

I. INTRODUCTION

This is the thirty-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 19 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 continue to 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. For this report, the Court instructed Class Counsel to provide any updates regarding: (1) Epiq's efforts relating to claims-filing services with Pacific Travel & Services LLC; (2) complaints from class members regarding third-party filing companies being non-responsive; and (3) issues related to Irongate Business Advisors ("Irongate").

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 June 10, 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.

Pursuant to the Court's order regarding third-party filer Pacific Travel, Epiq continued to reach out regarding the remaining merchants on whose behalf Pacific Travel attempted to file claims. Since the last report, a merchant reached out to Epiq with questions regarding his claim that Epiq was able to answer. Additionally, Epiq was contacted by the person that had previously worked with Mr. Nguyen. She reported that she "repaid \$4,963" to a class member who had been signed-up.

She sent an email expressing concerns regarding the funds she says Mr. Nguyen retained and asked whether another letter to the Attorney General would be possible or helpful. Based on the lack of communication from the U.S. Attorneys' Office, it is unknown whether an additional letter would be of any benefit. Class Counsel has attempted to call and email another person who worked with Pacific Travel. 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 June 9, 2026.

Class Counsel has also continued efforts to reach Mr. Nguyen, again via email most recently on June 9, 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.

Finally, as of June 15, 2026, Class Counsel received no response to its letters to the U.S. Attorney in New Jersey.

III. OTHER MATTERS

A. Betz & Baril, PLLC and ClickFunds, LLC

On May 21, 2026, Betz & Baril, PLLC and ClickFunds, LLC (collectively, the “Respondents”) filed a Notice of Motion for Limited Reconsideration and Limited Clarification of the May 7, 2026 Memorandum Decision and Order (“Motion”). ECF 9867. On June 4, 2026, Class Counsel’s response was filed. ECF 9878. Also, on June 4, 2026, Respondents filed a notice of appeal with the Second Circuit. ECF 9880. The Court denied the Motion on June 9, 2026. ECF 9883.

On June 8, 2026, the parties filed a joint status report detailing next steps. The agreed to mailing program will commence within 10 days of June 8, 2026. ECF 9882 at 1. Respondents’ counsel has confirmed that the mailing program is on track, with emails to go out on or before June 18, 2026.

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

The motion filed by Cascade Settlement Services LLC d/b/a Spectrum Settlement Recovery is now fully briefed. On March 30, 2026, Spectrum filed their reply. ECF 9813. On May 28, 2026, the Court held a hearing. The parties met-and-conferred and presented the Court with an agreed format for quarterly public reporting. The first report will be filed by July 10, 2026.

C. Complaint Regarding Third-Party Filer

As noted above, for years Epiq has tracked class member calls and emails regarding third parties and provides a chart of contacts to Class Counsel. Some of the contacts simply ask questions regarding the existence of third parties. Some, however, provide Epiq and Class Counsel with the

first reports of misleading information. Last month, a new entity, Irongate, was reported to Class Counsel. On May 20, 2026, Irongate responded and agreed to update its website in the coming days. It appears public websites regarding the settlement have now been taken down.

D. 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. Epiq has handled a number of nonresponsive third party issues this month. In general, following Epiq's intervention on behalf of class members, the third party has responded within a day. A couple issues with non-responsive third parties are still being pursued and may be subject to a report next month.

The following details Epiq's current process when they receive a class member complaint regarding responsiveness. For the initial complaint, Epiq provides the third-party contact information found in their records 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 as a recipient, requesting that the third party reach out to the class member and confirm their contact information in Epiq's records. The email also includes a deadline to reply, generally 48 hours. Currently, there are no known issues that have reached this stage in the process.

E. 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.

On June 10, 2026, Epiq received client lists from a total of 701 third-party claim filers claiming representation of 10 or more claimants. This is the same as last month. As previously noted, registrations included a mix of third parties that: (1) 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 (2) have added merchants.

The third parties’ total representation consists of 1,001,005 Tax Identification Numbers (“TINs”), which is an increase of 29 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 July 24, 2026.

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