more conservative assumption – *i.e.*, that the PayFacs will be determined to have “accepted” cards. *Id.*, ¶12.i.

Similarly, for the Branded Operators, the data in Epiq’s possession do not clearly identify the population of merchants that contract with their fuel suppliers to receive card-acceptance services. *Id.*, ¶13. While Epiq can use various proxies for Branded Operators (such as the Merchant Category Codes (“MCCs”) relating to fuel retailers), those too are imprecise. And like the PayFacs issue, the resolution of the Branded Operator question will impact the amount of funds which must be held back. *Id.*, ¶¶13.e-f.

III. THE PROPOSED DISTRIBUTION IS IN THE BEST INTEREST OF THE CLASS

While the ultimate resolution of the *Lanning* and *Old Jericho* appeals⁶ is pending and funds are held back to account for any outcome, it would be in the best interests of the class to make a partial distribution to the subset of claimants whose payment eligibility is now certain.

⁶ *Old Jericho Enters., Inc. v. Visa, Inc.*, No. 20-cv-2394 (E.D.N.Y.); *Lanning v. Visa, Inc.*, No. 21-cv-2360 (E.D.N.Y.); *Camp Grounds Coffee, LLC v. Visa, Inc.*, No. 21-cv-3401 (E.D.N.Y.). The Second Circuit has recently proposed both appeals be heard the week of October 13, 2025. Case Calendaring, *Old Jericho Enters., Inc. v. Visa, Inc.*, No. 24-2678 (2d Cir. July 9, 2025), ECF 90.

Specifically, Class Counsel propose to distribute approximately \$426 million to more than 605,000 claimants, after conducting a quality-control audit.⁷ Kovach Decl., ¶28. The population of claims included in the proposed partial distribution is limited to those that were timely, associated with a valid TIN, and in agreement with the fees calculated by Epiq and reflected on the pre-populated claim forms or the Merchant Portal. *Id.*, ¶16. The Proposed Distributees will receive a percentage of their pro rata share of the net settlement fund. *Id.*, ¶¶23-24. This will ensure that no merchant is overpaid now. *Id.* These claimants will receive the remaining portions of their pro rata shares in a subsequent distribution.

A. A Large Portion of the Class Will Benefit from the Proposed Distribution

As of August 12, 2025, claims have been submitted on behalf of 1,424,566 unique TINs. *Id.*, ¶8. Most of these claimants (970,888) have agreed with the fee calculation reflected in Epiq’s database. *Id.*, ¶10.a. The remainder are either in conflict, currently before the Special Master, have not submitted acceptable proof of authority, have requested that Epiq re-query its transaction data, or, in the absence of applicable transaction data, submitted their own data to inform Epiq’s fee calculation. *Id.*, ¶¶10.b.-c. These requests are in process.

As detailed in the Kovach Declaration, a partial distribution is in the best interest of those class members and in the interest of the claimants as a whole. A partial distribution now would accord with the salutary goal of Rule 23(b)(3) settlements “to get as much of the available damages remedy to class members as possible and in as simple and expedient a manner as possible.” *Newberg on Class Actions*, §12:15.

Needless to say, any partial distribution should not jeopardize the eventual recovery of those claimants whose claims are still in process, or whose claims are implicated in the *Lanning*

⁷ Class Counsel can provide the Court with a list of Claimant ID Numbers and corresponding partial-payment amounts, under seal, upon request.

and *Old Jericho* appeals. Accordingly, the proposed partial distribution is a conservative one, carefully calculated by Epiq to comport with the approved Plan of Allocation.

In addition to untimely or in-process claims, as well as claims likely to be in audit population, excluded from the proposed partial distribution are claims with MCC codes associated with gasoline (*i.e.*, implicated in the *Old Jericho* appeal) or claims from known Payment Facilitators or submerchants (*i.e.*, implicated in the *Lanning* appeal). Kovach Decl., ¶¶12-14. The current proposed partial distribution would also exclude otherwise eligible claims whose estimated partial pro rata payment would be less than \$5.00; those claims would be paid out in a single tranche at a later date. *Id.*, ¶18. This accounts for nearly 100,000 claims in the initial population. *Id.*

After applying these criteria – and conducting rigorous quality checks on the resulting distribution universe (*see id.*, ¶19) – Epiq arrived at a population consisting of 605,472 merchant claims filed by 499,175 registrants (“Proposed Distributees”). *Id.*, ¶28. These claimants’ total interchange fees is \$36,151,062,607.90; the proposed partial distribution amount is \$426,063,670.16. *Id.*

This sum of \$426,063,670.16 reflects several conservative assumptions designed to eliminate any risk of this partial distribution harming future claimants. Notably, to estimate what percentage of total claimant fees the Proposed Distributees’ \$36,151,062,607.90 in interchange fees represents, Epiq used as the denominator not the sum total of interchange fees associated with submitted claims, but rather the interchange fees reflected in the complete universe of transaction data in Epiq’s possession – a sum more than twice as large. *Id.*, ¶23. In addition, Epiq conservatively deducted from the net settlement amount available for distribution anticipated future costs, and did not include future accrued interest. *Id.*, ¶25.

The Court-approved Plan of Administration and Distribution proposed distributing the cash fund to eligible claimants pro rata through a process that is fair, equitable, simple, cost-effective, and minimally burdensome. ECF 7257-2 at I-2. The proposed partial distribution comports with these values. It will enable eligible claimants with the clearest, non-controversial claims to receive

a partial payment of their pro rata share of the net settlement fund now. And, because of the conservative holdback amount, it will ensure that the full measure of remedy damages remains available to claimants with more complex or controverted claims who require additional time for appeals and/or fee calculation.⁸

IV. CONCLUSION

Because the proposed partial distribution is in the best interests of the claimants as a whole – benefitting a majority of claimants with an expeditious partial distribution, while protecting those claimants for whom a distribution is not yet ripe – Class Counsel respectfully request that the Court grant the motion.

DATED: August 20, 2025

Respectfully submitted,

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⁸ This Court has previously approved preliminary, partial distributions in large antitrust settlements, when doing so is in the best interests of the class. *See, e.g., In re Air Cargo Shipping Servs. Antitrust Litig.*, No. 06-md-1775 (E.D.N.Y.) text-entry orders granting ECF 1526 (Aug. 25, 2011) & ECF 1781 (Jan. 4, 2013); *Air Cargo*, ECF 2450; *Air Cargo*, ECF 2503; *Air Cargo*, ECF 2509; *Air Cargo*, ECF 2478.

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

**IN RE PAYMENT CARD
INTERCHANGE FEE AND MERCHANT
DISCOUNT ANTITRUST LITIGATION**

This Document Applies to: All Cases.

No. 05-MD-01720 (MKB) (JO)

**DECLARATION OF CAMERON R. AZARI, ESQ., ON IMPLEMENTATION OF
CLAIM PHASE NOTICE**

I, Cameron R. Azari, Esq., hereby declare and state as follows:

1. My name is Cameron R. Azari, Esq. I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am a nationally recognized expert in the field of legal notice and I have served as an expert in dozens of federal and state cases involving class action notice plans.

3. I am a Senior Vice President of Epiq Class Action & Claims Solutions, Inc. (“Epiq”) and the Managing Director of Epiq Legal Noticing (aka Hilsoft Notifications), a business unit of Epiq that specializes in designing, developing, analyzing, and implementing large-scale, un-biased, legal notification plans. Hilsoft Notifications was recently rebranded as Epiq Legal Noticing.

4. This declaration describes the successful implementation of the Claim Phase Notice Plan (“Notice Plan” or “Plan”) for the parties’ settlement between the Rule 23(b)(3) Class Plaintiffs and the Defendants in *In re: Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, MDL 1720 in the United States District Court for the Eastern District of New York. Epiq conducted an extensive notice and publicity campaign, both at the time of preliminary approval and continuing throughout the claims-administration process. As described herein, the Notice Plan for the claim phase as designed and implemented reached the greatest practicable number of Settlement Class members and was consistent with the Notice Plan presented to and approved by the Court. This was a massive effort. Epiq received and analyzed more than 40 million data records and hundreds of billions of rows of transactions data, sent more than 38

million mailed Claim Forms, of which approximately 82% were successfully delivered, and implemented a comprehensive Media Plan that included more than 1.2 billion digital and social media notices (one of the largest digital noticing campaigns ever implemented for a class action case).

5. I previously executed my *Declaration of Cameron R. Azari, Esq., on Proposed Settlement Class Notice Program* (“Notice Plan Declaration”) dated August 31, 2018, which detailed Epiq’s class action notice experience and attached Epiq’s curriculum vitae. I also provided my educational and professional experience relating to class actions and my ability to render opinions on the overall adequacy of notice programs. Subsequently, I executed my *Declaration of Cameron R. Azari, Esq., on Implementation and Adequacy of Settlement Notices and Notice Plan* (“Implementation Declaration”) on June 6, 2019, which described the successful implementation of the Settlement Class Notice Program and provided settlement administration statistics. In addition, I executed my *Supplemental Declaration of Cameron R. Azari, Esq., on Implementation and Adequacy of Settlement Notice Plan* (“Supplemental Implementation Declaration”) on August 7, 2019, which provided updated administration statistics following the implementation of the Settlement Notice Plan.

6. The facts in this declaration are based on my personal knowledge, as well as information provided to me by my colleagues in the ordinary course of my business at Epiq and Epiq Legal Noticing (hereinafter “Epiq”).

OVERVIEW

7. As detailed in my Implementation Declaration, after preliminary approval, Epiq successfully implemented the initial Notice Plan. This declaration details the notice activities undertaken for the claim phase, provides “proofs of performance,” and explains how and why the Notice Plan was comprehensive, well suited to the Class, and conformed to the standards that federal courts and jurisprudence require. Epiq successfully implemented all aspects of the Notice Plan for the claim phase.

8. Considerable efforts were undertaken by Epiq to compile a database of individuals and entities that have accepted MasterCard or Visa during the 15-year class period stretching from January 1, 2004 to January 25, 2019. The process began with Epiq working within the data it obtained from the Defendants and others to compile a database of merchants that were likely to have accepted Visa and Mastercard during the fifteen-year class period.¹ Initially more than 221 million merchant records were gathered from MasterCard, Visa and the largest U.S. payment processors resulting in a database of more than 16 million distinct merchant records. Additional data provided by Visa after the 2019 Notice mailing, and additional details from Visa about how to interpret that data, resulted in more than 38 million distinct merchant records in total.

9. Since the precise number of Settlement Class members is unknown, the measured media selections to reach Settlement Class members were established based on three broad target audiences: (1) U.S. Adults aged 18+; (2) U.S. Adults who are Business Owners; and (3) U.S. Adults who are in Business and Finance Occupations.

10. To date, the Notice Plan has been implemented as ordered by the Court, including dissemination of the Claim Form to likely Rule 23(b)(3) Settlement Class members via postal mail and a Media Plan with an extensive schedule of well-read consumer magazines, national business publications, U.S. territories newspapers, digital notices, social media notices, Satellite radio, and streaming radio/television.² Notice placements also appeared in non-measured trade, business and specialty publications, local business journals, specialty language publications, sponsored search listings, a Case Website, and an extensive public relations campaign with (W)right On Communications, Inc., (“(W)right On”) providing additional notice exposures.

¹ Epiq was also able to make use of the data work that it performed from the time of the 2012 Settlement to the Second Circuit’s reversal of that Settlement.

² The Media Notice Plan that was implemented for the claim phase was modeled after the Media Notice Plan that Epiq designed and implemented for the initial notice efforts as detailed in my 2019 Implementation Declaration. The Media Notice Plan for the claim phase was updated to replace media publications such as *Parade Magazine* and *People en Espanol*, which no longer exist with modern media options such as streaming radio and television.

11. Commencing on December 1, 2023, Epiq sent a total of 38,185,025 individual Claim Forms to Settlement Class members by USPS first class mail. This campaign consisted of an initial 18.5 million Claim Forms mailed to merchants, starting in December 2023 into early 2024. An additional 19.6 million Claim Forms were mailed to additional potential Settlement Class members, identified based on additional data and information from Visa, commencing in September 2024, following the Court's August 8, 2024, Order, ECF 9380 granting an extension of the claim filing deadline and ordering Claim Forms to be mailed to these potential Settlement Class members. Complimenting this massive individual direct mailing effort, the measurable paid media effort alone reached 89.3% of all U.S. Adults aged 18+ with an average frequency of 5.0 times, 89.7% of all U.S. Adults who are Business Owners with an average frequency of 5.2 times, and 89.4% of all U.S. Adults in Business and Finance Occupations with an average frequency of 4.6 times.³

12. Not reflected in the calculable reach and average frequency of exposure are additional efforts that were utilized, but for which reach and average frequency of exposure are either incalculable or provide qualitative, not quantitative, enhancement (*e.g.*, the notice placements in trade, business and specialty publications, local business journals, specialty language publications, sponsored search listings, a Case Website, and an extensive public relations campaign with (W)right On . A significant number of Settlement Class members were smaller businesses, and many represented diverse and/or underserved communities where language or history created additional obstacles to communicating regarding the Settlement. For these reasons, noticing efforts and resources were intentionally targeted to ensure the message reached diverse business communities.

³ Reach is defined as the percentage of a class exposed to notice, net of any duplication among people who may have been exposed more than once. Notice exposure is defined as the opportunity to see a notice. The average frequency of notice exposure is the average number of times that those reached by a notice would be exposed to the notice.

13. Altogether, the significant paid media effort included 171 separate print publication units with a combined circulation of more than 11.2 million and more than 1.2 billion adult internet digital impressions. While the majority of the components of the Notice Plan appeared in English, the Notice was also published in seven additional languages (Spanish, Chinese, Japanese, Korean, Russian, Thai, and Vietnamese) to reach Settlement Class members whose native language is not English.

14. All documents were designed to be noticeable, clear, simple, substantive, and informative. No significant or required information was missing.

15. In my opinion, the Notice Plan fairly and adequately covered and notified the Class about their right to file a claim without excluding any demographic group or geographic area.

16. In my opinion, each person reached has been provided with adequate time prior to the Claims Deadline to accomplish what is necessary for filing a claim.

NOTICE PLAN IMPLEMENTATION

Individual Notice – Direct Mail

17. Epiq worked with the settling parties to develop a notice database using the extensive data developed for the initial notice phase, combined with additional data provided by Visa and Mastercard, and 2013-forward acquirer records. Historically, Epiq received and reviewed 221,872,131 rows of data containing merchant name, address and related information (Epiq received and processed 115,045,756 records as part of the prior, 2013 notice effort and an additional 106,826,375 records for transactions that occurred since that time). This data was obtained from Visa, Mastercard, settling banks, and third-party acquirers. Epiq combined and de-duplicated the data as appropriate. As with the data used for individual notice for the proposed 2012 settlement, extensive data analysis efforts were undertaken to maximize the accuracy of the deduplication efforts and to enhance the deliverability of the mailing effort. To the extent reasonably possible, separate records were “rolled-up” into one record for the notice mailing. After reasonable efforts to normalize, combine and de-duplicate these multiple datasets, Epiq determined that there were 38,185,025 records that would be mailed individual notice. *See Kovach Declaration.*

18. Prior to mailing, all mailing addresses were checked against the National Change of Address (“NCOA”) database maintained by the United States Postal Service (“USPS”).⁴ Any addresses that are returned by the NCOA database as invalid were updated through a third-party address search service. In addition, the addresses were certified via the Coding Accuracy Support System (“CASS”) to ensure the quality of the zip code, and verified through Delivery Point Validation (“DPV”) to verify the accuracy of the addresses. This address updating process is standard for the industry and for the majority of promotional mailings that occur today.

19. Commencing on December 1, 2023, Epiq disseminated 38,185,025 Claim Forms via USPS first class mail to likely Settlement Class members. The Claim Form, sent by postal mail, was an 8½” x 11” page including brief information about: 1) the Settlement and the Merchant’s associated Interchange Fees; 2) where Interchange Fees were located in the transaction data for the Merchant, 3) the amount of Interchange Fees for each merchant – pre-populated on the Claim Form; and 4) if Interchange Fees for the Merchant were not available, a field for the Merchant to submit their estimated Interchange Fee amount or select a box asserting that they do not know the amount of fees paid during the Class Period and would like the fees calculated for them. Many of the Claim Forms were prepopulated with merchant-identifying information and estimated Interchange Fees Paid and QR-codes and links to take the merchant to an online Merchant Portal that in many cases allowed the merchant to view its data and take various actions related to its claim. There were four types of Claim Forms, including: 1) Pre-Populated Claim Form (with transactional data); 2) No Transactional Value *with* Tax ID Claim Form; 3) No Transactional Value *without* Tax ID Claim Form; and 4) Blank Claim Form (for Class Members without any available data). The Claim Forms are included as **Attachment 1**.

⁴ The NCOA database contains records of all permanent change of address submissions received by the USPS for the last four years. The USPS makes this data available to mailing firms and lists submitted to it are automatically updated with any reported move based on a comparison with the name and known address.

20. The return address on the Claim Form is “Payment Card Interchange Fee Settlement.” The address panel of the envelope containing the Claim Form had a bold callout on the back: (“**It is time to file your claim for your share of the \$5.5+ billion settlement for anyone that accepted Visa or Mastercard from January 1, 2004 through January 25, 2019.**”). It also stated: (“**Enclosed claim form approved by U.S. Federal Court**”).

21. The return address on the Claim Form was a post office box that Epiq maintains for this action. The USPS automatically forwarded Claim Forms with an available forwarding address order that has not expired (“Postal Forwards”). Claim Forms returned as undeliverable were re-mailed to any new address available through USPS information, (for example, to the address provided by the USPS on returned mail pieces for which the automatic forwarding order had expired but was still within the time period in which the USPS returned the piece with the address indicated), or to better addresses that were found using a third-party address lookup service. Upon successfully locating better addresses, Claim Forms were promptly re-mailed. Epiq has re-mailed over six million Claim Forms.

22. Additionally, Claim Forms were mailed to all persons/entities who requested one via the toll-free telephone number or other means. The contents of the Claim Forms are also available to download or print at the Case Website, www.paymentcardsettlement.com (in English, Spanish, Chinese, Japanese, Korean, Russian, Thai, and Vietnamese).

Media Notice Plan

23. To guide the selection of measured media in reaching Settlement Class members, the Notice Plan focused the reach to three target audiences including (1) U.S. Adults aged 18+; (2) U.S. Adults who are Business Owners; and (3) U.S. Adults who are in Business and Finance Occupations.

National Consumer Magazine Publications

24. To target all demographic groups, the Publication Notice appeared in two selected leading weekly and monthly publications. The Notice appeared twice in each *People* and *Sports Illustrated*, for a total of four insertions. The Notice appeared as a highly visible, full page notice in each publication. The Notice ran on the dates and pages indicated below:

<i>Publication</i>	<i>On-Sale Dates</i>	<i>Page Positions</i>
<i>People</i>	1/5/24 & 3/1/24	76 & 28
<i>Sports Illustrated</i>	1/30/24 & 2/27/24	21 & 21

25. The selected publications have a combined circulation of 3.5 million. The Publication Notice is included as **Attachment 2**. Individual tear sheets of the Notice as it appeared in each of these selected consumer magazine publications are included as **Attachment 3**.

U.S. Territories Newspapers

26. The Publication Notice appeared once as a standard magazine sized, full page ad unit in English and Spanish language newspapers targeting the U.S. territories. Specifically, the Publication Notice ran on the dates and pages in the following five newspapers indicated below:

<i>Publication</i>	<i>Distribution</i>	<i>On-Sale Date</i>	<i>Page Position</i>
<i>El Nuevo Dia</i>	Puerto Rico	1/3/24	11
<i>El Vocero De Puerto Rico</i>	Puerto Rico	1/3/24	12
<i>Primera Hora</i>	Puerto Rico	1/3/24	19
<i>Samoa News</i>	American Samoa	1/3/24	B8
<i>Virgin Islands Daily News</i>	U.S. Virgin Islands	1/3/24	9

27. The selected publications have a combined circulation of over 442,000. An example of the Notice as it appeared in these publications is included as **Attachment 4**. Individual tear sheets for each U.S. territories newspaper insertion have been collected by Epiq and are available upon request.

National Business Publications

28. To target business owners and adults in business and finance occupations, the Publication Notice appeared in seven selected leading national business publications as a full-page or equivalent size ad unit. The selected publications include some of the largest circulating newspapers in the U.S.

<i>Publication</i>	<i>On-Sale Date(s)</i>	<i>Page Position(s)</i>
<i>Barrons</i>	1/6/24 & 3/6/24	6 & 9
<i>Financial Times</i>	1/5/23	3
<i>Forbes</i>	2/21/24	29
<i>Fortune</i>	2/20/24 & 4/23/24	11 & 29
<i>Investors Business Daily</i>	1/8/24	A7
<i>New York Times</i>	1/7/23	5
<i>Wall Street Journal</i>	1/6/24	B11

29. The selected seven business publications have a combined circulation of over 2.2 million. An example of the Publication Notice as it appeared in these selected national business publications is included as **Attachment 5**. Individual tear sheets for each business publication insertion have been collected by Epiq and are available upon request.

Trade & Specialty Publications

30. The Publication Notice appeared in 15 selected trade & specialty publications once or twice as a full page or equivalent size ad unit for a total of 23 insertions, three times as a half page ad and once as a full page spread. A complete list of the trade & specialty publications in which the Publication Notice appeared is included below.

<i>Publication</i>	<i>On-Sale Date(s)</i>	<i>Page Position(s)</i>
<i>Crain's New York</i>	1/8/24 & 2/26/24	7 & 5
<i>Crain's Chicago</i>	1/8/24 & 2/26/24	9 & 5
<i>Crain's Detroit</i>	1/8/24 & 2/26/24	9 & 7
<i>Crain's Cleveland</i>	1/8/24 & 2/26/24	5 & 5
<i>Convenience Store News</i>	1/14/24	33
<i>Mass Market Retailers</i>	1/15/24 & 2/26/24	7 & 13
<i>Supermarket News</i>	2/6/24	16-17
<i>C-Store Decisions</i>	1/8/24	51
<i>CSP Magazine</i>	Dec 2024 & Jan 2025	75 & 34

<i>Publication</i>	<i>On-Sale Date(s)</i>	<i>Page Position(s)</i>
<i>NACS</i>	Dec 2024 & Jan 2025	36 & 46
<i>FabriCare</i>	Q2 2025	7
<i>Hardware Retailing</i>	March 2024	57
<i>Clean Facts</i>	Q2 2024	8
<i>Total Food Service</i>	March 2024 & April 2024	57 & 57
<i>Retail Merchandiser (digital only)</i>	1/15/24	2

31. The selected publications, which include all editions of Crain’s, have a combined circulation of over 558,000. An example of the Publication Notice as it appeared in these publications is included as **Attachment 6**. Individual tear sheets for each trade, business and specialty publication insertion have been collected by Epiq and are available upon request.

Local Business Journals

32. The Publication Notice appeared twice as a full-page ad unit in local business journals and covering all major metropolitan areas in the United States in English. More details regarding the selected publications, on-sale dates, and page position are included in the following table.

<i>Local Business Journal</i>	<i>On-Sale Dates</i>	<i>Page Positions</i>
<i>Albany Business Review</i>	1/5/24 & 3/1/24	9 & 7
<i>Albuquerque Business First</i>	1/5/24 & 3/1/24	3 & 7
<i>Atlanta Business Chronicle</i>	1/5/24 & 3/1/24	2 & 13
<i>Austin Business Journal</i>	1/5/24 & 3/1/24	5 & 5
<i>Baltimore Business Journal</i>	1/5/24 & 3/1/24	32 (Back Cover) & 24 (Back Cover)
<i>Birmingham Business Journal</i>	1/5/24 & 3/1/24	11 & 7
<i>Boston Business Journal</i>	1/5/24 & 3/1/24	5 & 24
<i>Buffalo Business Journal</i>	1/5/24 & 3/1/24	5 & 7
<i>Charlotte Business Journal</i>	1/5/24 & 3/1/24	5 & 2
<i>Cincinnati Business Courier</i>	1/5/24 & 3/1/24	7 & 9

<i>Local Business Journal</i>	<i>On-Sale Dates</i>	<i>Page Positions</i>
<i>Columbus Business First</i>	1/5/24 & 3/1/24	2 & 2
<i>Dallas Business Journal</i>	1/5/24 & 3/1/24	9 & 5
<i>Dayton Business Journal</i>	1/5/24 & 3/1/24	5 & 5
<i>Denver Business Journal</i>	1/5/24 & 3/1/24	5 & 5
<i>Triad Business Journal</i>	1/5/24 & 3/1/24	24 (Back Cover) & 9
<i>Pacific Business News</i>	1/5/24 & 3/1/24	5 & 13
<i>Houston Business Journal</i>	1/5/24 & 3/1/24	44 & 48
<i>Jacksonville Business Journal</i>	1/5/24 & 3/1/24	7 & 7
<i>Kansas City Business Journal</i>	1/5/24 & 3/1/24	5 & 5
<i>Louisville Business First</i>	1/5/24 & 3/1/24	5 & 5
<i>Memphis Business Journal</i>	1/5/24 & 3/1/24	5 & 5
<i>South Florida Business Journal</i>	1/5/24 & 3/1/24	32 (Back Cover) & 13
<i>Milwaukee Business Journal</i>	1/5/24 & 3/1/24	28 (Back Cover) & 7
<i>Minneapolis/St. Paul Business Journal</i>	1/5/24 & 3/1/24	5 & 10
<i>Nashville Business Journal</i>	1/5/24 & 3/1/24	9 & 5
<i>Orlando Business Journal</i>	1/5/24 & 3/1/24	24 & 5
<i>Philadelphia Business Journal</i>	1/5/24 & 3/1/24	5 & 5
<i>Phoenix Business Journal</i>	1/5/24 & 3/1/24	5 & 5
<i>Pittsburgh Business Times</i>	1/5/24 & 3/1/24	7 & 5
<i>Portland Business Journal</i>	1/5/24 & 3/1/24	24 (Back Cover) & 5
<i>Triangle Business Journal</i>	1/5/24 & 3/1/24	5 & 5
<i>Sacramento Business Journal</i>	1/5/24 & 3/1/24	5 & 5
<i>San Antonio Business Journal</i>	1/5/24 & 3/1/24	3 & 3
<i>San Francisco Business Times</i>	1/5/24 & 3/1/24	5 & 3
<i>Silicon Valley Business Journal</i>	1/5/24 & 3/1/24	5 & 7
<i>Puget Sound Business Journal</i>	1/5/24 & 3/1/24	5 & 5

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<i>Local Business Journal</i>	<i>On-Sale Dates</i>	<i>Page Positions</i>
<i>St. Louis Business Journal</i>	1/5/24 & 3/1/24	5 & 7
<i>Tampa Bay Business Journal</i>	1/5/24 & 3/1/24	5 & 7
<i>Washington Business Journal</i>	1/5/24 & 3/1/24	24 & 9
<i>Wichita Business Journal</i>	1/5/24 & 3/1/24	16 & 5
<i>Alaska Journal of Commerce</i>	1/7/24 & 2/25/24	5 & 3
<i>Central New York Business Journal</i>	1/15/24 & 2/26/24	9 & 9
<i>Business Record (Central Iowa)</i>	1/5/24 & 3/1/24	28 (Back Cover) & 2
<i>Westfair Business Journal (f/k/a Fairfield County Business Journal & Westchester County Business Journal (Combined Online Issue)</i>	1/8/24 & 2/26/24	3 & 5
<i>Long Island Business News</i>	1/5/24 & 3/1/24	7 & 2
<i>Los Angeles Business Journal</i>	1/8/24 & 2/26/24	9 & 13
<i>Mississippi Business Journal (Jackson)</i>	1/12/24 & 3/8/24	39 & 11
<i>New Orleans City Business</i>	1/12/24 & 3/8/24	5 & 2
<i>NJBIZ</i>	1/8/24 & 2/26/2024	5 & Back Cover
<i>Orange County Business</i>	1/8/24 & 2/26/2024	5 & 5
<i>Pacific Coast Business Times</i>	1/5/24 & 3/1/24	16A & 2A
<i>Rochester Business Journal</i>	1/5/24 & 2/23/24	3 & 3
<i>San Diego Business Journal</i>	1/8/24 & 2/26/24	9 & 5
<i>San Fernando Valley Business Journal</i>	1/15 & 2/26/24	13 & 17
<i>North Bay Business Journal</i>	1/8/24 & 2/26/24	14 & 9
<i>The Journal Record (Oklahoma)</i>	1/3/24 & 2/28/24	3A & 5A

33. The selected 56 local business journals have a combined circulation of more than 675,000. An example of the Publication Notice as it appeared in these publications is included as **Attachment 7**. Individual tear sheets for each trade, business and specialty publication insertion have been collected by Epiq and are available upon request.

Specialty Language and Targeted Newspapers

34. To target foreign language business owners and adults in business and finance occupations affected by the Settlement, the Publication Notice appeared in 87 specialty language and targeted newspapers. The Publication Notice appeared as a full-page ad unit or equivalent size two times in selected daily or weekly publications and one time in selected monthly publications for a total of 172 insertions. The Publication Notice was translated into Spanish, Chinese, Japanese, Korean, Russian, and Vietnamese.

<i>Specialty Language and Targeted Newspapers</i>	<i>Distribution</i>	<i>On-Sale Dates</i>	<i>Page Positions</i>
<i>Afro-American</i>	Washington, DC	1/6/2024 & 3/2/2024	A6 & A5
<i>Al Dia</i>	Dallas / Ft. Worth	1/3/2024 & 2/28/2024	10A & 10A
<i>Al Dia</i>	Philadelphia	1/3/2024 & 2/28/2024	10A & 10A
<i>Asian Journal (Las Vegas)</i>	Las Vegas	1/4/2024 & 2/29/2024	3 & 3
<i>Asian Journal (Los Angeles)</i>	Los Angeles	1/6/2024 & 3/2/2024	A8 & A8
<i>Atlanta Inquirer</i>	Atlanta	1/6/2024 & 3/2/2024	5 & 5
<i>Atlanta Voice</i>	Atlanta	1/5/2024 & 3/1/2024	7 & 7
<i>Black Star News</i>	New York	4/4/2024, 4/18/2024, 5/9/2024, 5/16/2024 (print) 4/4/2024 - 5/29/2024 (digital)	N/A
<i>Boston Banner (Baystate Banner)</i>	Boston / Manchester	1/4/2024 & 2/29/2024	16 & 7
<i>California Journal</i>	Los Angeles	1/5/2024 & 3/1/2024	24 & 24
<i>Chicago Citizen Newspaper Group (5 Papers)</i>	Chicago	1/3/2024 & 2/28/2024	6 & 7
<i>China Press - Philadelphia Edition</i>	Philadelphia	1/5/2024 & 3/1/2024	A11 & A11
<i>Chinese Daily News - (World Journal Los Angeles)</i>	Los Angeles	1/4/2024 & 2/29/2024	A16 & A16
<i>Crusader Group (Chicago-Gary - Forced Combo)</i>	Chicago	1/6/2024 & 3/2/2024	16/9 & 9/9
<i>Daily Sun New York</i>	New York	1/5/2024 & 3/1/2024	6 & 5
<i>Dallas Chinese News</i>	Dallas/Ft. Worth	1/5/2024 & 3/1/2024	A7 & B14

<i>Specialty Language and Targeted Newspapers</i>	<i>Distribution</i>	<i>On-Sale Dates</i>	<i>Page Positions</i>
<i>Dallas Examiner</i>	Dallas/Ft. Worth	1/4/2024 & 2/29/2024	3 & 3
<i>El Diario</i>	New York	1/3/2024 & 2/26/2024	9 & 7
<i>El Especialito - Northern Jersey</i>	New York	1/5/2024 & 3/1/2024	5 & 5
<i>El Mundo</i>	Boston/Manchester	1/4/2024 & 2/29/2024	3 & 3
<i>El Observador</i>	San Francisco/Oakland/ San Jose	1/5/2024 & 3/1/2024	13 & 3
<i>El Planeta</i>	Boston/Manchester	1/12/2024 & 3/8/2024	5 & 17
<i>El Pregonero</i>	Washington, DC	1/18/2024 & 3/21/2024	9 & 9
<i>El Reportero</i>	San Francisco / Oakland / San Jose	1/5/2024 & 3/1/2024	8 & 8
<i>El Sol Latino (Philadelphia)</i>	Philadelphia	1/4/2024 & 2/29/2024	19 & 15
<i>El Tiempo Latino</i>	Washington, DC	1/5/2024 & 3/1/2024	A7 & A7
<i>Epoch Times - Chicago (Chinese Edition)</i>	Chicago	1/5/2024 & 3/1/2024	B12 & B12
<i>Epoch Times - Dallas (Chinese Edition)</i>	Dallas/Ft. Worth	1/5/2024 & 3/1/2024	B8 & B8
<i>Epoch Times - New York (Chinese Edition)</i>	New York	1/5/2024 & 3/1/2024	A12 & A12
<i>Epoch Times - Philadelphia (Chinese Edition)</i>	Philadelphia	1/5/2024 & 3/1/2024	B12 & B12
<i>Forward Times</i>	Houston	1/3/2024 & 2/28/2024	6B & 6A
<i>Houston Defender</i>	Houston	1/4/2024 & 2/29/2024	12 & 12
<i>Houston Sun</i>	Houston	1/5/2024 & 3/1/2024	8 & 8
<i>Impacto Latino Newspaper</i>	New York	1/4/2024 & 2/29/2024	9 & 11
<i>Korea Daily - Los Angeles</i>	Los Angeles	1/3/2024 & 2/28/2024	7 & 9
<i>Korea Daily - New York</i>	New York	1/3/2024 & 2/26/2024	7 & 9
<i>Korea Times – Chicago</i>	Chicago	1/3/2024 & 2/28/2024	A11 & A12
<i>Korea Times - Los Angeles</i>	Los Angeles	1/5/2024 & 3/1/2024	A5 & A28
<i>Korea Times - New York Edition</i>	New York	1/3/2024 & 2/26/2024	A5 & A5
<i>Korean New York Daily (New York Ilbo)</i>	New York	1/3/2024 & 2/26/2024	A12 & A11

<i>Specialty Language and Targeted Newspapers</i>	<i>Distribution</i>	<i>On-Sale Dates</i>	<i>Page Positions</i>
<i>Korean Phila Times</i>	Philadelphia	1/5/2024 & 3/1/2024	2 & 2
<i>La Informacion</i>	Houston	1/4/2024 & 2/29/2024	5 & 5
<i>La Opinion</i>	Los Angeles	1/3/2024 & 2/26/2024	7 & 5
<i>La Opinion De La Bahia</i>	San Francisco / Oakland / San Jose	1/7/2024 & 3/3/2024	3 & 3
<i>La Raza</i>	Chicago	1/7/2024 & 3/3/2024	8 & 3
<i>La Voz De Houston</i>	Houston	1/3/2024 & 2/28/2024	V3 & V10
<i>La Voz Hispana</i>	New York	1/4/2024 & 2/29/2024	24 & 13
<i>Lawndale Group News</i>	Chicago	1/4/2024 & 2/29/2024	5 & 12
<i>Lighthouse (Los Angeles Edition)</i>	Los Angeles	1/30/2024 & 3/1/2024	91 & 92
<i>Los Angeles News Observer</i>	Los Angeles	1/4/2024 & 2/29/2024	A10 & A11
<i>Metro Chinese Weekly</i>	Philadelphia	1/5/2024 & 3/1/2024	A24 & A24
<i>Metro Viet News</i>	Philadelphia	1/5/2024 & 3/1/2024	24 & 24
<i>Mundo Hispanico</i>	Atlanta	1/4/2024 & 2/29/2024	7 & 3
<i>NC Magazine</i>	National	March 2024	8
<i>New York Amsterdam News</i>	New York	1/4/2024 & 2/29/2024	11 & 7
<i>New York Trend</i>	New York	1/4/2024 & 2/29/2024	2 & 2
<i>Nguoi Viet Daily News</i>	Los Angeles	1/3/2024 & 2/26/2024	A12 & A8
<i>Novedades News</i>	Dallas / Ft. Worth	1/3/2024 & 2/28/2024	12 & 12
<i>NY Japion</i>	New York	1/12/2024 & 3/1/2024	13 & 13
<i>Philadelphia Asian News</i>	Philadelphia	1/19/2024 & 3/8/2024	7 & 7
<i>Philadelphia Observer</i>	Philadelphia	1/4/2024 & 2/29/2024	9 & 9
<i>Philadelphia Sunday Sun</i>	Philadelphia	1/5/2024 & 3/1/2024	5 & 22
<i>Philadelphia Tribune</i>	Philadelphia	1/3/2024 & 2/26/2024	5A & 5A
<i>Philippine News - Los Angeles Edition</i>	Los Angeles	1/5/2024 & 3/1/2024	24 & 24
<i>Pinoy News magazine</i>	Chicago	2/1/2024 & 3/1/2024	21 & 21

<i>Specialty Language and Targeted Newspapers</i>	<i>Distribution</i>	<i>On-Sale Dates</i>	<i>Page Positions</i>
<i>Post News Group Newspaper Network</i>	San Francisco / Oakland / San Jose	1/3/2024 & 2/28/2024	7 & 8
<i>Precinct Reporter/Tri-County Bulletin/Long Beach Leader</i>	Los Angeles	1/4/2024 & 2/29/2024	6/A8 & 6A8
<i>Reporter Publications</i>	San Francisco / Oakland / San Jose	1/4/2024 & 2/29/2024	8 & 11
<i>Rolling Out New York</i>	New York	1/4/2024 & 2/29/2024	12 & 12
<i>Russkaya Reklama - New York Edition</i>	New York	1/5/2024 & 3/1/2024	A31 & A29
<i>Saigon Times</i>	Los Angeles	1/5/2024 & 3/1/2024	2C & 2C
<i>San Francisco Bay View Newspaper</i>	San Francisco / Oakland / San Jose	2/1/2024 & 3/1/2024	23 & 15
<i>Seikatsu Press</i>	New York	1/13/2024 & 3/2/2024	2 & 2
<i>Sing Tao Daily - Chicago</i>	Chicago	1/3/2024 & 2/26/2024	A7 & A7
<i>Sing Tao Daily - New York)</i>	New York	1/3/2024 & 2/29/2024	A7 &, A7
<i>Sing Tao Daily - Southern California</i>	Los Angeles	1/3/2024 & 2/26/2024	A16 & A16
<i>Svet</i>	Chicago	1/5/2024 & 3/1/2024	4 & 11
<i>US Asian Post (Chicago)</i>	Chicago	1/5/2024 & 3/1/2024	10 & 10
<i>US Asian Post (Los Angeles)</i>	Los Angeles	1/5/2024 & 3/1/2024	10 & 10
<i>US Asian Post (New York)</i>	New York	1/5/2024 & 3/1/2024	10 & 10
<i>Via Times</i>	Chicago	1/10/2024 & 3/10/2024	3 & 3
<i>Viet Bao Daily News - LA Edition</i>	Los Angeles	1/5/2024 & 3/1/2024	18 & 16
<i>Vocero Hispano</i>	Boston / Manchester	1/5/2024 & 3/1/2024	7 & 7
<i>Washington Hispanic</i>	Washington, DC	1/5/2024 & 3/1/2024	24A & 24A
<i>Washington Informer</i>	Washington, DC	1/4/2024 & 2/29/2024	17 & 19
<i>Wave Community Newspapers</i>	Los Angeles	1/4/2024 & 2/29/2024	6 & 3
<i>World Journal New York - Chinese Daily News</i>	New York	1/3/2024 & 2/26/2024	A13 & A14

35. The selected specialty language and targeted newspapers have a combined circulation of over 3.8 million. An example of the Notice as it appeared in these publications is

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included as **Attachment 8**. Individual tear sheets for each specialty language and targeted newspaper insertion have been collected by Epiq and are available upon request. More details regarding the selected publications, on-sale dates, and page position are included in the following table.

Digital Notice

36. The Notice Plan included targeted digital advertising in English and Spanish on the selected advertising networks *Google Display Network* and *Yahoo Audience Network*, which together represent thousands of digital properties across all major content categories. All Digital Notices were designed to encourage engagement by Settlement Class members—by linking directly to the Case Website, allowing visitors easy access to relevant information and documents, including the Long Form Notice. Consistent with best practices, the Digital Notices used language from the Long Form Notice headline, which allowed users to identify themselves as potential Settlement Class members.

37. The Digital Notices were also placed on the leading social media platforms in the United States, including *Facebook*, *Instagram*, *X (Twitter)*, *LinkedIn*, *YouTube*, *Reddit*, and *TikTok*. For *YouTube* and *TikTok*, the Digital Notices were 30-second videos ads directing viewers to the Case Website. The social media campaign targeted users based on job title as well as used an interest-based approach which focuses on the interests that users exhibit while on the social media platforms, capitalizing on the Target Audience’s propensity to engage in social media.

38. *Facebook* is the leading social networking site in the United States with 60% of all social media usage with 196 million users,⁵ and *Instagram* has 171 million active users in the United States.⁶

⁵ Statista Digital 2024: Global Overview Report. Statista, founded in 2007, is a leading provider of worldwide market and consumer data and is trusted by thousands of companies around the world for data. Statista.com consolidates statistical data on over 80,000 topics from more than 22,500 sources and makes.

⁶ Statista Digital 2024: Global Overview Report.

39. *X (Twitter)* is a popular microblogging social media website that allows posts/tweets containing images or videos. Users can like, comment, and share/retweet posts. *X* has more than 103 million users in the United States.⁷

40. *LinkedIn* is the world's largest professional network on the internet with more than 250 million members in the United States.⁸

41. *YouTube* is the largest streaming video website in the United States with over 253 million users.⁹

42. *Reddit* is a widely used social forum website that contains more than one million communities known as subreddits. These communities cover specific topics making this an ideal platform to reach individuals with focused interests. *Reddit* has more than 57 million daily active users in the United States.¹⁰

43. *TikTok* is a short-form, video sharing app that is very popular among younger users. Videos are in portrait orientation, and most are 30 seconds or less. The app has over 135 million users in the U.S.¹¹

44. Digital Notices were also placed on the websites of several financial media outlets mirrored in the print portion of the Notice Plan, including the *WSJ.com*, *Bloomberg.com*, *Forbes.com*, *Time.com*, *Fortune.com*, *BusinessInsider.com*, *Inc.com*, and *Bizjournals.com*. Additional Spanish language and multi-cultural websites advertising in Spanish, Chinese, Japanese, Vietnamese, Korean, Thai & Russian also ran. Finally, advertising ran in the following trade websites: *Totalfood.com*, *CSPDailyNews.com*, *FuelsMarketNews.com* and *Convenience.org*.

45. In addition, 30-second audio ad placements were purchased on popular podcasts focused on content categories such as Entrepreneurship and Business/Professional News.

⁷ Statista Digital 2024: Global Overview Report.

⁸ Statista Digital 2024: Global Overview Report.

⁹ Statista Digital 2024: Global Overview Report.

¹⁰ Statista Digital 2024: Global Overview Report.

¹¹ Statista Digital 2024: Global Overview Report.

Examples of podcasts that aired the 30-second Notice include *The Diary of a CEO*, *WorkLife* with Adam Grant, *Smart Passive Income*, *The Ed Mylett Show*, and *The Prof G Pod* with Scott Galloway. Additionally, 30-second video ad placements were purchased on connected television and streaming services including *Hulu*, *Disney+*, *Fubo*, *Pluto TV*, and *Samsung TV*. Notices were also placed during traditional commercial breaks on ad-supported streaming plans and targeted to individuals who consume business/financial oriented content online. Airing video ads notices on streaming services allowed the digital notice to be distributed on any device where an individual chose to consume their content and entertainment including mobile devices, tablets, computers, and/or connected televisions.

46. More details regarding the target audiences, distribution, specific ad types of the Digital Notices, and the number of impressions are included in the following table:

<i>Network/Property</i>	<i>Target Audience</i>	<i>Ad Size(s)</i>	<i>Run Dates</i>	<i>Impressions Delivered</i>
<i>Google Display Network</i>	A18+	728x90, 300x250, 300x600 & 970x250	1/2/24 - 2/4/24	28,487,850
<i>Google Display Network</i>	A18+ and Affinity for business owner and/or business and finance			188,767,547
<i>Google Display Network</i>	A18+ and Intent for business owner and/or business and finance			183,566,878
<i>Yahoo Audience Network</i>	A18+; business and finance content			122,026,424
<i>Bizjournals.com</i>	A18+; business and finance content			5,238,843
<i>Bloomberg.com</i>	A18+; business and finance content			2,732,815
<i>Forbes.com</i>	A18+; business and finance content			5,166,379
<i>WSJ.com</i>	A18+; business and finance content			2,801,107
<i>Time.com</i>	A18+; business and finance content			1,242,111
<i>Fortune.com</i>	A18+; business and finance content			1,276,371

<i>Network/Property</i>	<i>Target Audience</i>	<i>Ad Size(s)</i>	<i>Run Dates</i>	<i>Impressions Delivered</i>
<i>Inc.com</i>	A18+; business and finance content	728x90, 300x250,	1/2/24 - 2/4/24	1,137,352
<i>BusinessInsider.com</i>	A18+; business and finance content	300x600 & 970x250	2/26/24 - 3/31/24 5/1/24 - 5/31/24	1,257,468
<i>totalfood.com</i>	A18+	300x250	5/1/24 - 5/31/24	n/a
<i>cspdailynews.com</i>	A18+	300x250, 728x90, 300x50	12/1/24 - 1/31/25	77,189
<i>fuelsmarketnews.com</i>	A18+	970x90, 450x75, 728x90	12/1/24 - 1/31/25	141,193
<i>convenience.org</i>	A18+	970x90, 450x75	12/1/24 - 12/31/24	140,061
<i>bizjournals.com DMA Targeted to Chicago</i>	A18+	728x90, 300x250, 300x600 & 970x250	1/2/24 - 2/5/24 2/26/24 - 3/31/24	357,197
<i>bizjournals.com DMA Targeted to Cleveland</i>	A18+			357,227
<i>bizjournals.com DMA Targeted to Los Angeles</i>	A18+			350,083
<i>bizjournals.com DMA Targeted to New York</i>	A18+			357,200
<i>Spanish Website Targeting¹²</i>	A18+			122,423,327
<i>Multi-cultural Language Targeting</i>	A18+; business and finance content		1/2/24 - 2/4/24 2/26/24 - 3/31/24 5/1/24 - 5/31/24	65,928,259
<i>Facebook</i>	A18+	Newsfeed & Right Hand Column	1/2/24 - 2/4/24	26,067,249
<i>Facebook</i>	A18+ with interest in Mastercard, Visa, business and/or small business		1/2/24 - 2/4/24 2/26/24 - 3/31/24 5/1/24 - 5/31/24	149,016,318
<i>Facebook</i>	A18+ who are in business & finance or with demographics of small business owner			59,017,128
<i>Facebook</i>	A18+ with job title of business owner ¹³			28,892,355

¹² Spanish websites included Univision.com, Telemundo.com, Elpais.com, CNNespanol.cnn.com, ESPNDeportes.com, and others.

¹³ Job titles included auto body owner, daycare owner, dry cleaner/laundromat owner, gym owner, hotel/motel owner, landscaping owner, retail merchandise store owner, salon owner, spa owner, restaurant owner, and others.

<i>Network/Property</i>	<i>Target Audience</i>	<i>Ad Size(s)</i>	<i>Run Dates</i>	<i>Impressions Delivered</i>
<i>Instagram</i>	A18+	Newsfeed	1/2/24 -2/4/24	6,974,653
<i>Instagram</i>	A18+ with interest in Mastercard, Visa, business and/or small business	Newsfeed	1/2/24 - 2/4/24 2/26/24 - 3/31/24 5/1/24 - 5/31/24	32,047,687
<i>Instagram</i>	A18+ who are in business & finance or with demographics of small business owner			14,205,167
<i>Instagram</i>	A18+ with job title of business owner (same as <i>Facebook</i>)			15,544,933
<i>Twitter</i>	A18+ with interests in business owner, business & finance and/or small business	Twitter Feed Ads	1/2/24 - 2/4/24 2/26/24 - 3/31/24 5/1/24 - 5/31/24	17,926,515
<i>Twitter</i>	A18+ and Post Engagement Targeting for Business Owner, Small Business Owner, Visa Merchant Services and/or Mastercard Merchant Services			38,339,824
<i>LinkedIn</i>	A18+ with job titles in senior management ¹⁴	LinkedIn Feed Ads	1/2/24 - 2/4/24 2/26/24 - 3/31/24 5/1/24 - 5/31/24	18,781,654
<i>YouTube</i>	A18+ and Affinity for business owner and/or business and finance	:30 second video ads		14,015,368
<i>YouTube</i>	A18+ and Intent for business owner and/or business and finance			13,844,888
<i>YouTube</i>	A18+ and select channel and video targeting ¹⁵			7,276,448
<i>Reddit</i>	A18+ targeted to feeds /r/Business, /SmallBusiness, /r/Entrepreneurs/, /r/BusinessHub/ and /r/Businessideas/	Reddit Feed Ads		18,003,941

¹⁴ Job titles included Owner, Business Partner, CEO, President, Vice President, CFO, CTO, COO, CIO, Business Director, Chief of Staff and/or Manager, among others.

¹⁵ Select channel and video targeting on youtube.com/Bloomberg, youtube.com/InsiderBusiness, youtube.com/wsj, youtube.com/Forbes, youtube.com/markets, and/or youtube.com/CNBC, among others.

<i>Network/Property</i>	<i>Target Audience</i>	<i>Ad Size(s)</i>	<i>Run Dates</i>	<i>Impressions Delivered</i>
<i>TikTok</i>	A18+; business and finance content	:30 second video ads	2/26/24 - 3/31/24 5/1/24 - 5/31/24	10,689,428
<i>Podcast Targeting (Spotify, Apple, Google)</i>	A18+ Entrepreneurship, Business news and Professional content	:30 second audio ads	1/2/24 - 2/4/24 2/26/24 - 3/31/24 5/1/24 - 5/31/24	6,479,097
<i>Streaming Television</i>	A18+ Business Owner	:30 second video ads	1/2/24 - 2/4/24, 2/26/24 - 3/31/24 5/1/24 - 5/31/24	6,972,165
TOTAL				1,216,147,549

47. Combined, approximately 1.2 billion adult impressions were generated by these Digital Notices during a five-month period.¹⁶ As applicable, clicking on the Digital Notice brought the reader to the Case Website with detailed information about the case. Examples of the various types of Digital Notices are included as **Attachment 9**.

Streaming Radio Campaign

48. The radio campaign component of the Notice Plan included radio spots strategically designed to bring awareness of the Settlement to Settlement Class members. MRI-Simmons¹⁷ syndicated data demonstrates that members of the Target Audience listen to radio an average of 15.5 hours per week.¹⁸ Internet streaming radio spots focused on stations of general interest and served on internet and satellite radio via the *Sirius XM Radio* (app) and *Pandora Streaming Radio*, which is likely

¹⁶ The third-party ad management platform, ClickCease was used to audit the Digital Notice ad placements. This type of platform tracks all Digital Notice ad clicks to provide real-time ad monitoring, fraud traffic analysis, blocks clicks from fraudulent sources, and quarantines dangerous IP addresses. This helps reduce wasted, fraudulent, or otherwise invalid traffic (e.g., ads being seen by ‘bots’ or non-humans, ads not being viewable, etc.).

¹⁷ MRI-Simmons is a leading source of publication readership and product usage data for the communications industry. MRI-Simmons is a joint venture of GfK Mediamark Research & Intelligence, LLC (“MRI”) and Simmons Market Research. MRI-Simmons offers comprehensive demographic, lifestyle, product usage and exposure to all forms of advertising media collected from a single sample. As the leading U.S. supplier of multimedia audience research, the company provides information to magazines, televisions, radio, internet, and other media, leading national advertisers, and over 450 advertising agencies—including 90 of the top 100 in the United States. MRI-Simmons’s national syndicated data is widely used by companies as the basis for the majority of the media and marketing plans that are written for advertised brands in the United States.

¹⁸ MRI-Simmons 2024 Survey of the American Consumer®.

to be listened to by the Target Audience. *Sirius XM Radio* and *Pandora Streaming Radio* were played on desktop, mobile, tablet, television, and in automobiles (*Sirius XM Radio* in automobiles uses satellite signal; however, users can stream the internet enabled content from their mobile devices). The radio campaign consisted of 30-second streaming radio spots that aired nationwide and were designed to drive individuals to the Case Website to learn more about the Settlement.

49. *Sirius XM Radio* spots were targeted via news channels, specifically *Bloomberg*, *CNBC*, *CNN*, *Business Radio*, and *Fox Business*. More than 1,100 spots aired via those channels. The *Pandora Streaming* radio campaign delivered 5 million streaming radio spots nationwide and were accompanied by more than 1.1 million Digital Notices on the *Pandora* app/website. The streaming radio campaign ran for three separate time periods (“flights”) from January 8, 2024, through May 31, 2024. The first flight ran from January 8, 2024, through January 28, 2024, delivering 259 spots. The second flight ran from March 11, 2024, through March 31, 2024, delivering 259 spots.¹⁹ The third flight ran from May 1, 2024, through May 31, 2024, delivering 584 spots. The streaming radio script is included as **Attachment 10**.

Internet Sponsored Search Listings

50. To facilitate Settlement Class members with locating the Case Website, sponsored search listings were acquired on the three most highly-visited internet search engines: *Google*, *Yahoo!* and *Bing*. When search engine visitors searched on common keyword combinations such as “Visa Mastercard Settlement,” “Interchange Fee Settlement,” or “Payment Card Settlement,” the sponsored search listing was generally displayed at the top of the page prior to the search results or in the upper right hand column.

51. The sponsored listings ran from December 1, 2023, through May 31, 2024, and were displayed 1,729,240 times, resulting in 168,494 clicks that displayed the Case Website. A complete list of the sponsored search keyword combinations is included as **Attachment 11**.

¹⁹ One makegood spot ran on April 4, 2024, which was originally scheduled to run on March 22, 2024.

Examples of the sponsored search listing as displayed on each search engine are included as **Attachment 12**.

PR Partnership with (W)right On Communications

52. Epiq worked directly with (W)right On, an award-winning integrated strategic communications firm based in San Diego, California. (W)right On was selected and engaged by Class Counsel to lead the overall public relations effort surrounding the Claim Form mailing and the claim phase in general. Epiq designed the Claim Forms in conjunction with (W)right On's feedback—to provide necessary information to merchants in an official yet accessible and concise manner. (W)right On also supported creating a “brand” for the Settlement and ensuring that communications from Epiq and Class Counsel adhered to intended messaging, which were designed to increase awareness of and participation in the Settlement. (W)right On also arranged for media appearances for selected Class Representatives, other Settlement Class members, and Class Counsel to raise awareness of the Settlement in the merchant community.

53. (W)right On publicized and explained the claim filing process and ensured the paid media program aligned with the public relations efforts and outreach program. Not only did (W)right On's outreach efforts reach the business community generally, it also targeted smaller businesses, including those from diverse and/or underserved communities to ensure the noticing reached all Class Members. More details regarding these efforts are explained in section 4.5 of Attachment 14 described below. (W)right On's *curriculum vitae* is included as **Attachment 13**.

54. (W)right On provided Class Member outreach and educational support throughout the life of the claim filing period including the following:

- Branded educational materials delivered through email campaigns, an online outreach kit, printed hard copies for in-person outreach at events and conferences, image and video storytelling, and educational webinars including claim submission demonstrations;

- Media materials and outreach in nine languages including a video news release in English and Spanish;
- Social media channels, content and engagement across *Facebook*, *X*, *Instagram*, *YouTube*, and *TikTok* as well as influencer content; and
- Outreach to hundreds of trade associations serving merchants and business groups including small and diverse businesses.

55. Over a 14-month period, the outreach and education strategy generated more than 70 million impressions, including:

- 42.5 million impressions from more than 500 media mentions;
- 21.5 million impressions from social media content and influencers; and
- 6.4 million impressions from the membership of 300 trade associations and business groups.

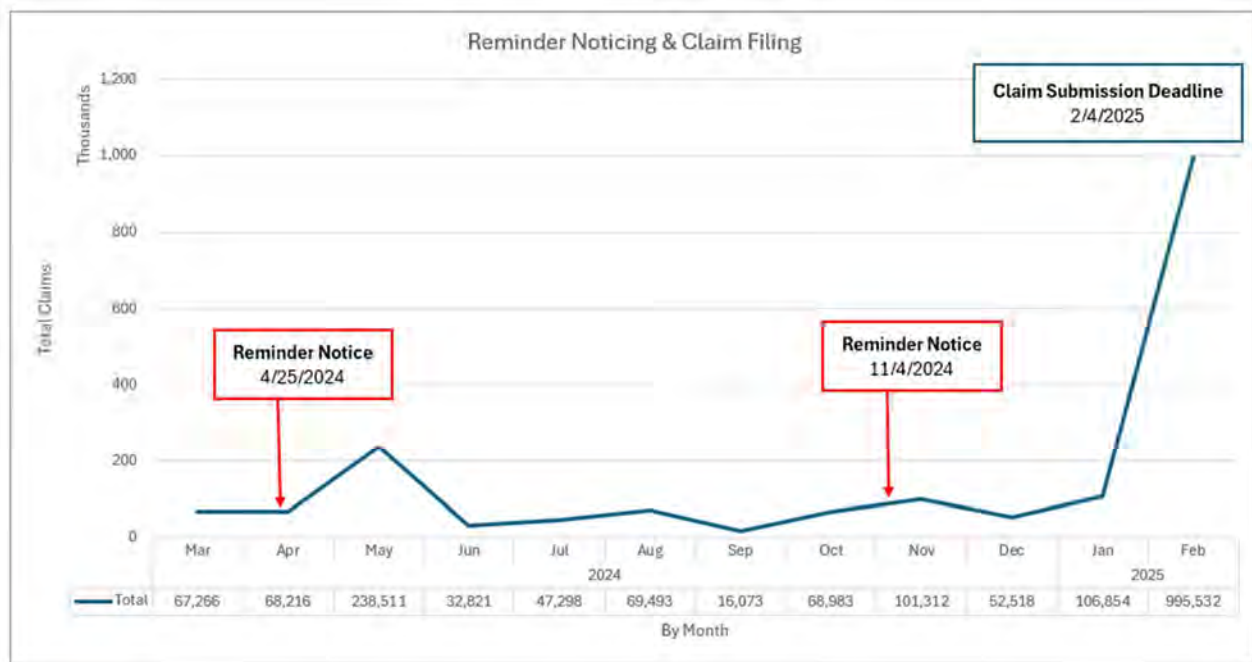
56. It is my understanding the outreach effort was recently awarded the Mark of Excellence by the Public Relations Society of America regional chapter. A full Outreach and Education Program Report as provided by (W)right On is included as **Attachment 14**.

Reminder Notice

57. In an effort to increase claim filing, commencing on April 25, 2024, Epiq sent 12,660,711 Reminder Postcard Notices via USPS first class mail to those Settlement Class members for whom a valid address was available and the initial Notice was not returned as undeliverable, and who had not yet filed a Claim Form or registered via the Merchant Portal at the website. The April Reminder Postcard Notices are included as **Attachment 15**.

58. Subsequently, commencing on November 4, 2024, Epiq sent 12,090,077 Reminder Postcard Notices via USPS first class mail to those Settlement Class members for whom a valid address was available and the initial Notice was not returned as undeliverable, and who had not yet filed a Claim Form or registered via the Merchant Portal at the website. The November Reminder Postcard Notices are included as **Attachment 16**.

59. There was a substantial increase in claim filing activity after the claim stimulation Reminder Postcard Notices were sent. The following graph illustrates the spikes in the claim filing activity after sending the Reminder Postcard Notices.



Case Website

60. Epiq continues to maintain and update the existing Case Website established on December 7, 2012, (www.PaymentCardSettlement.com). Epiq adapted the Case Website to be consistent with the education-and-outreach campaign that Epiq, (W)right On, and Class Counsel were conducting. In addition to containing the Merchant Portal, the Case Website was the main source of official settlement information to merchants. Settlement Class members are able to obtain detailed information about the action, review important documents including, Notices and answers to frequently asked questions (FAQs). At the onset of the claim phase, the website was significantly updated to accept online claims, with a Merchant Portal that allowed merchants to input their username and password (provided with the Claim Form) in order to file their claim. Potential unidentified Settlement Class members who did not receive a mailed Claim Form could also file a claim via the website. The Case Website was translated and is available in Spanish,

Chinese, Japanese, Korean, Russian, Thai, and Vietnamese with translated versions of the Notices. Links for each language and a corresponding country flag continue to be displayed prominently in the upper right corner of all key pages of the website. The Case Website address was displayed prominently on all notice documents. The Digital Notices linked directly to the Case Website. As of August 11, 2025, there have been 4,803,520 unique visitor sessions to the Case Website and 24,038,024 web pages have been presented.

Toll-free Telephone Number

61. The existing toll-free telephone number (1-800-625-6440) continues to be available and updated to allow Settlement Class members to call for additional information, listen to answers to FAQs, request that a Claim Form be mailed to them and select to speak to a live operator during normal business hours. The toll-free number was prominently displayed in the Notice documents as appropriate. As of July 9, 2025, there have been 255,647 calls to the toll-free telephone number representing 2,383,100 minutes of use, and service agents had handled 146,816 incoming calls representing 1,952,681 minutes of use and 45,932 outbound calls representing 261,673 minutes of use.

62. Throughout the claim period, Epiq handled inquiries from large and small merchants regarding the claim process, including routine merchant questions, which were escalated to more senior Epiq employees or Class Counsel as appropriate.

Email Inbox and Postal Mailing Address

63. The existing postal mailing address and email address established for the case continue to be available allowing Settlement Class members with the opportunity to request additional information or ask questions.

CONCLUSIONS

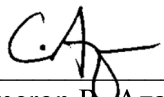
64. To date, the Notice Plan for the claim phase has been implemented as ordered by the Court, including dissemination of the Claim Form to likely Rule 23(b)(3) Settlement Class members via postal mail and a Media Plan with an extensive schedule of well-read consumer magazines, national business publications, U.S. territories newspapers, digital notices, social

media notices, Satellite radio, and streaming radio/television. Notice placements also appeared in non-measured trade, business and specialty publications, local business journals, specialty language publications, sponsored search listings, a Case Website, and an extensive public relations campaign with (W)right On, providing additional notice exposures.

65. Based on conservative calculations, the combined measurable paid media effort alone reached 89.3% of all U.S. Adults aged 18+ with an average frequency of 5.0 times, 89.7% of all U.S. Adults who are Business Owners with an average frequency of 5.2 times, and 89.4% of all U.S. Adults in Business and Finance Occupations with an average frequency of 4.6 times.

66. Although not calculable, reach and frequency of exposure were enhanced further by the individual notice effort, notice placements in trade, business and specialty publications, local business journals, specialty language publications, sponsored search listings, and a Case Website.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 15, 2025.



Cameron R. Azari, Esq.

Attachment 1

Pre-Populated Claim Form

Claim your share now. ▶▶▶

Payment Card Interchange Fee Settlement
Class Administrator
PO Box 2530
Portland, OR 97208-2530

**Submission Deadline:
February 4, 2025**

Claimant ID: [REDACTED]
Tax ID: [REDACTED]

Scan the QR code to file a claim online via your phone, computer, tablet, or other smart device.



• COURT-APPROVED CLAIM FORM •

If your business accepted Visa and/or Mastercard between 2004 - 2019, you're now eligible to claim your share of a \$5.5 billion Settlement.
Claim your share now. ▶▶▶



Submit Your Claim Online:

Submitting your claim online takes less than five minutes. You can scan the QR code or visit www.PaymentCardSettlement.com and use the secure website credentials provided below to file your claim. If you file your claim online, it must be submitted by 11:59 pm PST on **February 4, 2025**.

STEP ONE:

Scan the QR code to access the Case Website.



STEP TWO:

Enter your secure credentials where requested.

YOUR CLAIMANT ID:

[REDACTED]

CONTROL NO.:

[REDACTED]

STEP THREE:

Submit your claim!
Your claim process is now complete.



Why are you receiving this Claim Form?

You are receiving this Claim Form because records show you are a merchant (business owner) who may have accepted Visa and/or Mastercard at any time from January 1, 2004, to January 25, 2019 ("Class Period"). Visa, Mastercard and their issuing banks ("Defendants") are alleged to have violated the law because they wrongfully inflated Interchange Fees. Defendants say they have done nothing wrong. They claim their business practices are legal. After years of appeals, the Settlement is now final, and it is time to file your claim for a Settlement Payment. If you do not file your claim, you will not receive a Settlement Payment.

For many eligible merchants, data is available to determine the value of Visa and/or Mastercard transactions accepted during the Class Period. If that applies to you, your information is on the next page, and you can quickly file your claim based on those estimates (either by using the QR codes on this form, going to www.PaymentCardSettlement.com, or by mailing in this paper Claim Form). If you believe that the estimates of your Visa and/or Mastercard-branded activity provided on the next page are incorrect, please visit the Case Website to provide more information regarding your transactions. You may also be able to request additional detail on your business' transaction activity.

Please scan the QR code, or visit www.PaymentCardSettlement.com, for detailed information about the Settlement or to file your claim online. If you are making your claim by mail on the basis of the amount below, complete this Claim Form and send it to Payment Card Interchange Fee Settlement, PO Box 2530, Portland, OR 97208-2530, postmarked by **February 4, 2025**. If you have questions, contact us at info@PaymentCardSettlement.com or call 1-800-625-6440.

How much will you receive? It's based on the estimated amount of your Visa and/or Mastercard transactions.

The chart below includes a summary of estimates of your Visa and/or Mastercard transactions within the United States during the Class Period:

Visa and/or Mastercard Activity Summary			
	TRANSACTIONS	VOLUME	INTERCHANGE FEES
TOTAL	██████████	██████████	██████████

CLAIMANT ID: ██████████
CONTROL NO.: ██████████

Your actual recovery will not be the Interchange Fees listed above, but rather a percentage of the total based on a variety of factors including the total number of eligible claims submitted. The estimate of your Mastercard and Visa fees paid may be subject to further validation based on qualifying interchange activity under the terms of the Settlement. In such case, you would be mailed an updated Claim Form for your review and either acceptance or the opportunity to provide alternative figures. However, you should file a claim now to maximize your potential to receive a Settlement Payment. To view more detailed information related to your business, please visit www.PaymentCardSettlement.com and use the credentials shown above. At the Case Website, you may electronically submit your claim and receive an email confirmation of your claim submission.

File your claim now. ▶▶▶

It's easy to file your claim. Fill out the below information, and use the enclosed envelope to return your claim. Or if you prefer to file online in less than five minutes, you can scan the QR code or visit www.PaymentCardSettlement.com and use the secure website credentials provided to file your claim.



I accept the Class Administrator's estimate of Interchange Fees paid. By signing below, I attest that I have sufficient authority to submit this Claim Form on behalf of ██████████

Signature:

Date (MM/DD/YYYY):

Printed Name:

Title:

You may sign and return this form using the enclosed envelope to: Payment Card Interchange Fee Settlement, PO Box 2530, Portland, OR 97208-2530.

Settlement Payments will be made after all claims are received and processed following the Claims Deadline of **February 4, 2025**. Please be patient.

Do you think the summary above is missing transactional data related to your business? If so, please visit the Case Website where you can provide additional information about your business. You can ask the Class Administrator to use the additional information you provide to re-query the Defendants' database for additional transactional data that may be available. You can also provide your own estimate of eligible Interchange Fees you paid along with documentation to support your estimate if you have it. For example, you may provide statements from the merchant processor(s) (or "acquirer(s)") that processed your Mastercard and Visa transactions during the Class Period showing Mastercard and Visa Interchange Fees paid. You will need the Claimant ID and Control No. listed above. You may also be asked to enter the full Tax ID for your business.

Has your mailing address or contact information changed? If so, visit the Case Website to update it. You may be asked to enter the full Tax ID for your business in order to change your contact information.

Are you claiming on behalf of someone else? For claims that are determined eligible to receive a Settlement Payment, the resulting check will be issued payable to ██████████. HOWEVER, if you want any change to the payee name that would be printed on your check (if your business name has changed, or you believe you have authority for any reason to file on behalf of the named Class Member), you must provide additional information to the Class Administrator. Please go to the Case Website or call the toll-free number for assistance.

No Transactional
Value *with* Tax ID
Claim Form

Claim your share now. ▶▶

Payment Card Interchange Fee Settlement
 Class Administrator
 PO Box 2530
 Portland, OR 97208-2530

**Submission Deadline:
 February 4, 2025**



Claimant ID: [REDACTED]
 Tax ID: [REDACTED]

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Please scan the QR code, or visit www.PaymentCardSettlement.com, for detailed information about the Settlement or to file your claim online. If you want to make a claim by mail, fill in the information on the next page and mail the completed Claim Form using the enclosed envelope to Payment Card Interchange Fee Settlement, PO Box 2530, Portland, OR 97208-2530, postmarked by **February 4, 2025**. If you have questions, contact us at 1-800-625-6440 or info@PaymentCardSettlement.com.

How much will you receive?

	Visa and/or Mastercard Activity Summary		
	TRANSACTIONS	VOLUME	INTERCHANGE FEES
TOTAL	XXXX	\$XXXX.XX	\$XXXX.XX

CLAIMANT ID: [REDACTED]
 CONTROL NO.: [REDACTED]

This table has no values populated for your Visa and/or Mastercard transactions in the United States during the Class Period because either no eligible data was identified for the Tax ID (TIN) above or the data identified was associated with more than one TIN. Rather than submitting this form, you can go to www.PaymentCardSettlement.com and provide additional information about your business in order to ask the Class Administrator to re-query the Defendants' databases for qualifying Interchange Fees Paid by your business. You will then be notified of Interchange Fees Paid identified by the Class Administrator.

If you prefer to submit this Claim Form, provide the known or estimated dollar amount of your eligible Visa and/or Mastercard Interchange Fees Paid for the period January 1, 2004, to January 25, 2019 then complete the Claim Form. If the Class Administrator is unable to validate the Interchange Fees Paid you have claimed, you may later be required to submit documents to support your claim. If you do not know your Interchange Fees Paid, check the box "I do not know" and the Class Administrator will contact you about next steps.

As part of the Settlement, your actual recovery will not be the validated Interchange Fees Paid by your business, but rather a percentage of the total based on a variety of factors including the total number of eligible claims submitted.

File your claim now. ▶▶▶

You can scan the QR code or visit www.PaymentCardSettlement.com and use the secure website credentials provided on the prior page to file your claim.



If you do not want to visit www.PaymentCardSettlement.com to submit your claim online, you may provide the information requested and mail the completed form using the enclosed envelope postmarked by **February 4, 2025** to Payment Card Interchange Fee Settlement, PO Box 2530, Portland, OR 97208-2530.

By signing below, I attest that I have sufficient authority to submit this Claim Form for [REDACTED] and affirm the merchant accepted Visa and/or Mastercard between January 1, 2004, and January 25, 2019.

Class Period Interchange Fees Paid:

\$ _____

I do not know.

Signature:

Date (MM/DD/YYYY):

Printed Name:

Title:

Email Address:

Settlement Payments will be made after all claims are received and processed following the Claims Deadline of **February 4, 2025**. Please be patient.

Has your mailing address or contact information changed? Visit www.PaymentCardSettlement.com and provide your TIN to update your contact information.

Are you claiming on behalf of someone else? For claims that are determined eligible to receive a Settlement Payment, the resulting check will be issued payable to [REDACTED] HOWEVER, if you want any change to the payee name that would be printed on your check (if your business name has changed, or you believe you have authority for any reason to file on behalf of the named Class Member), you must provide additional information to the Class Administrator and/or submit your claim online. Please go to www.PaymentCardSettlement.com or call 1-800-625-6440 for assistance.

Questions? Assistance with preparing your claim is available at no cost to you from the Class Administrator and Class Counsel. Please email info@PaymentCardSettlement.com or call 1-800-625-6440.

CLAIMANT ID: [REDACTED]

To download a version of this Claim Form in Spanish Español, Russian Русский, Korean 한국어, Vietnamese Tiếng Việt, Japanese 日本語, Chinese 汉语, or Thai ไทย, please visit www.PaymentCardSettlement.com.

Questions? Visit www.PaymentCardSettlement.com or call 1-800-625-6440.

No Transactional
Value *without* Tax
ID Claim Form

Claim your share now. ▶▶▶

Payment Card Interchange Fee Settlement
 Class Administrator
 PO Box 2530
 Portland, OR 97208-2530

**Submission Deadline:
 February 4, 2025**



Scan the QR code to file a claim online via your phone, computer, tablet, or other smart device.



• COURT-APPROVED CLAIM FORM •

If your business accepted Visa and/or Mastercard between 2004 - 2019, you're now eligible to claim your share of a \$5.5 billion Settlement.



Claim your share now. ▶▶▶

You are receiving this Claim Form because you are a merchant (business owner) who may have accepted Visa and/or Mastercard at any time from January 1, 2004, to January 25, 2019 ("Class Period"). Visa and Mastercard and their issuing banks ("Defendants") are alleged to have violated the law because they wrongfully inflated Interchange Fees. Defendants say they have done nothing wrong. They claim their business practices are legal. After years of appeals, the Settlement is now final, and it is time to file your claim for a Settlement Payment. If you do not file a claim, you will not receive a Settlement Payment.

Please scan the QR code, or visit www.PaymentCardSettlement.com, for detailed information about the Settlement or to file your claim online. If you want to make a claim by mail, fill in the information on the next page and mail the completed Claim Form using the enclosed envelope to Payment Card Interchange Fee Settlement, PO Box 2530, Portland, OR 97208-2530, postmarked by **February 4, 2025**. If you have questions, contact us at 1-800-625-6440 or info@PaymentCardSettlement.com.

How much will you receive?

Visa and/or Mastercard Activity Summary			
	TRANSACTIONS	VOLUME	INTERCHANGE FEES
TOTAL	XXXX	\$XXXX.XX	\$XXXX.XX

This table has no values populated for your Visa and/or Mastercard transactions in the United States during the Class Period because the Merchant U.S. Tax Identification Number Tax ID (TIN) for your business was not provided to Class Administrator and as a result no eligible interchange activity data was identified for your business. Rather than submitting this form, you can go to www.PaymentCardSettlement.com and provide your TIN along with other information about your business in order to ask the Class Administrator to query the Defendants' databases for qualifying Interchange Fees Paid by your business. You will then be notified of Interchange Fees Paid identified by the Class Administrator.

If you prefer to submit this Claim Form, provide your TIN and the known or estimated dollar amount of your eligible Visa and/or Mastercard Interchange Fees Paid for the period January 1, 2004, to January 25, 2019 then complete the Claim Form. If the Class Administrator is unable to validate the Interchange Fees Paid you have claimed, you may later be required to submit documents to support your claim. If you do not know your Interchange Fees Paid, check the box "I do not know" and the Class Administrator will contact you about next steps.

As part of the Settlement, your actual recovery will not be the validated Interchange Fees Paid by your business, but rather a percentage of the total based on a variety of factors including the total number of eligible claims submitted.

File your claim now. 



You can scan the QR code or visit www.PaymentCardSettlement.com to file your claim.

If you do not want to visit www.PaymentCardSettlement.com to submit your claim online, you may provide the information requested and mail the completed form using the enclosed envelope **postmarked by February 4, 2025** to Payment Card Interchange Fee Settlement, PO Box 2530, Portland, OR 97208-2530.

By signing below, I attest that I have sufficient authority to submit this Claim Form for [REDACTED] and affirm the merchant accepted Visa and/or Mastercard between January 1, 2004, and January 25, 2019.

Class Period Interchange Fees Paid:

\$ _____

I do not know.

Business Name:

Merchant U.S. Tax Identification Number (TIN):

Signature:

Date (MM/DD/YYYY):

Printed Name:

Title:

Email Address:

Settlement Payments will be made after all claims are received and processed following the Claims Deadline of **February 4, 2025**. Please be patient.

Are you claiming on behalf of someone else? For claims that are determined eligible to receive a Settlement Payment, the resulting check will be issued payable to [REDACTED] HOWEVER, if you want any change to the payee name that would be printed on your check (if your business name has changed, or you believe you have authority for any reason to file on behalf of the named Class Member), you must provide additional information to the Class Administrator and/or submit your claim online. Please go to www.PaymentCardSettlement.com or call 1-800-625-6440 for assistance.

Questions? Assistance with preparing your claim is available at no cost to you from the Class Administrator and Class Counsel. Please email info@PaymentCardSettlement.com or call 1-800-625-6440.



Questions? Visit www.PaymentCardSettlement.com or call 1-800-625-6440.

Blank Claim Form

Claim your share now. ▶▶▶

Payment Card Interchange Fee Settlement
Class Administrator
PO Box 2530
Portland, OR 97208-2530

Tracking No.: [REDACTED]

**Submission Deadline:
February 4, 2025**

• COURT-APPROVED CLAIM FORM •

If your business accepted Visa and/or Mastercard between 2004 - 2019, you're now eligible to claim your share of a \$5.5 billion Settlement. Claim your share now. ▶▶▶



A merchant (business owner) with Visa and/or Mastercard Interchange Fees Paid for the period from January 1, 2004, to January 25, 2019 (the "Class Period") is eligible to file a claim in this settlement. Visa and Mastercard and their issuing banks ("Defendants") are alleged to have violated the law because they wrongfully inflated Interchange Fees. Defendants say they have done nothing wrong. They claim their business practices are legal. After years of appeals, the Settlement is now final, and it is time to file your claim for a Settlement Payment. If you do not file a claim, you will not receive a Settlement Payment. Visit www.PaymentCardSettlement.com to get detailed information about the Settlement.

Rather than submitting this form, you can go to www.PaymentCardSettlement.com and provide information about your business in order to ask the Class Administrator to query the Defendants' databases for qualifying Interchange Fees Paid by your business. You will then be notified of Interchange Fees Paid identified by the Class Administrator and then you can file a claim based on those figures or further work with the Class Administrator to validate your claim.

If you prefer to submit this Claim Form, provide the estimated dollar amount of your eligible Visa and/or Mastercard Interchange Fees Paid for the period January 1, 2004, to January 25, 2019 then complete the Claim Form. If the Class Administrator is unable to validate the Interchange Fees Paid you have claimed, you may later be required to submit documents to support your claim. If you do not know your Interchange Fees Paid, check the box "I do not know" and the Class Administrator will contact you about next steps.

As part of the Settlement, your actual recovery will not be the validated Interchange Fees Paid by your business, but rather a percentage of the total based on a variety of factors including the total number of eligible claims submitted.

If you do not want to visit www.PaymentCardSettlement.com to submit your claim online, you may fill out the information below and mail the completed form postmarked by **February 4, 2025** to Payment Card Interchange Fee Settlement, PO Box 2530, Portland, OR 97208-2530.

Class Period Interchange Fees Paid: \$ _____ I do not know.

Merchant U.S. Tax Identification Number (TIN): _____

Merchant Legal Name: _____

Street Address: _____

City, ST, Zip Code: _____ Country (If not United States): _____

By signing below, I attest that I have sufficient authority to submit a Claim Form for this Merchant:

Signature: _____

Date (MM/DD/YYYY): _____

Printed Name: _____

Title: _____








Email Address: _____

Phone Number: _____

Settlement Payments will be made after all claims are received and processed following the Claims Deadline of **February 4, 2025**. Please be patient.

Are you claiming on behalf of someone else? For claims that are determined eligible to receive a Settlement Payment, the resulting check generally will be issued payable to the Merchant Legal Name on this form. HOWEVER, if you want any change to the payee name that would be printed on your check (if your business name has changed, or you believe you have authority for any reason to file on behalf of the named Class Member), you must provide additional information to the Class Administrator and/or submit your claim online. Please go to **www.PaymentCardSettlement.com** or call 1-800-625-6440 for assistance.

Questions? Assistance with preparing your claim is available at no cost to you from the Class Administrator and Class Counsel. Please email info@PaymentCardSettlement.com or call 1-800-625-6440.

To download a version of this Claim Form in Spanish  Español , Russian  Русский , Korean  한국어 , Vietnamese  Tiếng Việt , Japanese  日本語 , Chinese  汉语 , or Thai  ภาษาไทย , please visit **www.PaymentCardSettlement.com**.

Questions? Visit www.PaymentCardSettlement.com or call 1-800-625-6440.

Attachment 2

If your business accepted Visa and/or Mastercard between 2004 - 2019, you're now eligible to claim your share of a \$5.5 billion Settlement.

Claim your share now. >>>



Merchants (business owners) who accepted Visa and/or Mastercard at any time from January 1, 2004, to January 25, 2019, are eligible to claim their share of a \$5.5 billion Settlement.

Visa and Mastercard and their issuing banks (the "Defendants") are alleged to have violated the law because they wrongfully inflated Interchange Fees. Defendants say they have done nothing wrong. They claim their business practices are legal.

After years of appeals, the Settlement is now final, and Claim Forms are now being accepted. If you do not file a claim, you will not receive a Settlement Payment.

Claim Forms are now being mailed to more than 15 million merchants. Even if you do not receive a Claim Form in the mail, you may still be eligible, and you should visit www.PaymentCardSettlement.com to get more information about the Settlement. The deadline to file a claim is **May 31, 2024**. You can file your claim online at the website. Or, if you prefer, you can get a paper Claim Form at the website or by calling 1-800-625-6440. Assistance with preparing your claim is available at no cost to you from the Class Administrator and Class Counsel.



Submitting your claim online can take less than five minutes.

STEP ONE:

Scan the QR code to go to www.PaymentCardSettlement.com.



STEP TWO:

Provide the information requested about your business.

STEP THREE:

Submit your claim! Your claim process is now complete.



To get a Claim Form in Spanish Español, Russian Русский, Korean 한국어, Vietnamese Tiếng Việt, Japanese 日本語, Chinese 汉语, or Thai ภาษาไทย, please visit www.PaymentCardSettlement.com.

Do you need additional help or information?



Visit Online:

www.PaymentCardSettlement.com



Email:

info@PaymentCardSettlement.com



Call:

1-800-625-6440

Attachment 3



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STEP TWO:

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STEP THREE:

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Visit Online:
www.PaymentCardSettlement.com



Email:
info@PaymentCardSettlement.com



Call:
1-800-625-6440

Do you need additional help or information?





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STEP TWO:

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STEP THREE:

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Visit Online:
www.PaymentCardSettlement.com



Email:
info@PaymentCardSettlement.com



Call:
1-800-625-6440

Do you need additional help or information?



Sports Illustrated

JACKPOT!

Why the **SUPER BOWL** and **LAS VEGAS** are the perfect couple

BY STEVE RUSHIN



If your business accepted Visa and/or Mastercard between 2004 - 2019, you're now eligible to claim your share of a \$5.5 billion Settlement.

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Submitting your claim online can take less than five minutes.

STEP ONE:

Scan the QR code to go to
www.PaymentCardSettlement.com










STEP TWO:

Provide the information requested about your business.

STEP THREE:

Submit your claim!
Your claim process is now complete.



To get a Claim Form in Spanish  Español, Russian  Русский, Korean  한국어, Vietnamese  Tiếng Việt, Japanese  日本語, Chinese  中文, or Thai  ภาษาไทย, please visit www.PaymentCardSettlement.com.

Do you need additional help or information?



Visit Online:

www.PaymentCardSettlement.com



Email:

info@PaymentCardSettlement.com



Call:

1-800-625-6440

GAME. SET. MATCH.

Sports Illustrated

THE DEBATE IS OVER:

WHY

NOVAK DJOKOVIC

IS THE BEST WE'VE
EVER SEEN

By L. Jon Wertheim

PHOTOGRAPH BY ERICK W. RASCO



Sports Illustrated MARCH 2024

MARCH 2024
VOLUME 135 | NO. 2
SI.COM | @SINOW

If your business accepted Visa and/or Mastercard between 2004 - 2019, you're now eligible to claim your share of a \$5.5 billion Settlement.

Claim your share now. >>>



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www.PaymentCardSettlement.com








STEP TWO:

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STEP THREE:

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Your claim process is now complete.



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Do you need additional help or information?



Visit Online:

www.PaymentCardSettlement.com



Email:

info@PaymentCardSettlement.com



Call:

1-800-625-6440

Attachment 4

Si su negocio aceptó Visa o Mastercard entre 2004 y 2019, ahora usted puede reclamar su parte de una conciliación de 5500 millones de dólares.

¡Reclame su parte ahora! ▶▶

Los comerciantes (propietarios de negocios) que en algún momento entre el 1 de enero de 2004 y aceptaron Visa o Mastercard pueden ahora reclamar su parte de una conciliación de 5500 millones de dólares.

Tanto Visa como Mastercard y sus bancos emisores (los "Demandados") han violado presuntamente indebidamente las tasas de intercambio. Los Demandados alegan que no han cometido nada indebidamente. Las prácticas comerciales son legales.

Tras años de apelaciones, la Conciliación es definitiva y desde ahora se aceptan formularios de reclamación. Si no interponer una reclamación, no recibirá ningún pago proveniente de la Conciliación.

En estos momentos se están enviando formularios de reclamación por correo postal a más de 15 millones de comerciantes. Incluso en el caso de que usted no reciba un formulario de reclamación por correo postal, existe la posibilidad de que sea apto para recibir un pago compensatorio. Le recomendamos que visite www.PaymentCardSettlement.com para obtener más información sobre la Conciliación. La fecha límite para la presentación de reclamaciones es el **31 de diciembre de 2025**. Puede presentar su reclamación en línea a través del sitio web. O, si lo prefiere, puede interponer su reclamación en papel, descargando el formulario de reclamación desde el mismo sitio web, o llamando por teléfono al administrador del grupo de demandantes y los abogados del grupo de demandantes están a su disposición para preparar su reclamación sin costo alguno.



Interponer su reclamación en línea le debería llevar cinco minutos o menos.

PASO UNO:

Escanee el código QR para acceder al sitio web
www.PaymentCardSettlement.com.



PASO DOS:

Proporcione la información que se solicita sobre su negocio.

PASO TRES:

¡Interponga su reclamación! Su parte de la conciliación de reclamación ha sido calculada.



Si desea obtener el formulario de reclamación en español  Español, ruso  Русский, coreano  한국어, vietnamita  Tiếng Việt, japonés  日本語, chino  汉语 o tailandés  ไทย le solicitamos que visite www.PaymentCardSettlement.com.



Visite el sitio web en línea:

www.PaymentCardSettlement.com

Attachment 5

If your business accepted Visa and/or Mastercard between 2004 - 2019, you're now eligible to claim your share of a \$5.5 billion Settlement.

Claim your share now. 

Merchants (business owners) who accepted Visa and/or Mastercard at any time from January 25, 2004, to January 25, 2019, are eligible to claim their share of a \$5.5 billion Settlement.

Visa and Mastercard and their issuing banks (the "Defendants") are alleged to have violated the law by wrongfully inflated Interchange Fees. Defendants say they have done nothing wrong. Their practices are legal.

After years of appeals, the Settlement is now final, and Claim Forms are now being accepted. If you do not submit a claim, you will not receive a Settlement Payment.

Claim Forms are now being mailed to more than 15 million merchants. Even if you do not receive a claim form by mail, you may still be eligible, and you should visit www.PaymentCardSettlement.com to get more information about the Settlement. The deadline to file a claim is **May 31, 2024**. You can file your claim online at www.PaymentCardSettlement.com. If you prefer, you can get a paper Claim Form at the website or by calling 1-800-625-6440. Assistance to file a claim is available at no cost to you from the Class Administrator and Class Counsel.



Submitting your claim online can take less than five minutes.

STEP ONE:

Scan the QR code to go to www.PaymentCardSettlement.com.



STEP TWO:

Provide the information requested about your business.

STEP THREE:

Submit your claim. The settlement process is now complete.

To get a Claim Form in Spanish  Español , Russian  Русский , Korean  한국어 , Vietnamese  Tiếng Việt , Japanese  日本語 , Chinese  汉语 , or Thai  ภาษาไทย , please visit www.PaymentCardSettlement.com.

Do you need additional help or information?



Visit Online:
www.PaymentCardSettlement.com



Email:
info@PaymentCardSettlement.com



Call:
1-800-625-6440

Attachment 6

ConvenienceStore

WHAT'S NEXT IN CONVENIENCE AND FUEL RETAILING

NEWS

INSIDE

HOW TO
MITIGATE
CRIME

FORECAST
STUDY 2024

Stuck in Neutral

OPTIMISM STALLS AMONG
RETAILERS AND SUPPLIERS IN
THE CONVENIENCE CHANNEL AS
CONSUMER RESILIENCY WANES

If your business accepted Visa and/or Mastercard between 2004 - 2019, you're now eligible to claim your share of a \$5.5 billion Settlement.

Claim your share now. ▶▶▶



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Submitting your claim online can take less than five minutes.

STEP ONE:

Scan the QR code to go to **www.PaymentCardSettlement.com**.



STEP TWO:

Provide the information requested about your business.

STEP THREE:

Submit your claim!
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Do you need additional help or information?



Visit Online:

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Email:

info@PaymentCardSettlement.com



Call:

1-800-625-6440

Attachment 7



Single-Port Robotic Surgery: EXPERIENCE MATTERS

Ask your physician if Single Port robotic surgery is appropriate for you.



The Central New York **BUSINESS JOURNAL**

INSIDE:
CENTERSTATE CEO TO OVERSEE MAIN
OFFICE FOR UPSTATE WORKFORCE-
DEVELOPMENT CENTERS. **PAGE 4.**

CNYBJ.COM

WEEKLY EDITION | VOL. 39 | No.



SPECIAL REPORT:

HEALTH CARE QUARTERLY



If your business accepted Visa and/or Mastercard between 2004 - 2019, you're now eligible to claim your share of a \$5.5 billion Settlement.

Claim your share now. 

Merchants (business owners) who accepted Visa and/or Mastercard at any time from January 25, 2004 to January 25, 2019, are eligible to claim their share of a \$5.5 billion Settlement.

Visa and Mastercard and their issuing banks (the "Defendants") are alleged to have violated the law by wrongfully inflating Interchange Fees. Defendants say they have done nothing wrong. Their business practices are legal.

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Submitting your claim online can take less than five minutes.

STEP ONE:

Scan the QR code to go to **www.PaymentCardSettlement.com**.



STEP TWO:

Provide the information requested about your business.

STEP THREE:

Submit your claim. Your claim process is now complete.



Attachment 8

**如果您的企业在 2004 年到 2019 年期间接受过维萨卡和/或万事达卡，则您现在有资格从 55 亿美元的和解金中申请属于自己的部分。
立即申请属于自己的部分。▶▶▶**

在 2004 年 1 月 1 日至 2019 年 1 月 25 日期间的任何时间接受过维萨卡或万事达卡商家（企业主）有资格从 55 亿美元的和解金中申请属于自己的部分。

维萨公司、万事达公司及其发卡行（“被告”）因不当提高交换费而被起诉。被告称自己的行为并无不当。他们称其商业行为属合法行为。

经过多年上诉，现达成最终和解，我们已开始接受索赔申请表。如果您符合条件，则可以获取和解金赔付。

目前我们正向 1,500 多万商家邮寄索赔申请表。即使您未收到邮寄的申请表，也可能有资格获得索赔，请访问 www.PaymentCardSettlement.com 的更多信息。索赔申请提交截止日期为 **2024 年 5 月 31 日**。您可在线提交索赔申请。如果您愿意，也可以通过网站获取纸质索赔申请表，或致电集体管理人和集体法律顾问可以免费协助您准备索赔申请。

Attachment 9

If your business accepted Visa/Mastercard between 2004-2019,



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ECONOMY | FINANCE | HEALTH | REAL ESTATE | ENERGY | CLIMATE | TRANSPORTATION | INDUSTRY
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Rivian stock falls on declining fourth-quarter EV deliveries

Michael Wayland 2 HOURS AGO



How Disney made Star Wars the top film franchise of 2023

Sarah Whitten
SAT, DEC 30TH 2023

CNBC TV
Fast Money
Halftime Report
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From FedEx to airlines, companies are starting to lose their pricing power

Leslie Josephs
FRI, DEC 29TH 2023



PGA Tour and LIV Golf are working to extend merger deadline into 2024

Jessica Golden
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SpaceX sets new rocket record with 96 successful launches in 2023

Michael Sheetz
FRI, DEC 29TH 2023

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Claim your share now. >>>

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MON, JAN 1ST 2024



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Michael Sheetz
FRI, DEC 29TH 2023

TEMAS DEL DÍA

Sismo en Japón | Israel y Hamas | Corte Suprema de Israel | Venezuela y Guyana | Educación superior



Ascienden a 57 los muertos por el terremoto en el oeste de Japón

En medio de las tareas de rescate por el sismo que dejó 57 muertos, dos aviones chocaron este martes en la pista del aeropuerto de Haneda, dejando al menos 5 muertos y 17 heridos. El devastador sismo de magnitud 7,5 afectó el oeste del país este lunes, dejando carreteras y edificios dañados, así como servicios de transporte y comunicaciones interrumpidos.

- Choque de aviones en aeropuerto en medio de tareas de socorro
- "Batalla contra el tiempo" para encontrar sobrevivientes
- Imágenes aéreas muestran daños en edificios y carreteras
- ¿Por qué ocurren tantos terremotos en Japón?



MINUTO A MINUTO

Al menos 4 muertos en ataque contra oficina de Hamas en Beirut



EE.UU.

Investigan como terrorismo doméstico el choque mortal en Rochester



VENEZUELA

Maduro, sin certezas sobre su posible candidatura para 2024



ECONOMÍA

Tesla está a punto de ser superada en el mercado de autos eléctricos



EUROPA

Princesa María de Dinamarca será la primera reina nacida en Australia



AVIACIÓN

Esperaban "viajar en el tiempo" pero llegaron en el año equivocado

TEMAS DEL DÍA

Sismo en Japón

Israel y Hamas

Corte Suprema de Israel

Venezuela y Guyana

Educación superior



1 / 4

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If your business accepted Visa/Mastercard between 2004-2019,



S&P 500
4,750.50
-19.33 (-0.41%)



Dow 30
37,783.53
+93.99 (+0.25%)



Nasdaq
14,808.26
-203.09 (-1.35%)



Russell 2000
2,029.98
+2.90 (+0.14%)



Crude Oil
70.75
-0.90 (-1.26%)



Gold
2,073.70
+1,8999 (+0.09%)



THE WALL STREET JOURNAL

Americans Are Canceling More of Their Streaming Services



Sarah Krouse

Tue, January 2, 2024 at 12:42 PM EST · 5 min read



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S&P 500 4,750.50 -19.33 (-0.41%)

Dow 30 37,783.53 +93.99 (+0.25%)

Nasdaq 14,806.77 -204.58 (-1.36%)

Russell 2000 2,030.36 +3.29 (+0.16%)

Crude Oil 70.75 -0.90 (-1.26%)

Gold 2,073.70 +1.8999 (+0.0917%)

THE WALL STREET JOURNAL

Americans Are Canceling More of Their Streaming Services

Sarah Krouse

Tue, January 2, 2024 at 12:42 PM EST · 5 min read



Business



LOGISTICS REPORT

New Disruption Geopolitics 2024 Supply

Companies that assessed their supply chain strategies in the wake of the 2019 pandemic are having to adjust their plans into practice far more quickly than they may have thought possible.

By Paul Berger

4 hours ago 7 min read



Bloomin' Brands Names Two Directors in Agreement With Starboard Value

Bloomin' Brands has appointed two new members of its board as part of an agreement with activist investor Starboard Value.

By Ben Gluckman



Tesla Falls Behind China's BYD in Quarterly EV Sales for First Time

The Chinese automaker for the first time topped Tesla as the world's largest seller of electric vehicles on a quarterly basis, a sign of China's emerging strength in the market.



HEARD ON THE STREET

Surpassing Tesla Will Take On the Competition in 2024

Having weathered domestic and international expansion, Tesla's next priority is to take on the competition.

By Jacky Wong

Finance

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TECH

As Nvidia hits \$2 trillion, billionaire Marc Rowan's asset manager Apollo calls AI a 'bubble' worse than even the dotcom era

BY CHRISTIAAN HETZNER
February 26, 2024



NEWSLETTERS

Retail investors have been clamoring to invest in AI. With Fundrise, there's now a path into private AI juggernaut Anthropic.

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NEWSLETTERS

How Citizens Financial positioned itself to scoop up private bankers from First Republic

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How Citizens Financial positioned itself to scoop up private bankers from First Republic

BY SHERYL ESTRADA

February 26, 2024



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U.S. MARKETS OPEN

DOW 30
+0.32% 37,938.49

S&P 500
-0.22% 5,024.41

NASDAQ 100
-0.51% 17,351

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Stock Market News

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Trump says he wants huge tariffs if elected. That could send inflation spiking.



In an interview with Time Magazine, Trump pushed back on the widely held idea that tariffs on overseas nations will cause inflation in the US.

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'Tough near-term setup': Here's what Wall Street expects from Apple's 2nd-quarter earnings

JPMorgan said investor expectations could be so bad that even a slight revenue miss from Apple could spark a turnaround in the stock price.



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Joseph Stiglitz on why America's appetite for Trump endures

Stiglitz explains how failed neoliberal policies that trace back to the Reagan era are driving Trump's appeal among voters.



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Do like Buffett and buy the dip in Apple stock before it...



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 ▲ +0.32% 37,938.49

S&P 500
 ▼ -0.22% 5,024.41

NASDAQ 100
 ▼ -0.51% 17,350.00

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Trump says he wants huge tariffs if elected. That could send inflation spiking.



- In an interview with Time Magazine, Trump pushed back on the widely held idea that tariffs on overseas nations will cause inflation in the US.

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**PREMIUM** 3h

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Stiglitz explains how failed neoliberal policies that trace back to the Reagan era are driving Trump's appeal among voters.

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Top Business News



Commercial Real Estate

Five predictions for the national real estate market in 2024

Dec 28 | We close the book on top stories from 2023 and we forecast what's to come nationally in this new year.

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Million Dollar Mountain, lake property hits \$3.15M



Commercial Real Estate

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動

過年時，有自媒體說當小販可月入三萬，你會辭職跟風去幹嗎？

2024-02-11

我靠做小販，月入三萬！我當瓦匠工，月入五萬！我當外賣員，三年102萬！.....為什麼很多自媒體在吹噓這些「好工作」，你會辭職跟風去幹嗎？太傻太天真了！那為什麼有人會信呢？原因:1.工越來越不好打，很多人想跳離自己這個普通平凡的牢籠，跳到一個滿地金銀的幸福之地，以解心頭之恨。2.

小巨肺鄧紫棋居住的房子有多豪？看看她家客廳對面的海就懂了

2024-02-17

鄧紫棋，雖然身材嬌小，卻蘊含著巨大的能量。她的歌聲深受眾人喜愛，尤其在高音飆唱時，給人留下深刻印象。她說話的聲音非常有質感，特別是在高音部分表現得輕鬆自如，令人驚嘆。她的音樂才華讓人難以置信，似乎輕鬆地觸及了高音領域，毫不費力。一年前，鄧紫棋向公眾展示了她位於香港的住所。



Auctions for Rolex Watches

Grailzee




2024 Must See Electric Cars

Mysearches

找不到想看的？搜尋

贊助

如果您的
2004-20
接受过
达卡作
您有资格
美元和解
自己的



立即申领

鄧紫棋,梅西不上,我上!歌聲炸裂,香港为之瘋狂!

2004年から2019年の間にVisa/Mastercard
による支払いを受け入れた企業は、55億ドル
の和解金の一部を請求することができます。

今すぐ和解金の一部を請求しましょう。



【北陸中日新聞 電子版を無料公開中】 【能登半島地震義援金受け付け中】

注目

自民裏金問題

マイナ問題

神宮外苑再開発

原発・エネルギー問題

裁判長に「俺が出るまで待っとけよ」 東名あお り運転一家4人死傷の被告に高裁も懲役18年 判決

2月26日 | 社会

神奈川県大井町の東名高速道路で2017年、あおり運転で一家4人のワゴン車を
停止させ、後続車の追突で死傷させたとして、自動車運転処罰法違反(危険運転
致死死傷)などの罪に問われた石橋和歩(かずま)被告(32)の差し戻し控訴審判決
で、東京高裁は26日、懲役18...







국가의 [모두](#) [정치](#) [사회문제](#) [외교](#) [방어](#) [북한](#) [외교순회](#) [K-웰니스](#)


🕒 [최근 뉴스 >](#)


[더불어민주당, 검찰과의 싸움 해명](#)


가장 인기 많은

1 의대 졸업생들이 인턴십을 포기하고 병원에서 ... 

2 [한국인의 마음속으로 AtoZ] 죽음과 부정: 한... 

삼 10일 동안 데이트한 연예인 폭행·강탈 혐의 여성... 

4 정부, 의사 복귀 기한을 목요일로 정하다 

5 바퀴가 트럭에서 떨어져 버스에 부딪혔습니다. ... 

정부, 의사 복귀 기한을 목요일로

정부는 의사들에게 최후통첩을 보내고, 따르자고 했다.

최정운 기자

게시일 - 2024년 2월 26일 - 14:53

뉴스 레터

[구독하다](#)

코리아헤럴드가 전하는 주요 뉴스와 한국에서 일어나는 모든 일에 대한 논평으로 하루를 시작하세요.

귀하의 사업체가 2004년에서 2019년 사이에 비자/마스터카드를 받은 경우





국가의 모두 정치 사회 문제 외교 방어 북한 외교순회 K-웰니스

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SKT 주도 글로벌 AI 연합, JV 설립

가장 인기 많은



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2 [한국인의 마음속으로 AtoZ] 죽음과 부정: 한...



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정부는 의사들에게 최후통첩을 보내고, 따르지 고했다.

최정윤 기자

게시일 - 2024년 2월 26일 - 14:53

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귀하는 55억 달러의 합의금 중 귀하의 지분을 청구할 자격이 있습니다



Если ваша компания принимала карты
Visa/Mastercard в период с 2004 по 2019 год,

ГОДОВЩИНА ВОЙНЫ



Вторжение России в Украину, 2 года спустя

2 ЧАСА НАЗАД

После 10 лет войны у союзников Украины отсутствует критический инстинкт выживания

5 ЧАСОВ НАЗАД

Украинская армия заявила, что вышла из восточного села под Авдеевкой

ДЕНЬ НАЗАД

Победа Украины «зависит от вас», заявил Зеленский Западу

24 ФЕВРАЛЯ 2024 Г.

В российском городе недалеко от границы с Украиной жизнь колеблется между войной и нормальной жизнью

вы имеете право на получение части суммы урегулирования в размере 5,5 млрд долл. США. Подайте исковое заявление сейчас.



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- КЛИМАТ
- РЕГИОНЫ
- БИЗНЕС
- МНЕНИЕ
- ИСКУССТВО И ЖИЗНЬ
- ПОДКАСТЫ
- АРХИВ



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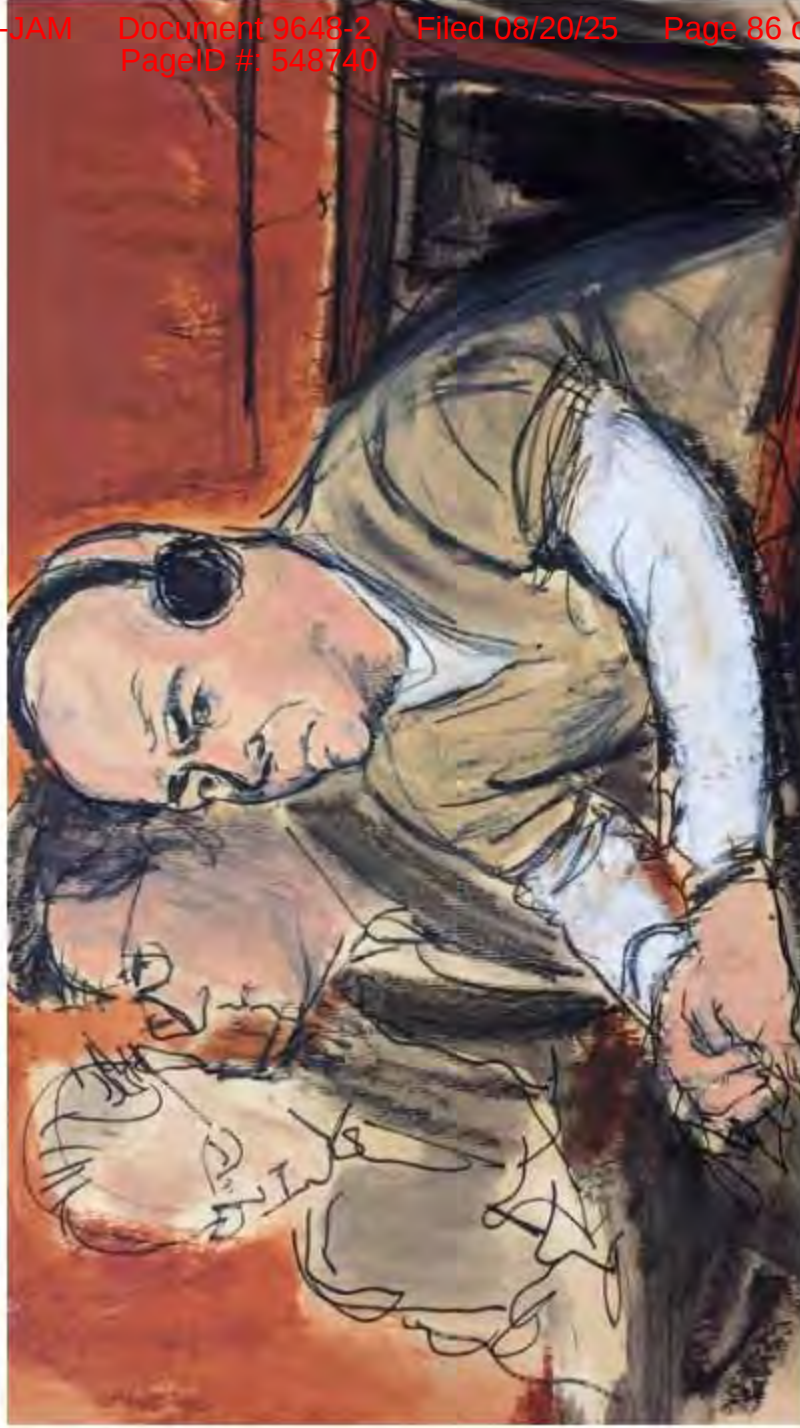


Lunes, 26 de febrero de 2024
El periódico de hoy

EL NUEVO HE

Parte de McClatchy Media Network

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VENEZUELA

Juicio de militar venezolano Cliver Alcalá devela existencia de otras 'investigaciones

2004-2019 คุณสามารถใช้สิทธิเรียกร้องส่วนแบ่งของคุณจาก
ตกลงชดใช้เพื่อระงับคดีความที่มีมูลค่า 5.5 พันล้านดอลลาร์

ใช้สิทธิเรียกร้องส่วนแบ่งของคุณได้ ในตอนนี้



Bangkok Post

ข่าว ประเทศไทย ธุรกิจ ชีวิต ภูมิ การเรียน

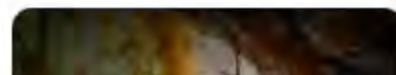
27 ก.พ. 2567 | 00:43:40 GMT+7



ประเทศไทย

26 กุมภาพันธ์ 2567

รถติดบนถนนพระราม 2 ดำเนินความเสียหายของหัวหิน





**Lãnh đạo sàn chứng
 chủ tịch FLC lừa đảo
 như thế nào**

Bộ n cựu lãnh đạo Sở Giao
 TP.HCM (HoSE) đã giúp ng
 Trình Văn Quyế t thời phò
 con và niềm yế t cổ phiế u
 3,6 nghìn tỷ đồ ùng (146 triệ
 đầ u tư.

**Nam diễn viên Hồng Kông Cổ Thiên Lạc nói người tình
 màn ảnh Jessica Tuyên Huyền là 'gia đình'**

Nam diễn viên kiêm ca sĩ Hô ùng Kông Cổ Thiên Lạc gầ n đây đã giải quyế t những tin
 đồn ùng xung quanh mộ i quan hệ của anh với nữ diễn viên Tuyên Huyền, nhấ n mạnh
 rằ ùng sau ba thập kỷ làm việc cùng nhau, họ có mộ i quan hệ 'như gia đình'.



**Du khách Trung Quố
 dọn dẹp Airbnb nếu
 700 USD tiền đặt cộ**

Một du khách Trung Quố c
 yêu cầu dọn dẹp phòng tá
 khác trong căn nhà thuê Air
 không sẽ có nguy cơ mấ t k
 5.000 nhân dân tệ (695 US

**'Kim Kardashian Việt' Lý Nhã Kỳ tiêu khối tài sản triệu USD
 như thế nào?**

Lý Nhã Kỳ, đượ c SCMP mệnh danh là “Kim Kardashian người Việt”, khoe bộ sưu tập
 túi xách Hermès phong phú, lái chiế c Rolls-Royce Ghost sang trọng và là một trong
 những chủ sở hữu du thuyế n đầ u tiên của Việt Nam.

Tin tức

Giao thông Môi trường Giáo dục Tội phạm





Nam diễn viên Hồng Kông Cổ Thiên Lạc nói người tình màn ảnh Jessica Tuyên Huyền là 'gia đình'

Nam diễn viên kiêm ca sĩ Hồng Kông Cổ Thiên Lạc gần đây đã giải quyết những tin đồn xung quanh mối quan hệ của anh với nữ diễn viên Tuyên Huyền, nhấn mạnh rằng sau ba thập kỷ làm việc cùng nhau, họ có mối quan hệ 'như gia đình'.

'Kim Kardashian Việt' Lý Nhã Kỳ tiêu khối tài sản triệu USD như thế nào?

Lý Nhã Kỳ, được SCMP mệnh danh là "Kim Kardashian người Việt", khoe bộ sưu tập túi xách Hermès phong phú, lái chiếc Rolls-Royce Ghost sang trọng và là một trong những chủ sở hữu du thuyền đầu tiên của Việt Nam.



Lãnh đạo sàn chứng khoán chủ tịch FLC lừa đảo như thế nào

Bộ phận lãnh đạo Sở Giao dịch Chứng khoán TP.HCM (HoSE) đã giúp Nguyễn Văn Quyết thoái vốn cho con và niềm yêu thích cổ phiếu của ông đã thu về 3,6 nghìn tỷ đồng (146 triệu USD) đầu tư.



Du khách Trung Quốc dọn dẹp Airbnb nếu không trả 700 USD tiền đặt cọc

Một du khách Trung Quốc yêu cầu dọn dẹp phòng tắm khác trong căn nhà thuê Airbnb không sẽ có nguy cơ mất khoản tiền phạt 5.000 nhân dân tệ (695 USD).





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Payment Card Settlement

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If your business accepted Visa/Mastercard of a \$5.5 billion Settlement

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PAYMENTCARDSETTLEMENT.COM

Visa/Mastercard Settlement



1



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Learn more



paymentcardsettlement Merchants who accepted
Visa/Mastercard may be eligible for money from a
settlement.



Payment Card Settlement @paymentca

Case 1:05-md-01720-MKB-JAM Document 9648-2 Filed 08/20/25 Page 93 of 166
PageID #: 548747

If your business accepted Visa and/or Mastercard between 2004 - 2019, you're now eligible to claim your share of a \$5.5 billion Settlement. Eligible merchants must file a Claim Form by May 31, 2024.

Claim your share now. ▶▶▶



www.PaymentCardSettlement.com
Visa and Mastercard Interchange Fees Settlement



📌 Promoted



Search



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My Network



Jobs

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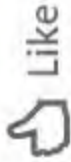
If your business accepted Visa/Mastercard between 2004-2019, you'r claim your share of a \$5.5 billion Settlement. File by May 31, 2024

Claim your share now.



Visa and Mastercard Interchange Fees Settlement

paymentcardsettlement.com



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Repost

**To find out more information
and how to file a claim**

go to

www.PaymentCardSettlement.com

or call

1-800-625-6440

Visa/Mastercard Settlement
paymentcardsettlement.com

[Learn more](#)

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If your business accepted Visa and/or Mastercard between 2004 - 2019, you're now eligible to claim your share of a \$5.5 billion Settlement. Eligible merchants must file a Claim Form by May 31, 2024.

Claim your share now. ▶▶▶



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**Payment Card
Settlement**

[Learn more](#)

11

Attachment 10

In Re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation
30-Second Video & Audio Script

30-Second Video & Audio Script

If your business accepted Visa and/or Mastercard payments at any time from January 1, 2004 to January 25, 2019, you are now eligible to claim a share of a \$5.5 billion dollar Settlement involving Interchange Fees. The Claim Deadline is fast approaching, and claims must be filed by May 31, 2024 in order to receive payment. To find out more information and to file your claim, go to the Court-approved official website Payment-Card-Settlement-dot-com or call 1-800-625-6440.

Attachment 11

Payment Card Interchange Fee Settlement

Sponsored Search Keyword List

credit card settlement	Visa Mastercard lawsuit
merchant settlement	interchange lawsuit
merchant card settlement	interchange fee lawsuit
Visa settlement	payment card lawsuit
Mastercard settlement	credit card litigation
Visa Mastercard settlement	merchant litigation
interchange settlement	merchant card litigation
interchange fee settlement	Visa litigation
payment card settlement	Mastercard litigation
credit card class action	Visa Mastercard litigation
merchant class action	interchange litigation
merchant card class action	interchange fee litigation
Visa class action	payment card litigation
Mastercard class action	credit card antitrust
Visa Mastercard class action	merchant antitrust
interchange class action	merchant card antitrust
interchange fee class action	Visa antitrust
payment card class action	Mastercard antitrust
credit card class action settlement	Visa Mastercard antitrust
merchant class action settlement	interchange antitrust
merchant card class action settlement	interchange fee antitrust
Visa class action settlement	payment card antitrust
Mastercard class action settlement	credit card claim
Visa Mastercard class action settlement	merchant claim
interchange class action settlement	merchant card claim
interchange fee class action settlement	Visa claim
payment card class action settlement	Mastercard claim
credit card lawsuit	Visa Mastercard claim
merchant lawsuit	interchange claim
merchant card lawsuit	interchange fee claim
Visa lawsuit	payment card claim
Mastercard lawsuit	

Attachment 12



News

Claim Form

Images

Process

Interchange Fee

Equifax

About 266,000,000 results (0.45 seconds)

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paymentcardsettlement.com

https://www.paymentcardsettlement.com

Visa/Mastercard Settlement - Claim your Settlement...

Merchants who accepted Visa/Mastercard may be eligible for money from a \$5.5B Settlement

Sponsored



certificateclearing.com

https://www.certificateclearing.com

Visa Mastercard Class Action - Payment Card Settlement

If You Took Visa/Mastercard Payments from 2004-2019, You're Due a Share of the Settlement

Get Started on Your Claim. You Only have 6 mos to Swipe Back Your Fees...

Sponsored



releasecardsettlement.com

https://www.releasecardsettlement.com

Release Card Settlement - Court Authorized Notice

Did You Receive a Prepaid Debit Card on Release from Custody from Jail or Other Facility?



Payment Card Interchange Fee Settlement

https://www.paymentcardsettlement.com

Payment Card Settlement | Official Court-Authorized Website

...

11 hours ago — The lawsuit is about claims that merchants paid excessive fees to accept Visa and Mastercard cards because Visa and Mastercard, individually, and together with ...

FAQs

Under the settlement, Visa, Mastercard and the Bank ...

Pre-register

Claim Pre-registration Form - Closed. The parties are ...

About 2,370,000 results (0.31 seconds)

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[paymentcardsettlement.com](https://www.paymentcardsettlement.com)
<https://www.paymentcardsettlement.com>

Interchange Fees Settlement - Claim your Settlement...

Merchants can now file a claim for payment from a \$5.5B Interchange Fees Settlement. Eligible merchants must file a Claim Form by May 31, 2024.

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[certificatclearing.com](https://www.certificatclearing.com)
<https://www.certificatclearing.com>

Recover Your Fair Share - Interchange Fee Settlement

See how to Recover Your Share of the \$5.5 Billion Payment Card Settlement. Get Started Now. Don't Miss Out. You Only have 6 mos to Swipe Back Your Fees. Deadline-5/31/24...

[Payment Card Interchange Fee Settlement](https://www.paymentcardsettlement.com)
<https://www.paymentcardsettlement.com>

Payment Card Interchange Fee Settlement

The lawsuit is about claims that merchants paid excessive fees to accept Visa and Mastercard cards because Visa and Mastercard, individually, and together with ...

FAQs · Pre-register · Contact · Documents

[Payment Card Settlement](#)

About 741,000 search results

Ad related to: Mastercard class action settlement

www.PaymentCardSettlement.com

Visa/Mastercard Settlement - Claim your Settlement Payment

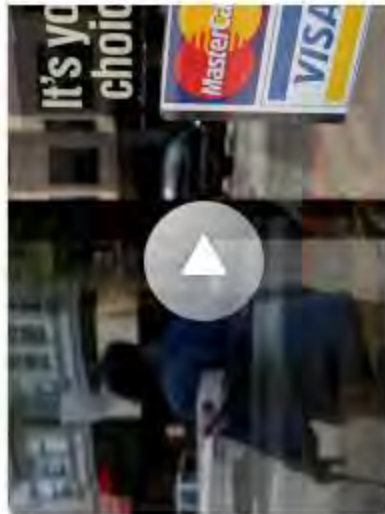
Merchants who accepted Visa/Mastercard may be eligible for money from a \$5.5B Settlement. Eligible merchants must file a Claim Form by May 31, 2024.

Trending Now

All [Holiday Gifts]

1. Best mattresses 2023
2. Monos luggage
3. Purple mattress
4. Bombas slippers
5. Christmas cards

Top Stories



Visa, Mastercard swipe-fee settlement claim process moves forward

The 18 million businesses, including convenience-store retailers and grocers, that accepted Visa of...

Supermarket News
2 days ago



Millions of U.S. Businesses Eligible for a Share of \$5.54B Payment Card Settlement

Claim forms are being mailed to class members throughout December by the U.S. Postal...includes...

19 Action News Cleveland
6 hours ago



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interchange fee class action



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About 905,000 search results

Ad related to: interchange fee class action

www.PaymentCardSettlement.com

Interchange Fees Settlement - Claim your Settlement Payment

Merchants can now file a claim for **payment** from a **\$5.5B Interchange Fees Settlement**. Eligible merchants must file a Claim Form by **May 31, 2024**.

People also ask

What are interchange fees?



Where can I find information about a settlement on interchange fees?



How much money will be provided in the payment card exchange fee settlement?



Does Fiserv have a class action settlement expert?



www.paymentcardsettlement.com · en

Payment Card Interchange Fee Settlement

Sep 18, 2018 · Payment Card **Interchange Fee Settlement Official Court-Authorized Settlement** Website Updated August 1, 2023 : The time for all appeals has passed, and the parties are currentl...

Documents

Barry's Cut Rate Stores Inc. Equitable Relief Class Action...

Claim Preregistration Form

Payment Card Interchange Fee Settlement Official...

Contact

FAQs

About 19,000,000 results

Visa/Mastercard Settlement | Claim your Settlement Payment

<https://www.paymentcardsettlement.com>

Ad: Merchants who accepted **Visa/Mastercard** may be eligible for money from a \$5.5B Settlement. Eligible merchants must file a Claim Form by May 31, 2024.

\$5.6 billion

According to 2 sources

A federal appeals court has approved a settlement of a class-action lawsuit brought against Visa and Mastercard. The settlement, in which the payment card networks agreed to pay a total of **\$5.6 billion** to 12 million merchants who brought an antitrust case against them, was approved Wednesday (March 15).

Appeals Court Approves Se...
pymnts.com

The Second Circuit Court of Appeals upheld a **\$5.6 billion** settlement agreement between Visa, Mastercard and more than 12 million retailers who accused the credit card companies of improperly fixing credit and debit card fees.

\$5.6B Visa, Mastercard sett...
topclassactions.com

Feedback

Reuters
<https://www.reuters.com/legal/visa-mastercard-...>

Credit cards



Related searches

- Q visa mastercard settle
- Q visa mastercard settle
- Q visa mastercard settle
- Q visa mastercard settle
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- Q visa mastercard settle
- Q www.paymentcardse
- Q visa mastercard settle

About 502,000 results

Interchange Fees Settlement | Claim your Settlement Payment

<https://www.paymentcardsettlement.com>

Ad Merchants can now file a claim for payment from a \$5.5B Interchange Fees Settlement. Eligible merchants must file a Claim Form by May 31, 2024.

\$188 million CAD

Several banks and financial institutions have agreed to a **\$188 million CAD** class action settlement resolving claims they charged high interchange fees and put in place rules that restricted merchants' ability to surcharge or refuse higher-cost Visa and Mastercard credit cards.

Visa, Mastercard interchange fees \$188M class action settlement
ca.topclassactions.com/lawsuit-settlements/credit-cards/visa-mastercard-interc...

Was this helpful?

People also ask

Where can I find information about a settlement on interchange fees?
Additional information regarding the litigation is available on the Court-approved website at

How much money will be provided in the payment card exchange fee settlement?
Write to: Payment Card Interchange Fee Settlement, P.O. Box 2530, Portland, OR 97208-2530. How much

What i lawsui
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with sli

www.paymentcardsettlement.com

Portland, OR 97208-2530. How much

Together

Attachment 13



Julie Wright, President & Founder

(W)right On Communications, Inc.

Julie Wright is President of (W)right On Communications, Inc., the award-winning integrated strategic communications firm she founded in 1998. The agency handles complex communications challenges in the business, nonprofit and public sectors drawing on data-driven insights and producing measurable results.

Prior to forming (W)right On Communications, Wright served at several public relations agencies in Canada and as Director of Marketing for a Canadian financial institution. She began her career as a journalist, working as a radio news anchor.



Wright regularly volunteers to serve her profession and the community. She is currently a Director and Communications Committee Chair for the California Travel Association. Her past roles include serving as Chair of the President's Advisory Council for California State University San Marcos, Director and Chair of the San Diego North Economic Development Council, Board Vice President for the La Jolla Village Merchants Association, Trustee of the Tri-City Hospital Foundation and Director-at-Large for the Los Angeles chapter of the International Association of Business Communicators (IABC).

In 2025, the San Diego chapter of the IABC awarded Wright as their "Communicator of the Year." San Diego Metropolitan Magazine named Wright a "Top San Diego Marketing Executive of 2024." The San Diego Business Journal named her a "Woman Who Means Business," and Leadership North County presented her their "Fran Aleshire Award" for community leadership.

Wright holds a Bachelor of Arts degree from the University of British Columbia and a Master of Journalism degree from the Graduate School of Journalism at the University of Western Ontario. She is a graduate of Leadership North County and the Corporate Directors Forum Governance Academy. She serves as a director of Innovotech Inc., a public company on the

LOS ANGELES


555 West 5th., 35th Floor
Los Angeles, CA 90013
Tel 213.633.7575

SAN DIEGO

402 W Broadway, 29th Floor
San Diego, CA 92101
Tel 858.886.7900

VANCOUVER

267 W. Esplanade, Suite 303
North Vancouver, BC V7M 145
Tel 778.650.5012

 wrightoncomm.com
 [wrightoncomm](https://www.facebook.com/wrightoncomm)
 [@wrightoncomm](https://twitter.com/wrightoncomm)

TSX-V. With her two sons now grown, Wright splits her time between San Diego and the Pacific Northwest with her husband and two rescue dogs.

(W)right On Communications

(W)right On Communications, Inc. is an award-winning integrated strategic communications firm based in San Diego, California that serves client partners across the U.S. and abroad.

Founded in 1998 by its President Julie Wright, the agency has earned recognition from Forbes and Newsweek as one of the Best PR Agencies in America and was named San Diego PR Team of the Year in 2024 by the Public Relations Society of America.

With a strategic, imaginative, and trusted approach, (W)right On Communications specializes in integrated media campaigns that combine earned media programs with social media strategies, owned content creation and paid media promotion. It provides its clients with full in-house creative services including branding, design and multimedia production to bring its clients' brand stories to life.

The agency focuses on two core practice areas. Its B2B and technology group specializes in legal and professional services, cybersecurity software, manufacturing, cleantech and renewable energy. Its hospitality and lifestyle team serves hotels, destinations, agritourism, luxury senior living, health and wellness brands and nonprofits.

(W)right On Communications is known for results-driven storytelling, collaborative partnerships and a passion for elevating its clients' brands through thoughtful, strategic communications and relationship building. Learn more at wrightoncomm.com.

Attachment 14



Payment Card Interchange Fee Settlement

Outreach and Education Program Report

April 15, 2025

Prepared by (W)right On Communications, Inc.

Table of Contents

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\$5.5 Billion Settlement for Merchants

Did your business accept Visa and/or Mastercard between Jan. 1, 2004 and Jan. 25, 2019? If yes, you're likely part of the biggest antitrust class-action settlement in history.

Claim your share now 

1. Executive Summary

After close to 20 years of litigation, the [Payment Card Interchange Fee Settlement](#) entered its claims phase on Dec. 1, 2023. This process would see more than \$5.5 billion returned to millions of Visa and Mastercard merchants. This was the largest private antitrust class-action settlement in U.S. history.

Millions of merchants that accepted Visa and/or Mastercard between January 1, 2004 and January 25, 2019 were eligible to claim a share, and given that nearly 20 years had passed since the start of the original litigation and class period, many merchants were expected to have moved, closed the business or even have died.

Class counsel and the settlement administrator, [Epiq](#), identified the need for additional outreach and education nationwide and tasked [\(W\)right On Communications](#) with delivering a program to help give as many class members as possible the opportunity to claim.

Strategy

The outreach team developed an integrated communications strategy to complement Epiq's mailed claim form and paid print and digital ads, including:

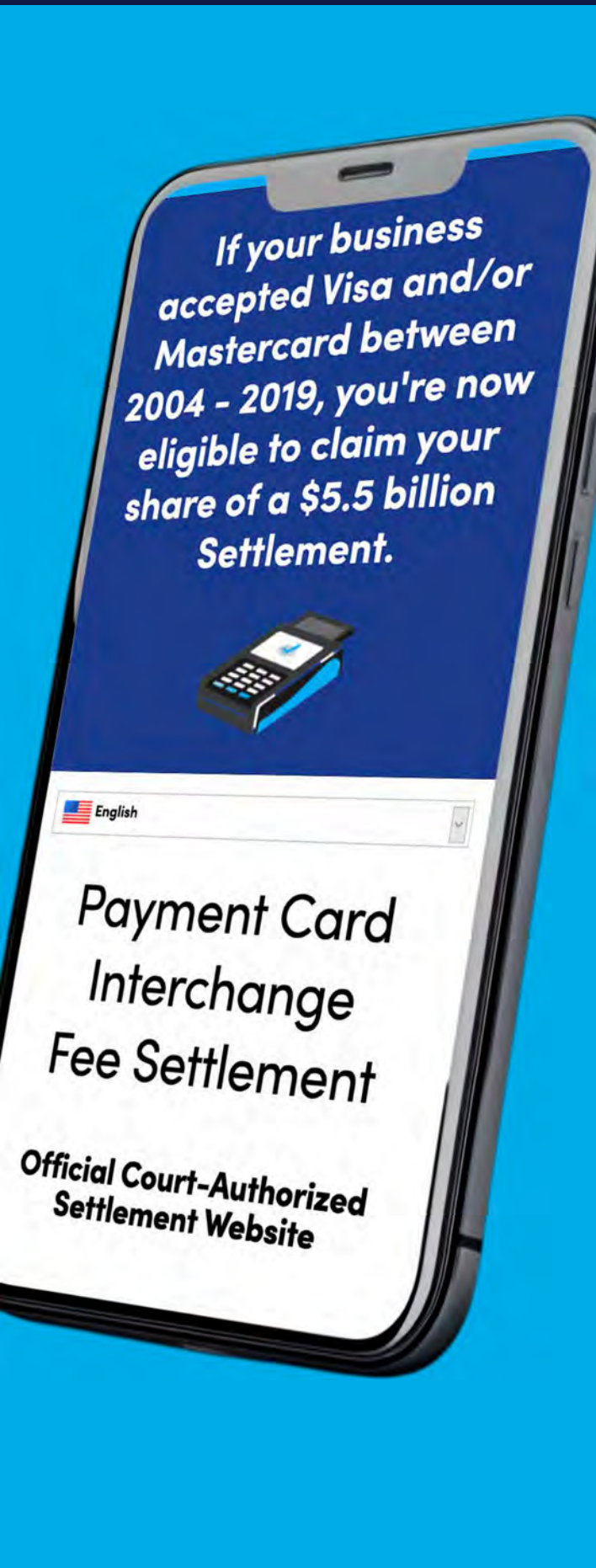
- Branded educational materials delivered through email campaigns, an online outreach kit, printed hard copies for in-person outreach at events and conferences, image and video storytelling and educational webinars including claim submission demonstrations.
- Media materials and outreach in nine languages including a video news release in English and Spanish.
- Social media channels, content and engagement across Facebook, X, Instagram, YouTube and TikTok as well as influencer content.
- Outreach to hundreds of trade associations serving merchants and business groups including small and diverse businesses.

Results

Over a 14-month claims period, the outreach and education strategy generated over 70 million impressions, including:

- 42.5 million from more than 500 media mentions
- 21.5 million from social media content and influencers
- 6.4 million from the membership of 300 trade associations and business groups

The outreach effort was recently awarded the Mark of Excellence by the Public Relations Society of America regional chapter.



2. Outreach Overview

In collaboration with the *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation* co-counsel and settlement administrator, (W)right On Communications assembled and implemented an outreach and education program targeting merchants that accepted Visa and Mastercard credit and/or debit cards during the class period. Outreach launched with the claims period on Dec. 1, 2023 and continued through its conclusion on Feb. 4, 2025.

The outreach program's goal was to give as many class members as possible the opportunity to claim their share of the \$5.5-billion settlement.

2.1 Outreach Results

An integrated, strategic communications program outreached to prospective class members via targeted news and trade media coverage, trade association resources, social media and influencers, associations serving diverse businesses and the Small Business Expo and University. A detailed dashboard monitored week-by-week progress for the first eight weeks to ensure a nimble approach before moving to month-by-month evaluation.

OUTREACH + EDUCATION PROGRAM REACH		
Outreach Activity	Impressions	Subtotals
MEDIA		
Media coverage - online views	19,641,000	
Media coverage - broadcast views	21,600,000	
PR Newswire - news release views	102,158	
Industry Dive - paid placements	980,433	
PR Newswire - paid placements	255,576	
		42,579,167
SOCIAL MEDIA		
X, Facebook, Instagram, TikTok - post reach	19,331,625	
YouTube - video views	192,525	
Influencers - post reach	1,963,558	
		21,487,708
ASSOCIATIONS		
Reach via trade association outreach	6,403,865	
Small Business Expo events and eblasts	86,800	
		6,490,665
	TOTAL	70,557,540

Impressions captured between Dec. 1, 2023 - Feb. 4, 2025.

2.2 Raising Awareness

To help make court-authorized outreach materials recognizable to class members, a branded, custom icon representing a payment card swipe machine was created and applied to all materials including:

- Claim form mailer
- Settlement website
- Outreach emails
- Outreach social media
- Outreach displays
- Outreach collateral



Claim your share now. >>>

Payment Card Interchange Fee Settlement
Class Administrator
PO Box 2530
Pawtucket, RI 02862-2530

Submission Deadline:
February 4, 2025

Claimant ID: 958761929
Tax ID: **-**-0047

Scan the QR code to file a claim online via your phone, computer, tablet, or other smart device.

EXAMPLE BUSINESS LLC
SARL O. MERCHANT
123 MAIN STREET
SUITE 2500
TOWNTOWN OH 12345

• COURT-APPROVED CLAIM FORM •

If your business accepted Visa and/or Mastercard between 2004 - 2019, you're now eligible to claim your share of a \$5.5 billion Settlement.
Claim your share now. >>>

Submit Your Claim Online:
Submitting your claim online takes less than five minutes. You can scan the QR code or visit www.PaymentCardSettlement.com and use the secure website interface provided below in the year claim. If you file your claim online, it must be submitted by 11:59 pm PST on **May 31, 2024**.

STEP ONE: Scan the QR code to access the Class Website.

STEP TWO: Enter your secure credentials where requested.

STEP THREE: Submit your claim. Your claim process is now complete.

YOUR CLAIMANT ID: XXXXXXXXX
CONTROLLING: XXXXXX

Why are you receiving this Claim Form?
You are receiving this Claim Form because records show you are a merchant (business owner) who may have accepted Visa and/or Mastercard or any fees from January 1, 2004, to January 25, 2019 ("Class Period"). Visa, Mastercard and their issuing banks ("Defendants") are alleged to have violated the law because they wrongfully inflated interchange fees. Defendants say they have done nothing wrong. They claim their business practices are legal. After years of appeals, the Settlement is now final, and it is time to file your claim for a Settlement Payment. If you do not file your claim, you will not receive a Settlement Payment.

For many eligible merchants, data is available to determine the value of Visa and/or Mastercard transactions accepted during the Class Period. If that applies to you, your information is on the next page, and you can quickly file your claim based on those estimates (either by using the QR code on this form, going to www.PaymentCardSettlement.com, or by mailing in this paper Claim Form). If you believe that the estimates of your Visa and/or Mastercard-processed activity provided on the next page are incorrect, please visit the Case Website to provide more information regarding your transactions. You may also be able to request additional data on your business' merchant activity.

[HOME](#) In the News FAQs Documents Merchant Portal Contact

If your business accepted Visa and/or Mastercard between 2004 - 2019, you're now eligible to claim your share of a \$5.5 billion Settlement.

English

Payment Card Interchange Fee Settlement

Official Court-Authorized Settlement Website



 **Payment Card Settlement**
January 30 at 10:38 AM · 🌐

Attention business owners! You may be eligible for a share of the Mastercard/VISA settlement—but time is running out. The filing deadline is Feb. 4, 2025. Watch this video to learn how to register and #claimyourshare before it's too late. 📺 📱


**Visa/Mastercard Settlement
Registering and Linking**



YOUTUBE.COM
Payment Card Settlement - Registering and Linking

**Claim your share
before it's too late**

File by February 4, 2025 at
PaymentCardSettlement.com



TIME IS RUNNING OUT



Learn how to claim your share.
Join Us: July 10, 12pm PT | 3pm ET

REGISTER NOW

RYAN MARTH
Partner, Robbins Kaplan

ALEXANDRA ("XAN") BERNAY
Partner, Robbins Keller
Co-Lead Counsel on the Payment Card Case

TWO WEEKS AWAY
Wednesday, July 10 at 12pm PT / 2pm CT / 3pm ET

Don't forget to register for our **FINAL** and **FREE live webinar** to learn how business owners can benefit from the **\$5.5 billion** Visa and Mastercard interchange fee settlement.

Members of the settlement's legal team will explain:

- Who's eligible to make a claim
- How to make a claim
- What free resources are available
- Answers to their questions during a Q&A

Business owners must file their claim by **August 30, 2024** for the opportunity to receive money back from the settlement.

Want more info? [CLICK HERE](#)

REGISTER NOW

SPEAKERS
Co-Lead Counsel on the Payment Card Case and settlement:
Alexandra ("Xan") Bernay
Partner, Robbins Keller
Ryan Marth
Partner, Robins Kaplan







3. Outreach Timeline

PHASE 1: LAUNCH

December 2023

Claims open Dec. 1 with a press announcement in five languages and media outreach, emails and calls to trade association contacts, social media and influencer posts.

Press release posted on C-Store Dive, Grocery Dive, Retail Dive and Restaurant Dive and promoted in associated e-newsletters.



January 2024

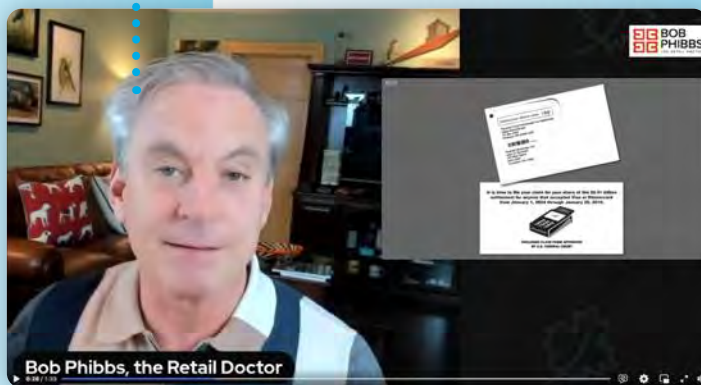
Media, trade association, social media and influencer outreach continues.

Webinars launch with Merchant Advisory Group on Jan. 16 and FMI food industry association on Jan. 30; invites begin for the outreach program's first hosted webinar.



February 2024

First hosted webinar on Feb. 6 educates trade association leaders and offers support to their members via digital outreach kit including content to share with members.



PHASE 2: BUILD ON LAUNCH MOMENTUM

March 2024

Spanish-language media, Latinx trade association and Native American trade association and event outreach begins; attend NCAIED RES conference Mar. 11-14 in Las Vegas to distribute claims postcard to artisan merchants.

Second hosted webinar Mar. 28 for trade association leaders and class members.

Webinars for Georgia Food Industry Association Mar. 19 and hosted class member webinar Mar. 28.



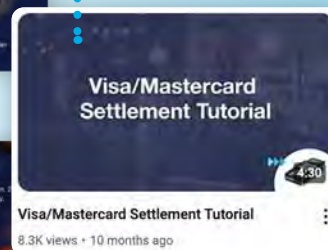
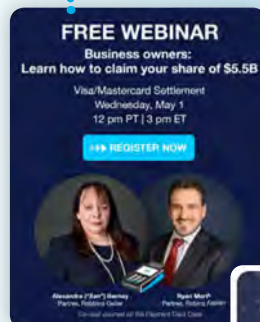
April 2024

Sponsored flier in Indian Gaming Trade Show + Convention attendee bags in Anaheim from April 11-14.

"Time is running out" press release issued Apr. 17 ahead of May 31 claims deadline.

Promoted upcoming webinar on social media and association and class member emails.

Tutorial videos produced by settlement administrator added to YouTube and Claims Portal.



PHASE 3: DEADLINE EXTENDED TO AUG. 30

May 2024

Third webinar for trade associations and class members hosted May 1.

Deadline extended to Aug. 30 and announced May 15 through association emails, calls and social content as well as a May 28 press release.

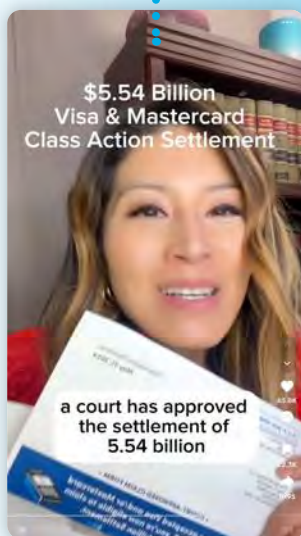


June 2024

Deadline extension announcement posted on CFO Dive, Grocery Dive, Retail Dive and Restaurant Dive and promoted in associated e-newsletters.

Webinar for International Municipal Lawyers Association June 10.

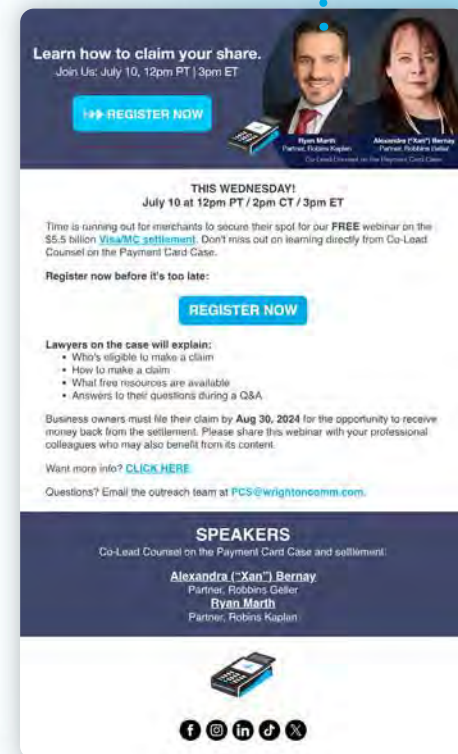
Reposted and shared influencer content from December and January.



July 2024

Fourth hosted trade association and class member webinar on July 10.

Emailed "last month to claim" message to database.



PHASE 4: DEADLINE EXTENDED TO FEB. 4

August 2024

Deadline extended to Feb. 4 and announced on Aug. 13 through association emails, calls and social content as well as press release.



NEW CLAIM DEADLINE: FEB 4, 2025

Merchants have until February 4, 2025 to file their claim

[File your claim today](#)

Why the Deadline is Extended

This is an extraordinary settlement that goes back 20 years, and it deserves a longer claims period to ensure as many eligible merchants as possible have the opportunity to claim their share. Many small businesses, in particular, have limited resources so the deadline extension now gives them more time to take action. It also allows more time for resolving conflicting claims and other similar issues.

For most merchants, the claims process is quick, simple and returns real money after years of allegedly inflated interchange fees. Visit www.paymentcardsettlement.com to learn more and to start your claim today.

No-cost assistance is available by emailing info@PaymentCardSettlement.com or calling 1-800-425-6440 between 9 a.m. and 5:30 p.m. ET Monday to Friday except holidays.

September 2024

Added webinar registration link to the settlement website to assist class members.

Conducted online survey of business owners: 81% said they were aware of the settlement; of those who were aware, 75% said they had claimed.

Merchant Survey: \$5.5 Billion Payment Card Settlement

We want your feedback!

Your responses to this survey are anonymous and will help the settlement administrator and court-authorized outreach and education team better serve you and other class members in this important settlement.

* 1. Did your business accept Visa and/or Mastercard from 1/1/2004-1/25/2019?

Yes

No

[Next](#)

\$5.5B Visa/Mastercard Settlement

"Each time we have to accept Visa/Mastercard payments, it takes away a bunch of our revenue. So it would make a huge difference for our business to receive money back from the settlement."

Rodnia Attiq
Co-owner
El Borrego Restaurant
San Diego, California

October 2024

Fifth class member webinar held Oct. 15 with 10,000+ registrations and 1,000+ attendees.

Pre-surveyed webinar participants to identify their issues and questions.

Post-webinar survey showed 85% of attendees were likely or very likely to file a claim after participating.

Increased social media boosting to drive merchants to the claims portal.

Visa/Mastercard Settlement

HOW-TO FILE WEBINAR

Learn how to claim your share of \$5.5B
with the Co-Lead Counsel and Settlement Administrator

Tuesday, October 15 at 12 pm PT | 3 pm ET

Alexandra ("Xian") Bernay
Partner, Robbins Keller

Ryan Marth
Partner, Robbins Kaplan

Lorise Kovach
Sr. Vice President, Epig

PHASE 4: DEADLINE EXTENDED TO FEB. 4 (continued)

November 2024

Exhibited in-person at Small Business Expo in Dallas-Ft. Worth on Nov. 20 and presented a Small Business University webinar on Nov. 26.

Sixth class member webinar on Nov. 21 draws 10,700 registrants and 2,200 participants.

Sponsored a second TikTok and Instagram post by class-action influencer Lawyer Angela.

Continued increased social media boosting to drive more merchants to the claims portal.



Visa/Mastercard Settlement

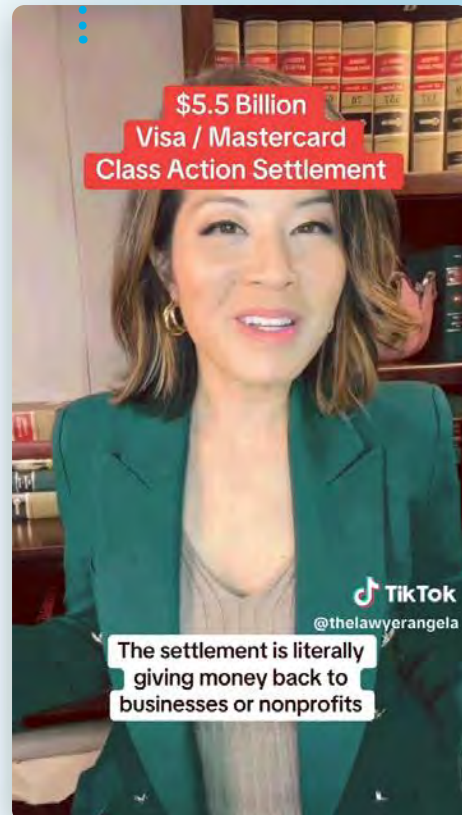
HOW-TO FILE WEBINAR

Learn how to claim your share of \$5.5B
with the Co-Lead Counsel and Settlement Administrator

Wednesday, January 8 at 11am PT | 2pm ET

December 2024

Exhibited in-person at Small Business Expo in Atlanta on Dec. 11.



PHASE 4: DEADLINE EXTENDED TO FEB. 4 (continued)

January 2025

Issued a "final month to claim" press release on Jan. 2 in English and Spanish.

Seventh and final class member webinar on Jan. 8 with 6,400 registrants and 2,000 attendees.

Presented Small Business University webinar on Jan. 21.

Final days to claim message emailed to 1000+ trade association contacts and 10,000+ webinar attendees.



February 4, 2025

All outreach and education campaign digital and social assets updated to reflect the deadline for claims has passed and referring inquiries to the settlement administrator's call center.

4. Outreach Strategies, Activities and Outcomes

4.1 Research

Prior to developing the outreach and education program strategy, the outreach team consulted the U.S. Federal Trade Commission's Sept. 2019 report on "[Consumers and Class Actions: A Retrospective and Analysis of Settlement Campaigns](#)." The report studied settlement notice programs for consumers and found advertisements did not increase claims rates and that the median claims rate was 9% and the weighted mean was 4% indicating that the larger the class size, the lower the claims rate.

Given the 18 million initial claim forms to be sent to eligible merchants, the Payment Card Settlement class size was very large. Additionally, the start of the class period stretched back 20 years to Jan. 1, 2004 and covered a 15-year period to Jan. 25, 2019. The U.S. economy had experienced two economic shocks since 2004: the 2008 recession and the COVID-19 pandemic. It was likely that many class members had sold or closed their businesses, retired, moved or died.

An additional factor was recognition that class members would represent a diverse landscape of American Visa and Mastercard credit and debit card merchants, and the majority would be small businesses.

Finally, it was already known that third-party filing services were aggressively pursuing merchants to handle their claims despite the great effort the settlement administrator and counsel had invested in making it as simple as possible for class members to claim.

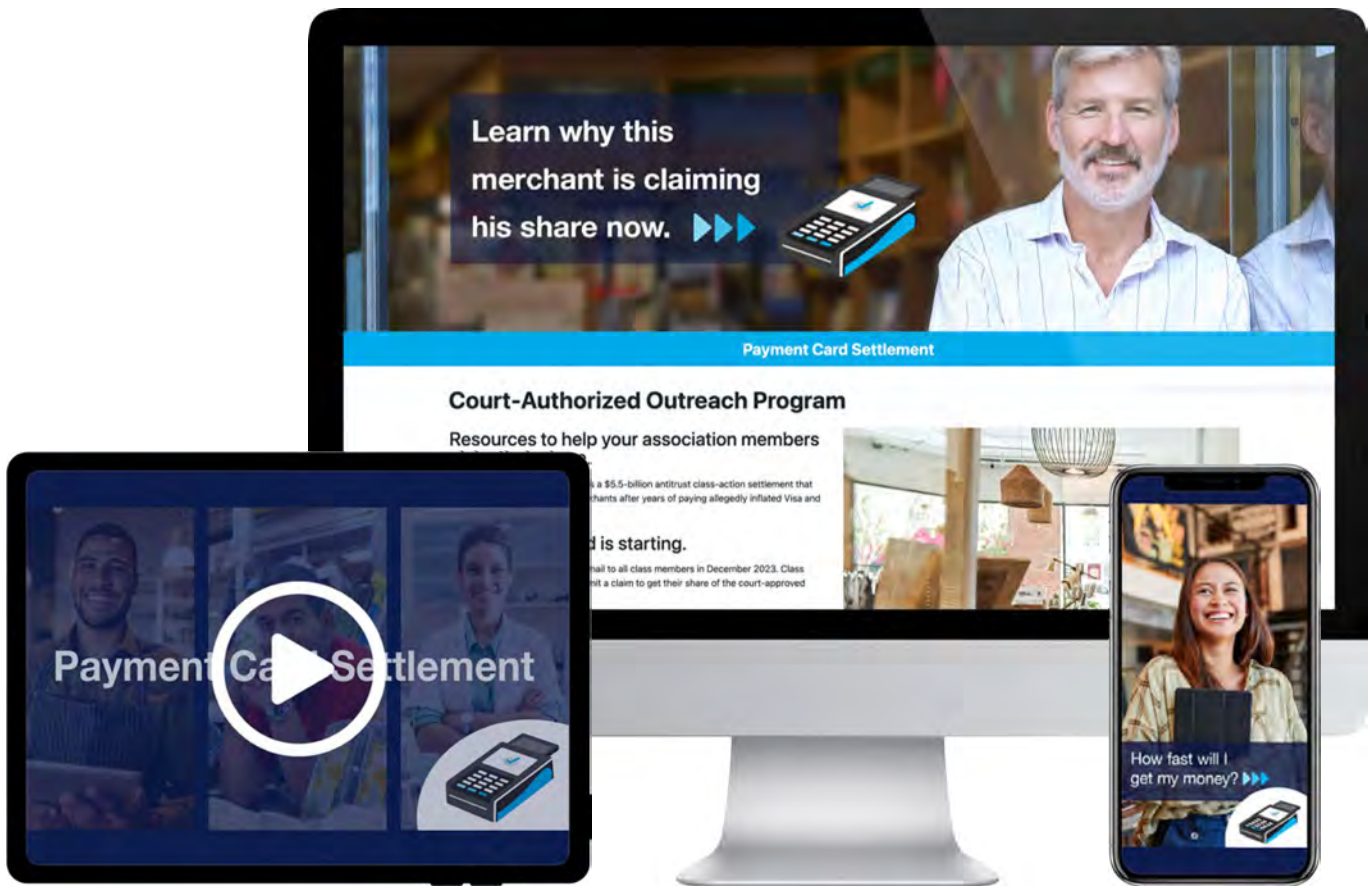
The goal was to give as many class members as possible the opportunity to claim their share of the landmark *In re Payment Card Interchange Fee* settlement requiring outreach strategies for hard-to-reach businesses, small businesses and many industries reliant on credit card payments to support their sales.

4.2 Trade Association and Merchant Relations

Trade Association Strategy

The trade association and merchant relations strategy enabled the outreach and education team to share the claims process and disseminate important information through trusted trade association and similar third-party channels. The effort targeted and worked with associations serving retail, restaurant and other merchant industries; diverse businesses; and small businesses.

Educational assets were developed to make it easy to share timely and accurate information with association members. The outreach team also offered custom webinars for associations upon request and an ongoing series of webinars open to association leaders and merchants. Association relationships helped to communicate deadline extensions as well as responding to misinformation or issues created by third-party filers. The final three webinars were promoted directly on the settlement website to assist the largest number of class members possible.



**“It’s so quick, it’s scary.
It’s very user friendly.”**

David Lappe
NSGA Past Chairman,
Kittery Trading Post

Trade Association Activities

Activities included:

- Sharing a digital outreach kit at pcsoutreachkit.com with educational assets including:
 - Talking points
 - Press release and video news release
 - FAQ
 - Newsletter articles
 - Social posts and graphics
- Hosted 7 webinars for association leaders and class members:
 - Four 30- to 45-minute webinars featuring an overview and Q&A with counsel
 - Three 30-minute webinars featuring an overview, live demonstration of the claims portal and FAQs with the settlement administrator and counsel
- Presented 6 custom webinars hosted by:
 - Merchants Payments Coalition
 - Georgia Food Industry Association
 - International Municipal Lawyers Association
 - Merchant Advisory Group
 - Small Business University x 2
- Exhibited and outreached in-person at 2 Small Business Expo events
- Sent 45 email campaigns to a database of over 1,000 trade association contacts and thousands of merchants who opted in to receive settlement updates

Trade Association Outcomes

Trade association and merchant outreach was critical to get the word out in a manner that class members would notice and also trust. The outreach team contacted more than 300 trade associations serving retail, restaurant, specialty retail, services, small businesses, diverse businesses and more by phone, email and LinkedIn where necessary. Through our conversations with associations, we learned that many were already working with third-party filers who had made deals with them prior to the opening of the claims period.

TRADE ASSOCIATION + MERCHANT RELATIONS	
	Dec. 1, 2023 – Feb. 4, 2025
Associations contacts	300
Members represented by these association contacts	6,403,865
Small Business Expo events in Dallas, Atlanta + webinars	86,800
Total Reach	6,490,665
Webinar attendees	5,670
Webinar registrants	27,890
Email campaigns sent	45
Email open rate	45%
Email click rate	7.6%
Small Business Expo conversations	550

NOTE: the industry average B2B open rate is 15.1% and click rate is 2.44%.

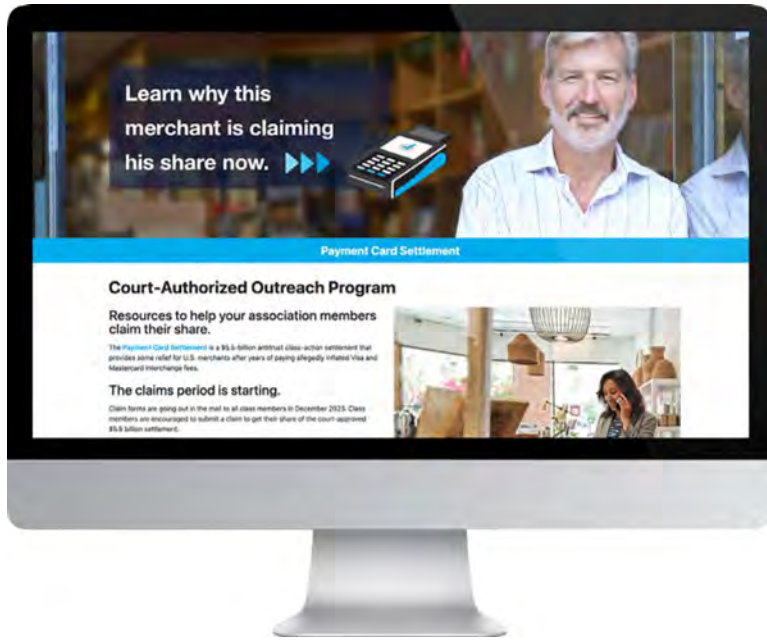
“The expertise and advice co-counsel Xan Bernay shared on the Payment Card Settlement educational webinar was extremely helpful and valuable in answering merchants’ questions and providing clear direction on how and when to correctly file claims. We’re glad we could make the informative session available to members.”

Beth Provenzano

SVP of Public Affairs, Events and Education, Merchant Advisory Group

Digital Outreach Kit website

A website at PCSoutreachkit.com shared downloadable assets for informing and educating trade association members.



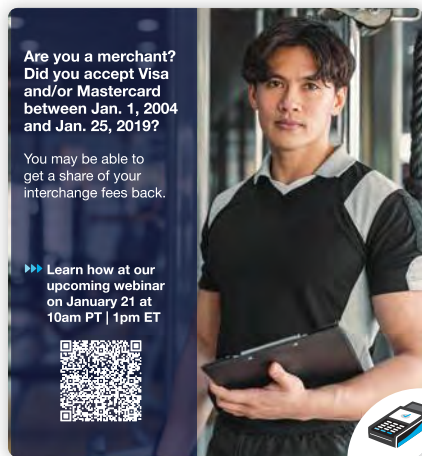
Association Outreach Emails

A database allowed timely communication about helpful resources, webinars and pending deadlines.



Small Business Expo

Toward the final months of the claims period, in-person outreach and sponsored webinars extended outreach to small businesses.



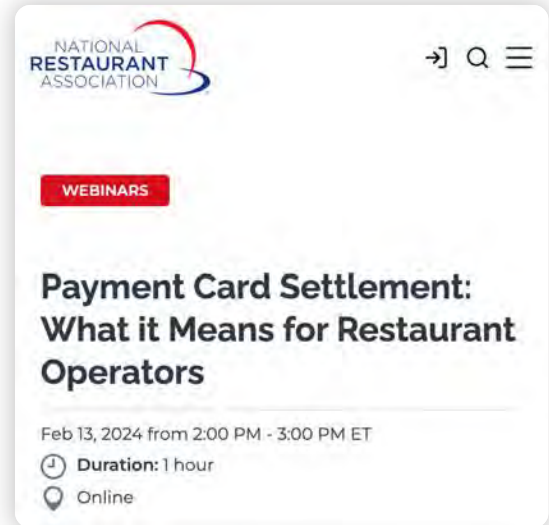
Hosted Webinars

Webinars informed and equipped trade association leaders and helped merchants directly.



Association Webinars

Trade associations hosted educational webinars for their members.



National Restaurant Association Webinar

Social Media Promotion

Webinar dates and webinar content was shared across Facebook, Instagram, Twitter and TikTok.



Georgia Food Industry Association Webinar



Small Business University Webinar

Trade Association Promotions

Trade association leaders promoted the settlement to members in their blogs, newsletters and social media posts including guidance on eligibility and how to claim.

NSGA
NATIONAL RESTAURANT ASSOCIATION

← BACK TO NEWS

Court Extends Deadline to File Claims for Visa, Mastercard Class Action Suit to February 4, 2025

Featured, NSGA News • May 7, 2024

NATIONAL RESTAURANT ASSOCIATION

ARTICLES March 12, 2024

Payment card settlement: What it means for you!

Find out now about the biggest antitrust class-action settlement, and whether you're entitled to it.

Cue up the National Restaurant Association's and Restaurant Law Center's recent webinar on the "Payment Card Settlement: What it Means for Restaurant Operators." Presented in February, the webinar's recording and copy of an accompanying Power Point presentation are available [here](#).

Georgia Restaurant Association • Follow

Apr 16

The Payment Card Settlement is the biggest antitrust class-action settlement in history and sets aside about \$6B for millions of U.S. merchants who for years paid artificially inflated Visa and Mastercard interchange fees. If your restaurant accepted Visa and/or Mastercard at any time between Jan. 1, 2004, to Jan. 25, 2019, then you are likely a member of the class settlement and entitled to a share of the settlement.

The deadline to submit a claim either through the physical mailer or online is May 31, 2024. Go to www.paymentcardsettlement.com to submit a claim before the deadline.

National Restaurant Association

#garestaurants #paymentcardsettlement #restaurantsact

RESTAURANT OPERATORS:
Are you eligible for Settlement Funds?

WisconsinRestaurants @theRealWRA • Apr 5

Payment Card Settlement is the largest antitrust class-action settlement in history, allocating over \$5.54B to merchants who paid inflated credit card interchange fees. The deadline for submitting a claim is May 31, 2024. WRA is here to help navigate this: wirestaurant.org/news/what-the-...

NFIB

How Do I Submit a Claim?

Eligible merchants must file a claim online or by mail on or before **February 4, 2025.**

Businesses who wish to claim should visit the [merchant portal](#) where they can submit the control number and claimant ID received in their original claim letters. If you did not receive a claim letter, or potentially threw the letter away, you can check your eligibility through the portal and start the claim process by providing your Tax Identification Number (TIN). It is important to note that proof of TIN supporting documents will need to be submitted through the portal when creating your account.

4.3 Media Outreach

Media Strategy

The media outreach strategy was developed to complement the settlement administrator’s claim form mailings and paid ads as well as the various direct, social media and diverse business outreach activities. Media coverage was important to build credibility and trust in the settlement and the claims process. For this reason, media coverage was also shared across the outreach program’s social channels.

Working closely with co-counsel, media messages emphasized the settlement’s size, legitimacy and the importance and ease of submitting a claim, while keeping all external facing spokespeople accurate and on message.

Media Activities

Media-related activities included:

- Media-centric messaging and FAQ
- In-person media spokesperson training
- Media kit with media resources and assets
- Four national press releases translated into Spanish, Chinese and Korean with the launch release available in 8 languages plus English
- Continuous proactive and responsive outreach to hundreds of business, legal and industry-specific journalists to reach class members with educational messages

Media Outcomes

Media outreach played a valuable role increasing awareness of the settlement, eligibility and claims process:

- National coverage included **Associated Press, USA Today, Essence** and **Fox** affiliates in major markets nationwide
- Local TV news stories included **NBC San Diego, Telemundo Los Angeles** and various markets nationwide
- Articles appeared in trade publications serving class member industries from retail to restaurants to dry cleaners
- Articles and TV segments also aired in **Spanish, Korean** and other languages

MEDIA RELATIONS	
	Dec. 1, 2023 – Feb. 4, 2025
Media mentions	534
Potential reach*	2,260,000,000
Broadcast audience views	21,600,000
Estimated online readership	19,641,000
News release views	102,158
IndustryDive + PR Newswire paid placement views	1,236,009
Total Views	42,579,167
Media coverage social shares	1,910
News release clicks to settlement URL	18,560
Settlement URL included in coverage	90
Domain Authority of media coverage sites (average)	64

* Unique Views per Month (UVM) of the combined media websites

National Media Coverage



Trade publications



American Drycleaner – The Payment Card Settlement article was named “Top story of the year”



Foreign Language

Empresas latinas pueden beneficiarse del acuerdo legal contra Visa y Mastercard

Por La Red Hispana / 6 de mayo de 2024 / Actualizado 179 Vistas

Queda menos de un mes para que millones de empresas reclamen la parte que les corresponde del acuerdo de conciliación de la demanda colectiva

크레딧카드사, 수수료 소송 합의

Chicago Korea Times

▶55억 달러 이상 현금 지급 약속
▶비자, 마스터 카드 사용자 비즈니스 대상

비자과 마스터 카드 전자결제사 구글 독점금지법 위반 관련 집단 소송이 합의되어 최근 보상 대상 기업들과의 보상금 상환 관련 사항을 놓고 있는 것으로 알려졌다.

이 집단 소송은 2019년에 연방이 초월 신청을 수락함에 따라 합의된 것으로 카드사는 카드, 현금 수수료와 관련 입찰을 위반하고 기업들이 원상 수수료를 납부하기 위한 명령을 재판부에 과도한 수수료를 지불하게 했다는 내용이다.

소송 합의에 따라 비자 및 마스터 카드사가 독점금지법 위반하고 카드 현금 수수료를 과도한 수수료를 부과했다는 것에 합의, 55억4,000만 달러 규모의 합의금을 지급하기로 결정했다.

모집 대상은 미국에서 2004년 1월 1일부터 2019년 1월 25일까지 비자과 마스터 카드를 결제 수단으로 받은 비즈니스 업소 등이 해당된다.

신청 절차는 재판부에 받은 청구서 양식에 필요한 ID를 사용, 집단 소송 웹사이트인 <http://paymentcardsettlement.com>에서 오는 5월31일까지 신청해야 한다.

<미영을 가자>

Esta es la fecha límite para que algunos usuarios de tarjetas de crédito reclamen su parte de un acuerdo de US\$5500 millones

El plazo definitivo se extiende hasta febrero, y permite a comerciantes afectados por sobrecargos de Visa y Mastercard recuperar fondos derivados de un litigio antimonopolio

25 de diciembre de 2024 | 21:02

Broadcast

SETTLEMENT DEADLINE EXTENDED

7A RESPONSE: Settlement deadline extended

7A RESPONSE: MAY 21, 2024 9:25 PM

Multibillion-dollar credit card settlement deadline extended

The deadline has been extended for business owners to claim their share of a multibillion-dollar settlement.

More Local Videos

NOW PLAYING

4:08 0:23

Millions of businesses eligible for \$5.5B Visa Mastercard antitrust fee settlement

By Megan Ziegler | Published January 2, 2024 11:01am CST | Business | FOX TV Digital Team

Millions of business owners nationwide may be eligible for part of a \$5.54 billion class-action settlement.

The settlement has to do with Visa and Mastercard merchant fees that are alleged to have been inflated.

Visa and Mastercard have admitted no wrongdoing and say their business practices are legal.

What is the Visa Mastercard antitrust lawsuit about?

#Antitrust #Debitcard

THE FOX NEWS RUNDOWN PODCAST

DEADLINE NEARS FOR BUSINESSES TO CLAIM SETTLEMENT MONEY

FOX NEWS RUNDOWN 5:28 AM

4.4 Social Media Outreach

Social Media Strategy

The social media strategy focused on building early awareness and credibility, prompting class member engagement and generating claim behavior through calls to action. Social media accounts were created for Facebook, Instagram, X and TikTok. Profiles linked back to the settlement administrator's website and call center.

Facebook was the focus given it skewed older to match the class member demographic and to leverage its targeted advertising features. Boosted content was important to deliver the message to merchants. Clear, accessible messaging and branded visual content were used to explain the case, class member eligibility and how to file a claim. Paid influencer partnerships were researched and incorporated to build quick credibility early in the claims period and to re-engage class members following the second deadline extension.

Social Media Activities

- Consistent weekly posting to share settlement information, engage and drive claims.
- Branded graphics, animations and videos to attract attention.
- Paid Facebook and Instagram boosting targeting merchants.
- Community management including responding to comments as appropriate.
- Influencer content through two paid partnerships:
 - Class-action TikTok and Instagram influencer Lawyer Angela shared two posts within the first three weeks of the claims period in Dec. 2023 and a third in Nov. 2024.
 - Retail industry Facebook and LinkedIn influencer Bob Phibbs, known as the Retail Doctor, posted twice in Dec. 2023 and also shared the claims process in two of his subscriber emails.
 - Influencer content also shared the settlement's social handles, showcased the claim form, helped to legitimize the settlement for skeptical merchants and encouraged merchants to take action.
 - The outreach program's social accounts also reshared influencer content directly with followers and in boosted posts to merchants.
- Social media performance was tracked continuously and strategies were adjusted as needed to continue engagement.

Social Media Outcomes

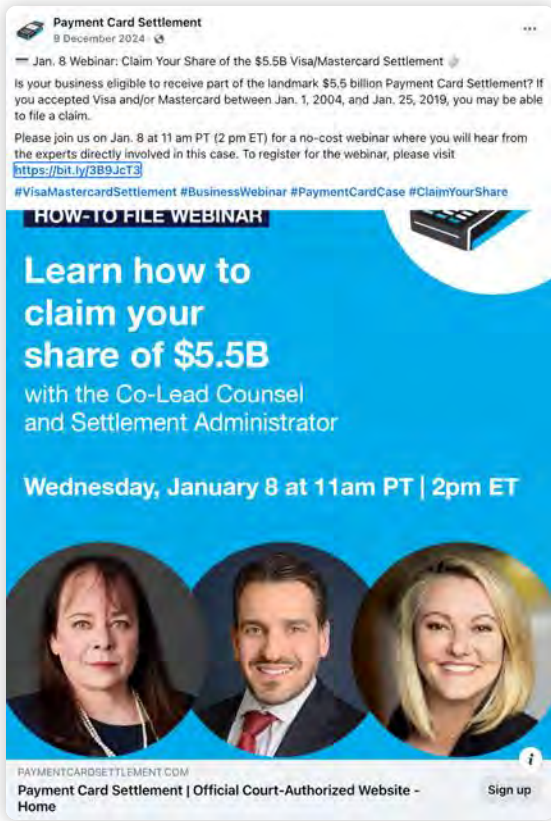
Social media, particularly Facebook, was instrumental in driving awareness and engaging directly with class members.

SOCIAL MEDIA OUTREACH	
	Dec. 1, 2023 – Feb. 4, 2025
Social posts*	465
Facebook	15,235,536
Instagram	4,025,685
X	19,528
TikTok	50,876
YouTube	192,525
Influencer	1,963,558
Total impressions	21,487,708
Social media engagements	224,094
Click throughs to website	103,417
Influencer engagements	249,790

* Inclusive of Facebook, Instagram, X, TikTok and YouTube

Facebook

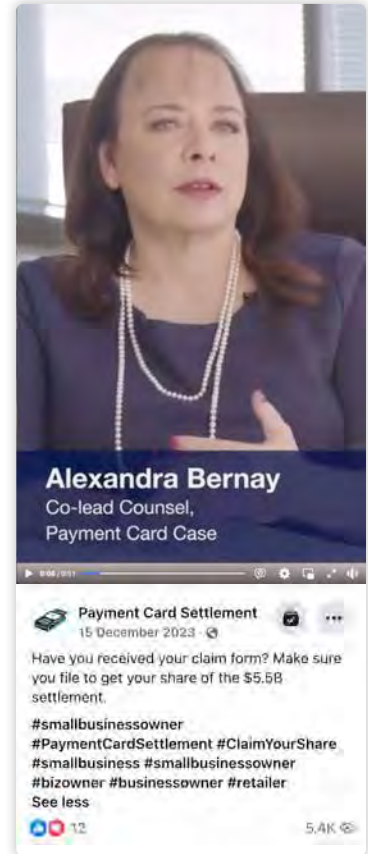
Our targeted audience of older business owners spent time primarily on Facebook, and we accordingly made the channel our main social focus over the duration of the outreach campaign, boosting content regularly to increase post visibility.



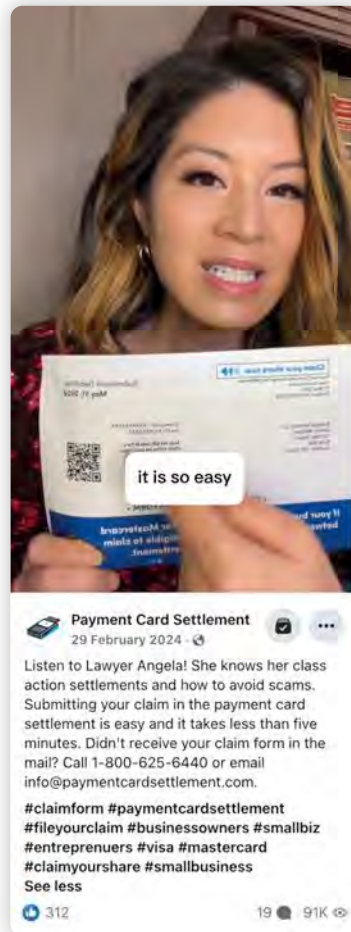
Best performing post: The post about the final webinar of the claims period was viewed more than 1 million times by more than 384,000 people, generating more than 7,600 clicks to the settlement website.



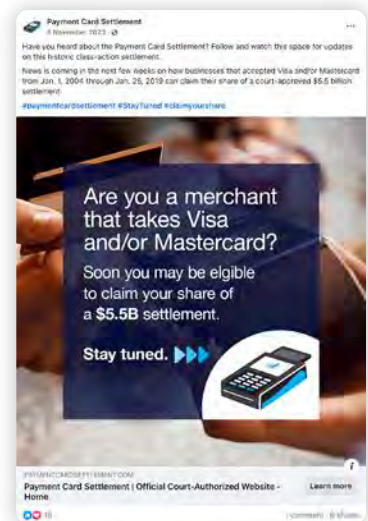
Highest number of comments



Highest engagement rate



Highest number of clicks



Instagram

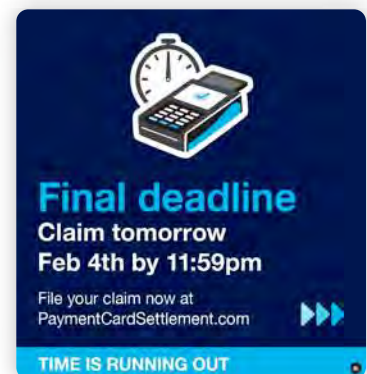
We reposted Facebook content on Instagram and used it for influencer content to reach new audiences. Otherwise, it was a lower performing and lower priority platform.



Best performing post: The most viewed post on Instagram shared media coverage to show the settlement’s legitimacy and was viewed 30,755 times by 26,700 people generating 110 interactions.



Highest Engagement Rate

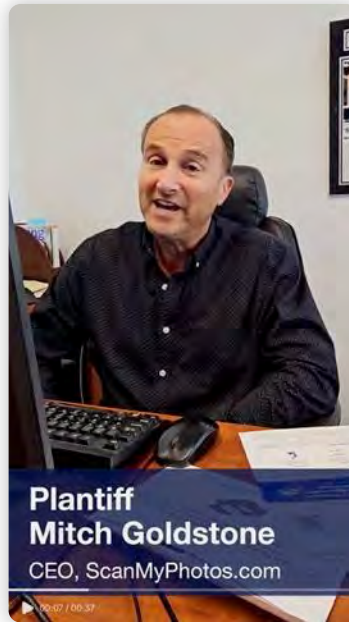


TikTok

We featured video content, class member testimonials and high-performing influencer content on TikTok.



Best performing post: The top TikTok post garnered nearly 6,000 impressions featuring a Mexican restaurant owner’s experience with interchange fees.



Highest Engagement Rate



Highest Number of Comments



X (Twitter)

Initially an important channel, the team deprioritized this social channel as the platform's policies and content became increasingly pay-to-play and unmoderated.



Best performing post: This X post promoting the second hosted webinar was viewed by more than 2,000 people.



Highest Engagement

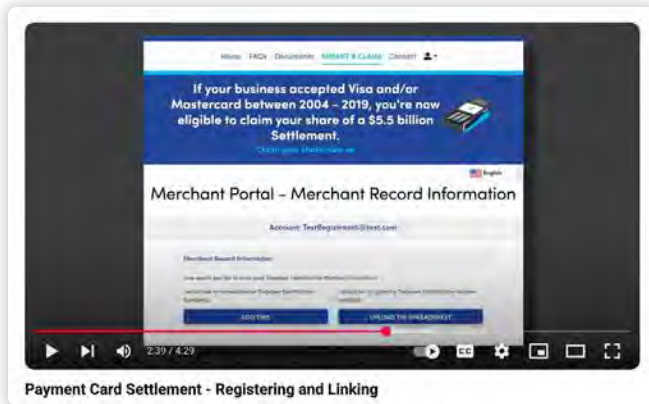


Highest Number of Comments,
Highest Number of Link Clicks



YouTube Highest Viewed Videos

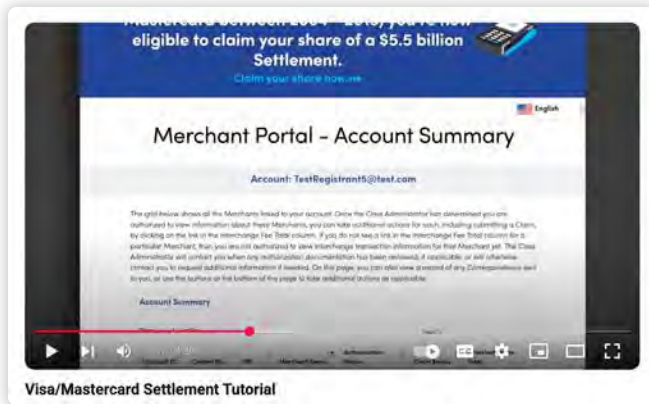
The video-based platform helped us reach our target demographic of older business owners with video tutorials, class member testimonials, video news release, webinar and FAQ.



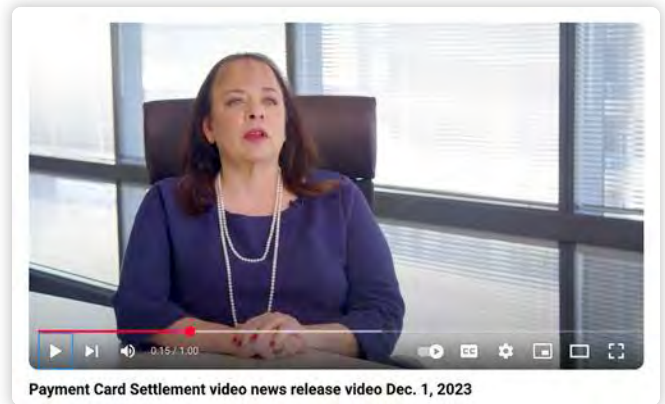
127,000 views (Registering and Linking Tutorial)



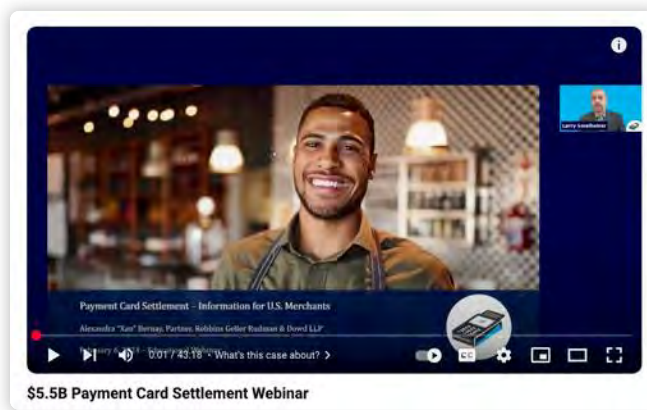
52,000 views (What To Do If You Disagree Tutorial)



8,300 views (Visa/Mastercard Settlement Tutorial)



1,600 views (Video News Release)



1,600 views (Feb. 6, 2024 Webinar)

4.5 Diverse Business Outreach

Diverse Business Strategy

The Payment Card Settlement and the antitrust case that led to the landmark \$5.5-billion settlement for merchants was well-known among large enterprises with in-house legal departments and the resources to monitor major legal developments impacting their industry. Many of America's largest merchants had also previously opted out of the settlement to pursue their own cases. The majority of class members were smaller businesses, and many were also diverse or underserved businesses where language or history created additional obstacles to communicating about the settlement.

For this reason, resources were intentionally directed to ensure the message was getting out to diverse business communities.

Diverse Business Activities

Activities included:

- Digital outreach kit at pcsoutreachkit.com with [Spanish translations](#) including:
 - Press release
 - Video news release
 - FAQ
 - Newsletter articles
- Claims period launch press release available online in nine languages:
 - Spanish, Korean, Russian, Thai, Vietnamese, Chinese, Spanish, Japanese, English
- Flier distributed at the National Center for American Indian Enterprise Development's Reservation Economic Summit event (4,000 attendees)
- Attendee bag insert at the Indian Gaming Trade Show + Convention (5,000 fliers)
- In-person meeting with the Philippine American Chamber of Commerce of Oregon

(cont'd on next page)

- Calls and emails to roughly 30 national chambers and associations serving diverse businesses, including:
 - Latino Restaurant Association
 - L'Attitude
 - Hispanic Metropolitan Chamber
 - U.S. Hispanic Chamber
 - U.S. Black Chambers
 - National Black Chamber
 - Northwest Native Chamber
 - Minnesota Indian Gaming Association
 - Vietnamese American Chamber of Commerce
 - Asian Pacific American Chamber of Commerce
 - Asian American Store Owner Association
 - Japanese Restaurant Association of America
 - National Gay Lesbian Chamber of Commerce
 - Black American Chamber
 - Korean American Restaurant Association
 - United Bodegas of America
 - Bodega Small Business Group
- In-person outreach to diverse, small businesses via Small Business Expo events in Dallas-Ft. Worth and Atlanta
 - Video testimonials were also gathered from eligible diverse business owners at the Atlanta event and shared on social media

Diverse Business Outcomes

Representatives of the Native American and Hispanic business community were most engaged and responsive to outreach efforts.

TRIBAL BUSINESS COMMUNITY OUTREACH	
	Dec. 1, 2023 – Feb. 4, 2025
Tribal media reach	3,500
Conference attendee collateral distributed	9,000
Association reach*	10,105
Total Reach	22,605

SPANISH-LANGUAGE MEDIA + COMMUNITY OUTREACH	
	Dec. 1, 2023 – Feb. 4, 2025
Spanish-language media mentions	47
Broadcast views	61,300
Estimated online readership	1,110,000
Association reach*	5,000,000
Total Reach	6,171,300

*Where membership data available

Targeting Spanish-Language Audiences

All press materials were available in Spanish and pitched to Spanish-language media across the country.



Native American Outreach

Information was distributed at relevant conferences.



Translated Assets

Materials in Spanish were distributed via the Digital Outreach Kit, on YouTube and via social media posts.



Video Testimonials

Video testimonials from diverse business owners were promoted across social media.



Small Business Expo

In person outreach to small business owners helped generate word of mouth.



4.6 Evaluation

The outreach program continually evaluated and adjusted strategies based on class member feedback.

Following the first hosted webinar for trade association leaders and class members on Feb. 5, 2024, the outreach team sent a survey to participants. The respondents affirmed that the webinar was very informative and they were very likely to share the information with their members. Respondents represented organizations with 5,000 to 10,000 members.

Following the court’s second deadline extension in August, the outreach team surveyed class members to evaluate the outreach and education effort to date and make any needed adjustments.

Surveys took several forms:

- **Pre-webinar surveys** to solicit questions and input on issues from registrants prior to the fall webinars
- **Post-webinar survey** to gauge participant satisfaction and impact on claim intent
- **Survey of settlement awareness** and claim intent among 100+ anonymous Visa and Mastercard merchants with merchant accounts active during the class period

Pre-Webinar Surveys: Class Member Questions and Issues

The Oct. 15 and Nov. 21 webinar registration links were promoted on the settlement administrator’s website, which drew a record 10,000 registrations. Given the large number of webinar participants, questions could not be asked and answered in real time.

Therefore, participants were given a survey link to submit their questions and topics of interest in advance. About 200 responses were collected for the Oct. 15 webinar and 241 for the Nov. 21 webinar. Topics of interest trended across both surveys and questions from the “Other” category were elevated to the webinar presenters ahead of time to speak to or point out during the claims portal demonstration:

	October 2024 (~200 questions)	November 2024 (~241 questions)
Timing and size of my claim payment	48.2%	53.3%
How to start a claim	47.7%	51%
Authorizing my claim	44.2%	41.9%
Issues with my financial data	19.1%	19%
Claiming for multiple merchant accounts and TINs	15.1%	14%
My authorization status shows a conflict	11%	7.9%
Other (please specify)	26.6%	29%

Webinar Participant Satisfaction and Impact on Claim Intent

A survey was sent to all Oct. 15 webinar participants. Only 24 responded, so the sample size was very small. **Two-thirds reported being satisfied (20.8%) or very satisfied (45.8%) with the quality of information presented.** Four respondents indicated that they were dissatisfied or very dissatisfied.

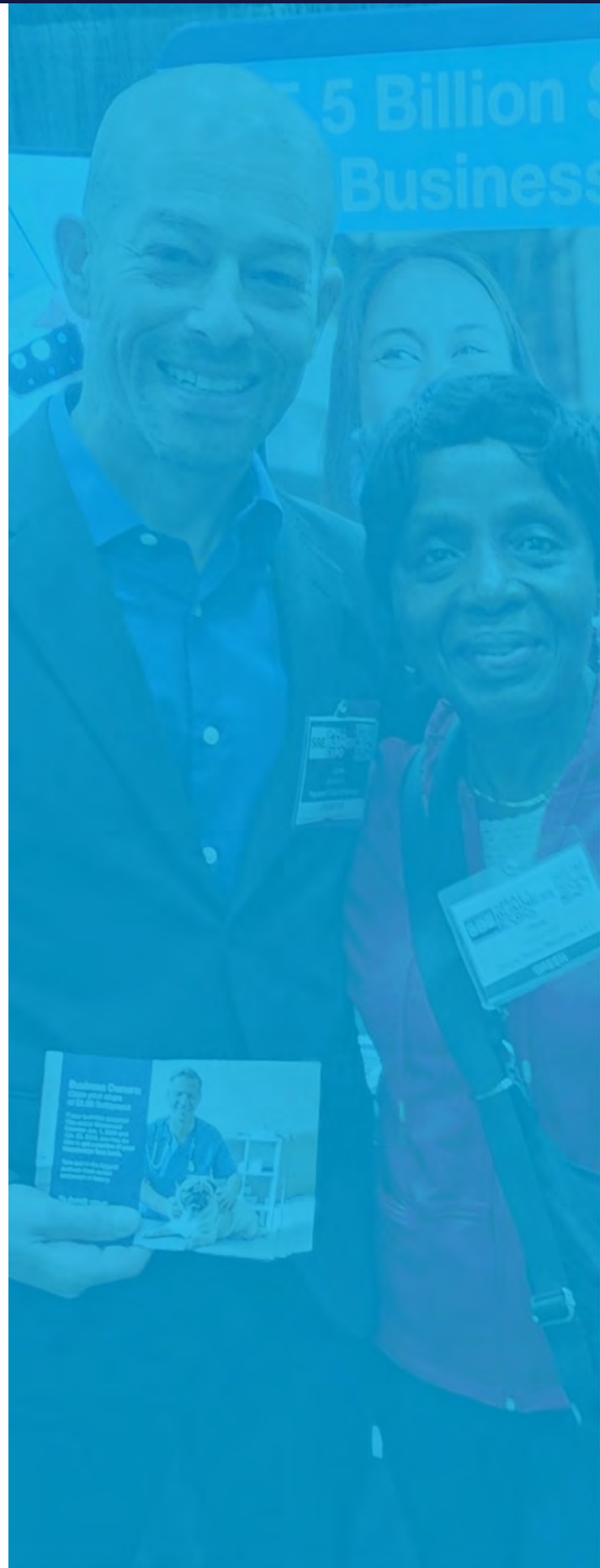
Most important were responses to our question around intent: “After participating in the webinar, how likely are you to file your claim?” Of 21 respondents, 17 (81%) indicated being likely (9.52%) or very likely (71.43%) to claim. Only 2 respondents said that they would be unlikely to claim.

Comments received included:

“I felt the team was ready, willing, and very able to help me get my claim filed properly, and easily.”

“Already filed.”

“I submitted with tax numbers but was unable to upload authorization docs. I am waiting for email so I can do that.”



Visa and Mastercard Merchant Awareness and Claim Intent

A sample size of 113 small to mid-sized business owners was surveyed online with 90% reporting that they had accepted Visa and / or Mastercard during the class period. Of those who were eligible, over 81% reported that they were aware that they may have a claim to the \$5.5-billion Payment Card Settlement, and close to 87% of merchants who knew about their eligibility reported that they had made a claim.

The survey asked those who reported making a claim what their motivations were:

- 27% - The claim form I got in the mail
- 25.4% - Getting some of my interchange fees back
- 20.6% - Getting my share
- 15.9% - The size of the settlement
- 9.5% - It's my job to submit a claim like this
- 1.6% - Claims process sounded easy

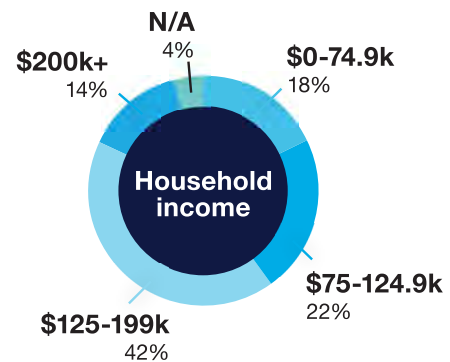
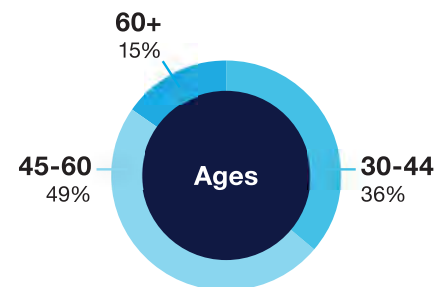
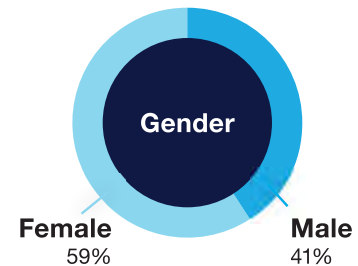
After learning that getting some of their interchange fees back from the credit card companies was a top motivator, the outreach campaign emphasized this more emotional response to encourage claims behavior during the latter months of the claims period.

For those respondents who were aware that they were eligible but had not claimed (only 18), the reasons that they reported were:

- 38.9% - I don't know how to claim (7)
- 27.8% - I'm already working with a third-party filing service (5)
- 22.2% - I just found out that I might be eligible (4)
- 16.7% - I sold my claim (3)
- 16.7% - I don't think the payout is worth it (3)
- 11.1% - I don't trust the process (2)

While 39% reported that they did not know how to claim, 44.5% were already working with a third-party filer or had sold their claim. The least cited reason was a lack of trust in the process which was validating given the efforts of the outreach team, settlement administrator and class counsel.

Demographics of respondents



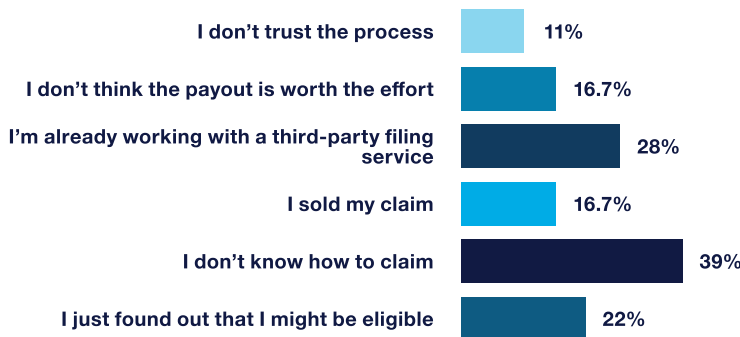
Are you aware that you may be able to make a claim in a \$5.5 billion Payment Card Settlement?



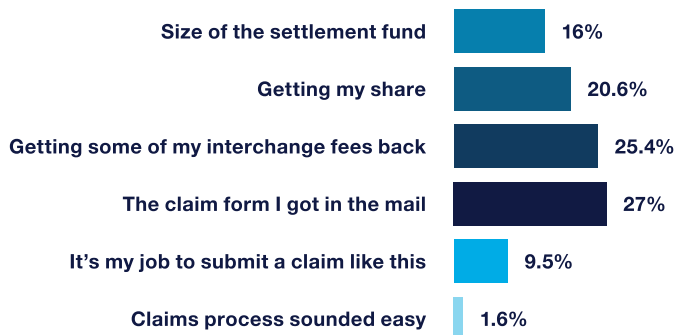
Have you claimed your share yet?



What are your top reasons for not claiming?



What most motivated you to claim?



Other Sources of Feedback

Media feedback

USA Today:

“Wait, I thought the opportunity to sign up ended in May ([Who qualifies for share of \\$5.5 billion Visa and Mastercard settlement – NBC Chicago](#))? Was it extended? Apparently, *I* need some education! If there is still a chance to sign up, yes, I would like to know about it and maybe write a story to alert people.”

This comment on a news story and the outreach team's follow up led to a story in USA Today.

American Drycleaner:

Payment Card Settlement article named “Top story of the year” at American Drycleaner, based on story views.

[Ranked as the #1 most-read story of 2024](#)

The logo features a stylized white letter 'W' enclosed within a white circle. To the right of this icon, the words "Wright On Communications" are written in a white, bold, sans-serif font.

Wright On Communications

**402 W Broadway, 29th Floor
San Diego, CA 92101**

858.886.7900

info@wrightoncomm.com

www.wrightoncomm.com

Attachment 15

Payment Card Interchange Fee Settlement
Class Administrator
PO Box 2530
Portland, OR 97208-2530

PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE
PAID
PORTLAND, OR
PERMIT NO. 2662



Reminder:
The deadline to file your claim is quickly approaching.
You must file by May 31, 2024, to ensure your portion of the \$5.5 Billion Settlement.




You were previously mailed a claim form because records indicate you are a merchant (business owner) who may have accepted Visa and/or Mastercard at any time from January 1, 2004, to January 25, 2019. Our records indicate you have not yet filed a claim.

CLAIMANT ID: [REDACTED]
CONTROL NO.: [REDACTED]



Scan the QR code to file a claim online via your phone, computer, tablet, or other smart device.

In order to file a claim, you will need to use the credentials above on the Court-approved official website to provide an estimate of the Interchange Fees Paid during the Class Period or indicate that you do not know the total fees paid by the **Claims Deadline of May 31, 2024**. Act now to file a claim. This is your last chance to share in the Settlement Fund.

For more information on the Settlement, to file a claim online, or for other information please visit the Court-approved official website at www.PaymentCardSettlement.com. You may also email info@PaymentCardSettlement.com or call toll-free 1-800-625-6440.

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Payment Card Interchange Fee Settlement
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PO Box 2530
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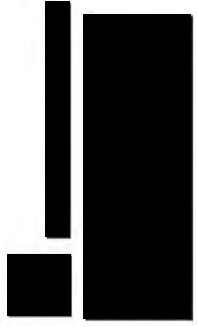
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Attachment 16

Payment Card Interchange Fee Settlement
Class Administrator
PO Box 2530
Portland, OR 97208-2530

PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE
PAID
PORTLAND, OR
PERMIT NO. 2682

Reminder:
The deadline to file your claim is quickly approaching.
You must file by February 4, 2025, to ensure your portion of the \$5.5 Billion Settlement.

You were previously mailed a claim form because records indicate you are a merchant (business owner) who may have accepted Visa and/or Mastercard at any time from January 1, 2004, to January 25, 2019. Our records indicate you have not yet filed a claim.

CLAIMANT ID: [REDACTED]

CONTROL NO.: [REDACTED]



Scan the QR code to file a claim online via your phone, computer, tablet, or other smart device.

In order to file a claim, you will need to use the credentials above on the Court-approved official website to provide an estimate of the Interchange Fees Paid during the Class Period or indicate that you do not know the total fees paid by the **Claims Deadline of February 4, 2025**. Act now to file a claim. This is your last chance to share in the Settlement Fund.

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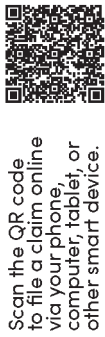
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AK585

**UNITED STATE DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

**IN RE PAYMENT CARD INTERCHANGE
FEE AND MERCHANT DISCOUNT
ANTITRUST LITIGATION**

No. 05-MD-1720 (MKB) (JO)

This Document Applies to: All Cases.

**DECLARATION OF LOREE KOVACH REGARDING ONGOING CLAIMS PROCESS
AND INITIAL PARTIAL DISTRIBUTION**

I, LOREE KOVACH, declare and state as follows:

1. I am a Senior Vice President for Epiq Class Action & Claims Solutions, Inc. (“Epiq”), the Class Administrator in the above-captioned case. In this capacity, I am authorized to make the following Declaration on behalf of Epiq. The following statements are based upon my personal knowledge, information provided to me by associates and staff under common supervision, and upon a review of the business records maintained by Epiq.

2. In conjunction with the *Declaration of Cameron R. Azari, Esq., on Implementation Claim Phase Notice* (“Second Supplemental Notice Declaration”), this Declaration is to update the Court further on completed and ongoing tasks related to the claims filing process and proposed initial partial distribution.

3. The claim filing deadline established by the Court passed on February 4, 2025. Due to high volumes of engagement at the time of the deadline, Epiq and Class Counsel agreed to leave the Merchant Portal open until April 4, 2025. This meant that Class Members who had not previously filed claims or otherwise interacted with the Merchant Portal could register and link merchant records to their account, and that Class Members with existing registrant accounts could continue to link new merchant records through this later date. Following this date, and currently, previously registered individuals or third-party filers can only link new merchant Taxpayer

Identification Numbers (“TINs”) to their records if exceptional circumstances are present, including where Epiq’s analysis of a research request reveals additional TINs related to a given merchant or where a merchant mistakenly registered a TIN associated with a payment facilitator instead of their own.

STATUS OF CLAIM SUBMISSIONS

4. As of the date of this declaration, Class Members can only submit claims that are still considered timely in certain situations, as discussed further in Para. 11.a -e., *infra*. All other claims submitted after the deadline may be considered untimely.

5. Throughout the claim submission period, Class Members were able to submit claims by mail, email, or via the Case Website. At the outset of the claim submission process, to assist Class Members in filing claims and taking other actions via the website, Epiq created a Merchant Portal accessible via the website. Any Class Member who received a claim form via mail could use the Claimant ID and Control Number on their claim form to log into the Merchant Portal, view their interchange fees, file a claim if in agreement with those fees, or take actions to challenge the fees if not. A registration account was created for Class Members via this process. Class Members who did not have access to their Claimant ID and Control Number could register one or more TINs to create a registrant account in the Merchant Portal. After providing proof they were authorized to act on behalf of the TINs they registered, the registrant would be able to review fee information associated with those TINs (if available in the Class Administrator’s records), file a claim if they agreed with the fee amount, or engage in the challenge process if they did not or if fees were unavailable. As of the date of this declaration, no new registration accounts can be created via the Merchant Portal.

6. The Class Administrator also automatically created registration accounts for Class Members who filed claims via mail or email to allow them to more easily access information about their claim, respond to communications, and take any further actions with respect to their claim via the Merchant Portal.

7. As of August 12, 2025, there are 1,113,638 registrant accounts in Epiq's records. These 1,113,638 registrants have linked 2,119,233 TINs to their accounts.

8. As of August 12, 2025, claims have been submitted for 1,424,566 unique TINs. These claims currently represent over 45% of all interchange fees in the data available to Epiq.

9. As of August 12, 2025, 692,872 unique TINs have been registered, but the registrant has not yet submitted a claim for the TIN. Below are additional details about these registered TINs without claims:

- a. 25,358 TINs are in conflict because they have been registered by two or more parties purporting to have authority to act on behalf of the TIN.¹ Parties in conflict are first asked to resolve the conflict amongst themselves. If they cannot do so, the conflict is referred to the Special Master for further determination as to which registrant is appropriately authorized to act on behalf of the TIN. As conflicts are resolved, claims are typically filed, thus Epiq expects claims to be filed for the majority of these TINs after the conflicts are resolved.
- b. 134,686 TINs have been registered by an individual or entity which has not provided sufficient documentation proving the registrant's authority to act on

¹ As of August 12, 2025, a total of 160,163 TINs have been registered by more than one registrant and have entered the conflict process. As of the date of this declaration, approximately 84% of all conflicts have been resolved.

behalf of the TIN. These registrants have been provided with notice of the deficiency and an opportunity to cure; they are also entitled to dispute any rejection of their documentation by the Class Administrator via an appeal to the Special Master.²

- c. 160,900 TINs are not in conflict, nor are they engaged in the deficiency process regarding insufficient proof of authority, but the registrant has yet to file a claim. Of these, 157,751 were registered on or before the February 4, 2025, claim filing deadline. Epiq sent periodic reminders to these registrants, reminding them of the filing deadline and the need to take further action with respect to the TIN. Given the reminders and the fact that no action has been taken since the filing deadline, Epiq does not expect claims to be filed for most, if not all, of these TINs. The remaining 3,149 TINs were registered after the filing deadline; thus, it is more likely claims will be filed for TINs in this population.
- d. 371,928 TINs are not in conflict, nor are they engaged in the deficiency process, but the registrant is a payment facilitator and the TIN(s) it registered belonged to a submerchant client of the payment facilitator. As discussed further in Para. 12, *infra*, payment facilitators are currently unable to file claims on behalf of their submerchant TINs because the merchants themselves, and not the payment facilitators, are Class Members. These registrants have been provided with notice of this determination and an opportunity to dispute via an appeal to the Special Master. Claims will only be allowed for these TINs if the Special Master so directs

² Where a registrant does not respond or provide appropriate proof of authority, no claim will be accepted for the associated TIN.

or if the *Lanning* appeal is resolved in a way that would make these payment facilitators Class Members.

10. Class Members who filed claims could either agree with the interchange fee amounts in Epiq's records, if available, or could engage in a multi-step dispute process if they disagreed with the fees in Epiq's records. Class Members for whom Epiq did not have fee data could likewise engage in a multi-step process to attempt to locate or calculate their estimated fees. The following numbers are as of August 12, 2025.

- a. There are 970,888 TINs for which claims have been filed where the Class Member agreed with the fees in Epiq's records. As of the date of this declaration, the interchange fees associated with this population account for approximately 63% of all claimed fees.
- b. There are 193,230 TINs for which claims have been filed where the Class Member disagreed with the fees provided by Epiq and submitted a research request. Research requests are submitted via the Merchant Portal by clicking the "Request Research" button and including various data points that Epiq could use to re-query the transaction data and attempt to find additional transaction records. These research requests are either pending review and completion by Epiq or it has been less than 30 days since the results of the research request have been provided to the Class Member. *See* Para. 11, *infra*, for further discussion regarding deadlines relevant to the dispute process.
- c. There are 339,696 TINs for which claims have been filed where no transaction data is available in Epiq's records, and the Class Member provided an estimated interchange fee amount, stated that they did not know their estimated interchange

fees during the Class Period, or otherwise submitted annualized sales data volumes by clicking the “Provide Sales Data” button on the Merchant Portal. These submissions are either pending review and resolution by Epiq or it has been less than 30 days since the Class Member has been informed of the resolution of their submission.

11. The above numbers are subject to change as Class Members take further action with respect to their claims. Specifically, the following activities are ongoing with respect to certain claims and may impact the above numbers:

- a. *Resolution of Conflicts.* As noted in Para. 9.a. above, when two or more registrants register the same TIN, the record is considered to be in conflict. The conflicted parties are asked to resolve the conflict amongst themselves. If they are not able to do so, the conflict is resolved by the Special Master.³ Once a conflict is resolved, the registrant deemed to have authority to act on behalf of the relevant merchant has 30 days to take the next step relevant to the claim, whether that be filing a claim or challenging the interchange fee data in Epiq’s records via submission of a research request or sales data.
- b. *Resolution of Research Requests.* For claimants who have submitted a research request, once they are notified of the results of that research by Epiq, they have 30

³ The Plan of Distribution provides for an appeal process that goes beyond the Special Master, including for appeal to the District Court and beyond.

days to take any further action with respect to the claim.⁴ Claimants who are not satisfied with the results of a research request can submit sales data.

- c. *Resolution of Sales Data Submissions.* Claimants who submit sales data to contest the interchange fees in Epiq's records may be asked to produce documentation to support some or all of their sales figures and are given 30 days to do so.⁵ Once a sales data submission is reviewed and resolved by Epiq, the claimant has 30 days to take any further action with respect to their claim. Claimants who still disagree with their interchange fee amounts may submit a narrative dispute detailing what they think their interchange fee amounts should be, along with documentation supporting the narrative.
- d. *Resolution of Fee Disputes.* Claimants who have submitted a narrative dispute regarding their interchange fees have 30 days to take further action with respect to their claim once Epiq resolves the dispute. Claimants who still disagree with their interchange fees and with Epiq's resolution of their dispute can appeal to the Special Master.
- e. *Resolution of Appeals to the Special Master.* The Special Master will review all appeals from determinations by Epiq and will request further documentation or

⁴ As of August 12, 2025, Epiq has received research requests for 193,222 TINs. Over 180,000 of these requests have been completed. Over \$5.35 billion in interchange fees has been located as a result of completed research requests to date.

⁵ As of August 12, 2025, Epiq has received and is processing sales data submissions for 35,015 TINs.

briefing from the Class Member as needed, pursuant to the process outlined in the Court's Revised Order Appointing Special Master, Dkt 9403, ¶ 4.⁶

OUTSTANDING LEGAL ISSUES

12. Payment Facilitators
 - a. On May 28, 2024, the Court issued its Order and Memorandum enforcing the Settlement Agreement with regard to payment facilitators and their merchant-customers. The Court found that merchant-customers, not the payment facilitators, accepted payment cards and are therefore members of the Rule 23(b)(3) Class.
 - b. In its August 8, 2024, Memorandum & Order (the "Payfac Trust Order"), the Court directed Class Counsel to "establish and fund a trust account with settlement funds owed to merchants who used the services of payment facilitators such as Square and Intuit, pending the Second Circuit's resolution of the [*Lanning*] appeal."⁷
 - c. The identification of "merchants who used the services of payment facilitators" (otherwise referred to as "submerchants") in the transaction data, and calculating "settlement funds owed to [them]" for purposes of funding the trust, is a particularly difficult task.

⁶ Over the last 14 months, Epiq has worked with the Special Master on a variety of issues related to the administration. As of the date of this declaration, the largest concentration of time has been spent on the continued resolution of the large volume of registration conflicts between third-party filers, merchants, and claim purchasers. In consultation with the Special Master on process and content, Epiq has issued over 31,000 Special Master Conflict Determinations and resolved over 90,000 conflicts with more than 16,000 additional conflicts in process of final resolution. In addition, Epiq has worked with the Special Master on matters related to payment facilitator, conflict, claim purchaser, and proof of authority disputes and communications to resolve the same. Epiq expects certain Special Master standing orders related to this activity to begin issuing in the near future.

⁷ ECF No. 9384.

- d. As an initial matter, there is no identifier in the data available to Epiq to denote which TINs used payment facilitators and which did not. Epiq, using only the data provided by Visa or the acquirers, cannot identify with any certainty which claims may relate to merchants who used the services of a payment facilitator.
- e. Epiq can identify certain merchants who used payment facilitators via other methods. It can refer to the opt-outs from payment facilitators Square and Intuit, which included the TINs of their clients. Other payment facilitators have attempted to file claims on behalf of their submerchant clients by registering those TINs, and Epiq can refer to those registrations to identify TINs of merchants who presumably used those payment facilitators. There is also limited ability to identify submerchants of PayPal in the data provided, and certain trends in the available transaction data typically indicate payment facilitator activity. These proxy methods would not, however, identify all merchants who used payment facilitators nor would they identify all transactions intermediated by payment facilitators. In addition, the above data sources do not indicate whether the identified merchant used a payment facilitator for a portion of the Class Period or for the entire Class Period.
- f. Even with respect to the merchants who used payment facilitators and who could be identified by the above proxy methods, calculating the interchange fees of each, and thus the settlement funds owed to them, is difficult at this juncture. Many such claims are still engaged in the challenge process identified in Para. 9.d., *supra*. The records available to Epiq to calculate submerchant interchange fee amounts are often insufficient, thus these Class Members are more likely to need to engage in

the challenge process to ensure their claim is based off the correct interchange fee amount. These transactions are harder to identify because transactions handled by a payment facilitator typically appear under the payment facilitator's merchant identifier rather than that of the underlying submerchant, and the other data related to those transactions is insufficient to determine the submerchant to which the transaction belongs.

- g. Even if Epiq were to estimate the fees owed to identifiable submerchants and extrapolate from those estimated fees the fees owed to unidentifiable submerchants, this amount would likely not be sufficient to address all possible outcomes of the *Lanning* appeal. Should the *Lanning* appeal result in a reversal of the Court's May 28, 2024, Order, such that payment facilitators can assert that they are the Class Members in the Settlement entitled to file claims, then the trust that is to be established should include any settlement funds that would be awarded under this outcome.
- h. For purposes of illustration, let us assume that Payment Facilitator X did not opt out, and has attempted to file a claim, and the total interchange fees attributed to their submerchants during the Class Period are \$50 million. A subset of Payment Facilitator X's submerchants filed timely claims accounting for \$10 million in interchange fees; the remainder of its submerchants did not register or file claims. If the *Lanning* appeal is resolved in favor of payment facilitators, \$50 million of interchange fees would be claimed by Payment Facilitator X, rather than the only \$10 million in fees associated with its submerchants who filed claims and are currently considered Class Members. Accordingly, the appropriate amount of

funds to place into trust would be the settlement funds associated with the highest possible payment outcome related to resolution of the appeal.

- i. To thus appropriately fund the trust, Class Counsel and Epiq propose a conservative approach (meaning one that accounts for all possible outcomes such that the risk is that the trust is overfunded rather than underfunded) whereby the following transactions are identified: 1) all transactions associated with card-acceptor IDs with a “PayFac” flag in the AMMF5 data produced by Visa; 2) all transactions with trends that typically identify payment facilitator activity, such as asterisks in the merchant name in the AMMF5 data; 3) any transactions associated with TINs identified on Square and Intuit’s opt-out submissions; 4) all transactions associated with PayPal, and 5) all transactions associated with a TIN registered by a payment facilitator.⁸ The estimated pro rata payment amount that would result from all such fees, based on current data related to claims filed, is then calculated and used to fund the payment facilitator trust.⁹ Using this methodology, Class Counsel and Epiq recommend that \$2,900,000,000 be placed in the trust account referenced in the PayFac Trust Order.

⁸ This methodology assumes that, regardless of the outcome of the *Lanning* appeal, no new registrations will be allowed. For instance, if the appeal is resolved in such a way that payment facilitators are determined to be class members, any payment facilitators who have not already registered via the Merchant Portal or otherwise attempted to file a claim will not be given the opportunity to do so in the future. Otherwise, money may not have been appropriately set aside for payment facilitators with a large volume of interchange fees but which could not be identified via the proxy methodology.

⁹ A less conservative approach was also considered, whereby Epiq would identify the same set of interchange fees but then limit the calculation to only those fees associated with TINs that had been registered or filed a claim to date. This methodology would have resulted in a trust fund of \$2,075,080,000. However, because many such TINs may still engage in the challenge process and their associated fees could thus increase, as discussed above, this approach was discarded as too risky.

13. Branded Operators

- a. On October 1, 2024, the Court issued an order (the “Branded Operator Trust Order”) based on Class Counsel’s agreement with the *Old Jericho* plaintiffs and directed Class Counsel to “fund a trust account with settlement funds owed to branded gasoline retailers who contract with their suppliers to receive card-acceptance services.”¹⁰
- b. Similar to the payment facilitator obstacles outlined above, the population of branded gasoline retailers who contract with their suppliers to receive card-acceptance services cannot be easily identified within the data available to Epiq. In particular, the data available to Epiq does not reflect any contractual relationships regarding card acceptance services between gasoline retailers and their suppliers.
- c. Epiq can use Merchant Category Code (“MCC”) information provided in the data to identify transactions that are likely to be related to gasoline retailers, with varying degrees of certainty. MCC information is available at the transaction level, not the TIN level, so in order to identify MCCs applicable to a merchant, the transaction must be linked to a TIN in the Class Administrator’s records. In addition, not all transactions have any MCC information associated with them in the available data.
- d. There are MCCs that are strongly related to gasoline retailers, such as “service stations” and “automated fuel dispensers,” while other MCCs are sometimes related, such as “Convenience Stores and Specialty Markets.” Class Counsel and Epiq have determined that the appropriate proxy method for calculating the

¹⁰ ECF No. 9450.

appropriate funding for the trust is to identify all transactions associated with any MCCs that are either strongly related or sometimes related to gasoline retailers and calculating the pro rata payment associated with those transactions based on claim data currently available.¹¹

- e. Use of MCCs in this way will result in a trust that is overfunded, as noted above, because including certain MCCs such as the ones related to convenience stores may include some merchants who do not sell gasoline. It will also be overbroad insomuch as *Old Jericho* Plaintiffs seek to represent merchants in *Illinois Brick* repealer states, and the population identified via MCC will not distinguish between merchants in repealer states and those which are in non-repealer states, nor can Epiq identify from the data available to it with certainty which Class Members or transactions are related to repealer states.
- f. Based on the methodology discussed above, Class Counsel and Epiq have calculated \$450,000,000 as the amount to be placed in the trust account referenced in the Branded Operator Trust Order.¹²

14. General Information

¹¹ Using MCCs to identify transactions related to gasoline retailers is a better proxy than attempts to identify relevant merchants by name because many branded gasoline retailers and suppliers use business names that have no apparent relation to “gasoline,” such as ROUTE 66 IECA, FAST STOP 103, and ASC SF LLC, rather than the name of the gasoline brand they sell, like Chevron or BP.

¹² As with the PayFac Trust Order, a less conservative approach was considered whereby the population of transactions upon which the calculation was based was further limited to only instances where the identified transaction was linked to a TIN that was registered, but this approach was discarded for similar reasons, including that such claims may still be in the process of challenging their interchange fee amounts. This less conservative calculation would have resulted in a trust amount of \$270,000,000.

- a. Should the Court agree with these recommendations, each trust will be created as a sub-account of the existing Qualified Settlement Fund (“QSF”) established for this settlement. The trust funds will be segregated from the remaining balance in the QSF but will earn interest for the benefit of the Class at the same rate as the remaining funds in the QSF.
- b. The amounts of each trust can be revised at any time if the Court so recommends.

IDENTIFICATION OF INITIAL PARTIAL DISTRIBUTION POPULATION

15. Class Counsel asked Epiq to outline a process by which an initial partial distribution, to those claimants that are not potentially impacted by the outstanding legal issues and whose claims are not otherwise still in process, could be paid a portion of their total anticipated award before the end of this year. By excluding both claims still in process, those potentially subject to audit in the future, and those potentially impacted by any of the pending legal issues, Epiq identified a population of claims which could be issued initial partial payments now, with a conservative holdback that takes into account the legal issues discussed in Paras. 12 – 13, *supra*, and as discussed further below.

16. The population of claims that could be included in an initial partial distribution was identified by including claims that met the below criteria:

- a. The claim was submitted timely;
- b. The TIN is not in conflict;
- c. The claimant agreed with the fees provided by the Class Administrator on the pre-populated claim forms or on the Merchant Portal;

- d. No research request was submitted;¹³
 - e. No annualized sales data was submitted; and
 - f. The claimant has not otherwise engaged in any challenge or dispute process.
17. The initial population excludes claims where any of the following is true:
- a. Claims submitted after the February 4, 2025, deadline;
 - b. Claims missing the estimated interchange fees paid during the Class Period where the claimant either left the field blank or checked the “I don’t know” box;
 - c. The claimant did not agree with the fees provided by the Class Administrator (i.e., a research request and/or sales data was submitted);
 - d. Claims with a pending response deadline associated with unresolved conflicts, deficiencies, disputes, research request results, sales data results, or fee disputes;
 - e. Claims with any pending issue before the Special Master;
 - f. Claims included in Epiq’s Audit Plan population (discussed in further detail in Para. 21, *infra*);
 - g. Claims associated with Excluded Party TINs;
 - h. Claims with MCCs associated with gasoline, as discussed in Para. 13, *supra*; and
 - i. Claims from payment facilitators or submerchants, as discussed in Para. 12, *supra*.
18. In addition to the populations identified as excluded above, Epiq recommends also excluding from the initial partial distribution any otherwise eligible claims where the total estimated pro rata payment amount is less than \$5.00. As of August 12, 2025, this accounts for

¹³ Those claimants who disagreed with the interchange fee totals in the data and submitted research requests that have been resolved are not in the initial partial distribution population as those claims will be subject to the Audit Plan, discussed in Para. 21, *infra*.

99,877 claims. As discussed further in Para. 23 – 24, *infra*, any initial payment of eligible claims must be a partial payment of the total estimated pro rata award, resulting in multiple payments for any claims included in an initial partial distribution. It will be more cost-effective to send those claimants with lower payment amounts only a single payment at a later date, rather than two or more low-value payments.

19. After applying the criteria outlined in Paras. 16 – 18, *supra*, 605,472 claims were identified as potentially eligible for an initial partial distribution payment. Epiq then conducted various quality assurance checks on this population. These checks included, but were not limited to:

- a. A manual review of all top 100 claims (by interchange fees) in the population, including authorization documentation, signatory authority, and address checks;
- b. A data analysis of the top 2,500 claims (by interchange fees) for data anomalies;
- c. A random sampling of proof of authority documentation across the entire population;
- d. A review of merchant name discrepancies, where the Class Member merchant name provided by the claimant differed from the merchant name in the transaction data;
- e. Fraud checks, including a review of claims submitted from the same IP address and those that contain duplicative name and address information; and
- f. A data analysis to ensure no invalid TINs were included in the population.

20. Section IV.B. of the Plan of Distribution states that Epiq will be responsible for developing an appropriate plan to audit claim forms (an “Audit Plan”) and will provide the Audit Plan to Class Counsel before beginning any audits. A preliminary Audit Plan has been shared with Class Counsel and will be finalized once all claims processing activities have been concluded. It

is customary to perform audits on finalized populations in order to ensure both statistical significance across the whole population as well as to ensure that, should the audit return abnormal results for the particular audit group, the entire group can be subject to further review.

21. At this time, the preliminary Audit Plan includes the following activities.

- a. Random sampling (of a statistically significant size) of the entire claim population;
- b. Random sampling of all claims submitted by third-party filers;
- c. Random sampling of all claims that were:
 - i. Updated via research request
 - ii. Updated via sales data submission
 - iii. Updated as a result of any other dispute step
- d. Certain high-value claims with interchange fees above a designated threshold;
- e. All claims that were updated by moving transactions from one TIN to another (i.e., instances where the merchant business was sold during the Class Period);
- f. All claims where the TIN was associated with a potential payment facilitator (i.e., where a known payment facilitator attempted to register for the TIN);
- g. All claims where the TIN was not in the original data set used for the claim form mailings, nor in any supplementary data sets for additional Class Members as discussed in the Second Supplemental Notice Declaration;
- h. Other populations manually selected by Epiq.

22. Aside from the general random sampling referenced in Para. 21.a., *supra*, the claims included in the initial partial distribution population were unlikely to be included in any other audit populations and otherwise pose low risk of fraud or other fee calculation issues.

CALCULATION OF THE PRO RATA DISTRIBUTION AMOUNT

23. In order to ascertain the initial partial distribution amount for the population of claims discussed in Paras. 16 – 18, *supra*, and again summarized in Para. 28 below, Epiq undertook a conservative approach to calculating the potential pro rata value to be applied to a claimant's interchange fees. To account for the uncertainty regarding the resolution of the *Lanning* and *Old Jericho* appeals, as well as the number of claims where claimants are still in the process of challenging their interchange fees, Epiq used the total amount of fees available in the data in its possession as the denominator, rather than the total fees claimed. While it is extremely unlikely that any resolution of the pending appeals and pending challenges results in a scenario where all interchange fees in the data produced to Epiq are claimed, this conservative approach will allow for a reasonable calculation without requiring extensive efforts to project the final value of claims where challenges to the fee amount are still in progress, and will provide a buffer for the inherent lack of precision available in calculating the funds to place in trust regarding the pending appeals.

24. The result of this approach is a pro rata value that is likely far lower than the ultimate and final pro rata value that will be calculated after all appeals are resolved and all claims have been fully processed. Claimants eligible for the initial partial distribution will thus receive a payment that is only a portion of their total pro rata award, as is necessitated by the lack of certainty at present time. As outlined in Paras. 12 – 13, *supra*, once the outstanding legal issues are resolved and, once the challenge process has concluded and the full universe of claimed interchange fees is known, Epiq can complete the final pro rata calculation and ensure that supplemental payments are made to any merchant initially only paid a portion of their total settlement award.

25. In calculating the net settlement amount available for distribution, Epiq has deducted amounts representing anticipated future costs. This includes Epiq's anticipated

administrative fees through the remainder of the administration and any possible future attorney fee awards. In addition, and again to be conservative, while the settlement funds will continue to earn interest throughout the life of the settlement administration, Epiq did not include projected future interest in the calculation of this initial partial distribution.

26. It should also be noted that the pro rata value used to calculate the initial distribution amounts for claimants is not impacted because Class Counsel and Epiq recommend the more conservative calculations for funding the trusts related to the PayFac and Branded Operator Trust Orders. The overall holdback amount that results from the initial distribution calculation methodology would not change had the less conservative amounts referenced in footnotes 9 and 12 been used; only the amounts placed into trust would change.

27. Should the Court provide its approval for an initial partial distribution, Epiq proposes updating functionality on the Merchant Portal to lock any claims that would be paid in the initial partial distribution to ensure that claimants do not unintentionally take actions that would result in their removal from the payment population. Once locked, these claimants would no longer be able to submit a research request or annualized sales data disagreeing with the interchange fee amounts that they previously agreed with when filing their claim without explicit permission from Epiq. The claims in this population have been finalized for a substantial amount of time, and these claimants are unlikely to make changes at this stage since they already accepted the interchange fees in the transaction data.

28. As of August 12, 2025, after completion of all quality assurance checks, the proposed initial partial distribution population would include 605,472 merchant claims (approximately 42% of all claims filed), submitted by 499,175 registrants (approximately 44% of all registrants). The associated interchange fees for these claims amount to \$36,151,062,607.90.

As discussed in Paras. 16 – 18 above, this population includes timely claims where registrants have authority to file on behalf of the provided merchant TIN, there is no conflicting registration or claim for the same TIN, the merchant agreed with the interchange fee amounts provided on the claim form or in the Merchant Portal, and the claimant has not otherwise engaged in any challenge or dispute process. Excluded from the population are claims that would have otherwise been included, but for the fact that the payment calculated for the claim in the initial partial distribution was less than \$5.00, as discussed in Para. 18 above. The total funds to be distributed in the initial partial distribution is \$426,063,670.16.

29. As noted above in Para. 11.a. above, it is possible that claims in this population may be removed from the initial partial distribution if another registrant were to register the TIN, thus putting it into conflict, between now and when payments are distributed. In addition, if any Class Member in the population requests and is granted permission to take additional steps with respect to their claim, despite having passed various deadlines by which they may do so, the Class Member may be removed from the population.

30. Once an initial partial distribution is approved by the Court, Epiq will update the Merchant Portal to indicate for registrants whether their claims are included in the initial partial distribution and the initial distribution payment amount for those that are, and will contact each registrant with a claim or claims in the initial partial distribution and ask them to visit the Merchant Portal, review their claim(s) to be included for payment, and then elect how they would like to be paid. Where a registrant has more than one eligible claim for payment, they will be able to elect a single payment as a lump sum or elect a different payment method for each merchant. Epiq anticipates that available payment methods will include mailed physical check, direct deposit, and

certain digital payment options to be determined by Class Counsel. Registrants who fail to make a payment election will be issued a paper check by mail for each claim.

31. Making required updates to the Merchant Portal to accommodate the payment process, as described above, conducting outreach to registrants and providing them sufficient time to make a payment election, conducting any final fraud checks based on payment direction provided, and effectuating payments, is a multi-step process. As such, Epiq recommends that the Court order a distribution no earlier than 90 days from the date of its Order approving said distribution.

CONCLUSION

32. The proposed plan described in this declaration for issuing initial payments is reasonable and will provide a measurable benefit for more than half of the claims received to date. In recognition of the fact that Class Members have been waiting many years to receive payments, the plan is calculated to pay as many claims as possible while maintaining a reasonable and conservative holdback of sufficient funds to account for any possible results of the outstanding legal issues and the resolution of all conflicts, research requests, sales data submissions, and any other pending disputes concerning the claims excluded from the initial partial distribution.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on August 19, 2025 at Seattle, Washington.



Loree Kovach

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

	X	
In re PAYMENT CARD INTERCHANGE	:	MDL No. 1720(MKB)(JAM)
FEE AND MERCHANT DISCOUNT	:	
ANTITRUST LITIGATION	:	Civil No. 05-5075(MKB)(JAM)
	:	
	:	[PROPOSED] ORDER GRANTING
This Document Relates To:	:	MOTION FOR INITIAL, PARTIAL
	:	DISTRIBUTION OF SETTLEMENT FUNDS
	:	
ALL ACTIONS.	:	
	:	
	X	

The Court, having considered Rule 23(b)(3) Class Plaintiffs' Motion for Initial, Partial Distribution of Settlement Funds, having considered all of the submissions and arguments with respect to the motion, and having ruled on the motion, ORDERS as follows: The Net Settlement Fund, shall be distributed to claimants as detailed in Rule 23(b)(3) Class Plaintiffs' Motion and accompanying declarations and exhibits thereto.

IT IS SO ORDERED.

DATED: _____
THE HONORABLE MARGO K. BRODIE
UNITED STATES DISTRICT COURT CHIEF JUDGE