

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)
	:	
_____	:	RULE 23(b)(3) CLASS COUNSEL'S
This Document Relates To:	:	MONTHLY REPORT REGARDING THIRD-
	:	PARTY ENTITIES
ALL ACTIONS.	:	
	:	
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I. INTRODUCTION

This is the twenty-eighth 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 22 new contacts regarding third parties since the last report. Epiq also forwards to Class Counsel certain specific issues which are discussed below. The vast majority of the calls this month relate to class members having trouble getting a response from the third-party claims-filing companies they have contracted with.

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 February 24, 2026 to contact affected merchants. Current counts:

Merchants with Phone Number	70
Unable to Reach	43
Left Voicemail	21
Spoke with Owner/Employee	6
Merchants with Email	39
Merchants with Mailing Address	73
Merchants without Contact Information	3
Merchants with Registrations in Process	33

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, 2025 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. ECF 9676. 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. *Id.* at 3. She claimed she had additional funds she wished to return as well. *Id.* There was a brief discussion regarding how to determine which class members were owed refunds. *Id.* 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. *Id.* at 3-4. The person reengaged with Epiq and spoke to representatives there on October 15, 2025. ECF 9679 at 3. There have been additional calls since then as reported to the Court on October 24 and November 7, 2025. *See* ECFs 9679, 9687.

During a later call, information regarding another person who worked with Pacific Travel was revealed. ECF 9687 at 2. Class Counsel has attempted to call and email this person to find out information. A translator was used to ensure the email was in English and Vietnamese. To date, despite several follow ups, this person has not responded. Attempts to reach them continue. Multiple emails have been sent, including most recently on February 20, 2026.

Class Counsel has also continued to try to reach Mr. Nguyen, again via email most recently on February 20, 2026. He has also received courtesy copies of all filings that mention Pacific Travel.

Epiq has continued to reach out to the remaining merchants on whose behalf Pacific Travel attempted to file claims. Despite this ongoing outreach, Epiq has not received any new communication from class members wanting to file claims.

Finally, as of February 27, 2026, Class Counsel has received no response to its letters to the U.S. Attorney in New Jersey.

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	384
Pending	425
Rejected	2
Total	811

Class Counsel expects to have more information regarding the status of initial payments to clients of cardsettlement.org in a future report. Class Counsel has still not received any further contact from Merchant Stronghold.

III. OTHER MATTERS

A. Betz & Baril, PLLC and ClickFunds, LLC

A fully briefed motion for sanctions is currently before the Court. Class Plaintiffs filed a motion for sanctions on February 9, 2026. ECF 9793. On February 23, 2026, counsel for Betz & Baril, PLLC and ClickFunds, LLC filed an opposition to the motion. ECF 9798.

Class Counsel remains available should the Court wish to conduct a hearing or receive supplemental briefing. Class Counsel believes the Court has more than sufficient information to impose the reasonable sanctions requested in light of the failure to explain or address the conduct in the motion.

B. Recent Filing by Cascade Settlement Services LLC's Motion for an Order Directing Settlement Administrator to Provide Regular Public Reporting

Yesterday, Cascade Settlement Services LLC d/b/a Spectrum Settlement Recovery filed a motion seeking to force the Class Administrator to publicly file certain reports regarding various aspects of the settlement process, using a proposed reporting process it deems proper. ECF 9799. Class Counsel is working with Epiq to respond to this filing and requests the Court set a briefing schedule so that Class Counsel and Epiq can fully address this motion. Class Counsel suggests any response be due within 21 days.

C. Issue Concerning Third-Party Managed Care Advisory Group, LLC

As previously reported in the past two updates, Class Counsel became aware of certain litigation involving third-party claims-filing company Managed Care Advisory Group, LLC (“MCAG”). *See In re Managed Care Litig.*, No. 00-md-01334 (S.D. Fla.). In this case, MCAG has more than 160,000 Tax Identification Numbers (“TINs”), associated with it. This makes them the largest third-party claims filer in this action. On December 15, 2025, the same day it learned of the *Managed Care* litigation, Class Counsel wrote to MCAG and its counsel requesting information. On December 18, 2025, Class Counsel had a conference call with MCAG counsel, restructuring counsel and a representative from MCAG. During this call, counsel provided some information regarding the current structure of the company, which clarified certain issues, and committed to providing written answers to Class Counsel’s December 15, 2025 letter by December 23, 2025. On December 23, 2025, Class Counsel received a detailed letter from MCAG. This letter provided information concerning the structure of the entity along with information related to the management of funds. At this time, based on the representations from counsel and MCAG, Class Counsel has no current concerns regarding MCAG in this action related to the issues raised in the *Managed Care* litigation.

D. Letter from Class Member Sheryl Havered

On February 10, 2026, a letter from merchant Sheryl Havered posted to the docket. ECF 9796. In this letter, Ms. Havered re-posed two questions that she had previously asked Second Circuit judge, Hon. Dennis Jacobs, to which Co-Lead Counsel responded in August. Co-Lead Counsel sent a response to Ms. Havered’s most recent letter the day after it posted. No further action is needed at this time.

E. Complaints From Class Members Regarding Third-Party Filing Companies Being Non-Responsive

Epiq has flagged an issue for Class Counsel that appears to be a growing concern. A number of class members in the past month have called the toll-free hotline or emailed the administrator to complain that they have had difficulty getting responses from third-party filing companies that the class members contracted with for claims-filing services. According to Epiq, there have been

numerous new complaints about a lack of responsiveness. Epiq has been reaching out to various third parties to remind them of their responsibilities and has also provided class members with contact information, where available.

One issue that has arisen because of this lack of responsiveness is that class members who would have been in the initial partial distribution may now not be included because requests for payment type election were not made before the deadline.

The following details Epiq's current process when they receive a class member complaint regarding responsiveness. For the initial complaint, Epiq provides the contact information found on the record of the third-party to the class member and asks the class member to try again.

If they contact Epiq again saying that they are still unable to get a response from the third-party, Epiq sends an email, including the class member, requesting that the third-party reach out to the class member and confirm contact information in Epiq's records. The email also includes a deadline to reply, usually 48 hours. Currently there are no known issues that have reached this stage in the process. Outstanding matters detailed last month are resolved.

F. 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 February 23, 2026, Epiq has received client lists from a total of 698 third-party claim filers claiming representation of 10 or more claimants. There has been no increase in the number of such third-party filers since the last report. As previously noted, registrations included a mix of third parties previously self-identified as "Other" or "Owner/Employee" on the portal when registering where Epiq has subsequently identified them as a third-party filer and updated their designation in Epiq's records and third parties who have added merchants.

The third parties' total representation consists of 1,000,659 TINs, which is an increase of 262 TINs from last month's report. This increase is plausible due to ongoing review leading to recategorization/corrections of how third-party filers registered along with third parties 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 March 27, 2026.

DATED: February 27, 2026

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