

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

<p>Afni, Inc., assignee of State Farm Bank, Plaintiff/Counterclaim Defendant, v. Thuy Martinez, Defendant/Counterclaimant, v. EMVLP, LLC, Twenty-One Eighty-Five, LLC, State Farm Bank, F.S.B., and ROE Entities I–X, successors to State Farm Bank, F.S.B., Third-Party Counterclaim Defendants.</p>	<p>Case No. 23SL-AC00070-01 Division 2</p>
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Notice of Pending Class Action

This notice is for your information only. A Court authorized this notice.

This is not a solicitation from a lawyer.

This notice describes a class action lawsuit pending against Counterclaim Defendant Afni, Inc., assignee of State Farm Bank (“Afni”) and EMVLP, LLC, Twenty-One Eighty-Five, LLC, State Farm Bank, F.S.B., and (collectively, “SFB Defendants”) (Afni and SFB Defendants are collectively referred to as “Counterclaim Defendants”). You’ve received this notice because Counterclaim Defendants’ records indicate you are a person whose rights could be affected by the lawsuit. You’re entitled to remain in the lawsuit as a class member or opt out of the lawsuit as described below.

You need to choose whether to stay in the lawsuit or exclude yourself from the Class.

You must make this decision no later than July 22, 2025.

If your present address differs from the address on this notice, or if the person to whom this notice was addressed is deceased, provide the class administrator with an updated address or the name and address of the deceased person’s executor or personal representative. This information may be provided by email to info@sfbnoticeclass.com or by mail to Afni v Martinez c/o Class Administrator, P O Box 23309, Jacksonville, FL, 32241. Please refer to the Notice ID that is included on the back of this Notice.

The remainder of this notice contains important information. Read the entire notice carefully.

The lawsuit described in this notice might affect your rights.

1. What is the purpose of this notice?

This notice was sent to you by order of the Twenty-First Judicial Circuit Court for St. Louis County, Missouri (the “Court”). This notice tells you about the class, the lawsuit, your right to participate, and your right to opt out of the class. Nothing in this notice should be taken as an expression by the Court of any opinion on the ultimate outcome of the lawsuit, and nothing in this notice should be taken to mean you would recover anything.

2. What is this lawsuit about?

This lawsuit is about notices you were mailed by SFB Defendants after your car was repossessed. Thuy Martinez (“Martinez,” “Counterclaimant,” or “Class Representative”) alleges Counterclaim Defendants violated the form and content requirements for notices under the Uniform Commercial Code. Martinez claims neither she nor any class member owes Counterclaim Defendants money after their cars were repossessed, and instead, Counterclaim Defendants owe them money. Counterclaim Defendants have denied all claims against them and asserted affirmative defenses which could provide a complete defense to the claims of Martinez and the class members.

The Court decided this lawsuit can be a class action because it meets the requirements of Missouri Rule of Civil Procedure 52.08, which governs class actions in Missouri courts. Under the Court’s certification, Martinez will act as Class Representative, and the attorneys representing the Class as Class Counsel are Jesse B. Rochman, Martin L. Daesch, and Craig W. Richards of OnderLaw, LLC.

3. What is a class action and who is involved?

In a class action case, one or more persons sue on behalf of other people who have similar claims. The person who sues is generally called the named plaintiff but, in this case, is called the named Counterclaimant. The named Counterclaimant represents all similarly situated people in the court. The named Counterclaimant in this lawsuit is Thuy Martinez.

4. Why did I receive this notice?

This notice is being made available to you because Counterclaim Defendants’ records reflect that you may have been mailed a form after your vehicle was repossessed. If this is the case, you may be a member of a “class” of persons whose rights may be affected by the outcome of this lawsuit (the “Class”).

Do not be alarmed. **You have not been sued; nor have you “filed” a lawsuit.** This notice simply informs you of Martinez’s counterclaim in this lawsuit and lets you know that you have been identified as a potential member of the Class, and to advise you of your rights and options as a Class member.

5. Has the judge decided who is right?

No. By certifying the Class and issuing this notice, the judge is not suggesting that the named Counterclaimant or the Class have won or lost the case.

6. What are my options?

You will be a class member unless you ask to be excluded from the lawsuit. As a class member, you will be bound by the outcome, whether the issues are decided by trial or otherwise, and whether the outcome is favorable or unfavorable. As a class member, any claims you might have regarding the facts in this lawsuit cannot be pursued in any other lawsuit. Martinez and Class Counsel will represent you in the lawsuit. By joining the case, you designate Martinez, to the fullest extent possible, to make decisions on your behalf concerning the case, the method and manner of conducting the case, the entering of an agreement with Class Counsel regarding payment of attorney’s fees and litigation costs, the approval of settlements, and all other matters pertaining to the case. These decisions and agreements made and entered into will be binding on you if you do not opt out of the case. If the Court permits, you may be required to provide information and documents, appear for a deposition and/or testify in court. You will also be permitted to attend any hearings in this matter.

If you believe your interests are not being fairly and adequately represented by Martinez or Class Counsel, you will have an opportunity to advise the Court and let the judge know your concerns. You will also receive any future notices concerning any decisions affecting the Class. You will also have an opportunity to be heard in regard to any proposed settlement of the Class claims.

As a member of the Class, you will be entitled to share in any monetary recovery that Martinez obtains for the Class. You will also receive the benefit of any other relief that the Court may award the Class.

If you wish to remain a member of the class, don't do anything and your interests and rights in the lawsuit will be represented by the Class Representative and Class Counsel.

Class members may enter an appearance individually or through additional counsel of their own choosing at their own expense, but don't have to do so.

A. If you want to appear in the lawsuit.

If you do not exclude yourself from the Class, you also have the right to enter an appearance in the lawsuit, individually or through your own attorney, at your own expense, if you wish to do so. A class member who appears in person or through counsel does not become a named party and will still be represented by Class Counsel. A Class member who wants to communicate directly with the Court through his or her own attorney instead of through Class Counsel may wish to enter an appearance in the lawsuit.

If you wish to enter an appearance, you or your attorney must prepare and file a Notice/Entry of Appearance electronically or by mail with the Clerk of Court of the Circuit Court of St. Louis County, Missouri, 105 S. Central Avenue, Clayton, Missouri 63105.

B. If you wish to intervene in the lawsuit.

If you do not exclude yourself from the Class, you can also seek to "intervene" and become a named party in the lawsuit. Any such request or motion to intervene must comply with the Missouri Rules of Civil Procedure and applicable law, and be filed by you or an attorney retained by you at your own expense with the Clerk of Court of the Circuit Court of St. Louis, County, Missouri, 105 S. Central Avenue, Clayton, Missouri 63105. A class member who thinks his or her interests are not being adequately protected may seek to intervene.

7. How will Class Counsel be Paid?

If Class Counsel gets money or benefits for the Class, they may ask the Court for fees and expenses. If the Court grants Class Counsel's request, Class Counsel's fees and expenses would either be deducted from any money obtained for the Class or paid separately by the Counterclaim Defendants.

If you wish to opt out of the class, you must send an email or written notification specifying that you want to be excluded from this Class Action. If by email, send to info@sfbnoticeclass.com by July 22, 2025. If by letter, send to: Afni v Martinez c/o Class Administrator, P O Box 23309, Jacksonville, FL, 32241, postmarked by July 22, 2025. The exclusion request should state: "I [or We] hereby request to be excluded from the class in *Afni v. Martinez*, No. 23SL-AC00070-01."

People who request exclusion from the class won't be entitled to share in the benefits of any settlement or judgment that may be reached, nor will they be bound by any settlement or judgment. If you elect to be excluded from the class, you may pursue your claims at your own expense in a separate lawsuit.

How Do I Get More Information? For more information, you may go to www.sfbnoticeclass.com, or you may contact the Administrator at 800-351-1696 or Class Counsel by mailing Tracy L Malloy, 110 E Lockwood Ave, Saint Louis, MO 63119 or by email at tmalloy@onderlaw.com.

**Questions about this notice should be directed to Class Administrator.
Please Don't Contact the Court or Clerk with Questions**