

You are eligible to get an \$800 payment as a result of the settlement in the class action lawsuit captioned:

Bradley Meehan & Cesar E. Corvera Santamaria v. Roadmaster Drivers School of Pennsylvania, Inc., No. 5:22-cv-02499-JMG (E.D. Pa.)

A federal court authorized this notice.

This is not a solicitation from a lawyer or notice of a lawsuit against you.

Please read this notice carefully.

It explains your rights and options to participate in a class action settlement.

What are your legal rights and options?

DO NOTHING:	If you do nothing, you will receive a pro-rated payment and will not be able to sue Roadmaster Driver School of Pennsylvania, Inc. (“Roadmaster”) for any claim(s) that you have against them related to this case.
EXCLUDE YOURSELF:	If you exclude yourself from the settlement, you will not receive a payment, and you will not release any claims you may have against Defendant.
OBJECT:	You may tell the Court you don’t agree with the settlement.

Why is this notice available?

This is a notice of a proposed settlement in a class action lawsuit. The settlement would resolve the lawsuit, which Bradley Meehan (“Meehan”) and Cesar E. Corvera Santamaria (“Corvera”) (collectively, “Plaintiffs”) filed against Roadmaster Drivers School of Pennsylvania, Inc. (“Roadmaster” or “Defendant”). Please read this notice carefully. It explains the lawsuit, the settlement and your legal rights, including the process for receiving a payment, excluding yourself from the settlement or objecting to the settlement.

What is this lawsuit about?

Meehan and Corvera filed this lawsuit against Defendant, alleging that Defendant violated the Pennsylvania Unfair Trade Practices and Consumer Protection Law (“CPL”), 73 P.S. 201-1, *et seq.*, breached contracts, and/or was unjustly enriched when it provided educational classes at its Bethlehem, Pennsylvania campus advertised to lead to a valid commercial drivers’ license (“CDL”) and then administered testing that was invalidated by the Pennsylvania Department of Transportation.

Why is this a class action?

In a class action, one or more people called “class representatives” file a lawsuit on behalf of people who have similar claims. All of these people together are a “class” or “class members.” The Court resolves the claim at once for all class members, except for those who exclude themselves from the class.

Why is there a settlement?

Meehan and Corvera and Defendant have agreed to settle the lawsuit to avoid the time, risk and expense associated with it, and to achieve a final resolution of the disputed claims. Defendant denies any wrongdoing, denies any liability under the UTPCPL or breach of contract or unjust enrichment theories, and denies that class certification would have been appropriate if this case had not been resolved. Under the settlement, participating class members will receive a *pro rata* payment of approximately \$800, in settlement of the claims raised in the lawsuit. Meehan and Corvera and their attorneys think the settlement is best for all class members.

How do you know if your claims are included in the settlement?

This settlement resolves claims on behalf of the following class:

Each student of Roadmaster Drivers School of Pennsylvania, Inc. who paid or caused to be paid tuition and/or fees or other related educational expenses in connection with CDL training and testing, who later had their CDL declared to be improperly issued due to improperly conducted skills testing, from October 26, 2016 to and through the date of the Settlement Agreement, May 10, 2024.

Based on Defendant's records, you are a Settlement Class Member.

What does the settlement provide?

Defendant will establish a settlement fund in the amount of \$400,000. Out of the settlement fund, Defendant will pay:

- a. Compensation to Settlement Class Members of approximately \$800 each;
- b. A Service Award to each Class Representative of \$7,500, subject to the Court's approval;
- c. Notice and Administration Costs incurred by Class Counsel, estimated to be \$20,000; and
- d. An award of attorneys' fees and reimbursement of costs in the amount of \$133,333.33, subject to the Court's approval.

How can you get a payment?

Unless you opt out of the settlement, you will receive a pro rata payment of approximately \$800 without doing anything, as long as the settlement administrator has your most up to date mailing address. You can update your mailing address at www.roadmasterCDLsettlement.com.

When will you be paid?

If the Court grants final approval of the settlement, settlement checks will be mailed to class members after the judgment in the lawsuit becomes final. If there is an appeal of the settlement, payment may be delayed.

What rights are you giving up in this settlement?

Unless you exclude yourself from the settlement, you will be considered a Settlement Class Member, which means you give up your right to sue or continue a lawsuit against Defendant over the released claims. This is called a “release.” Unless you formally exclude yourself from the settlement, you will release your claims against Defendant.

For more information on the release, released parties and released claims, you may obtain a copy of the class action settlement agreement from the settlement website, www.roadmasterCDLsettlement.com.

How can you exclude yourself from the settlement?

You may exclude yourself from the settlement, in which case you will not receive a payment. If you wish to exclude yourself from the settlement, you must mail a written request for exclusion to the settlement administrator, at the addresses set forth below, **postmarked by August 3, 2024**. You must include in your request for exclusion your:

- a. Full name;
- b. Address; and
- c. A clear and unambiguous statement that you wish to be excluded from the settlement, such as “I request to be excluded from the settlement in the *Meehan* action.”

You must sign the request personally. If any person signs on your behalf, that person must attach a copy of a power of attorney or other official document authorizing that signature.

When and where will the Court decide whether to approve the settlement?

The Court will hold a final fairness hearing on **September 18, 2024, at 1:30 P.M. in Courtroom 4B**. The hearing will take place in the Edward N. Cahn U.S. Courthouse, 504 W. Hamilton Street, Allentown, Pennsylvania, before the Honorable John M. Gallagher. At the final fairness hearing, the Court will consider whether the settlement is fair, reasonable, and adequate and, if so, whether it should be granted final approval. The Court will also hear objections to the settlement, if any. The Court may make a decision at that time, postpone a decision or continue the hearing.

Do you have to attend the hearing?

No. You are not required to attend the hearing. But you are welcome to attend the hearing at your own expense. You cannot speak at the hearing if you have excluded yourself from the class settlement. Once you have excluded yourself, the class settlement does not affect your legal rights.

What if you want to object to the settlement?

If you do not exclude yourself from the settlement, you can object to the settlement if you do not believe it is fair, reasonable, and adequate. If you wish to object, you must mail a written notice of objection, postmarked by **August 3, 2024**, to Class Counsel, Defendant’s attorneys, and to the Court, at the following addresses:

Class Counsel:
Francis Mailman Soumilas, P.C.
Lauren KW Brennan
1600 Market Street, Suite 2510
Philadelphia, PA 19103

Defendant's Counsel:
Marshall Dennehey, P.C.
Josh J.T. Byrne
2000 Market St., Suite 2300
Philadelphia, PA 19103

Court:
U.S. District Court for the
Eastern District of
Pennsylvania
504 W. Hamilton Street
Allentown, PA 18101

You must include in your objection your:

- a. Full name;
- b. Address;
- c. A statement of the specific objection(s);
- d. The grounds for the objection(s); and
- e. A statement noting whether you intend to appear at the fairness hearing.

By when must you enter an appearance?

Any class member who objects to the settlement and wishes to enter an appearance must do so by **August 29, 2024**. To enter an appearance, you must file with the Clerk of the Court a written notice of your appearance and you must serve a copy of that notice, by U.S. mail or hand-delivery, upon Class Counsel and Defendant's attorneys, at the above addresses.

What will happen if the Court does not approve the settlement?

If the Court does not finally approve the settlement or if it finally approves the settlement and the approval is reversed on appeal, or if the settlement does not become final for some other reason, you will receive no benefits and the lawsuit will continue.

Who are the attorneys for Meehan and Corvera?

Meehan and Corvera's attorneys are:

James A. Francis
John Soumilas
Lauren KW Brennan
FRANCIS MAILMAN SOUMILAS, P.C.
1600 Market Street, Suite 2510
Philadelphia, PA 19103
Tel: (215) 735-8600
Fax: (215) 940-8000

Michael A. Tompkins
Jeffrey K. Brown
Brett R. Cohen
LEEDS BROWN LAW, P.C.
One Old Country Road, Suite 347
Carle Place, NY 11514
Tel: (516) 873-9550

The Court has appointed these attorneys to act as Class Counsel. You do not have to pay Class Counsel. If you want to be represented by your own lawyer, and have that lawyer appear in Court for you in this case, you must hire one at your own expense.

Who are Defendant's attorneys?

Defendant's attorneys are:

Josh J.T. Byrne
Vlada Tasich
Marshall Dennehey, P.C.
2000 Market Street, suite 2300
Philadelphia, PA 19103
Tel: (215) 575-2805 / (215) 575-2659

Where can you get additional information?

This notice is only a summary of the settlement. All documents filed with the Court, including the full class action settlement agreement, may be reviewed or copied at the United States District Court for the Eastern District of Pennsylvania. In addition, pertinent case materials are available at the settlement web site, www.roadmasterCDLsettlement.com.

If you would like additional information about this matter, please contact:

***Meehan v. Roadmaster Drivers School of Pennsylvania, Inc.* – Class Counsel**
c/o Francis Mailman Soumilas, P.C.
1600 Market Street, Suite 2510
Philadelphia, PA 19103
Tel: (215) 735-8600
Fax: (215) 940-8000

Please do not call the Judge about this case. Neither the Judge, nor the Clerk of Court, will be able to give you advice about this case. Furthermore, neither Defendant nor Defendant's attorneys represent you, and they cannot give you legal advice.