

## Exhibit 1

### Notice To Class Members

Authorized by the U.S. District Court for the  
Southern District of New York

— Notice of Class Action Settlement —

To: Visa, MasterCard and Diners Club Cardholders

This notice is to inform you of a hearing about an agreement to settle a class action lawsuit. The lawsuit is about the prices that cardholders of Visa and MasterCard credit and debit/ATM cards, and Diners Club credit cards (including charge cards) were charged to make transactions denominated in a foreign currency or with a foreign merchant, including purchases, cash advances, cash withdrawals; and Internet transactions. The Visa cards include Visa-, Interlink-, and Plus-branded credit and debit/ATM cards; the MasterCard cards include MasterCard-, Cirrus-, and Maestro-branded credit and debit/ATM cards.

The Plaintiffs in this lawsuit (In re Currency Conversion Fee Antitrust Litigation, MDL 1409) challenge how the price of credit and debit/ATM card foreign transactions was set and disclosed, including claims that Visa, MasterCard, their member banks, and Diners Club conspired to set and conceal fees, typically of 1-3%, on foreign transactions, and that Visa and MasterCard inflated their base exchange rates before applying these fees. The Plaintiffs also claim that the amount of these fees and that the failure to adequately disclose them violated federal and state antitrust disclosure, unfair competition, deceptive practices, and consumer protection laws, as well as common law and equity. The Defendants (Visa, MasterCard, Bank of America, Bank One/First USA, Chase, Citibank, Diners Club, HSBC/Household, MBNA and Washington Mutual/Providian) deny the Plaintiffs' claims and say they have done nothing wrong, improper, or unlawful. If you made a foreign transaction between February 1, 1996 and Month Day, 2006 with a U.S.-issued Visa, MasterCard, or Diners Club card, you are a member of the Settlement Damages Class. If you have; or had, as of Month Day, Year a Visa, MasterCard, or Diners Club card, you are a member of the Settlement Injunctive Class, and will benefit from the settlement even if you did not use your card to make a foreign transaction.

The lawsuit asks for money damages and restitution for the Settlement Damages Class, and injunctive relief for the Settlement Injunctive Class.

What is the settlement?

This settlement includes certain agreements relating to disclosures on billing statements and other documents about foreign transaction pricing (including foreign transaction fees), and the Defendants have agreed to create a settlement fund of \$336,000,000 to pay

valid claims, attorneys' fees and expenses, and the costs of administering the settlement and notice: The Plaintiffs will also ask the Court for up to \$350,000 in service awards from the settlement fund on behalf of the 20 class representatives for their, efforts on behalf of the classes. The Defendants do not waive any right they may have to arbitrate your claim if you opt out of the settlement, or if the settlement does not become final.

Do I need to hire a lawyer?

The Court has appointed the lawyers listed below to represent you. You do not have to hire your own lawyer. But you can if you want to, at your own cost

What are my options?

You may:

- Ask for a refund. Use the claim form (on back) to ask for a refund. Or file online at [www.xyzlongurl.com/claim](http://www.xyzlongurl.com/claim). The amount of your refund will depend on the bank that issued your credit or debit/ATM card and:
  - the dollar value of your claim, not including any alleged inflation of base exchange rates (some claims may be adjusted upwards), and
  - the amount of money available to pay claims and the number and total dollar value of all valid claims filed. (You might get only a partial refund.)  
Deadline: Month Day, YEAR
- Exclude yourself from the Settlement Damages Class. Send the "opt-out" form letter (available at: [www.xyzlongurl.com](http://www.xyzlongurl.com), or by calling: 1-888-123-4567) to: P. O. Box 123, Anytown, HI 12345. If you opt out, you will not get money from the settlement. You cannot opt out of the Settlement Injunctive Class. Deadline: Month Day, YEAR
- Object to the settlement File your objection and proof of class membership with the Court. You must also give notice to the attorneys for the class by hand, Court for overnight mail, or by certified mail, return receipt requested. The final approval hearing will be on Month Day, YEAR at \_\_\_\_\_ at the U.S. District for the Southern District of New York, 500 Pearl Street, New York, N.Y., 10007-1581. You do not have to go to court or hire an attorney. But you can if you want to, at your own cost. The hearing is to decide whether to approve the settlement, class counsels' requests for attorneys' fees and expenses, and awards for the class representatives. (The time and date may change without further notice to you.) Deadline to object and give notice: Month Day, YEAR

Are other cases affected by this settlement?

Yes. There are other cases in federal and state courts against VISA, MasterCard; and/or some Defendant banks concerning their disclosure of foreign transaction pricing, including fees. These cases are listed below.<sup>1</sup> Claims in those cases will be extinguished if this settlement is approved, but you can still make a claim here, as described above, for foreign transactions between February 1, 1996 and Month Day, 2006.

MasterCard has agreed to pay a total of \$3,350,000 in attorneys' fees and expenses in the cases marked below with an asterisk (\*). In addition, VISA and MasterCard have agreed to pay \$32,000,000 in attorneys' fees and expenses to the attorneys who, for 6 years, litigated Schwartz v. VISA Intl Corp., No. 822404-4 (CA), including a trial and appeals. The attorneys in the Schwartz case are some of the Plaintiffs' attorneys in this case. The cases marked with a plus (+) have also been settled. These payments will not reduce the \$336,000,000 settlement fund.

<sup>1</sup>Certified statewide classes: Cavette v. MasterCard, CT-002506-03 (Shelby Cty., TN), W2005-02422-SC-S09-CV (TN Sup Ct); Schrank v. Citibank, 03 Civ. 2843 (SONY, NY). Proposed statewide classes: Fischer v. MasterCard, 03600572/2003 (NY Cty., NY), Friedman v. MasterCard, CV 04-539330 (Cuyahoga Cty., OH), \*Gastineau v. MasterCard, CV 2004-283 (Lonoke Cty., AK), Gillard v. MasterCard, 03 CH06659 (Cook Cty., IL), 05-3143 (IL Ct App, 1st Dist), \*Hernandez V. MasterCard, C-1056-03-C (Hidalgo Cty., TX), Johnson v. MasterCard, 62-C7-04-009691 (Ramsey Cty., MN), Terry v. MasterCard, CV 2003-007154 (Maricopa Cty., AZ), Relativity Travel v. JP Morgan Chase Bank, 05601075/2005 (NY Cty., NY), \*Rubin v. MasterCard, 03-09368 CA 20 (Dade Cty., FL), 3D05-2373 (FL Ct App, 3rd Dist), Salkin v. MasterCard, 002648 (Phila. Cty., PA), 1741 EDA 2005 (PA Super Ct, Eastern Dist), Bildstein v. MasterCard, 03 Civ 9826 (SDNY, NY).

Proposed nationwide classes: Clarcken v. Diners Club, 01 Civ 10857 (SONY, NY), Gaffigan v. MasterCard, 042-07768 (St. Louis, MO) (nationwide, except IL and CA), +Mattingly v. Visa, RG05198142 (Alameda Cty., CA) (nationwide for Visa; CA for MasterCard), +Shrieve v. Visa. RG04155097 (Alameda Cty., CA) (nationwide for Visa; CA for MasterCard; also on behalf of general public). Includes proposed nationwide class: +Baker v. Visa, 06-CV-0376 (SD, CA). General public nationwide: Schwartz v. Visa, 822404-4 (Alameda Cty., CA) (CA general public only for MasterCard), A105222 (CA CI App. 1st Dist), S-138751 (CA Sup Ct). For more information about these cases, go to: [www.xyzlongurt.com](http://www.xyzlongurt.com), or call: 1-800-945-9890.

How will the attorneys be paid?

The lawyers for the class members will request 27.5% of the \$336,000,000 settlement fund, plus interest, for attorneys' fees for investigating the facts, litigating and resolving the case. They will also request reimbursement of their expenses, not to exceed \$5,000,000, to be paid from the settlement fund.

## Release of claims and binding effect of the settlement

If the settlement receives final court approval and you are a member of the Settlement Injunctive Class, you will be bound by the settlement. If you are a member of the Settlement Damages Class and do not opt out, upon final court approval, you will be bound by the settlement and will release all claims, known or unknown, against each of the Defendants, each of the Visa and MasterCard member banks, and the related entities and individuals of each of the above, which (1) in whole or in part arise out of or relate to any foreign transaction, or the disclosure or pricing thereof, including, without limitation, any and all claims that are based in whole or in part on any act, agreement, conduct or omission up to Month Day, Year that has or had, and/or allegedly has or had, the purpose or effect of fixing, inflating, embedding, concealing, or inadequately disclosing the nature, pricing, or any other aspect of any credit or debit/ATM card foreign transaction (including, but not limited to, foreign transaction fees, base exchange amounts, and/or any component of either), or (2) are, have been, or could have been asserted within the scope of the facts asserted in the litigation. For more information on the release, including certain limitations and defined terms, see the settlement agreement.

## More information

This notice is only a summary. To see the settlement agreement, court orders, and other documents about this lawsuit and related cases, go to: [www.xyzlongurl.com](http://www.xyzlongurl.com). Or call 1-800-945-9890. You can also go to the Courthouse during regular business hours to see court documents: Clerk of the Court, United States Courthouse, 500 Pearl Street, New York, New York 10007-1581.

Or mail your questions to the attorneys for the class:

Bonny E. Sweeney	Merrill G. Davidoff
Lerach Coughlin et al., LLP	Berger & Montague, P.C.
655 West Broadway, Ste. 1900	1622 Locust Street
San Diego, CA 92101	Philadelphia, PA 19103

## Questions?

Go to: [www.xyzlongurl.com](http://www.xyzlongurl.com)  
Or call: 1-800-945-9890

Do not contact the Court, the Defendants,  
or your bank with questions about this case.

## Exhibit 2

### Notice To Agencies And Companies

Authorized by the U.S. District Court for the Southern District of New York

Notice of Class Action Settlement — For Agencies and Companies

This notice is to inform you of a hearing about an agreement to settle a class action lawsuit. The lawsuit is about the prices that cardholders of Visa, MasterCard and Diners Club credit and debit/ATM cards were charged to make transactions denominated in a foreign currency or with a foreign merchant, including purchases, cash advances, cash withdrawals, and Internet transactions. The Visa cards include Visa-, Interlink-, and Plus-branded credit and debit/ATM cards; the MasterCard cards include MasterCard-, Cirrus-, and Maestro-branded credit and debit/ATM cards.

This Notice is being provided directly to this Agency or Company (“Agency/Company” and/or “you”) to facilitate the notice and claims process with respect to Agency/Company cards. For purposes of this Notice, “Agency/Company cards” refers to all Visa, MasterCard, and Diners Club credit and debit/ATM cards (“Cards”) issued to your employees (1) pursuant to a contract(s) between you and a U.S. card-issuing bank or financial entity (“Issuer”); (2) on which such employees incur charges; and (3) on which you reimburse your employees or pay the Issuer(s) for the charges. “Agency/Company cards” also includes all Cards issued to your employees pursuant to a contract that designates Agency/Company to receive applicable notices.

The Plaintiffs in this lawsuit (In re Currency Conversion Fee Antitrust Litigation, MDL 1409) challenge how the price of credit and debit/ATM card foreign transactions was set and disclosed, including claims that Visa, MasterCard, their member banks, and Diners Club conspired to set and conceal fees, typically of 1-3%, on foreign transactions, and that Visa and MasterCard inflated their base exchange rates before applying these fees. The Plaintiffs also claim that the amount of these fees and that the failure to adequately disclose them violated federal and state antitrust, disclosure, unfair competition, deceptive practices, and consumer protection laws, as well as common law and equity. The Defendants (Visa, MasterCard, Bank of America, Bank One/First USA, Chase, Citibank, Diners Club, HSBC/Household, MBNA and Washington Mutual/Provident) deny the Plaintiffs’ claims and say they have done nothing wrong, improper, or unlawful. If you made foreign transactions between February 1, 1996 and \_\_\_\_\_, 2006 with U.S.-issued Visa, MasterCard, or Diners Club cards, including Agency/Company cards, you are a member of the Settlement Damages Class. If you have U.S.-issued Visa, MasterCard, or Diners Club cards, including Agency/Company cards, you are a member of the Settlement Injunctive Class and will benefit from the settlement even if you did not use such cards to make foreign transactions. The lawsuit asks for money damages and

restitution for the Settlement Damages Class, and injunctive relief for the Settlement Injunctive Class.

If (1) you do not make a claim or opt out of the settlement, AND (2) your employees (a) pay their Agency/Company card accounts individually, (b) are authorized by you to use those accounts for personal transactions, and (c) are permitted by the terms of their employment to make claims on Agency/Company card accounts under the settlement, or to opt out of the Settlement Damages Class on those accounts, individually (rather than through you), then you should immediately give notice of the proposed settlement directly to your employees by circulating the form of notice available at [www.xyzlongurl.com](http://www.xyzlongurl.com). If you provide that form of notice to cardholders as directed in this Notice, notify the Settlement Administrator in writing that you have done so.

What is the settlement?

This settlement includes certain agreements relating to disclosures on billing statements and other documents about foreign transaction pricing (including foreign transaction fees), and the Defendants have agreed to create a settlement fund of \$336,000,000 to pay valid claims, attorneys' fees and costs, and the costs of administering the settlement and notice. The Plaintiffs will also ask the Court for up to \$350,000 in service awards from the settlement fund on behalf of the 20 class representatives for their efforts on behalf of the classes. The Defendants do not waive any right they may have to arbitrate claims made by you or your employees in connection with Agency/Company card use if you opt out of the settlement, or if the settlement does not become final.

The Court has appointed the lawyers listed below (see "More Information") to represent the Settlement Classes. You are free to consult your own counsel in connection with this matter.

What options are there?

- Ask the settlement administrator for a refund in connection with foreign transactions made with Agency/Company cards between February 1, 1996 and \_\_\_\_\_, 2006. The amount of the refund will depend on the dollar value of your claim, **not including any alleged inflation of base exchange rates** (some claims may be adjusted upwards), the number and total dollar value of all valid claims filed, the bank(s) that issue(s) or issued your Agency/Company cards, and the amount of money available to pay claims. Refunds may be partial. Claim procedures are described below; or
- Opt out of the Settlement Damages Class. Opt-out procedures are described below; and
- Object to the proposed settlement. Objection procedures are described below.

## Claim procedures

Acting for Agency/Company accounts, you may submit a claim, in which case you will receive the applicable refund. This is the only way to make a claim if you pay (or paid) the Issuer(s) for the charges incurred by your employees on Agency/Company cards.

To submit a claim, you should request an Agency/Company password from the Settlement Administrator. To do so, go to [www.ccfsettlement.com](http://www.ccfsettlement.com), call 1-800- \_\_\_\_\_ or contact the Settlement Administrator in writing at \_\_\_\_\_. Using the password you are provided, you can then submit your claim securely online at [www.xyzlongurl.com](http://www.xyzlongurl.com). Detailed claim submission instructions are available on the website. If you are unable to submit your claim online, arrangements can be made with the Settlement Administrator to submit your claim on an encrypted claim disk by certified mail. Please contact the Settlement Administrator in writing to request a claim disk, software, and applicable instructions. You should also indicate why you are unable to file the claim online.

Please keep proof of your eligible transactions until your claim has been processed. You may be required to provide such proof to the Settlement Administrator.

If you submit a claim, you will also be asked to affirm, under penalty of perjury, that information submitted with your claim is complete and accurate, that it is the only claim that Agency/Company is submitting and that Agency/Company employees have not and will not submit claims based on their use of Agency/Company cards.

To avoid duplicative claims and facilitate the claims process, Companies that submit claims to the Settlement Administrator should instruct affected employees not to submit claims based on the use of Company cards and not to opt Company accounts out of the Settlement Damages Class. If a Company and one of its employees both submit a claim on the same account, the Settlement Administrator may request additional information from them. Duplicative claims will not be honored.

If you reimburse (or reimbursed) your employees for their Agency/Company card use, you may follow the same procedure described above or, as an alternative, have your individual employees submit claims. If you have your employees submit claims, you should provide them with the notice available at [www.xyzlongurl.com](http://www.xyzlongurl.com). Timely filed and valid claims will then be paid directly to your employees, and you will waive all other rights to a payment from this settlement.

If you make a claim or if you have your employees do so, you cannot opt out of the settlement. By submitting a claim, you authorize the Defendants and the Settlement Administrator to provide and share Agency/Company card information (including information you provided) to verify and process the claim.

## Opt-out procedures

Acting for Agency/Company accounts, you may opt out of the Settlement Damages Class by sending the “Agency/Company Opt-Out Letter” to \_\_\_\_\_, postmarked by \_\_\_\_\_. This is the only way to opt out of the Settlement Damages Class if you pay (or paid) the Issuer(s) for the charges incurred by your employees on Agency/Company cards. The Agency/Company Opt-Out Letter is available at [www.xyziongurl.com](http://www.xyziongurl.com) or by calling 1-800-123-4567.

If you reimburse (or reimbursed) your employees for their Agency/Company card use, you may follow the same procedure or, as an alternative, have individual employees decide whether to opt out of the Settlement Damages Class individually with respect to each account. If you have your employees decide whether to opt out on an individual account basis, you should provide your employees with the notice available at [www.xyzlongurl.com](http://www.xyzlongurl.com). Making a claim on an account precludes opting out. It is not possible to opt out of the Settlement Injunctive Class.

## Objection procedures

Acting for Agency/Company accounts, you may object to the proposed settlement. This is the only way to object to the settlement if you pay (or paid) the Issuer(s) for the charges incurred by your employees on Agency/Company cards.

If Agency/Company objects to the settlement, you must file written objections with the Court and proof of class membership by \_\_\_\_\_. You must also give notice to the attorneys for the Settlement Classes by hand, overnight mail, or by certified mail, return receipt requested. The final approval hearing will be on \_\_\_\_\_ at \_\_\_\_\_ at the U.S. District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007-1581. The hearing is to decide whether to approve the settlement, the class counsels’ requests for attorneys’ fees and costs, and awards for the class representatives. (The time and date may change without further notice to you.) You are free to use your own counsel in connection with evaluating or submitting any objection, or otherwise participating in the hearing.

If you reimburse (or reimbursed) your employees for their Agency/Company card use, you may follow the same procedure or, as an alternative, have your individual employees object to the settlement. If you have your individual employees file objections, you should provide them with the notice available at [www.xyzlongurl.com](http://www.xyzlongurl.com).

How will the attorneys for the settlement classes be paid?

The lawyers for the class members will request 27.5% of the \$336,000,000 settlement fund, plus interest, for attorneys’ fees for investigating the facts, litigating and resolving

the case. They will also request reimbursement of their actual expenses, not to exceed \$5,000,000, to be paid from the settlement fund.

Are other cases affected by this settlement?

Yes. There are other cases in federal and state courts against Visa, MasterCard, and/or some Defendant Banks concerning their disclosure of foreign transaction pricing, including fees. These cases are listed below. Claims in those cases will be extinguished if this settlement is approved, but you can still make a claim here, as described above, for foreign transactions between February 1, 1996 and \_\_\_\_\_.

MasterCard has agreed to pay a total of \$3,350,000 in attorneys' fees and costs in the cases marked below with an asterisk (\*). In addition, Visa and MasterCard have agreed to pay \$32,000,000 to the attorneys who, for 6 years, litigated *Schwartz v. Visa Intl Corp.*, No. 822404-4 (CA), including a trial and appeals. The Schwartz attorneys are some of the Plaintiffs' attorneys in this case. The cases marked with a plus (+) have also been settled. These payments will not reduce the \$336,000,000 settlement fund.

Release of claims and binding effect of Settlement

If the settlement receives final court approval, it will be binding on the Settlement Injunctive Class. The settlement will also bind all members of the Settlement Damages Class that do not validly opt out, and, upon final court approval, such members will release all claims, whether known or unknown, against each of the Defendants, each of the Visa and MasterCard member banks, and the related entities and individuals of each of the above, which (1) in whole or in part arise out of or relate to any foreign transaction, or the disclosure or pricing thereof, including, without limitation, any and all claims that are based in whole or in part on any act, agreement, conduct or omission up to \_\_\_\_\_, 2006 that has or had, and/or allegedly has or had, the purpose or effect of fixing, inflating, embedding, concealing, or inadequately disclosing the nature, pricing, or any other aspect of any credit or debit/ATM card foreign transaction (including, but not limited to, foreign transaction fees, base exchange amounts, and/or any component of either), or (2) are, have been, or could have been asserted within the scope of the facts asserted in the litigation. For more information on the release, including certain limitations and defined terms, see the settlement agreement.

More Information

This notice is only a summary. For a complete copy of the settlement agreement, to see court orders and other documents about this case, or for answers to questions about the settlement, go to: [www.xyz.com](http://www.xyz.com). Or call 1-800-123-4567. You can also go to the Courthouse during regular business hours to see court documents: Clerk of the Court, United States Courthouse, 500 Pearl Street, New York, New York 10007-1581. Do not contact the Court with questions about this case.

Or mail your questions to the attorneys for the Settlement Classes:

Bonny E. Sweeney  
Lerach Coughlin Stoia Geller Rudman & Robbins, LLP  
655 West Broadway, Ste. 1900  
San Diego, CA 92101

Merrill G. Davidoff  
Berger & Montague, P.C.  
1622 Locust Street, Philadelphia, PA 19103

<sup>1</sup>Certified statewide classes: \*Cavette v. MasterCard, CT-002506-03 (Shelby Cty., TN), W2005-02422-SC-S09-CV (TN Sup Ct); Schrank v. Citibank, 03 Civ. 2843 (SDNY, NY). Proposed statewide classes: \*Fischer v. MasterCard, 03600572/2003 (NY Cty., NY), \*Friedman v. MasterCard, CV 04-539330 (Cuyahoga Cty., OH), Gastineau v. MasterCard, CV 2004-283 (Lonoke Cty., AK), \*Gillard v. MasterCard, 03 CH06659 (Cook Cty., IL), 05-3143 (IL Ct App, 1st Dist), \*Hernandez v. MasterCard, C-1056-03-C (Hidalgo Cty., TX), \*Johnson v. MasterCard, 62-C7-04-009691 (Ramsey Cty., MN), \*Perry v. MasterCard, CV 2003-007154 (Maricopa Cty., AZ), Relativity travel v. JP Morgan Chase Bank, 05601075/2005 (NY Cty., NY), \*Rubin v. MasterCard, 03-09368 CA 20 (Dade Cty., FL), 3D05-2373 (FL Ct App, 3rd Dist), \*Salkin v. MasterCard, 002648 (Phila. Cty., PA), 1741 EDA 2005 (PA Super Ct, Eastern Dist), Bildstein v. MasterCard, 03 Civ 9826 (SDNY, NY). Proposed nationwide classes: Clarcken v. Diners Club, 01 Civ 10857 (SDNY, NY), Gaffigan v. MasterCard, 042-07768 (St. Louis, MO) (nationwide, except IL and CA), +Mattingly v. Visa, RG05198142 (Alameda Cty., CA) (nationwide for Visa; CA. for MasterCard), +Shrieve v. Visa, RG04155097 (Alameda Cty., CA) (nationwide for Visa; CA for MasterCard; also on behalf of general public). Includes proposed nationwide class: +Baker v. Visa, 06-CV-0376 (SD, CA). General public nationwide: Schwartz v. Visa, 822404-4 (Alameda Cty., CA) (CA general public only for MasterCard), A105222 (CA Ct App, 1st Dist), S-138751 (CA Sup Ct). For more information about these cases, go to: [www.xyzlongurl.com](http://www.xyzlongurl.com), or call 1-800-123-4567.

## Exhibit 3

### Publication Notice

#### - Legal Notice -

This summary notice is authorized by the U.S. District Court for the Southern District of New York.

Before any money is paid, there will be a settlement approval hearing.

To: Visa-, MasterCard-, and Diners Club-branded Credit and Debit/ATM Cardholders

If you (individuals, companies, and agencies) used a Visa or MasterCard credit or debit/ATM card, or a Diners Club credit card (including charge cards) to make a foreign transaction between February 1, 1996 and Month 00, YYYY, you could get a refund from a class action settlement. The settlement applies to you even if you did not make a foreign transaction, and you will benefit from it.

What is this lawsuit about?

The lawsuit (called In re Currency Conversion Fee Antitrust Litigation) claims that Visa, MasterCard, their member banks, and Diners Club conspired to set and hide the price of foreign transactions (including fees, typically 1-3%) in violation of federal and state law, and that Visa and MasterCard inflated their base exchange rates before applying these fees. The Defendants (Visa, MasterCard, Bank of America, Bank One/First USA, Chase, Citibank, Diners Club, HSBC/Household, MBNA and Washington Mutual/Provident) deny these claims.

What is the settlement?

The settlement provides \$336,000,000 to pay claims, the costs of administering the settlement and notice, and court-awarded attorneys' fees (up to 27.5% of the settlement fund, plus interest and expenses) and awards for the class representatives. The Defendants also agree to certain disclosure-related practices. If approved, the settlement will bind you. If you are eligible to make a claim and do not opt out, you will release all claims related to any foreign transaction, or the subject matters of the lawsuit, against the Defendants, the member banks, and related entities and individuals. Claims in other cases involving foreign transactions will also be extinguished, but you can still make a claim here, if you are eligible for a refund. Settlement agreements have also been signed in some of these other cases. These agreements include payment of fees and expenses to attorneys, some of whom have represented the Plaintiff in *Schwartz v. Visa (CA)*. These payments will not reduce the \$336,000,000 settlement.

Do I have to go to court?

No, but you may if you want to. You may also hire an attorney, at your own cost, if you want to. The court hearing to decide whether to approve the settlement is on xx/xx/xxxx at \_\_\_ at The U.S. District Court for the Southern District of New York, 500 Pearl Street, New York, N.Y., 10007-1581. If you plan to go, check with the court to confirm the time and date.

Am I eligible for a refund?

Yes, if you made a foreign transaction with a Visa, MasterCard, or Diners Club credit or debit/ATM card between February 1, 1996 and Month 00, YYYY. The amount of your refund will depend on the amount of total claims, the dollar value of your claim (not including any alleged inflation of base exchange rates), the bank that issued your card, and the amount of money available to pay claims. You might only get a partial refund.

Do I have other options?

Yes, you may:

- Object. You must file your written objection and proof of class membership with the court. You do not have to go to court or hire an attorney. But you can if you want to, at your own cost.

Deadline: Month Day, YEAR

- Opt out. If you are eligible for a refund from the settlement but do not want one, and you want to keep your right to sue for money, you must opt out by sending the opt-out form letter (available at: [www.xyzlongurl.com](http://www.xyzlongurl.com) or by calling: 1-800-945-9890) to: P.O. Box 56789, Anytown, HI 12345. If you opt out, you cannot get money from the settlement. You cannot opt out of the part of the settlement involving agreed disclosure-related practices.

Deadline: Month Day, YEAR

For more information...

This notice is only a summary. For answers to common questions and more information, visit [www.xyzlongurl.com](http://www.xyzlongurl.com). For recorded information, call: 1-800-945-9890.

How do I ask for a refund?

File a claim for your refund online at: [www.xyzlongurl.com](http://www.xyzlongurl.com)

Or file by mail (get a claim form at [www.xyzlongurl.com](http://www.xyzlongurl.com), or by calling 1-800-945-98890).

Deadline: Month Day, YEAR

Recorded Information and Claim Forms: 1-800-945-9890

Ask for your refund: [www.xyzlongurl.com](http://www.xyzlongurl.com)