

Notice distribution plan

- Notice will be handled by Heffler Claims Group, or by another claims administration company that specializes in class action notice.
- In order to provide the best notice that is practicable under the circumstances under FED. R. CIV. P. 23(c)(2)(B), notice in the form of Exhibit A will initially be sent via email to all Class Members' last known email addresses, as provided by Defendants.
- For any email notices that are undeliverable, a short-form notice will be sent on a postcard to the Class Member's last-known physical address, as provided by Defendants; a proposed short-form notice is attached as Exhibit B.
- For any short-form notices that are returned as undeliverable, the claims administrator will perform skip tracing, and will re-mail the postcards to any new addresses discovered through the skip tracing process.
- As set forth in Exhibits A and B, the claims administrator will set up a website at www.gfaaction.com and a toll-free telephone number to enable Class Members to get more information about this case.
- Class Counsel proposes that Class Members have 45 days from the date the notice is initially sent to request exclusion from the Class.

Class Counsel submits that the forms of notice attached as Exhibits A and B and the foregoing notice plan satisfy the requirements of FED. R. CIV. P. 23 and any reasonableness standard imposed by due process. *See Petrovic v. Amoco Oil Co.*, 200 F.3d 1140, 1152-53 (8th Cir. 1999). Moreover, counsel for Defendants has reviewed the notice plan and forms of notice, and they have no objections. Accordingly, Class Counsel respectfully requests the Court to grant this motion and approve the notice plan and forms of Class notice.

Dated: October 10, 2018

Respectfully submitted,

/s/ Marc R. Stanley

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Of Counsel for Plaintiffs and the Class

Certificate of Service

The undersigned hereby certifies that true and correct copies of the foregoing were served on October 10, 2018, on the following counsel of record via the method indicated:

Harriet E. Miers, via email:	hmiers@lockelord.com
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/s/ Marc R. Stanley _____
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