

Date: October 17, 2022
To: Class Members
From: DirecTV Class Action Settlement Administrator
Subject: Notice of DirecTV Class Action Settlement

[Español](#) • [中文](#) • [이메일 공지문](#) • [Thông báo qua Email](#)

The notice concerns your potential right to recovery based on a settlement in a case called *Perez v. DIRECTV Group Holdings, LLC, et al.*, Case No. 16-cv-01440-JLS-DFM, pending in the United States District Court for the Central District of California filed on August 4, 2016. This proposed class action Settlement will resolve a lawsuit against DIRECTV Group Holdings, LLC, DIRECTV Holdings, LLC, DIRECTV, LLC (collectively, “DIRECTV”), Signal Auditing, Inc., Lonstein Law Office, P.C., Julie Cohen Lonstein, and Wayne M. Lonstein (collectively and together with DIRECTV, the “Defendants”). The Court authorized this notice.

The Settlement Class is defined as: “All businesses and business owners in the United States who had DIRECTV services installed in their commercial establishment; who were subsequently audited by Defendant Signal Auditing, Inc.; and who at any time on or after the day four years prior to the date on which the original Complaint was filed (August 4, 2012) through the date the Court grants preliminary approval of the settlement, received communications from the Lonstein Defendants on behalf of DIRECTV seeking money for allegedly unauthorized use of DIRECTV licensed programming, including NFL Sunday Ticket or any other DIRECTV-related programming.”

What is the Lawsuit About?

Plaintiff Doneyda Perez, individually and on behalf of Oneida’s Beauty and Barber Salon filed this nationwide putative class action case on August 4, 2016 against Defendants alleging multiple claims, including civil violation of the Racketeer Influenced & Corrupt Organizations Act (“RICO”), 18 U.S.C. §1962(c). Additional named Plaintiffs were added to the lawsuit on December 12, 2020 (“Class Representatives” or “Plaintiffs”). The Plaintiffs in this case allege that they were each contacted by the Lonstein Law Office on behalf of DIRECTV concerning allegations that they displayed DIRECTV programming in their businesses without a valid commercial license. Plaintiffs allege that Defendants conspired to sell businesses and business owners residential DIRECTV programming and then hired the Lonstein Law Office to pursue legal claims against those businesses for broadcasting DIRECTV programming without a valid commercial license.

Defendants deny these allegations. Defendants contend that they have complied with the law in all respects and at all times and that the legal claims brought on behalf of DIRECTV were both valid and brought in good faith.

What are the Settlement Terms?

DIRECTV will pay \$9,400,000 into a Settlement Fund. The Settlement provides that the Settlement Fund is to be distributed to Class Members, after deduction of any Court-approved attorneys’ fees and expenses, notice and administration costs, and incentive awards. The benefit to be paid to each Class Member depends on the amount of money, if any, the Class Member paid to the Lonstein Law Office and the final number of Class Members. [CLICK HERE](#) to review your

estimated payment by entering your Unique ID «SIMID» and other information requested to verify your identity.

What Are My Options?

Do Nothing (except fill out an IRS W-9 Form if your Settlement Benefit is \$600 or more)

If the settlement is approved by the Court and «AssociatedBusinessName» does nothing, it will remain in the Class, it will be eligible for a payment, and **all legal claims it has against the Defendants that were or could have been raised in the Lawsuit related to the allegations in the Lawsuit will be released.** If your Settlement Benefit is more than \$599, [CLICK HERE](#) to visit the settlement website and fill out an IRS Form W-9 for your business before your settlement benefit check can be mailed to you. **To update the address or contact information for «AssociatedBusinessName», please [CLICK HERE](#) to visit the settlement website at www.DirectvPerezClassSettlement.com.**

Opt Out

You can Opt Out from the Class – that is be excluded from the Class – if you wish to retain the right to sue Defendants separately for the Released Claims. If you Opt Out, you cannot obtain any benefits from the Settlement, which means you will not receive a monetary payment as part of the Settlement Benefit distribution. In addition, if you Opt Out you cannot submit an Objection to the Settlement.

To Opt Out, [CLICK HERE](#) to submit an Opt Out form on the settlement website, or you may mail or email an Opt-Out request to the Administrator at *Perez et al v. DirecTV et al.*, c/o Settlement Administrator, P.O. Box 26170, Santa Ana, CA 92799 or info@DirectvPerezClassSettlement.com. An Opt-Out request from a Class Member that is an individual must be signed by the Class Member requesting exclusion, contain the Class member's full name and address; and the following statement: "I request to be excluded from the proposed class settlement in *Perez v. DIRECTV Group Holdings, LLC, et al.*, Case No. 16-cv-01440-JLS-DFM (C.D. Cal.)." An Opt-Out request from a Class Member that is a business must be signed by a business representative duly authorized to act on behalf of the business, contain the full legal name of the business, the business' address, the full name and title of the individual submitting the Opt-Out request on behalf of the business, and the following statement: "This business requests to be excluded from the proposed class settlement in *Perez v. DIRECTV Group Holdings, LLC, et al.*, Case No. 16-cv-01440-JLS-DFM (C.D. Cal.)." An Opt-Out request from a Class Member that is a business must **also** be accompanied by the following additional statement: "I, [name of business representative], represent and warrant that I have the legal authority and ability to exclude [name of business] from the proposed class settlement in *Perez v. DIRECTV Group Holdings, LLC, et al.*, Case No. 16-cv-01440-JLS-DFM (C.D. Cal.)."

To be valid, the Opt-Out request must be postmarked on or before the Opt-Out Deadline, which is December 11, 2022.

Object to the Settlement

You can ask the Court to deny approval of the Settlement by timely filing an Objection with the Court. The Court cannot require a larger Settlement; the Court can only approve

or disallow the Settlement. If the Court denies approval to the Settlement, no Settlement Benefits will be issued, and the lawsuit will continue. You can also ask the Court to disapprove the requested payments to Plaintiff and to Class Counsel.

You may also appear at the Final Approval Hearing, either yourself or through your own attorney. If you appear through your own attorney, you are responsible for paying that attorney. **If you want to raise an objection to the Settlement at the Final Approval Hearing, you must submit that objection in writing, by the Objection Deadline, which is December 11, 2022.**

If you want to raise an Objection to the Settlement at the Final Approval Hearing, you or your counsel must submit that Objection in writing to the Administrator at *Perez et al v. DirecTV et al.*, c/o Settlement Administrator, P.O. Box 26170, Santa Ana, CA 92799 by the deadline December 11, 2022. The Administrator will provide your Objection to DIRECTV and Class Counsel and Class Counsel will file your Objection with the Court. Your Objection must be postmarked by the Objection Deadline set forth above. Any Objection must include: (a) a reference at the beginning to this case, *Perez v. DIRECTV Group Holdings, LLC, et al.*, Case No. 16-cv-01440-JLS-DFM (C.D. Cal.) and the name of the presiding judge, the Hon. Josephine L. Staton; (b) the name, address, telephone number, and, if available, the email address of the Person objecting, and if represented by counsel, of his/her counsel; (c) a written statement of all grounds for the Objection, accompanied by any legal support for such Objection; (d) whether he/she intends to appear at the Final Approval Hearing, either with or without counsel; (e) a statement explaining the objectors' basis for asserting that the objector is a member of the Settlement Class; and (f) a detailed list of any other objections submitted by the Class Member, or his/her counsel, to any class actions submitted in any court, whether state or otherwise, in the United States in the previous five (5) years. If the Class Member or his/her counsel has not objected to any other class action settlement in any court in the United States in the previous five (5) years, he/she shall affirmatively state so in the written materials provided in connection with the Objection to this Settlement. Failure to include this information and documentation may be grounds for overruling and rejecting your Objection.

If you submit an Objection, you may appear, either personally or through counsel, at the Final Approval Hearing in order to show cause why this Settlement and this Agreement should not be approved as fair, adequate, and reasonable or to object to any request for a Attorneys' Fees and Expenses or Incentive Award. Class Members shall send notice of their intention to attend or speak at the final fairness hearing to Class Counsel and/or the Settlement Administrator no later than **fourteen (14) days** prior to the final fairness hearing date. The Settlement Administrator or Class Counsel should, in turn, file a notice no later than **seven (7) days** prior to the final fairness hearing date, providing the Court with a list of Class Members who wish to speak at the hearing, if any. Moreover, because the Court may conduct the final fairness hearing in this matter via Zoom, the Settlement Administrator and/or Class Counsel are responsible for providing Class Members who wish to attend the hearing with the Zoom information the Clerk will distribute in advance of the hearing. If the Court makes the Final Approval Hearing available via Zoom or via other means of remote appearance, a remote appearance shall be considered equivalent to an in-person appearance, with all the rights and obligations applicable to in-person appearances.

If you fail to comply with these requirements, you may be deemed to have waived all objections and may not be entitled to speak at the Final Approval Hearing on January 6, 2023.

When Will the Court Decide If the Settlement is Approved?

The Court will hold a hearing on January 6, 2023, to consider whether to approve the Settlement. Class Counsel will ask the Court to award them up to \$3,133,333.33 in attorneys' fees, \$155,000.00 in litigation expenses, and a total of \$80,000.00 in incentive awards to the six (6) business owners who brought the Lawsuit. The hearing is open to the public. You may appear at the hearing, but you do not have to.

The hearing will be held in the United States District Court of the Central District of California, before the Honorable Josephine L. Staton, in the First Street U.S. Courthouse, 350 West 1st St., Los Angeles, CA 90012, Courtroom 8A, 8th Floor, or such other judge and courtroom assigned by the Court. Virtual attendance may be possible. This hearing date may change without further notice to you. Consult the Settlement Website at www.DirectvPerezClassSettlement.com or the Court docket in this case available through Public Access to Court Electronic Records PACER (<http://www.pacer.gov>), for any updated information on the hearing date and time.

For the full Notice of Settlement please visit the Settlement Administrator website at www.DirectvPerezClassSettlement.com or the links below.

- [Notice of Settlement in English](#)
- [Notificación por correo electrónico](#)
- [Notificación del acuerdo](#)
- [电子邮件通知](#)
- [和解通知](#)
- [이메일 공지문](#)
- [합의에 관한 공지문](#)
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