

WHAT IS THIS LAWSUIT ABOUT?

Inmer Campos-Carranza and Joseph Agyeman (the “Plaintiffs”) sued Credit Plus in federal court because they believe that Credit Plus violated a law, the Fair Credit Reporting Act (“FCRA”). The FCRA, at 15 U.S.C. § 1681e(b), requires that a reseller of consumer reports, like Credit Plus, maintain reasonable procedures to ensure maximum possible accuracy of the information it includes in consumer reports. The Plaintiffs alleged that Credit Plus willfully violated this provision of the FCRA when it included a MERS Report with information that indicated Plaintiffs had mortgage liens with an “inactive” status, without indicating whether the mortgage lien was paid-in-full, transferred to another servicer, foreclosed, or discharged in bankruptcy. Plaintiffs alleged that this practice of using “inactive” as a status is incomplete or misleading and can cause the mortgage underwriting process to be delayed or result in other problems with underwriting.

Credit Plus denies that a MERS Report is a consumer report under the FCRA, that it did anything wrong, or that it violated any laws.

The Court has not made a determination that a MERS Report is a consumer report under the FCRA or that Credit Plus violated the FCRA. This notice should not be interpreted as an expression of the Court’s opinion on the merits of the lawsuit.

Within the Settlement, you are a member of the “Settlement Class.” It is defined to include: all consumers whom Credit Plus’ records reflect had a current address in Virginia at the time that a Credit Plus MERS Report with a mortgage status field indicating “inactive” was ordered between February 4, 2014 through September 19, 2016.

WHAT CAN I GET OUT OF THE SETTLEMENT?

A \$750,000.00 Global Settlement Fund will be used to make cash payments to the Settlement Class Members, as well as to pay Attorneys’ Fees and Costs, Service Awards to the Plaintiffs, and Notice and Administration Expenses. You have the right to submit a claim for your *pro rata* portion of the Net Cash Payment if you applied for a mortgage or mortgage refinance between February 4, 2014 to September 19, 2016, and you believe your application was delayed, denied, or subject to additional scrutiny. The Net Cash Payment is the amount to be paid to Settlement Class Members after deduction from the Global Settlement Fund of the Attorneys’ Fees and Costs, Service Awards, and Notice and Administration Expenses.

You must submit the enclosed Claim Form to receive a cash payment. (A copy of the Claim Form is also available at www.InactiveLitigation.com). The Claim Form deadline is January 27, 2017. The average payment is estimated to be approximately \$142.78 if ten percent (10%) of all class members, or approximately 3,070 class members, submit a Claim Form.

All Settlement Class Members, including those who do not submit a Claim Form, may request their archived tri-merge credit report and MERS Report from Credit Plus. You can do this at any time and for no charge. To request your reports, you must include in your written request to Credit Plus all of the following: (a) “Pursuant to the Settlement in *Campos-Carranza et al. v. Credit Plus, Inc.*, I am requesting my archived tri-merge credit report and MERS Report.”, (b) full name, (c) last four digits of social security number, (d) Credit Order ID (as identified on the Claim Form attached to this Mail Notice), (e) the address to which the archived reports should be sent, (f) a copy of your photo identification. Requests shall be sent to: Credit Plus, Inc., ATTN: Danielle Harman, 31550 Winterplace Parkway, Salisbury, MD 21804.

WHO ARE THE ATTORNEYS REPRESENTING THE CLASS AND HOW WILL THEY BE PAID?

The Court has appointed lawyers to represent the Settlement Class, but you may enter an appearance in the case through an attorney if you want. If you do so, you will have to pay for your own lawyer. The attorneys who have been appointed by the Court to represent the Settlement Class are: Kristi C. Kelly and Andrew J. Guzzo of Kelly & Crandall, PLC; and Leonard A. Bennett and Craig Marchiando of Consumer Litigation Associates, PC.

Subject to Court approval, Settlement Class Counsel will seek Attorneys’ Fees and Costs in an amount not to exceed \$225,000.00. Settlement Class Counsel will also seek a Service Award to be paid to Mr. Campos-Carranza and Mr. Agyeman in the amount not to exceed \$5,000.00 each for their services in representing the Settlement Class. These

A FEDERAL COURT ORDERED THIS NOTICE. THIS IS NOT A SOLICITATION FROM A LAWYER.

Attorneys' Fees and Costs and Service Award payments will be paid from the Global Settlement Fund. The Notice and Administrative Expenses, estimated to be \$86,000.00 and also subject to Court approval, will also be paid from the Global Settlement Fund.

WHAT RIGHTS AM I GIVING UP IN THIS SETTLEMENT?

You give up your right to sue or file a lawsuit seeking statutory damages and punitive damages against Credit Plus for its inclusion of an "inactive status" on a MERS Report it appended to your tri-merge credit report. If you decide to submit a claim, you will also release your actual damages. Giving up your legal claims is called a release.

IF I CHOOSE TO DO SO, HOW DO I EXCLUDE MYSELF FROM THE SETTLEMENT?

If you wish to be excluded from the Settlement, you must mail a written request for exclusion to the Settlement Administrator at: Exclusion Requests – "Exclusion—*Campos-Carranza v. Credit Plus* Settlement Administrator" at P.O. Box 1367, Blue Bell, PA 19422. Your request for exclusion must be in writing and postmarked on or before January 27, 2017. The request must state: "I do not want to be part of the Settlement Class in *Campos-Carranza v. Credit Plus*." The request must be signed and include your name, address, telephone number, and last four digits of your social security number. You cannot send an exclusion for someone else and you cannot exclude a group of class members. The address you use on your exclusion request should be the address to which this Notice was mailed. If you have a new address, please also inform us of the new address so we can update the appropriate records.

HOW DO I TELL THE COURT I DON'T LIKE SOMETHING ABOUT THE SETTLEMENT?

You may object to all or part of the Settlement if you think it is not fair, reasonable, and/or adequate. You must file with the Court and serve on counsel a written explanation of the reasons you think that the Court should not approve the Settlement. You must sign the letter and include your name, address, and your objection on "*Campos-Carranza v. Credit Plus, Inc.*, Civil Action No. 1:16cv120." The deadline to file an objection and to serve it on each of the lawyers is January 27, 2017. The attorneys are:

Kristi C. Kelly KELLY & CRANDALL, PLC 4084 University Drive, Suite 202A Fairfax, VA 22030 <i>Counsel for Plaintiffs</i>	Julia K. Whitelock GORDON REES SCULLY MANSUKHANI, LLP 1300 I Street, NW, Suite 825 Washington, DC 20005 <i>Counsel for Credit Plus, Inc.</i>
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The Court and Settlement Class Counsel will consider your views in deciding whether the Settlement should be approved.

WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?

The Court will hold a Fairness Hearing on February 17, 2017, at 10:00 a.m. The hearing will be held in the Albert V. Bryan U.S. Courthouse, 401 Courthouse Square, Alexandria, VA 22314. At the Fairness Hearing, the Court will consider whether the proposed settlement is fair, reasonable, and adequate. The Court will hear objections to the Settlement, if any. We do not know how long the Court will take to make its decision. In addition, the hearing may be continued at any time by the Court without further notice to you.

You do not have to appear in order to receive a benefit. However, you may request permission to speak at the hearing by filing a "Request to Appear" with the Court. Be sure to sign the letter and include your name, address, and a specific statement that you want to be heard on "*Campos-Carranza v. Credit Plus, Inc.*, Civil Action No. 1:16cv120." The deadline to file a request to appear with the Court and to serve it on each of the lawyers listed above is January 27, 2017.

WHERE CAN I GET ADDITIONAL INFORMATION?

This Notice is only a summary of the proposed Settlement of this lawsuit. Certain pleadings and documents filed in Court, including the Class Action Settlement Agreement and Release, may be reviewed or copied in the Clerk's Office or by visiting the website www.InactiveLitigation.com. For more information, you may call the Settlement Administrator at 1-800-222-2760 or Settlement Class Counsel at (703) 424-7730.

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