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THE HONORABLE BRIAN McDONALD
SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY

MIKE AALAND, individually on behalf of those
similarly situated,

Plaintiff,

v.

CONTRACTORS.COM LLC, a California Limited
Liability Company, and ONE PLANET OPS INC.,
a Delaware Corporation,

Defendants.

No. 19-2-24212-4 SEA

**DECLARATION OF VANESSA
PADEL FORD REGARDING NOTICE
AND SETTLEMENT
ADMINISTRATION**

I, VANESSA PADEL FORD, declare as follows:

1. I am a Client Engagement Manager at JND Legal Administration LLC (“JND”). This Declaration is based on my personal knowledge, as well as information provided to me by other JND employees and, if called upon to do so, I could and would testify competently thereto.
2. JND is serving as the Settlement Administrator¹ in the above-captioned litigation (“Action”) as ordered by the Court in its Order Granting Unopposed Motion for Preliminary Approval of Class Action Settlement (“Preliminary Approval Order”) dated July 19, 2021, Docket No. 28.

CLASS MEMBER DATA

3. Per Section 6.2.1 of the Settlement Agreement, on July 29, 2021, Defendants provided JND with a list of 2,976 mobile telephone numbers to which a text message was sent by the Defendants.

¹ Capitalized terms used and not otherwise defined in this Declaration shall have the meanings given such terms in the Class Action Settlement Agreement and Release, dated July 2, 2021 (“Settlement Agreement”).

1 4. JND analyzed the list of mobile telephone numbers for duplicates and subsequently
2 loaded a total of 2,085 unique phone numbers (“Settlement Class List”) into a dedicated Settlement
3 database. A unique Class Member ID was assigned to each Settlement Class List record for
4 identification and tracking throughout the Settlement administration process.

5 5. Pursuant to Section 6.2.1 of the Settlement Agreement, JND performed a reverse phone
6 number lookup for each phone number on the Settlement Class List. Of the 2,085 unique phone
7 numbers researched, JND received 1,728 unique name and address combinations representing 1,245
8 or 83% of Settlement Class List unique phone numbers. The reverse phone number lookup search did
9 not return any contact information for 840 or 17% of Settlement Class List unique phone numbers.

10 6. At the request of the Parties, JND performed an additional manual search of the 840
11 phone numbers for which the reverse phone number lookup did not provide any contact information.
12 As a result of this manual search, another 692 unique name and address combinations were obtained
13 and loaded into the Settlement database, leaving 148 or 7% phone numbers with no name and address
14 to contact.

15 7. In total, JND was able to locate 2,420 mailing addresses representing 1,937 or 93% of
16 the Settlement Class List unique phone numbers belonging to potential Settlement Class Members.

17 8. Before sending the Postcard Notice, JND updated mailing address information using
18 data from the National Change of Address (“NCOA”) database.²

19 **SETTLEMENT POSTCARD NOTICE**

20
21 9. Per Section 6.2.2 of the Settlement Agreement and Paragraph 9 of the Preliminary
22 Approval Order, JND sent Postcard Notice on August 18, 2021, by USPS first class mail, postage pre-
23 paid, to potential Class Members at the 2,420 addresses located through the reverse and manual
24 address searches. A representative sample of the Postcard Notice is attached as Exhibit A.
25

26 ² The NCOA database is the official United States Postal Service (“USPS”) technology product which makes changes of
27 address information available to mailers to help reduce undeliverable mail pieces before mail enters the mail stream. This
28 product is an effective tool to update address changes when a person has completed a change of address form with the
USPS. The address information is maintained in the database for 48 months.

1 10. As of November 3, 2021, of the 2,420 Postcard Notices mailed to potential Class
2 Members, 281 have been returned to JND as undeliverable. Of the 281 undeliverable Postcard
3 Notices, 5 were forwarded to an updated address provided by the USPS and 32 were remailed to a
4 new address obtained through an advanced address search. Of the 37 remailed Postcard Notices, none
5 have been returned as undeliverable. Of the 2,420 Postcard Notices, 2,176 or 90% have been deemed
6 delivered and 244 or 10% have been deemed undeliverable.

7 11. The 2,176 Postcard Notices deemed delivered represent 1,796 or 93% of the potential
8 Class Members who were mailed a Postcard Notice and the 244 undeliverable Postcard Notices
9 represent 144 or 7% of the potential Class Members.

10 12. In summary, JND received a total of 2,085 unique phone numbers for potential Class
11 Members. In total, 1,793 or 86% of potential Class Members' Postcard Notice were deemed delivered
12 and 292 or 14% (144 unique potential Class Members with undeliverable Postcard Notices and 148
13 for which the reverse phone number and manual searches were unsuccessful) were deemed
14 undeliverable.

15 13. Based on JND's experience, the Settlement Class Notice was successful and satisfies
16 due process.

SETTLEMENT WEBSITE

17
18 14. Pursuant to the Settlement Agreement, JND established a dedicated, case-specific
19 website for the Settlement, www.optextclassaction.com ("Settlement Website"). The "Home" page
20 provides a summary of the proposed Settlement and an overview of legal rights and options. The "FAQ"
21 page provides answers to frequently asked questions, information about how to receive a payment, how
22 to request exclusion or objection, the dates and information for relevant Court proceedings, including
23 the Final Approval Hearing, and contact information for JND. The "Important Documents" page
24 provides downloadable PDF copies of important Court documents, including the Settlement Agreement,
25 the Unopposed Motion for Preliminary Approval of Class Action Settlement, and the Preliminary
26 Approval Order. It also provides copies of documents related to the Class Notice including the Long
27

1 Form Notice, Postcard Notice, Email Notice,³ Long Form Notice and Claim Form. The “Notificación
2 en Español” page provides a downloadable PDF copy of the Long Form Notice in Spanish. Copies of
3 the Long Form Notice in English and Spanish are attached as Exhibits B and C, respectively. A copy of
4 the Email Notice is attached as Exhibit D, and the Claim Form is attached as Exhibit E.

5 15. Between August 18, 2021, when the Postcard Notice was issued, and November 3,
6 2021, there were a total of 2,241 views of the Settlement Website pages and documents and 318 unique
7 visitors to the Settlement Website. JND will continue to update and maintain the Settlement Website
8 throughout the Settlement administration process.

9 **TOLL-FREE INFORMATION LINE AND EMAIL COMMUNICATIONS**

10 16. On August 18, 2021, JND established a toll-free telephone number, 1-888-691-3561,
11 for Class Members to call and obtain information about the Settlement. The toll-free number is
12 accessible 24 hours a day, 7 days a week.

13 17. As of November 3, 2021, the toll-free number has received 10 incoming calls. JND
14 will continue to maintain the toll-free number throughout the Settlement administration process.

15 18. On August 18, 2021, JND also established a dedicated Settlement email address,
16 info@OPTextClassAction.com, to receive and respond to Class Member email inquiries pertaining to
17 the Settlement.

18 19. As of November 3, 2021, JND has received no emails.

19 **EXCLUSIONS RECEIVED**

20 20. Postcard Notices informed Class Members who wanted to exclude themselves from the
21 Settlement that they must do so by mailing an exclusion letter to JND postmarked on or before October
22 18, 2021. Per Section 6.4.2 of the Settlement Agreement, the exclusion request must include the Class
23 Member’s full name, address, telephone number, a statement requesting to be excluded from the
24 Settlement, and signature.

25 21. As of the date of this Declaration, JND has not received any exclusion requests.

26
27

³ The Email Notice is accessible to view on the Settlement Website, even though not ultimately emailed to Class Members
28 because no email addresses were available.

1 **OBJECTIONS**

2 22. The Postcard Notice informed Class Members who wanted to object to the Settlement
3 that they must do so by filing a written objection with the Court by October 18, 2021.

4 23. As of the date of this declaration, JND is not aware of any Settlement objections.
5

6 **CLAIM FORMS AND LEAD BENEFITS**

7 24. The Postcard Notice informed Class Members who wished to receive Settlement
8 benefits that they may submit a Claim Form online through the Settlement Website or postmarked by
9 mail by October 18, 2021. In addition, the Postcard Notice directed Class Members to call the toll-
10 free information line or visit the Settlement Website to learn how to redeem their 6 free Lead Benefits.⁴

11 25. As of the date of this Declaration, JND has received a total of 37 Claim Forms (29
12 received online and 8 received by mail), of which 31 Claim Forms are valid.

13 26. As of November 3, 2021, JND has not received any requests from Class Members to
14 redeem Lead Benefits.

15 **SETTLEMENT ADMINISTRATION FEES AND EXPENSES**
16 **AND SUMMARY OF WORK**

17 27. As of October 31, 2021, JND has incurred \$46,809.57 in Settlement Administration
18 fees and expenses (which does not include fees and expenses attributed to administering Leads-related
19 services). The Settlement Administration fees and expenses incurred reflect the Settlement
20 Administration work JND has performed pursuant to the Settlement Agreement and Preliminary
21 Approval Order including: (i) obtaining addresses for Settlement Class Members using reverse phone
22 number searches (as described); (ii) performing manual research to obtain additional mailing
23 addresses; (iii) mailing the Postcard Notice to Settlement Class Members; (iv) tracking non-delivered
24 Postcard Notices and taking reasonable steps to re-mail to an updated address; (v) monitoring incoming
25 mail to track and timely report any written requests for exclusion or objections to the Settlement to the

26 _____
27 ⁴ On October 28, 2021, JND learned that the “Redeem Leads” function of the Settlement Website had been inadvertently
28 disabled between October 18, 2021 and October 28, 2021, but the feature was immediately reenabled. At all times, Class
Members have been able to redeem leads by calling the toll-free number.

1 Parties; (vi) tracking and timely reporting Claim Forms submitted electronically and by mail to the
2 Parties; (vii) preparing the reports and declarations relating to administration of the Settlement; (viii)
3 establishing and maintaining the Settlement Website with online claim filing functionality and an
4 online form for Class Members to redeem their Lead Benefits; (ix) receiving and processing Claim
5 Form submissions and validating claims; (x) and establishing a toll-free telephone number and an
6 email address for Settlement Class Members to contact JND.

7 28. JND estimates it will incur \$24,055 in Settlement Administration fees and expenses in
8 the next 12 months from November 2021 through November 2022. JND has agreed that total
9 Settlement Administration fees and expenses will not exceed \$70,865.

10 29. JND will continue to administer the Settlement through all phases of Settlement
11 Administration, as required by the Settlement Agreement, Preliminary Approval Order, and pursuant
12 to any future orders of this Court.

13 I declare under the penalty of perjury pursuant to the laws of the State of Washington that the
14 foregoing is true and correct.

15 Executed on November 5, 2021, in Seattle, Washington.

16 

17
18 VANESSA PADELFFORD

1 **CERTIFICATE OF SERVICE**

2 I, Klarisse Leonor, certify under penalty of perjury under the laws of the State of
3 Washington that I have caused service of a true and correct copy of the foregoing document, to
4 be effected on the following named counsel in the manner identified below:

5
6 Paul Karlsgodt, WSBA No. 40311
James R. Morrison, WSBA No. 43043
Baker & Hostetler LLP [] Via Email
7 999 Third Avenue, Suite 3600 [] Via Messenger
8 Seattle, WA 98104
Phone: 206-332-1380 [] Via U.S. Mail, First Class
9 Fax: 206-624-7317
E-Mail: pkarlsgodt@bakerlaw.com [X] Via King County E-Service
10 jmorrison@bakerlaw.com
11 rmann@bakerlaw.com
jhickman@bakerlaw.com

12 *Attorneys for Defendant Contractors.com LLC*

13
14 DATED this 5th day of November, 2021, at Seattle, Washington.

15 /s/ Klarisse Leonor
16 Klarisse Leonor, Paralegal
17 **HKM EMPLOYMENT ATTORNEYS LLP**
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Exhibit A

*A state court authorized this Notice.
This is not junk-mail, an advertisement,
or a solicitation from a lawyer.*

**You may be eligible for
a payment from a class
action settlement if you
received a text message
from Contractors.com
or One Planet Ops**

*Si desea recibir esta notificación en
español, llámenos o visite nuestra
página web en
www.optextclassaction.com*

*Aaland v. One Planet Settlement
c/o JND Legal Administration
P.O. Box 91414
Seattle, WA 98111*

Claimant ID:

Postal Service: Please do not mark barcode

A settlement has been reached in a class action lawsuit against One Planet Ops Inc. and Contractors.com LLC (collectively “Defendant”) relating to text messages sent by Defendant (the “Text Messages”). The plaintiff claims that Defendant sent the Text Messages in violation of the Washington State Consumer Protection Act. Defendant denies all of the claims and says it did not do anything wrong.

WHO IS INCLUDED? Defendant’s records show you are an individual who may have received a text message from Defendant and, therefore, you may be included in this Settlement as a “Settlement Class Member.”

SETTLEMENT BENEFITS. The Settlement provides two types of benefits to Settlement Class Members: 1) payment of between \$120 and \$1,500, depending on the number of claims received; and 2) six free leads, valued at \$50 each, from Defendant, which provides leads for contractors.

THE ONLY WAY TO RECEIVE A PAYMENT IS TO FILE A CLAIM. To get a Claim Form, visit the website at www.optextclassaction.com or call 1-888-691-3561. The claim deadline is **October 18, 2021**. The website and toll-free number also have information on how to redeem your free leads.

OTHER OPTIONS. If you do nothing, you will remain in the class, you will not be eligible for a payment (but remain eligible to redeem your six free leads), and you will be bound by the decisions of the Court and give up your rights to sue Defendant for the claims resolved by this Settlement. If you do not want to be legally bound by the Settlement, you must exclude yourself by **October 18, 2021**. If you stay in the Settlement, you may object to it by **October 18, 2021**. A more detailed notice is available to explain how to exclude yourself or object. Please visit the website at www.optextclassaction.com or call 1-888-691-3561 for a copy of the more detailed notice. On **November 19, 2021 at 9:00 a.m.**, the Court will hold the Final Approval Hearing to determine whether to approve the Settlement, Class Counsel’s request for attorneys’ fees, costs, and expenses of up to 30 percent of the Total Settlement Value of \$1,529,000 and a service award of \$5,000 for the Class Representative. You or your own lawyer, if you have one, may ask to appear and speak at the hearing at your own cost, but you do not have to. This is only a summary. For more information, call or visit the website below.

www.optextclassaction.com

1-888-691-3561

YOUR INDIVIDUAL LEAD ID IS:

. RETAIN THIS NUMBER TO REDEEM YOUR LEADS.

Exhibit B

You may be eligible for a payment from a class action settlement if you received a text message from Contractors.com or One Planet Ops

Para una notificación en Español, visitar www.optextclassaction.com

A state court authorized this Notice. This is not junk-mail, an advertisement, or a solicitation from a lawyer.

- A settlement has been proposed in a class action lawsuit against Defendants One Planet Ops Inc. and Contractors.com LLC (collectively “Defendant”) relating to text messages sent by Defendant (the “Text Messages”).
- If you received a notification from Defendant, you may be included in this Settlement as a “Settlement Class Member.”
- The Settlement provides payments to people who submit valid claims, as well as a code redeemable for six (6) Leads from Defendant to Settlement Class Members.
- Your legal rights are affected regardless of whether you do or do not act. Read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		
SUBMIT A CLAIM FORM	This is the only way you can get payment.	Submit online or postmark by October 18, 2021
EXCLUDE YOURSELF FROM THE SETTLEMENT	You will not get any payment or free leads from the Settlement, but you also will not release your claims against Defendant. This is the only option that allows you to be part of any other lawsuit against Defendant or related parties for the legal claims resolved by this Settlement.	Postmark by October 18, 2021
OBJECT TO THE SETTLEMENT	Write to the Court with reasons why you do not agree with the Settlement.	File with the Court and postmark to Class Counsel and Defendant’s Counsel by October 18, 2021
GO TO THE FINAL APPROVAL HEARING	You may ask the Court for permission for you or your attorney to speak about your objection at the Final Approval Hearing.	November 19, 2021 at 9:00 a.m.
DO NOTHING	You will not get any payment from this Settlement and you will give up certain legal rights. Submitting a claim form is the only way to obtain payment from this Settlement. Leads may still be redeemed using the code provided on the postcard notice you received.	

- These rights and options—and the deadlines to exercise them—are explained in this Notice. For complete details, view the Class Action Settlement Agreement and Release (“Settlement Agreement”), available at www.optextclassaction.com, or call 1-888-691-3561.
- The Court in charge of this case still has to decide whether to grant final approval the Settlement. Payments will only be made after the Court grants final approval of the Settlement and after any appeals are resolved.

Questions? Call 1-888-691-3561 Toll Free, or Visit www.optextclassaction.com

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION	3
1. Why is this Notice being provided?	3
2. What is this lawsuit about?	3
3. What is a class action?	3
4. Why is there a Settlement?	3
WHO IS INCLUDED IN THE SETTLEMENT?	3
5. How do I know if I am part of the Settlement?	3
6. Are there exceptions to being included in the Settlement?	4
THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY	4
7. What does the Settlement provide?	4
HOW TO GET BENEFITS	4
8. How do I get benefits from the Settlement?	4
9. How will claims be decided?	4
10. When will I get my payment?	5
REMAINING IN THE SETTLEMENT	5
11. Do I need to do anything to remain in the Settlement?	5
12. What am I giving up as part of the Settlement?	5
EXCLUDING YOURSELF FROM THE SETTLEMENT	5
13. If I exclude myself, can I still get payment from the Settlement?	5
14. If I do not exclude myself, can I sue Defendant for the same thing later?	5
15. How do I get out of the Settlement?	6
THE LAWYERS REPRESENTING YOU	6
16. Do I have a lawyer in this case?	6
17. How will Class Counsel be paid?	6
OBJECTING TO THE SETTLEMENT	6
18. How do I tell the Court that I do not like the Settlement?	6
19. What is the difference between objecting to and excluding myself from the Settlement?	7
THE COURT’S FINAL APPROVAL HEARING	7
20. When and where will the Court decide whether to approve the Settlement?	7
21. Do I have to come to the Final Approval Hearing?	7
22. May I speak at the Final Approval Hearing?	8
IF YOU DO NOTHING	8
23. What happens if I do nothing?	8
GETTING MORE INFORMATION	8
24. Are more details about the Settlement available?	8
25. How do I get more information?	8

BASIC INFORMATION

1. Why is this Notice being provided?

The Court directed that this Notice be provided because you have a right to know about a proposed settlement that has been reached in this class action lawsuit and about all of your options before the Court decides whether to grant final approval of the Settlement. If the Court approves the Settlement, and after objections or appeals, if any, are resolved, the Settlement Administrator appointed by the Court will distribute the payments that the Settlement allows. This Notice explains the lawsuit, the Settlement, your legal rights, what payments are available, who is eligible for them, and how to get them.

The Court in charge of this case is the Superior Court of the State of Washington, County of King. The case is known as *Michael Aaland v. Contractors.com LLC, and One Planet Ops Inc.*, Cause No. 19-2-24212-4 SEA (the "Action"). The person who filed the Action is called the Plaintiff and the entities they sued, Defendant, are called the Defendants.

2. What is this lawsuit about?

The Action claims that Defendant sent the Text Messages in violation of the Washington State Consumer Protection Act. The Action seeks, among other things, payment for persons who received such Text Messages.

Defendant has denied and continues to deny all of the claims made in the Action, as well as all charges of wrongdoing or liability against it.

3. What is a class action?

In a class action, one or more people called Class Representatives (in this case, Michael Aaland) sue on behalf of people who have similar claims. Together, all these people are called a Class or Class members. One Court and one judge resolves the issues for all Class members, except for those who exclude themselves from the Settlement Class.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiff or Defendant. Instead, the Plaintiff negotiated a settlement with Defendant that allows both Plaintiff and Defendant to avoid the risks and costs of lengthy and uncertain litigation and the uncertainty of a trial and appeals. It also allows Settlement Class Members to obtain payment without further delay. The Class Representative and his attorneys think the Settlement is in the best interest of all Settlement Class Members. This Settlement does not mean that Defendant did anything wrong.

WHO IS INCLUDED IN THE SETTLEMENT?

5. How do I know if I am part of the Settlement?

You are a part of this Settlement as a Settlement Class Member if you meet the following definition, approved by the Court:

All residents of Washington state with a cellular telephone number to which at least one electronic commercial text message was transmitted by Contractors.com, or someone acting on behalf of Defendant. The Settlement Class is defined to include all persons who could claim to have suffered any injury or could assert any claims as a result of the sending or receipt of Text Messages to the mobile telephone numbers listed in Exhibit 5 of the Parties' Settlement Agreement.

If you have received this notice, then you have been identified as a person who may have received such a Text Message.

Questions? Call 1-888-691-3561 Toll Free, or Visit www.optextclassaction.com.com

6. Are there exceptions to being included in the Settlement?

Yes. Specifically excluded from the Settlement Class are: (i) Defendant and its officers and directors; (ii) all Settlement Class Members who timely and validly request exclusion from the Settlement Class; and (iii) the Judge assigned to evaluate the fairness of this settlement.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

7. What does the Settlement provide?

The Settlement will provide payments to people who submit valid claims. If the Settlement is approved, Defendant will be obligated to make a payment of \$774,500.00, inclusive of all funds necessary to effectuate the Settlement other than internal costs incidental to providing the leads described below. The Gross Settlement Payment includes the Settlement Administration Costs, the Fee Award and Costs, the Class Representative Service Award, and all Individual Settlement Payments to Settlement Class Members who submit a timely and valid Claim Form. Persons who submit a timely and valid claim will be entitled to payment of at least \$120 and up to \$1,500, depending on the number of claims received. The total amount of any unclaimed funds will be paid, subject to Court approval, to the following charity: Downtown Seattle Association.

In addition, Defendant will also provide codes for six (6) redeemable leads. Each lead is valued at \$50.00. In the postcard notice, each Settlement Class Member will receive a unique code to redeem the free leads. To redeem leads using the unique code, go to www.optextclassaction.com or call 1-888-691-3561. You will be asked to provide information that will allow Defendant to tailor the Leads to your business needs. Leads redeemed prior to the time that the Court finally approves the settlement will be provided after the settlement is finally approved and becomes effective. Leads may be redeemed until settlement administration terminates, which is one year after the Effective Date of the settlement, as defined in the Settlement Agreement.

HOW TO GET BENEFITS

8. How do I get benefits from the Settlement?

To ask for a payment, you must complete and Submit a Claim Form. Claim Forms are available at www.optextclassaction.com, or you may request one by mail by calling 1-888-691-3561. Read the instructions carefully, fill out the Claim Form, and submit it online or mail it postmarked no later than **October 18, 2021** to:

Aaland v. One Planet Settlement
c/o JND Legal Administration
PO Box 91414
Seattle, WA 98111

To redeem your free leads, contact Contractors.com either by calling 1-888-691-3561 or visiting www.optextclassaction.com. You will be asked to provide the Lead ID that was provided on the postcard notice you received. If you misplaced the Lead ID from your postcard, you can contact the Settlement Administrator at www.optextclassaction.com, or by calling 1-888-691-3561 to request your Lead ID. Leads must be redeemed before the settlement administration terminates, which is one year after an order approving the settlement becomes final.

9. How will claims be decided?

The Settlement Administrator will initially decide whether the information provided on a Claim Form is complete and valid. The Settlement Administrator may require additional information from any claimant. If the required information is not timely provided, the claim will be considered invalid and will not be paid.

10. When will I get my payment?

The Court will hold a Final Approval Hearing at **9:00 a.m. on November 19, 2021**, to decide whether to approve the Settlement. If the Court approves the Settlement, there may be appeals. It is always uncertain whether any appeals can be resolved favorably, and resolving them can take time, perhaps more than a year. It also takes time for all the Claim Forms to be processed, depending on the number of claims submitted and whether any appeals are filed. Please be patient.

REMAINING IN THE SETTLEMENT

11. Do I need to do anything to remain in the Settlement?

You do not have to do anything to remain in the Settlement, but if you want a payment you must submit a Claim Form online or postmarked by **October 18, 2021**. You are still able to redeem your six free leads as described in Question 8 above.

12. What am I giving up as part of the Settlement?

If the Settlement becomes final, you will give up your right to sue Defendant for the claims being resolved by this Settlement. The specific claims you are giving up against Defendant are described in Section 1.27 of the Settlement Agreement. You will be “releasing” Defendant and all related people or entities as described in Section 1.28 of the Settlement Agreement. The Settlement Agreement is available at www.optextclassaction.com.

The Settlement Agreement describes the Released Claims with specific descriptions, so read it carefully. If you have any questions about what this means you can talk to the law firms listed in Question 16 for free or you can, of course, talk to your own lawyer at your own expense.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from this Settlement, but you want to keep the right to sue Defendant about issues in the Litigation, then you must take steps to get out of the Settlement Class. This is called excluding yourself from – or is sometimes referred to as “opting out” of – the Settlement Class.

13. If I exclude myself, can I still get payment from the Settlement?

No. If you exclude yourself from the Settlement, you will not be entitled to any benefits of the Settlement, but you will not be bound by any judgment in this case.

14. If I do not exclude myself, can I sue Defendant for the same thing later?

No. Unless you exclude yourself from the Settlement, you give up any right to sue Defendant for the claims that this Settlement resolves. You must exclude yourself from the Settlement Class to start your own lawsuit or to be part of any different lawsuit relating to the claims in this case. If you exclude yourself, do not submit a Claim Form to ask for a payment.

15. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must send a letter by mail stating that you want to be excluded from the Settlement in *Michael Aaland v. Contractors.com LLC, and One Planet Ops Inc.*, Cause No. 19-2-24212-4 SEA. Your letter must also include your name, address, and signature. You must mail your exclusion request postmarked no later than **October 18, 2021** to:

Aaland v. One Planet Settlement - Exclusions
c/o JND Legal Administration
PO Box 91414
Seattle, WA 98111

THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer in this case?

Yes. The Court appointed Jason A. Rittreiser, Rachel M. Emens, Henry Brudney, and Donald Heyrich of HKM Employment Attorneys LLP 600 Stewart Street, Suite 901, Seattle, WA 98101 and Peter D. Stutheit of Stutheit Kalin LLC, 308 SW 1st Avenue, Suite 325, Portland, OR 97204 to represent you and other Settlement Class Members. These lawyers are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

17. How will Class Counsel be paid?

If the Settlement is approved and becomes final, Class Counsel will ask the Court to award attorneys' fees, costs, and expenses not to exceed 30 percent of the Total Settlement Value of \$1,529,000. Class Counsel will also request approval of a service award of \$5,000 for the Class Representative.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the Settlement or some part of it.

18. How do I tell the Court that I do not like the Settlement?

If you are a Settlement Class Member, you can object to the Settlement if you do not like it or a portion of it. You can give reasons why you think the Court should not approve the Settlement. The Court will consider your views before making a decision. To object, you must file with the Court and mail copies to Class Counsel and Defendant's Counsel a written notice stating that you object to the Settlement in *Michael Aaland v. Contractors.com LLC, and One Planet Ops Inc.*, Cause No. 19-2-24212-4 SEA.

Your objection must include:

- 1) your full name, address, telephone number, and e-mail address;
- 2) information or proof showing you are a Settlement Class Member;
- 3) the reasons why you object to the Settlement, including any documents supporting your objection;
- 4) the name and address of your attorney if you have retained one;
- 5) the name and address of any attorneys representing you that may appear at the Final Approval Hearing;
- 6) a statement confirming whether you and/or your counsel intend to personally appear and/or testify at the Final Approval Hearing;

Questions? Call 1-888-691-3561 Toll Free, or Visit www.optextclassaction.com.com

- 7) a list, by case name, court, and docket number, of all other cases in which you (directly or through a lawyer) have filed an objection to any proposed class action settlement within the last three years;
- 8) a list, by case name, court, and docket number, of all other cases in which your lawyer (on behalf of any person or entity) has filed an objection to any proposed class action settlement within the last three years;
- 9) your signature or the signature of your attorney or other duly authorized representative (along with documentation illustrating representation).

Your objection must be filed with the Clerk of the Superior Court of the State of Washington, County of King, 516 Third Avenue, Room E-609, Seattle, WA 98104 no later than **October 18, 2021**. You must also mail copies of your objection to Class Counsel and Defendant’s Counsel postmarked no later than **October 18, 2021**, at all of the addresses below.

CLASS COUNSEL	DEFENDANT’S COUNSEL
Jason A. Rittereiser, Rachel M. Emens, Henry Brudney, and Donald Heyrich HKM EMPLOYMENT ATTORNEYS LLP 600 Stewart Street, Suite 901 Seattle, WA 98101 Peter D. Stutheit STUTHEIT KALIN LLC 308 SW 1st Avenue, Suite 325 Portland, OR 97204	Paul G. Karlsgodt BAKER & HOSTETLER LLP 1801 California Street, Suite 4400 Denver, Colorado 80202-2662

19. What is the difference between objecting to and excluding myself from the Settlement?

Objecting is telling the Court that you do not like something about the Settlement. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class. If you exclude yourself from the Settlement, you have no basis to object or submit a Claim Form because the Settlement no longer affects you.

THE COURT’S FINAL APPROVAL HEARING

The Court will hold a hearing to decide whether to approve the Settlement. You may attend and you may ask to speak, but you do not have to. You cannot speak at the hearing if you exclude yourself from the Settlement.

20. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing at **9:00 a.m. on November 19, 2021**, in the Superior Court of the State of Washington, County of King, 516 Third Avenue, Seattle, WA 98104. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will take into consideration any properly-filed written objections and may also listen to people who have asked to speak at the hearing (*see* Question 18). The Court will also decide whether to approve fees and costs to Class Counsel, and the service awards to the Class Representative.

21. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you file an objection, you do not have to come to Court to talk about it. You may also hire your own lawyer to attend, at your own expense, but you are not required to do so.

22. May I speak at the Final Approval Hearing?

Yes, you may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must follow the instructions provided in Question 18 above. You cannot speak at the hearing if you exclude yourself from the Settlement.

IF YOU DO NOTHING

23. What happens if I do nothing?

If you do nothing, you will not receive any compensation from this Settlement but you are still able to redeem your six free leads as described in Question 8 above. If the Court approves the Settlement, you will be bound by the Settlement Agreement and the Release. This means you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendant or related parties about the issues involved in the Action, resolved by this Settlement, and released by the Settlement Agreement.

GETTING MORE INFORMATION

24. Are more details about the Settlement available?

Yes. This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement, which is available at www.optextclassaction.com, or by writing to the Settlement Administrator at *Aaland v. One Planet Settlement.*, c/o JND Legal Administration, P.O. Box 91414, Seattle, WA 98111

25. How do I get more information?

Go to www.optextclassaction.com, call 1-888-691-3561, or write to the Settlement Administrator at *Aaland v. One Planet Settlement.*, c/o JND Legal Administration, P.O. Box 91414, Seattle, WA 98111.

***Please do not call the Court or the Clerk of the Court for additional information.
They cannot answer any questions regarding the Settlement or the Action.***

Exhibit C

Usted puede ser elegible para un pago de un acuerdo de demanda colectiva si recibió un mensaje de texto de Contractors.com o One Planet Ops

Para obtener una notificación en español, visite www.optextclassaction.com

Un tribunal estatal autorizó este aviso. Esto no es un correo no deseado, una publicidad ni una oferta de representación de un abogado.

- Se ha propuesto un acuerdo en una demanda colectiva contra los Demandados One Planet Ops Inc. y Contractors.com LLC (colectivamente “Demandado”) en relación con los mensajes de texto enviados por el Demandado (los “Mensajes de Texto”).
- Si usted recibió una notificación del Demandado, puede estar incluido en este Acuerdo como “Miembro del grupo de demandantes”.
- El Acuerdo proporciona pagos a las personas que presenten reclamos válidos, así como un código canjeable por seis (6) Contactos del Demandado a los Miembros del grupo de demandantes.
- Sus derechos legales se verán afectados independientemente de que usted actúe o no. Lea cuidadosamente este aviso.

SUS DERECHOS LEGALES Y OPCIONES EN ESTE ACUERDO DE CONCILIACIÓN		
PRESENTAR UN FORMULARIO DE RECLAMO	Esta es la única manera de obtener un pago.	Debe enviarlo por Internet o con sello postal no posterior al 18 de octubre de 2021 .
EXCLUIRSE DEL ACUERDO DE CONCILIACIÓN	Usted no obtendrá ningún pago ni contactos gratuitos del Acuerdo, pero tampoco renunciará a sus reclamos contra el Demandado. Esta es la única opción que le permite formar parte de alguna otra demanda contra el Demandado o partes relacionadas con respecto a los reclamos legales resueltos en este Acuerdo.	Sello postal de, a más tardar, el 18 de octubre de 2021
OBJETAR EL ACUERDO DE CONCILIACIÓN	Escriba al Tribunal las razones por las que no acepta el Acuerdo.	Debe presentarlo ante el Tribunal y enviar por correo postal al abogado del grupo y al abogado del Demandado antes del 18 de octubre de 2021
IR A LA AUDIENCIA DE APROBACIÓN DEFINITIVA	Usted o su abogado puede pedir permiso al Tribunal para hablar sobre su objeción en la audiencia de aprobación definitiva.	19 de noviembre de 2021 a las 9:00 a. m.
NO HACER NADA	Usted no recibirá ningún pago de este Acuerdo y renunciará a ciertos derechos legales. La única forma de obtener un pago en este Acuerdo es presentando un formulario de reclamo. Los contactos pueden seguir siendo canjeados con el código proporcionado en el aviso postal que recibió.	

- Estos derechos y opciones, y los plazos para ejercerlos, se explican en este Aviso. Para obtener detalles completos, consulte el Acuerdo de Conciliación y Exención de la Demanda Colectiva (“Acuerdo de Conciliación”), disponible en www.optextclassaction.com o llame al 1-888-691-3561.
- El Tribunal a cargo de esta causa todavía debe decidir si otorga aprobación definitiva o no al Acuerdo. Los pagos solo se efectuarán después de que el Tribunal conceda la aprobación definitiva del Acuerdo y de que se resuelvan las apelaciones.

¿Tiene preguntas? Llame gratis al 1-888-691-3561 o visite www.optextclassaction.com

QUÉ SE INCLUYE EN ESTE AVISO

INFORMACIÓN BÁSICA	3
1. ¿Por qué se proporciona este Aviso?	3
2. ¿De qué trata esta demanda?	3
3. ¿Qué es una demanda colectiva?	3
4. ¿Por qué existe un Acuerdo de Conciliación?	3
¿QUIÉN ESTÁ INCLUIDO EN EL ACUERDO?	3
5. ¿Cómo sé si formo parte del Acuerdo?	3
6. ¿Existen excepciones para estar incluido en el Acuerdo?	4
LOS BENEFICIOS DEL ACUERDO: LO QUE OBTIENE SI CUALIFICA	4
7. ¿Qué dispone el Acuerdo de Conciliación?	4
CÓMO OBTENER BENEFICIOS	4
8. ¿Cómo obtengo beneficios del acuerdo?	4
9. ¿Cómo se decidirá los reclamos?	5
10. ¿Cuándo recibiré mi pago?	5
PERMANECER EN EL ACUERDO	5
11. ¿Tengo que hacer algo para permanecer en el acuerdo de conciliación?	5
12. ¿A qué renuncio al formar parte de la Conciliación?	5
EXCLUIRSE DE LA CONCILIACIÓN	5
13. Si me excluyo, ¿todavía puedo obtener un pago de la Conciliación?	5
14. Si no me excluyo, ¿puedo demandar al Demandado por el mismo asunto más adelante?	5
15. ¿Cómo me excluyo del Acuerdo de Conciliación?	6
LOS ABOGADOS QUE LO REPRESENTAN	6
16. ¿Tengo un abogado en este caso?	6
17. ¿Cómo se les pagará a los Abogados del grupo?	6
OBJETAR LA CONCILIACIÓN	6
18. ¿Cómo le indico al Tribunal que no me agrada el Acuerdo?	6
19. ¿Cuál es la diferencia entre excluirme y objetar el Acuerdo de Conciliación?	7
AUDIENCIA DE APROBACIÓN DEFINITIVA DEL TRIBUNAL	7
20. ¿Cuándo y dónde decidirá el Tribunal si aprueba el Acuerdo de Conciliación?	7
21. ¿Debo asistir a la Audiencia de Aprobación Definitiva?	7
22. ¿Puedo hablar en la Audiencia de aprobación definitiva?	8
SI NO HICIERA NADA	8
23. ¿Qué sucede si no hago nada?	8
OBTENER MÁS INFORMACIÓN	8
24. ¿Hay más detalles sobre el Acuerdo de Conciliación?	8
25. ¿Cómo obtengo más información?	8

INFORMACIÓN BÁSICA

1. ¿Por qué se proporciona este Aviso?

Un Tribunal ordenó que se enviara este Aviso debido a que usted tiene derecho a saber que se ha llegado a una propuesta de acuerdo en esta demanda colectiva y conocer todas sus opciones antes de que el Tribunal decida darle la aprobación definitiva al Acuerdo. Si el Tribunal aprueba el Acuerdo, y después de que se resuelvan todas las objeciones o apelaciones, un administrador del acuerdo de conciliación designado por el Tribunal hará los pagos que el Acuerdo permita. Este Aviso explica la demanda, el Acuerdo, sus derechos legales, los pagos disponibles, quién puede tener derecho a recibirlos y cómo obtenerlos.

El Tribunal encargado de este caso es el Tribunal Superior del estado de Washington, Condado de King. El caso se conoce como *Michael Aaland v. Contractors.com LLC, and One Planet Ops Inc.*, Causa N.º 19-2-24212-4 SEA (la “Demanda”). La persona que presentó la Demanda se llama el Demandante y las entidades a las que demandó se llaman los Demandados.

2. ¿De qué trata esta demanda?

En la Demanda se alega que el Demandado envió los Mensajes de Texto infringiendo la Ley de Protección al Consumidor del Estado de Washington. La Demanda pretende, entre otras cosas, un pago para las personas que recibieron dichos Mensajes de Texto.

El Demandado ha negado y continúa negando todos los reclamos hechos en la Demanda, así como todos los cargos de irregularidades y responsabilidad en su contra.

3. ¿Qué es una demanda colectiva?

En una demanda colectiva, una o más personas denominadas los Representantes del grupo de demandantes (en este caso, Michael Aaland) demandan en nombre de personas que tienen reclamos similares. Juntas, todas estas personas se denominan “Grupo de demandantes” o “Miembros del grupo de demandantes”. Un Tribunal y un juez resuelven los asuntos para todos los Miembros del grupo de demandantes, excepto para aquellos que se excluyan del grupo.

4. ¿Por qué existe un Acuerdo de Conciliación?

El Tribunal no ha pronunciado una decisión ni a favor del Demandante ni a favor del Demandado. En su lugar, el Demandante negoció un acuerdo con el Demandado que permite tanto al Demandante como al Demandado evitar los riesgos y los costos de un litigio largo e incierto y la incertidumbre de un juicio y las apelaciones. También permite a los Miembros del grupo de demandantes obtener el pago sin más demora. Los Representantes del grupo y sus abogados creen que el Acuerdo de Conciliación es lo mejor para todos los Miembros del grupo de demandantes. Este Acuerdo no significa que el Demandado haya hecho algo incorrecto.

¿QUIÉN ESTÁ INCLUIDO EN EL ACUERDO?

5. ¿Cómo sé si formo parte del Acuerdo?

Usted forma parte de este Acuerdo como Miembro del grupo del acuerdo de la demanda colectiva si cumple con la siguiente definición, aprobada por el Tribunal:

Todos los residentes del estado de Washington con un número de teléfono celular al que Contractors.com, o alguien que actúe en nombre del Demandado, transmitió al menos un mensaje de texto comercial electrónico. La definición de Grupo del Acuerdo en la Demanda Colectiva incluye a todas las personas que podrían alegar haber sufrido algún perjuicio o podrían hacer valer algún reclamo como resultado del envío o la recepción de Mensajes de Texto a los números de teléfono móvil enumerados en el Anexo 5 del Acuerdo de Conciliación de las Partes.

¿Tiene preguntas? Llame gratis al 1-888-691-3561 o visite www.optextclassaction.com.com

Si usted ha recibido este aviso, entonces ha sido identificado como una persona que puede haber recibido dicho Mensaje de Texto.

6. ¿Existen excepciones para estar incluido en el Acuerdo?

Sí. Se excluyen específicamente del Grupo del acuerdo de conciliación: (i) el Demandado y sus funcionarios y directores; (ii) todos los Miembros del grupo del acuerdo que soliciten oportuna y válidamente su exclusión del Grupo; y (iii) el Juez asignado para evaluar la imparcialidad de este acuerdo.

LOS BENEFICIOS DEL ACUERDO: LO QUE OBTIENE SI CUALIFICA

7. ¿Qué dispone el Acuerdo de Conciliación?

El Acuerdo proporcionará pagos a las personas que presenten reclamos válidos. Si se aprueba el Acuerdo, el Demandado estará obligado a realizar un pago de \$774,500.00, incluidos todos los fondos necesarios para cumplir con el Acuerdo, aparte de los costos internos relacionados con la provisión de los contactos que se describen a continuación. El pago bruto del acuerdo incluye los costos de administración del acuerdo, la adjudicación de honorarios y costas, la adjudicación de servicios del representante del grupo y todos los pagos individuales del acuerdo a los miembros del grupo que presenten en tiempo y forma un formulario de reclamo. Las personas que presenten un reclamo en tiempo y forma tendrán derecho a un pago de al menos \$120 y hasta \$1500, dependiendo del número de reclamos recibidos. El importe total de los fondos no reclamados se pagará, sujeto a la aprobación del Tribunal, a la siguiente organización benéfica: Downtown Seattle Association.

Además, el Demandado también proporcionará códigos para seis (6) contactos canjeables. Cada contacto tiene un valor de \$50.00. En el aviso postal, cada miembro del grupo del acuerdo recibirá un código único para canjear los contactos gratuitos. Para canjear los contactos utilizando el código único, visite www.optextclassaction.com o llame al 1-888-691-3561. Se le pedirá que proporcione información que permita al Demandado adaptar los Contactos a las necesidades de su negocio. Los Contactos canjeados antes del momento en que el Tribunal apruebe definitivamente el acuerdo se proporcionarán después de que sea aprobado definitivamente y entre en vigor. Los Contactos pueden canjearse hasta que la administración del acuerdo termine, lo cual es un año después de la fecha de entrada en vigor del acuerdo, tal como se define en el Acuerdo de Conciliación.

CÓMO OBTENER BENEFICIOS

8. ¿Cómo obtengo beneficios del acuerdo?

Para recibir un pago, debe completar y presentar un Formulario de Reclamo válido. Los Formularios de reclamo están disponibles en www.optextclassaction.com, o puede solicitar uno por correo postal llamando al 1-888-691-3561. Lea atentamente las instrucciones, rellene el Formulario de Reclamo y envíelo por Internet o por correo con sello postal a más tardar de fecha **18 de octubre de 2021** a:

Aaland v. One Planet Settlement
c/o JND Legal Administration
PO Box 91414
Seattle, WA 98111

Para canjear sus contactos gratuitos, póngase en contacto con Contractors.com llamando al 1-888-691-3561 o visitando www.optextclassaction.com. Se le pedirá que proporcione el identificador de contactos que figuraba en el aviso postal que recibió. Si ha extraviado el identificador de contactos de su aviso postal, puede ponerse en contacto con el administrador del acuerdo en www.optextclassaction.com o llamar al 1-888-691-3561 para solicitar su identificador de contactos. Los contactos deben ser canjeados antes de que finalice la administración del acuerdo, es decir, un año después de que la orden de aprobación del acuerdo sea definitiva.

9. ¿Cómo se decidirá los reclamos?

El administrador del acuerdo decidirá inicialmente si la información proporcionada en un formulario de reclamo es completa y válida. El administrador del acuerdo puede solicitar información adicional a cualquier reclamante. Si la información requerida no se proporciona a tiempo, el reclamo se considerará inválido y no se pagará.

10. ¿Cuándo recibiré mi pago?

El Tribunal llevará a cabo una Audiencia de aprobación definitiva el **19 de noviembre de 2021 a las 9:00 a. m.** para decidir si aprueba o no el Acuerdo de Conciliación. Aun cuando el Tribunal aprobase el Acuerdo de Conciliación, puede haber apelaciones. Nunca hay certeza de que las apelaciones puedan resolverse favorablemente, y su resolución puede llevar tiempo, quizá más de un año. También se necesita tiempo para procesar todos los formularios de reclamos, dependiendo del número de reclamos presentados y de si se presentan apelaciones. Le solicitamos que tenga paciencia.

PERMANECER EN EL ACUERDO

11. ¿Tengo que hacer algo para permanecer en el acuerdo de conciliación?

No tiene que hacer nada para permanecer en el Acuerdo, pero si desea recibir un pago debe presentar un Formulario de Reclamo por Internet o por correo con sello postal anterior al **18 de octubre de 2021**. Todavía puede canjear sus seis contactos como se describe en la pregunta 8.

12. ¿A qué renuncio al formar parte de la Conciliación?

Si el Acuerdo se convierte en definitivo, usted renunciará a su derecho de demandar al Demandado por los reclamos que se resuelven en él. Los reclamos específicos a los que usted renuncia contra el Demandado se describen en la Sección 1.27 del Acuerdo de Conciliación. Usted “exonerará” al Demandado y a todas las personas o entidades relacionadas como se describe en la Sección 1.28 del Acuerdo de Conciliación. El Acuerdo de Conciliación está disponible en www.optextclassaction.com.

El Acuerdo de Conciliación describe los Reclamos exonerados con descripciones específicas, así que léalo atentamente. Si tiene alguna duda sobre lo que esto significa, puede hablar gratuitamente con los bufetes de abogados que figuran en la pregunta 16 o, por supuesto, puede hablar con su propio abogado por su cuenta y cargo.

EXCLUIRSE DE LA CONCILIACIÓN

Si no desea recibir un pago de esta Conciliación, pero quiere mantener el derecho de demandar al Demandado sobre cuestiones del Litigio, debe tomar medidas para excluirse del Grupo de demandantes. Esto se denomina excluirse o, en ocasiones, se hace referencia a ello como “optar por no participar” del Grupo de demandantes.

13. Si me excluyo, ¿todavía puedo obtener un pago de la Conciliación?

No. Si se excluye de la Conciliación, no tendrá derecho a recibir ningún beneficio en virtud de ella, pero no quedará obligado por ningún fallo dictado en este caso.

14. Si no me excluyo, ¿puedo demandar al Demandado por el mismo asunto más adelante?

No. A menos que se excluya, usted renuncia al derecho a demandar al Demandado por los mismos reclamos que el Acuerdo resuelva. Debe excluirse del Grupo del acuerdo para iniciar su propia demanda o para ser parte de cualquier otra demanda relacionada con los reclamos de este caso. Si se excluye del acuerdo, no envíe un Formulario de Reclamo para solicitar un pago.

15. ¿Cómo me excluyo del Acuerdo de Conciliación?

Para excluirse, debe enviar una carta por correo postal indicando que desea ser excluido del Acuerdo en *Michael Aaland v. Contractors.com LLC, and One Planet Ops Inc.*, Causa N.º 19-2-24212-4 SEA. Su carta también debe incluir su nombre, dirección y firma. Debe enviar por correo su solicitud de exclusión con sello postal no posterior al **18 de octubre de 2021** a:

Aaland v. One Planet Settlement. - Exclusiones
c/o JND Legal Administration
PO Box 91414
Seattle, WA 98111

LOS ABOGADOS QUE LO REPRESENTAN

16. ¿Tengo un abogado en este caso?

Sí. El Tribunal designó a Jason A. Rittreiser, Rachel M. Emens, Henry Brudney y Donald Heyrich de HKM Employment Attorneys LLP 600 Stewart Street, Suite 901, Seattle, WA 98101 y a Peter D. Stutheit de Stutheit Kalin LLC, 308 SW 1st Avenue, Suite 325, Portland, OR 97204 para que lo representen a usted y a otros miembros del grupo del acuerdo de conciliación. Estos abogados se denominan los Abogados del Grupo. No se le cobrará por los servicios de estos abogados. Si desea que lo representase su propio abogado, podrá contratar uno y asumir el cargo.

17. ¿Cómo se les pagará a los Abogados del grupo?

Si el Acuerdo se aprueba y se convierte en definitivo, los Abogados del Grupo pedirán al Tribunal que conceda los honorarios de los abogados, las costas y los gastos que no superen el 30 por ciento del Valor Total del Acuerdo de \$1,529,000. Los Abogados del Grupo también solicitarán la aprobación de una compensación por servicios de \$5,000 para el Representante del Grupo.

OBJETAR LA CONCILIACIÓN

Puede indicarle al Tribunal que no está conforme con el Acuerdo de Conciliación o con cualquier parte de este.

18. ¿Cómo le indico al Tribunal que no me agrada el Acuerdo?

Si es miembro del grupo de demandantes, puede objetar el Acuerdo si hubiera alguna parte que no le agrada. Puede dar las razones por las que cree que el Tribunal no debería aprobar el Acuerdo. El Tribunal considerará sus opiniones antes de tomar una decisión. Para objetar, debe presentar ante el Tribunal y enviar por correo copias a los Abogados del Grupo y a los Abogados del Demandado una notificación escrita en la que declare que objeta al Acuerdo en *Michael Aaland v. Contractors.com LLC, and One Planet Ops Inc.*, Causa N.º 19-2-24212-4 SEA.

Su objeción debe incluir:

- 1) su nombre completo, dirección, número de teléfono y dirección de correo electrónico;
- 2) información o pruebas que demuestren que usted es un miembro del grupo de demandantes;
- 3) las razones por las que se opone al Acuerdo, incluyendo cualquier documento que apoye su objeción;
- 4) el nombre y la dirección de su abogado, si ha contratado uno;
- 5) el nombre y la dirección de cualquier abogado que lo represente y que pueda comparecer en la Audiencia de aprobación definitiva;
- 6) una declaración que confirme si pretende comparecer y/o testificar en la Audiencia de aprobación definitiva, ya sea personalmente o por medio de su abogado;
- 7) una lista, por nombre de caso, tribunal y número de expediente, de todos los demás casos en los que usted (directamente o a través de un abogado) haya presentado una objeción a cualquier acuerdo de demanda colectiva propuesto en los últimos tres años;

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- 8) una lista, por nombre de caso, tribunal y número de expediente, de todos los demás casos en los que su abogado (en nombre de cualquier persona o entidad) haya presentado una objeción a cualquier acuerdo de demanda colectiva propuesto en los últimos tres años;
- 9) su firma o la firma de su abogado u otro representante debidamente autorizado (junto con la documentación que ilustre la representación).

Su objeción debe presentarse ante el secretario del Tribunal Superior del estado de Washington, Condado de King, 516 Third Avenue, Sala E-609, Seattle, WA 98104 a más tardar el **18 de octubre de 2021**. También debe enviar por correo copias de su objeción a los Abogados del Grupo y a los Abogados del Demandado con sello postal no posterior al **18 de octubre de 2021**, a todas las direcciones indicadas a continuación.

ABOGADOS DEL GRUPO	ABOGADOS DEL DEMANDADO
Jason A. Rittereiser, Rachel M. Emens, Henry Brudney y Donald Heyrich HKM EMPLOYMENT ATTORNEYS LLP 600 Stewart Street, Suite 901 Seattle, WA 98101 Peter D. Stutheit STUTHEIT KALIN LLC 308 SW 1st Avenue, Suite 325 Portland, OR 97204	Paul G. Karlsgodt BAKER & HOSTETLER LLP 1801 California Street, Suite 4400 Denver, Colorado 80202-2662

19. ¿Cuál es la diferencia entre excluirme y objetar el Acuerdo de Conciliación?

Objetar es decirle al Tribunal que no le agrada algo del Acuerdo de Conciliación. Excluirse es decirle al Tribunal que no quiere ser parte del Grupo de la Conciliación. Si se excluye, no tiene fundamento para objetar o presentar un Formulario de Reclamo porque el Acuerdo ya no le afecta.

AUDIENCIA DE APROBACIÓN DEFINITIVA DEL TRIBUNAL

El Tribunal llevará a cabo una audiencia para decidir si aprueba o no el Acuerdo de Conciliación. Puede asistir y pedir la palabra, pero no tiene obligación de hacerlo. No puede pedir la palabra en la Audiencia si se excluye de la Conciliación.

20. ¿Cuándo y dónde decidirá el Tribunal si aprueba el Acuerdo de Conciliación?

El Tribunal celebrará una Audiencia de aprobación definitiva a las **9:00 a. m. del 19 de noviembre de 2021**, en el Tribunal Superior del Estado de Washington, Condado de King, 516 Third Avenue, Seattle, WA 98104. En esta audiencia, el Tribunal considerará si el Acuerdo es justo, razonable y adecuado. El Tribunal tendrá en cuenta las objeciones escritas debidamente presentadas y también podrá escuchar a las personas que hayan solicitado intervenir en la audiencia (*véase* la pregunta 18). El Tribunal también decidirá si aprueba los honorarios y las costas de los Abogados del Grupo, así como las compensaciones por servicio al Representante del Grupo.

21. ¿Debo asistir a la Audiencia de Aprobación Definitiva?

No, los Abogados del grupo responderán cualquier pregunta que pudiese tener el Tribunal. No obstante, puede asistir a la audiencia por su cuenta y cargo. Si envía una objeción, no tiene obligación de asistir al Tribunal para explicarla. También puede contratar a su propio abogado para que asista, por su cuenta y cargo, pero no está obligado a hacerlo.

22. ¿Puedo hablar en la Audiencia de aprobación definitiva?

Sí, puede solicitarle permiso al Tribunal para hablar en la Audiencia de aprobación definitiva. Para ello, debe seguir las instrucciones indicadas en la pregunta 18. No puede pedir la palabra en la Audiencia si se excluye de la Conciliación.

SI NO HICIERA NADA

23. ¿Qué sucede si no hago nada?

Si no hace nada, no recibirá ninguna compensación de este Acuerdo, pero podrá canjear sus seis contactos como se describe en la pregunta 8. Si el Tribunal aprueba el Acuerdo, usted quedará obligado por el Acuerdo de Conciliación y la Exención. Esto significa que no podrá comenzar un litigio, continuar un litigio o formar parte de cualquier otro litigio en contra del Demandado o cualquiera de las partes sobre los asuntos involucrados en la Demanda, resueltos por esta conciliación y exonerados por el Acuerdo de Conciliación.

OBTENER MÁS INFORMACIÓN

24. ¿Hay más detalles sobre el Acuerdo de Conciliación?

Sí. En este Aviso, se resume el Acuerdo de Conciliación propuesto. Encontrará más detalles en el Acuerdo de Conciliación, que está disponible en www.optextclassaction.com, o puede escribir al administrador del acuerdo a *Aaland v. One Planet Settlement*, c/o JND Legal Administration, P.O. Box 91414, Seattle, WA 98111

25. ¿Cómo obtengo más información?

Visite www.optextclassaction.com, llame al 1-888-691-3561 o escriba al administrador del acuerdo a *Aaland v. One Planet Settlement*, c/o JND Legal Administration, P.O. Box 91414, Seattle, WA 98111.

***No llame al Tribunal o al secretario del Tribunal para obtener información adicional.
Ellos no pueden responder a ninguna pregunta sobre el Acuerdo o la Demanda.***

Exhibit D

claims resolved by this Settlement. If you do not want to be legally bound by the Settlement, you must exclude yourself by **October 18, 2021**. If you stay in the Settlement, you may object to it by **October 18, 2021**. A more detailed notice is available to explain how to exclude yourself or object. Please visit the website at www.optextclassaction.com or call 1-888-691-3561 for a copy of the more detailed notice. On **November 19, 2021, at 9:00 a.m.**, the Court will hold a Final Approval Hearing to determine whether to approve the Settlement, Class Counsel's request for attorneys' fees, costs, and expenses of up to 30 percent of the Total Settlement Value of \$1,529,000 and a service award of \$5,000 for the Representative Plaintiff. You or your own lawyer, if you have one, may ask to appear and speak at the hearing at your own cost, but you do not have to. This is only a summary. For more information, call or visit the website below.

Aaland v. One Planet Settlement
c/o JND Legal Administration
PO Box 91414
Seattle, WA 98111

Toll-Free: 1-888-691-3561

Website: www.optextclassaction.com

Email: info@optextclassaction.com

PLEASE DO NOT CONTACT THE COURT OR THE COURT CLERK'S OFFICE

To unsubscribe, please click on the following link: [unsubscribe](#)

Exhibit E

CLAIM FORM

Your claim must be
either submitted online
or postmarked and
mailed by:
October 18, 2021

Aaland v. One Planet Settlement
c/o JND Legal Administration
PO Box 91414
Seattle, WA 98111

Toll-Free: 1-888-691-3561
E-mail: info@optextclassaction.com
Website: www.optexclassaction.com

If you received a text message from Contractors.com or One Planet Ops ("Defendant"), you may submit an electronic Claim Form online at www.optextclassaction.com, or mail a completed paper Claim Form to the Settlement Administrator at the address listed below. If (1) you fill out this claim form, (2) the settlement is approved, and (3) you are found to be eligible for a payment, you will receive a check for a minimum of \$120 and a maximum of \$1,500. Even if you do not submit this claim form, you are eligible for six free leads from Defendant, with each valued at \$50.

The Settlement Notice describes your legal rights and options. Please visit the official Settlement Website at www.optextclassaction.com or call 1-888-691-3561 for more information.

If you wish to submit a claim for a Settlement Payment, you need to provide the information requested below. Please type or print clearly in blue or black ink. This Claim Form must be submitted online OR mailed and postmarked by **October 18, 2021**.

1. CLASS MEMBER INFORMATION

Name (required):

Address including number, street and apt. or suite no. (required):

City (required):

State (required):

Zip (required):

Email Address (optional):

Phone Number (required)

Questions? Visit www.optextclassaction.com or call toll-free at 1-888-691-3561
To view JND's privacy policy, please visit <https://www.jndla.com/privacy-policy>

2. PAYMENT ELIGIBILITY INFORMATION

Please review the Settlement Notice and sections 1.27 and 3.1 through 3.3 of the Settlement Agreement (available at www.optextclassaction.com) for more information on who is eligible for a payment and the nature of the settlement benefits.

PLEASE PROVIDE THE INFORMATION LISTED BELOW:

Check the following box to confirm that you received a text message from Defendant:

3. SIGN AND DATE YOUR CLAIM FORM

I declare under penalty of perjury under the laws of the United States and the laws of my state of residence that the information supplied in this Claim Form by the undersigned is true and correct to the best of my recollection, and that this form was executed on the date set forth below.

I understand that I may be asked to provide supplemental information by the Settlement Administrator before my claim will be considered complete and valid.

Signature: _____

Date (month/day/year): _____

Printed Name: _____

4. MAIL YOUR CLAIM FORM

This claim form must be submitted online at www.optextclassaction.com or postmarked by **October 18, 2021** and mailed to:

Aaland v. One Planet Settlement
c/o JND Legal Administration
PO Box 91414
Seattle, WA 98111

5. REDEEM YOUR FREE LEADS

Your six (6) free leads may be redeemed using the Lead ID provided on the postcard notice you received. To redeem your leads, call 1-888-691-3561 or visit www.optextclassaction.com. You will be asked to provide information, including your specialty or preferred project types for opening an account to allow Contractors.com to tailor leads to your business. If you misplaced the Lead ID from your postcard, you may contact the Settlement Administrator at www.optextclassaction.com or by calling 1-888-691-3561 to request your Lead ID. Leads redeemed prior to the date the Court finally approves the settlement will be made available after the Court grants final approval.

Questions? Visit www.optextclassaction.com or call toll-free at 1-888-691-3561
To view JND's privacy policy, please visit <https://www.jndla.com/privacy-policy>