



United States District Court for the Southern District of New York

*Lojewski, et al., on behalf of themselves and all others similarly situated v. Group Solar USA, LLC, et al.*

Case No. 1:22-cv-10816-PAE

## **NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

***A federal court has authorized this website notice.***

***This is not a solicitation from a lawyer. You are not being sued.***

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**This settlement resolves a dispute with Salal Credit Union over whether certain Salal customers were promised (but not paid) "Welcome Checks" by Group Solar USA, LLC.**

**The parties have reached a proposed \$415K settlement. Attorneys for the class will seek a fee of \$138,331.95, (plus reimbursement of certain costs) out of the proposed settlement amount. You have been identified as a potential class member and may be entitled to money. It is estimated that class members may be entitled to 241% or more of the amount of any unpaid Welcome Check.**

**Your rights are affected whether you act or not. Read this notice carefully. If you disagree with the settlement or the attorneys' fees request, you can object. To object or opt out, you must act by December 23, 2025. The Court will hold a final fairness hearing on February 12, 2026. You can visit [www.solarwelcomechecklitigation.com](http://www.solarwelcomechecklitigation.com) to learn more and review the motion for approval and attorneys' fees request.**

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You do not need to do anything. If you take no action, you will receive your payment, you will be bound by the settlement, and you will not be able to bring another lawsuit for the same issues against Salal Credit Union.

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# About This Notice

## Why did I get this notice?

This notice is to tell you about the settlement of a class action lawsuit brought in the United States District Court for the Southern District of New York, *Lojewski, et al. v. Group Solar USA, LLC, et al.*, Case No. 1:22-cv-10816-PAE, brought on behalf of Group Solar clients who did not receive their promised “Welcome Checks”. **You received this notice because our records indicate you are a member of the group of people affected, called the “class.”** This notice gives you a summary of the terms of the proposed settlement agreement, explains what rights class members have, and helps class members make informed decisions about what action to take.

The Court approved this notice because you have a right to know about a proposed settlement of a class action lawsuit, and about all of your options, before the Court decides whether to approve the settlement. If the Court approves it, and objections and appeals (if any), are resolved, the Settlement Administrator will make the payments the settlement allows.

## What do I do next?

Read this notice to understand the settlement. Then, decide if you want to:

Options	More information about each option
<b>Do Nothing</b>	You will be eligible to get a payment for your share of the Settlement Fund. If the Court approves the settlement, you give up your right to bring your own lawsuit about the issues within this lawsuit.
<b>Opt Out</b>	Exclude yourself from the settlement. You will get no payment. This option allows you to bring another lawsuit against Salal Credit Union about the same issues.
<b>Object</b>	Tell the Court why you do not like the settlement or the request for attorneys’ fees and costs. If the Court approves the settlement, you will still receive payment and give up your right to bring your own lawsuit about

	the issues within this lawsuit.
<b>Go to a Hearing</b>	Ask to speak in Court about the fairness of the settlement.

Read on to understand the specifics of the settlement and what each choice would mean for you.

## What are the most important dates?

Your deadline to object or opt out: **December 23, 2025**  
 Settlement final approval hearing: **February 12, 2026 at 11:00 a.m.**

# Learning About the Lawsuit

## What is this lawsuit about?

The lawsuit claims that Salal Credit Union purchased certain solar panel finance agreements from Group Solar LLC and thereby became liable for Group Solar’s alleged failure to send certain “Welcome Checks” that had been promised to customers. The lawsuit claimed violations of New York General Business Law §§ 349 and 350, Breach of Contract, New York Personal Property Law § 401, and Unjust Enrichment.

Salal Credit Union denies that it did anything wrong.

**Where can I learn more?**  
 You can get a complete copy of the proposed settlement and other key documents in this lawsuit on the documents page of the website.

## Why is there a settlement in this lawsuit?

In 2025, the parties agreed to settle, which means they have reached an agreement to resolve the lawsuit. Both sides want to avoid the risk and expense of further litigation. While Defendant disputes the allegations in the lawsuit and denies any liability or wrongdoing, it enters into the settlement solely to avoid the expense, inconvenience, and distraction of further proceedings in the litigation.

In a class action, someone called a Class Representative (in this case Rafal Lojewski) sue on behalf of all people who have similar claims. Salal Credit Union challenged whether this case should proceed as a class action but have agreed not to oppose this case proceeding as a class for settlement purposes only.

The Court has not decided this case in favor of either side.

## What is a class action?

All of these people with similar claims are “Class Members,” and grouped together are a “Class.” One court resolves the issues for all Class Members, except for those who exclude themselves from the Class.

## What happens next in this lawsuit?

You have until December 23, 2025 to object to or opt out of the settlement, with further details on these options provided below.

The Court will then hold a Fairness hearing to decide whether to approve the settlement. The hearing will be held at:

**Where:** US District Court for the Southern District of New York, 40 Foley Square, New York, NY 10007

**When:** 11:00 a.m. on February 12, 2026

The Court has directed the parties to send you this notice about the proposed settlement. Because the settlement of a class action decides the rights of all members of the proposed class, the Court must give

final approval to the settlement before it can take effect. Payments will only be made if the Court approves the settlement.

You do not have to attend, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the settlement.

If the Court does not approve the settlement, it will be void and the lawsuit will continue. The date of the hearing may change without further notice to members of the class.

## Learning About the Settlement

### What does the settlement provide?

Salal Credit Union have agreed to create a \$415,000 settlement fund to be divided among all class members. The portion of the fund that each class member will receive will be determined based upon the value of each member's disputed claim. In the event funds remain after the first round of payments to class members, a second round of payments will be issued to those class members that accepted the first payment, but only if this second distribution will result (after subtracting the cost of issuing a second round of checks) in at least \$20.00.

Members of the settlement class will "release" their claims as part of the settlement, which means they cannot sue Salal Credit Union for the same issues and legal violations raised in this lawsuit. The full terms of the release can be found in the Important Court Documents section of the website.

If there is money left over after the payment process is completed, it will be donated to Empire Justice Center's Foreclosure Prevention Program.

## How much will my payment be?

Each Settlement Class member who does not opt-out will receive a pro rata share of the \$415,000 settlement fund, calculated based on the amount of their unfulfilled "Welcome Checks". It is estimated that class members will be entitled to 241% or more of the amount of any unpaid Welcome Check".

You will receive payment via check.

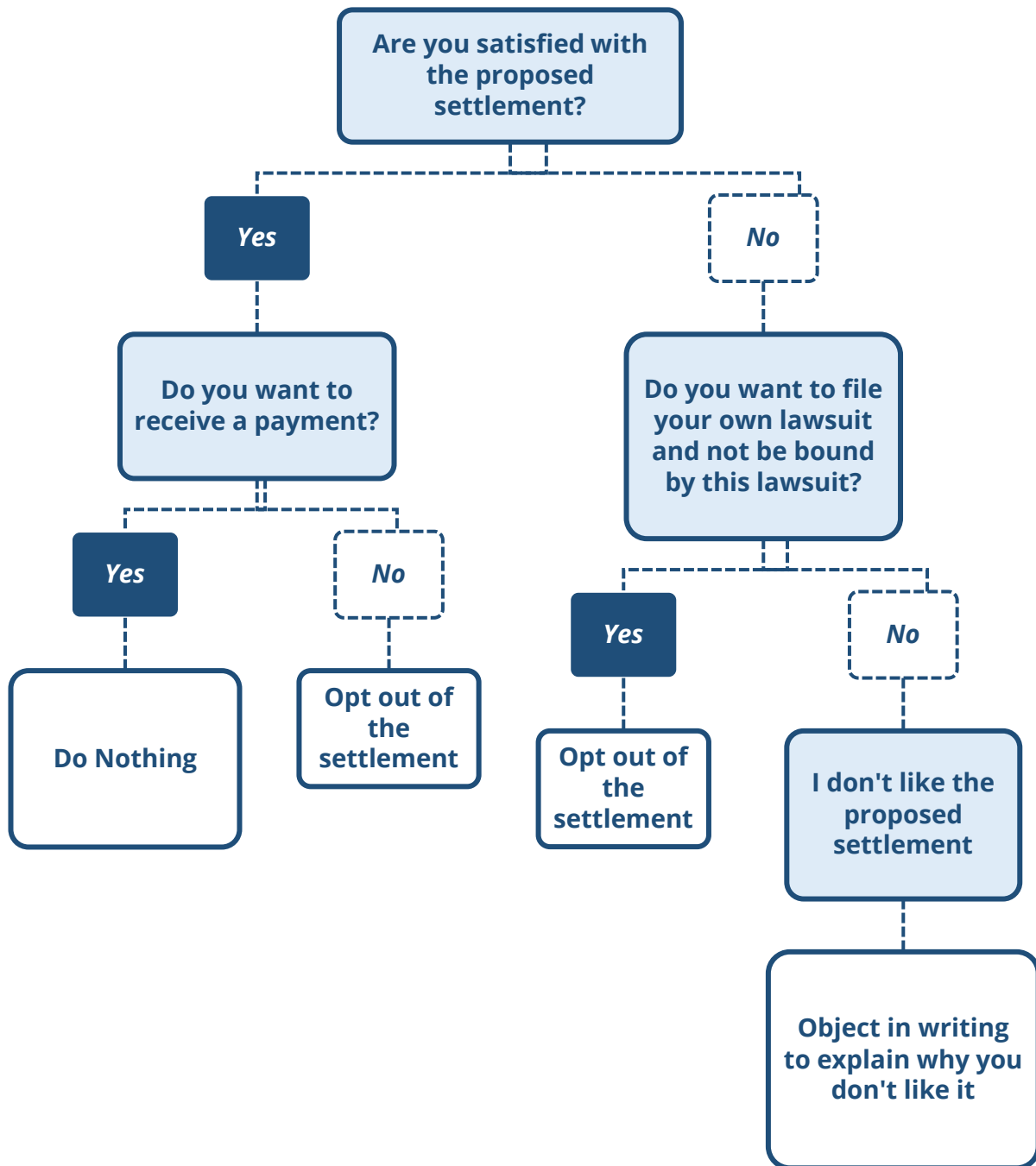
## Deciding What to Do

### How do I weigh my options?

You have three options. You can do nothing, you can opt out of the settlement, or you can object to the settlement. This chart shows the effects of each option:

	<b>Do Nothing</b>	<b>Opt Out</b>	<b>Object</b>
<b>Can I receive settlement money if I . . .</b>	YES	NO	YES
<b>Am I bound by the terms of this lawsuit if I . . .</b>	YES	NO	YES
<b>Can I pursue my own case if I . . .</b>	NO	YES	NO
<b>Will the class lawyers represent me if I . . .</b>	YES	NO	NO

## What is the best path for me?



## Do I have a lawyer in this lawsuit?

In a class action, the court approves class representatives and lawyers to work on the case and represent the interests of all the class members. For this settlement, the Court has approved the following individuals and lawyers:

### **Your lawyers:**

- Daniel A. Schlanger from Schlanger Law Group LLP

This is the lawyer who negotiated this settlement on your behalf. He is experienced in handling similar cases.

If you want to be represented by your own lawyer, you may hire one at your own expense.

## Do I have to pay the lawyers in this lawsuit?

Lawyers' fees and costs will be paid by Salal Credit Union. **You will not have to pay the lawyers directly.**

To date, the lawyers have not been paid any money for their work or the expenses that they have paid for the case. To pay for some of their time and risk in bringing this case without any guarantee of payment unless they were successful, your lawyer will request, as part of the final approval of this Settlement, that the Court approve a payment of up to \$138,331.95 total in attorneys' fees plus out-of-pocket expenses. The lawyers' complete request will be filed with the Court and posted to the website no later than January 29, 2026.

Lawyers' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the lawyers' fees even if you think the settlement terms are fair.

Your lawyers will also ask the Court to approve a Service Payment of \$6,000 to the Class Representative for the time and effort she contributed to the case. If approved by the Court, the Service Payment will be paid from the Settlement Fund.

# Opting Out

## What if I don't want to be part of this settlement?

You can exclude yourself, which is often referred to as “opting out” of the settlement. If you do, you will not receive payment and cannot object to the settlement. However, you will not be bound or affected by anything that happens in this lawsuit. That means you keep the right to sue Salal Credit Union or be part of another case against Salal Credit Union about the issues in this lawsuit. **If you have a pending lawsuit against Salal Credit Union speak to your lawyer in that case immediately.** You may need to exclude yourself from this Class to continue your own lawsuit.

## How do I opt out?

To opt out of the settlement, you must send the Settlement Administrator a Request to Opt Out that is postmarked no later than December 23, 2025. It must contain a statement that clearly indicates your desire to be excluded from the Settlement Class. For example, it might say “I hereby request that I be excluded from the proposed Settlement Class in the Action.” Be sure to include the case name (*Lojewski, et al. v. Group Solar USA, LLC, et al.*), your name, address, telephone number, and signature. A request to Opt-Out by an owner or a co-owner on an account will be treated as a request to Opt-Out by all owners on the account.

Lojewski v Group Solar  
c/o Settlement Administrator  
PO Box 23698  
Jacksonville, FL 32241

# Objecting

## What if I disagree with the settlement?

If you disagree with any part of the settlement (including the lawyers' fees) but don't want to opt out, you may object. You must give reasons why you think the Court should not approve it and say whether your objection applies to just you, a part of the class, or the entire class. The Court will consider your views. The Court can only approve or deny the settlement — it cannot change the terms of the settlement. You may, but don't need to, hire your own lawyer to help you.

You can only object if you stay in the class. If you opt out of the class, you cannot object because the case no longer affects you.

The objection must:

- (1) be in writing;  
be filed with the Clerk of the Court by December 23, 2025;
- (2) include the case name and number (*Lojewski, et al. v. Group Solar USA, LLC, et al.*, 1:22-cv-10816-PAE);
- (3) include your full name, address and telephone number;
- (4) (if you are represented) include the name, address, and telephone number of counsel;
- (5) state the reasons for your objection;
- (6) state whether either you or your lawyer intend to appear at the final approval hearing;
- (7) include your signature.

The written objection must be filed with the Clerk of the Court by December 23, 2025.

File your written objection using the Court's ECF system or mail your written objection to:

District Court Clerk's Office  
Daniel Patrick Moynihan  
U.S Courthouse  
500 Pearl Street  
New York, New York 10007

You may ask the Court for permission to speak at the Fairness Hearing

on February 12, 2026. To do so, you or your lawyer must send a letter stating that it is your “Notice of Intention to Appear in *Lojewski, et al. v. Group Solar USA, LLC, et al.*, 1:22-cv-10816-PAE,” Your Notice of Intention to Appear must be filed or mailed so as to be filed with the Court no later than [date] and be sent to the same parties as listed above to file an objection. The Notice of Intention to Appear must include copies of any papers, exhibits, or other evidence that you will present to the Court in connection with the Fairness Hearing. You cannot speak at the hearing if you exclude yourself from the settlement.

## Doing Nothing

### What are the consequences of doing nothing?

If you do nothing, you will receive payment from the Settlement Fund. You will also be bound by the settlement and its “release” provisions. That means you won’t be able to start, continue, or be part of any other lawsuit against Salal Credit Union about the issues in this case. A full description of the claims and persons who will be released if this settlement is approved can be found in the Important Court Documents section of the website.

## Key Resources

### How do I get more information?

This notice is a summary of the proposed settlement. The complete settlement with all its terms and related case documents can be found the Important Court Documents section of the website. To get a copy of the settlement agreement or get answers to your questions:

- contact the lawyer (information below)
- access the Court’s Case Management/ Electronic Case Files (CM/ECF) system online or by visiting the Clerk’s office of the Court (address below).

- Visit the settlement website at:  
[www.solarwelcomechecklitigation.com](http://www.solarwelcomechecklitigation.com)

Please do not call the Court, Salal Credit Union, or Salal Credit Union’s counsel regarding the settlement.

The short form (postcard or email) notice sent to each class member contained a unique identifier. You can get information about the specific Welcome Check amount you are alleged to have been underpaid, and your specific portion of the settlement proceeds by going to [www.solarwelcomechecklitigation.com](http://www.solarwelcomechecklitigation.com) and entering that identifier, or by contacting Class Counsel using the contact information found below.

<b>Resource</b>	<b>Contact Information</b>
<b>Settlement Administrator</b>	Lojewski v Group Solar c/o Settlement Administrator PO Box 23698 Jacksonville, FL 32241 <a href="mailto:info@solarwelcomechecklitigation.com">info@solarwelcomechecklitigation.com</a>
<b>Your Lawyer (Class Counsel)</b>	Daniel A. Schlanger SCHLANGER LAW GROUP LLP 150 Allens Creek Road, Suite 240 Rochester, NY 14618 212-500-6114 <a href="mailto:dschlanger@consumerprotection.net">dschlanger@consumerprotection.net</a>
<b>Court</b>	Daniel Patrick Moynihan U.S Courthouse 500 Pearl Street New York, New York 10007