

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 COUNSEL'S
	: MONTHLY REPORT REGARDING THIRD-
	: PARTY ENTITIES
ALL ACTIONS.	: :
_____	X

I. INTRODUCTION

This is the twenty second monthly report regarding third-party claims filers following the Court’s request.

Rule 23(b)(3) Class Counsel (“Class Counsel”) and Epiq continue to receive communications regarding third parties. Calls received via the toll-free number are tracked and reported to Class Counsel from Epiq. Class Counsel also directly receives calls and emails regarding third parties that are followed up on immediately. Additionally, Class Counsel regularly searches online using various keywords to monitor new entrants. Epiq received 17 new contacts regarding third parties since the last report. It also forwards to Class Counsel certain specific issues which are discussed below.

Now that the claims-filing deadline has passed, there have been fewer issues related to the solicitation of class members for filing. Monthly reports will continue.

II. STATUS OF PREVIOUS ORDERS TO SHOW CAUSE

A. Cardsettlement.org and Merchant Stronghold

Matters related to cardsettlement.org appear to be managed. Cardsettlement.org provides a report regularly to detail its efforts regarding confirmation of engagement.

Below is the most recent information provided by cardsettlement.org regarding client contacts:

Affirmed	383
Pending	426
Rejected	2
Total	811

Class Counsel has still not received any further contact from Merchant Stronghold.

B. Pacific Travel and Services LLC

Epiq alerted Class Counsel to a concerning issue related to Pacific Travel and Services LLC (“Pacific Travel”), a company that appeared to be signing up merchants for claims-filing and demanding pre-payment for services based on purported expected settlement benefits that were

not true. Pursuant to the Court's July 22, 2025 Minute Entry, Class Counsel filed a report on August 15, 2025 regarding continued efforts to communicate with Pacific Travel. ECF 9646. On August 18, 2025, the Court entered a text-only Order directing Epiq to attempt to contact the approximately 80 class members who signed up for claims-filing services with Pacific Travel and determine whether such claims can be filed. On the same day, Class Counsel met with Epiq to discuss the Court's Order and Epiq is beginning work on the project immediately. Class Counsel will have a report for the Court, as directed, in the next status report.

III. OTHER MATTERS

A. Recovermyclaim.com

Class Counsel and Epiq are working on an issue related to the company Recovermyclaim.com. This entity had worked with an agent to sign up merchants for claims-filing services. Epiq flagged certain of the submissions, noting that the proof of authority documents provided were questionable. Following a number of conferences, Recovermyclaim.com indicated that an agent had filed some proofs of authority that it did not properly have authorization to submit. Recovermyclaim.com launched an investigation into the matter and was instructed by Epiq and Class Counsel that all proofs of authority submitted that could be traced to the agent had to be reviewed and, if needed, withdrawn. This process is ongoing, but to date Recovermyclaim.com has withdrawn a number of claims. Class Counsel has told the representative from Recovermyclaim.com that it may seek costs associated with Epiq's efforts related to these claims when the process of removing the questionable submissions is over. Class Counsel will report further in the next monthly report.

B. Non-Responsive Third Parties

Epiq has alerted Class Counsel to an issue related to the non-responsiveness of certain third parties. In two instances, class members contacted Epiq after numerous attempts to contact the company who they had contracted with for claims-filing services went unanswered. Epiq sent the companies an email, cc'ing the class member and asking for a response. No responses were

received. Epiq also sought to reach out by phone to one third party after receiving an undeliverable response to its email and was sent to a full voicemail box. Epiq is continuing to monitor this situation. Class Counsel sought to contact the two companies by email and phone. Both eventually responded, with one claiming that both its phone and email systems were down, but are now fixed. Class Counsel reminded both entities of the importance of responding to their clients and to Epiq.

C. Third Party Filer Review

Last month, Class Counsel conducted a wide-ranging review of known third-party filing companies. Many websites that were previously active are now inactive or uninvolved in any advertising related to the case. Several sites mention the settlement with proper disclaimers and links. A handful mention the settlement, however their advertising is no longer accurate. A few contain some questionable, although unlikely actionable, statements. On August 5, 2025, Class Counsel sent email communication to all known third-party filing and claims-purchasing companies reminding them of the importance of only sharing accurate, up-to-date information. More than 650 emails were sent. Class Counsel received numerous responses to its email. Several third parties provided information showing that public facing marketing had been updated and others acknowledged receipt.

D. Outreach to Third Parties by Epiq

As Class Counsel previously reported, since August 18, 2023, Epiq has been performing specific outreach efforts to known third-party claims filers.

As of August 15, 2025, Epiq has received client lists from a total of 689 third-party claim filers claiming representation of 10 or more claimants, which is an increase of 8 from last month's report. The third parties total representation consists of 994,894 Tax Identification Numbers ("TINs"), which is an increase of 678 TINs from last month's report.

IV. CONCLUSION

Class Counsel will continue to apprise the Court regarding issues with third-party claims filers via monthly reports and will bring urgent matters to the Court's attention via letter. The next monthly report will be filed on September 26, 2025.

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