

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

_____	X	
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-fourth 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 11 new contacts regarding third parties since the last report. Epiq 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-entry 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 October 20, 2025 to contact affected merchants:

Merchants with Phone Number:	70
Unable to Reach:	43
Left Voicemail:	21
Spoke with Owner/Employee:	6
Merchants with Email:	37
Merchants with Mailing Address:	73
Merchants without Contact Information:	3
Merchants with Registrations in Process:	28

Class Counsel directed Epiq to provide a mailing in English and Vietnamese to all Pacific Travel merchants with mailing addresses. In response to the Court’s October 10 text-entry Order, Epiq conducted additional outreach, sending the message again. That outreach was completed on October 16 (emails) and October 17 (paper).

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.

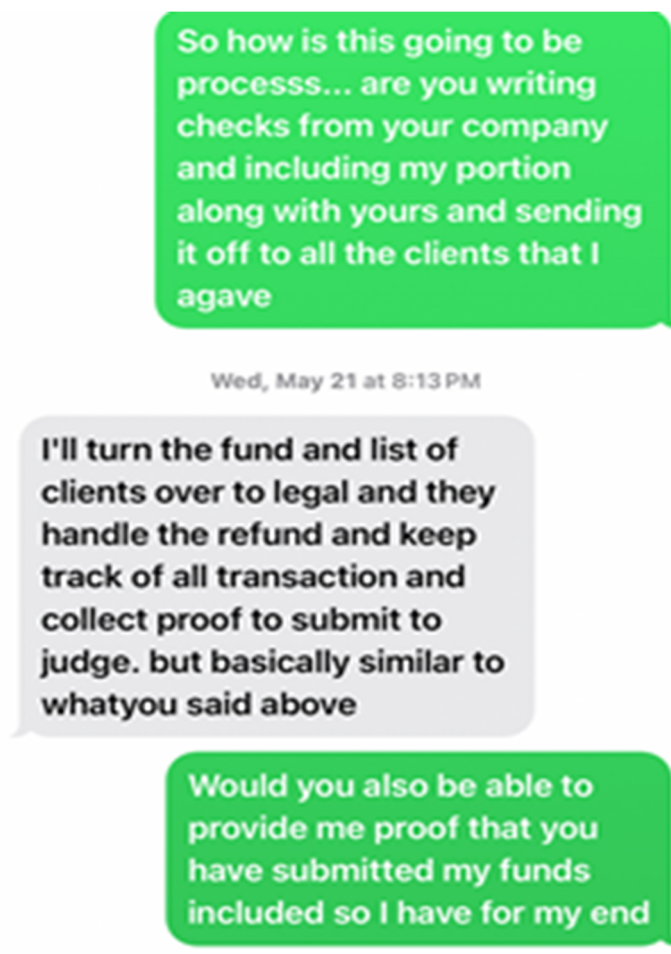
You do not have to pay for services to file a claim. As the Court-appointed Class Administrator, we help business owners file claims for free. If you are the owner or employee of [BUSINESS NAME] (Tax Identification Number ending in XXXXX), and you want to file a claim, please email us at info@paymentcardsettlement.com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

As reported in the October 10, 2025 Status Report, Class Counsel and Epiq held a call with a person who had worked with Mr. Nguyen to sign up class members. She stated that she had provided Mr. Nguyen with \$19,000 that had been at least a large portion of money that was to have

been her percentage. She claimed she had additional funds she wished to return as well. There was a brief discussion regarding how to determine which class members were owed refunds. The person later wrote to Epiq stating that she was under a doctor's care and also studying for a major examination, but that she would get back to Epiq. The person reengaged with Epiq and spoke to representatives there on October 15. Following that call, on October 18, this person sent wire transfer information that appeared to confirm that \$19,000 was sent to Mr. Nguyen in May 2025. This person also sent a screenshot of a conversation with Mr. Nguyen that is reproduced in redacted form below¹:



¹ Class Counsel has requested Epiq continue to engage with this person and to try to gather additional information, if possible.

Following receipt of this information, Class Counsel again sought to contact Mr. Nguyen and emailed him on October 20, 2025. As of this filing, there has still been no response from him.

Also on October 20, Class Counsel wrote to the U.S. Attorney's Office in New Jersey (where Pacific Travel and Mr. Nguyen are based) to provide details regarding this matter for possible investigation by that office. That letter (without attachments) is attached as Exhibit A.

Class Counsel will continue to contact the affected class members and will continue efforts to reach Mr. Nguyen. Those efforts will be provided in the next monthly report, or sooner, should the Court require.

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.com²

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.

² The name of this entity is recovermyfee.com, not recovermyclaim.com.

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. Recovermyfee.com has now agreed to pay Epiq's costs related to the issues raised.

Recovermyfee.com requested its statement be included in this report.

B. Statement from Recovermyfee.com

RecoverMyFee.com values the collaboration with Class Counsel in ensuring that matters are addressed effectively, accurately, and with integrity.

We regret the circumstances that gave rise to these challenges; yet throughout the process of addressing the issues raised by Class Counsel, RecoverMyFee.com has maintained complete transparency and devoted substantial time, effort, and resources to resolve every matter with careful attention to every detail. While the process was demanding, we embraced it fully, and the work has been entirely worthwhile in safeguarding the integrity of RecoverMyFee.com and supporting the broader process.

We sincerely commend the professionalism, clarity, and diligence of Class Counsel and Epiq. RecoverMyFee.com remains committed to upholding the highest standards of transparency, diligence, and cooperation with Class Counsel at every stage and aspect of the proceedings.

C. "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 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.

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 October 20, 2025, Epiq has received client lists from a total of 695 third-party claims filers claiming representation of 10 or more claimants, which is an increase of 2 third-party claims filers from last month’s report. As previously noted, registrations include: (1) a mix of third-party claims filers previously self-identified as “Other” or “Owner/Employee” when registering on the portal, where Epiq subsequently identified them as third-party claims filers and updated their designation in Epiq’s records; and (2) third-party claims filers who have added merchants. The increase of two third-party claims filers since last month’s report occurred as Epiq identified: (1) a registration record that was self-reported as “Other” but is actually a third-party claims filer; and (2) a previously known third-party claims filer who added Tax Identification Numbers (“TINs”), located as part of the Research Request process, increasing the total number of merchants in the third-party claims filer’s account to 10.

Third-party claims filers’ total representation consists of 997,945 TINs, which is an increase of 2,805 TINs from last month’s report. This increase is plausible due to: (1) re-categorization/corrections of how third-party claims filers registered; and (2) third-party claims filers who continue to upload new TINs as a result of the Research Request process.

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 November 21, 2025.

DATED: October 24, 2025

ROBBINS GELLER RUDMAN
& DOWD LLP
PATRICK J. COUGHLIN
ALEXANDRA S. BERNAY

s/ Alexandra S. Bernay

ALEXANDRA S. BERNAY

655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

ROBINS KAPLAN LLP
K. CRAIG WILDFANG
THOMAS J. UNDLIN
RYAN W. MARTH
2800 LaSalle Plaza
800 LaSalle Avenue South
Minneapolis, MN 55402-2015
Telephone: 612/349-8500
612/339-4181 (fax)

BERGER MONTAGUE PC
H. LADDIE MONTAGUE, JR.
MERRILL G. DAVIDOFF
MICHAEL J. KANE
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Telephone: 215/875-3000
215/875-4604 (fax)

Co-Lead Counsel for Plaintiffs