

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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In re PAYMENT CARD INTERCHANGE	:	MDL No. 1720(BMC)(JAM)
FEE AND MERCHANT DISCOUNT	:	
ANTITRUST LITIGATION	:	Civil No. 05-5075(BMC)(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-third 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 14 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. Pacific Travel & Services LLC

Epiq alerted Class Counsel to a concerning issue related to Pacific Travel & 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 began work on the project immediately.

Epiq has made progress in its efforts to contact class members who signed up for claims-filing services with Pacific Travel. The following chart details Epiq's efforts as of September 22, 2025 to contact affected merchants:

Merchants with Phone Number:	70
Unable to Reach:	47
Left Voicemail:	16
Spoke with Owner/Employee:	7
Merchants with Email:	16
Merchants with Mailing Address:	73
Merchants without Contact Information:	3

Based on these numbers, Class Counsel directed Epiq to provide a mailing in English and Vietnamese to all Pacific Travel merchants with mailing addresses.

That message is reproduced below:

ACTION REQUESTED – Payment Card Settlement: File a Claim

Dear Business Owner,

This letter relates to a claim that was recently filed for [BUSINESS NAME] by a company called Pacific Travel & Services LLC. Pacific Travel and Services is a company that contacted businesses and asked for advanced payment for its services. Following an order from the Court, the claims that were filed by Pacific Travel and Services have been withdrawn.

You do not have to pay for services to file a claim. As the Court-appointed Class Administrator, we help business owners file claims for free. If you are the owner or employee of [BUSINESS NAME] (Tax Identification Number ending in XXXXX), and you want to file a claim, please email us at info@paymentcardsettlement.com or call 1-800-625-6440.

For more information about the Settlement, visit www.PaymentCardSettlement.com or call 1-800-625-6440. The website is available in eight languages, including Vietnamese. If you need assistance in another language, our call center can help you.

If you have more questions and want to talk with a lawyer about this letter or your options, please let us know by emailing info@paymentcardsettlement.com. We will connect you with the lawyers appointed to represent you in the case.

Additionally, a call was received just this week from a person who had worked with Pacific Travel and had apparently collected funds from class members. This person claimed that they had returned collected funds to the owner of Pacific Travel and wanted to assist in getting class members their money back. Further details were provided on September 24, 2025. This person has taken a number of steps to try to get the owner of Pacific Travel to refund money that class members had pre-paid to Mr. Nguyen. This person explained to Epiq that they contacted Mr. Nguyen through

calls, texts, and emails to ask when he would return funds to class members. This person felt a sense of responsibility because they had helped sign up people for claims-filing who were friends, family, and business associates. The person reported that they tried

to return the portion I was responsible for. Tri [Nguyen] insisted that the refunds needed to come from him directly due to a supposed court order, [t]rusting his word at the time, back in May with the understanding that he would begin processing refunds back right away to the owners.

This person apparently sent money to Mr. Nguyen. They said that Mr. Nguyen completely stopped responding to any messages. They further reported: “Unfortunately, to this day, neither I nor anyone else has seen any of those funds returned nor any kind of communications from him.” Class Counsel was also given a variety of banking details of Mr. Nguyen, including account names and other details.

Late Wednesday night Class Counsel received additional information from the person who had worked with Pacific Travel providing details of several class members, including the amounts these people were duped into paying, as well as detailed contact information. People paid many thousands of dollars to Pacific Travel – including at least one class member that paid more than \$10,000. Other amounts ranged from more than \$2,000-\$6,000. This additional information may be helpful in contacting class members to at least assist with claims filing.

Class Counsel will continue to contact the affected class members and will continue efforts to reach Mr. Nguyen. Class Counsel will provide a further update regarding outreach efforts and contact with the former associate of Pacific Travel in its next monthly report as much of this new information must be reviewed more thoroughly, including a call with the person who contacted Epiq.

B. 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.

III. OTHER MATTERS

A. Recovermyfee.com¹

Class Counsel and Epiq believe they have now resolved issues related to the company recovermyfee.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, recovermyfee.com indicated that an agent had filed some proofs of authority that it did not properly have authorization to submit. Recovermyfee.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. A number of claims have now been withdrawn and recovermyfee.com understands that Epiq is seeking costs of \$8,125.00 related to its efforts to unravel this situation. Multiple calls have been held with the leaders of recovermyfee.com and it appears outstanding areas of concern have now been addressed. Class Counsel also provided numerous edits to outgoing materials sent by recovermyfee.com that contained errors. To the extent additional issues arise, Class Counsel will report to the Court in its next monthly report.

B. “Stranded” Merchants

Epiq reports that some merchants have been “stranded” by third-party filers that either affirmatively withdrew the registrations or claims they filed on behalf of the merchant or had their registrations/claims administratively withdrawn because they did not respond to a preliminary

¹ The name of this entity is recovermyfee.com, not recovermyclaim.com.

determination from the Special Master. Epiq is reviewing stranded merchants whose claims are above a certain threshold to attempt to locate owners' contact information and conduct outreach. For those merchants that Epiq is able to reach, Epiq will create new registration accounts and assist them with filing, should they be interested in filing claims.

In addition, should a class member in this situation contact the Class Administrator asking about their "claim," Epiq will create new registration accounts and assist them with filing, if they are interested.

C. 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 September 22, 2025, Epiq has received client lists from a total of 693 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 995,140 Tax Identification Numbers ("TINs"), which is an increase of 246 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 October 24, 2025.

DATED: September 26, 2025

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