

United States District Court for the Eastern District of Virginia
Lula Williams, et al. v. Big Picture Loans, LLC, et al.
Case No. 3:17-cv-461 (REP)

NOTICE OF CLASS ACTION LAWSUIT

You are receiving this notice because certain records indicate that you resided in Virginia at the time you made payments on a loan from Big Picture Loans and/or Castle Payday. You do not have to do anything if you want to remain as a member of this class and keep the possibility of getting money from this lawsuit.

Why did I get this Notice?

The Court instructed that you be sent this Notice because you have a right to know that the Court has certified a class in a lawsuit that may affect you. You have legal rights and options that you may exercise before the Court conducts a trial. The purpose of the trial is to decide whether Defendant Matt Martorello (“Defendant”) is liable to you under certain claims relating to loans made to you by Big Picture Loans, LLC and/or Red Rock Tribal Lending, LLC (d/b/a Castle Payday). The named Plaintiffs in this Action are bringing these claims on Class members’ behalf with the assistance of Class Counsel. The Court has defined the Class as follows:

- (a) **Big Picture RICO Class:** All Virginia Consumers who entered into a loan agreement with Big Picture where a payment was made from June 22, 2013 to December 20, 2019.
 - (i) **Big Picture Usury Sub-class:** All Virginia consumers who paid any principal, interest, or fees on their loan with Big Picture from June 22, 2015, to December 20, 2019.
 - (ii) **Big Picture Unjust Enrichment Sub-class:** All Virginia consumers who paid any amount on their loan with Big Picture from June 22, 2014 to December 20, 2019.
- (b) **Red Rock RICO Class:** All Virginia consumers who entered into a loan agreement with Red Rock where a payment was made from June 22, 2013 to December 20, 2019.
 - (i) **Red Rock Usury Sub-class:** All Virginia consumers who paid any principal, interest, or fees on their loan with Red Rock from June 22, 2015 to December 20, 2019.
 - (ii) **Red Rock Unjust Enrichment Sub-class:** All Virginia consumers who paid any amount on their loan with Red Rock from June 22, 2014, to December 20, 2019.

Available records indicate that you may have resided in Virginia at the time you obtained and/or made payments on a loan from Big Picture Loans and/or Castle Payday.

What is the case about?

Plaintiffs Lula Williams, Gloria Turnage, George Hengle, Dowin Coffy, and Felix Gillison, Jr. (“Plaintiffs”) have brought this lawsuit because they allege that Defendant is and was the founder, director, and/or owner of Bellicose Capital, LLC and Eventide Credit Acquisitions, LLC, which are companies that had contractual relationships with Red Rock and Big Picture. Plaintiffs allege that Defendant’s actions violated the Racketeer Influenced and Corrupt Organizations Act (“RICO”) and Virginia’s usury law and other laws because your Big Picture Loans and Castle Payday loans carried unlawful interest rates. Defendant asserts that the loans are lawful and denies that he did anything wrong or that his conduct violated RICO or Virginia’s laws.

Is there any money available now?

No. There is no money available now because the Court has not yet conducted a trial, and the two sides have not settled this case. If there is a future money award or settlement, you will be notified at that time.

What happens if I do nothing at all?

You do not have to do anything at this time. By doing nothing, you will remain a Class Member, to the extent you are one. If you stay in the Class and it wins at trial, you will be notified how you may be able to obtain a share of the damages collected, if any. However, if you do not opt out of the Class, you will also be legally bound by all of the Orders the Court issues and judgments the Court makes in this class action.

How do I exclude myself from the Class?

If you do not want to remain in this Class, you must request to be excluded. To be excluded, you must send an "Exclusion Request" in the form of a letter sent by first class mail, stating that you want to be excluded from "*Williams v. Big Picture Loans, LLC*." You must include your name, address, and signature on the letter. Your Exclusion Request must be postmarked on or before May 12, 2023, and mailed to *Williams v. Big Picture Loans, LLC Class Administrator, PO Box 23648, Jacksonville, FL 32241*. You may also get an Exclusion Request form at the website, <https://www.bigpictureloansclassaction.com/>.

Do I have a lawyer in the case and should I get my own lawyer?

If you remain in the class, you do not need to hire your own lawyer because Class Counsel will work on your behalf and of other members of the class. Details regarding Class Counsel may be found at: www.bigpictureloansclassaction.com. However, if you want your own lawyer, you will have to "exclude" yourself from the Class and retain your own lawyer.

How and when will the damages be determined?

The case is scheduled for trial starting July 13, 2023. Jury selection will be held on July 12, 2023. It is possible that the trial could be delayed or the case could be resolved or settled before trial.

How do I get further assistance or information?

If you have any questions or need further assistance, please contact the lawyers representing the Class Members, including you, using the following:

Via Internet: www.bigpictureloansclassaction.com.

By Phone: (800) 687-0140

By E-Mail: classcounsel@bigpictureloansclassaction.com