

BY ORDER OF THE CIRCUIT COURT FOR PRINCE GEORGE’S COUNTY

If you paid a Service Fee to NovelPay in connection with NovelPay’s collection of charges arising from residential real property located in Maryland, including rent and community association dues, during the period beginning April 19, 2018 through and including December 26, 2024, you could be part of a Class Action Settlement.

*The Circuit Court for Prince George’s County, Maryland authorized this notice.
This is not a solicitation from a lawyer.*

- Through a proposed Class Action Settlement, NovelPay, LLC (“NovelPay”) has agreed without any admission of wrongdoing to resolve a lawsuit over whether NovelPay acted as a collection agency and charged Service Fees to Maryland tenants without a collection agency license or bond, allegedly in violation of Maryland law.
- The proposed Class Action Settlement avoids costs and risks from continuing the lawsuit, pays money to Settlement Class Members who file Valid Claims, and releases NovelPay from liability to Class Members.
- Under the proposed Settlement, NovelPay will fund a common fund of \$3,000,000 (the “Common Fund”). This Common Fund will be used to make payments to all Settlement Class Members who file Valid Claims, after deducting Class Counsel’s Court-approved expenses and attorneys’ fees. In return, Settlement Class Members give up any right to sue for claims resulting from, arising out of, or regarding the factual predicate alleged in the Litigation.
- Court-appointed lawyers for Settlement Class Members will ask the Court to approve a payment of 1/3 of the Common Fund as attorneys’ fees, plus their expenses of litigation, for investigating the facts, litigating the case, and negotiating the Settlement.
- In addition, NovelPay has agreed to pay the costs of settlement administration, and to pay the Class Representative an incentive payment of up to \$15,000 in addition to the Common Fund, subject to Court Approval.
- The two sides disagree on whether a class action could have been maintained, whether NovelPay did anything wrong, and how much money was at stake.
- **If you are a Settlement Class Member, your legal rights are affected whether you act, or don’t act. Read this notice carefully.**

QUESTIONS? CALL (833) 319-2034 TOLL FREE, OR VISIT www.StokesClassSettlement.com

LEGAL RIGHTS AND OPTIONS FOR CLASS MEMBERS:

FILE A CLAIM	If you paid a Service Fee to NovelPay in connection with NovelPay’s collection of charges arising from residential real property located in Maryland, including rent and community association dues, during the period beginning April 19, 2018 through and including December 26, 2024, you are a Settlement Class Member and you can file a claim online, or download and mail a Claim Form at www.StokesClassSettlement.com or you can ask the Settlement Administrator to mail you a Claim Form by calling (833) 319-2034. The deadline to file a claim is August 8, 2025 .
DO NOTHING	If you do not file a Valid Claim, you will not receive any payment, even if you are a Settlement Class Member. You will still be bound by the Settlement and will still release NovelPay from liability to you. If you remain in the Settlement Class, you can’t sue, continue to sue, or be part of any other lawsuit against NovelPay about the claims which were made or could have been made in the Lawsuit.
EXCLUDE YOURSELF	If you “opt out” or exclude yourself, you will get no settlement benefits. This is the only option that allows you to ever bring an action against NovelPay about legal claims sharing the factual predicate of the claims asserted in this case. If you wish to exclude yourself from the Settlement, you must mail a request for exclusion to the Settlement Administrator postmarked no later than March 26, 2025 , as explained herein.
OBJECT	If you have objections, you may write to the Court about why you don’t like the Settlement. The deadline to object is March 26, 2025 .
GO TO A HEARING	If you write to the Court with an objection, you can also ask to speak in Court about the fairness of the Settlement.

- These rights and options -- **and the deadlines to exercise them** -- are explained in this notice.
- The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved. Please be patient.

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BASIC INFORMATION

1. Why did I get this notice?

You received this notice because NovelPay identified you as a person who paid a Service Fee to NovelPay in connection with NovelPay's collection of charges arising from residential real property located in Maryland, including rent and community association dues, during the period beginning April 19, 2018 through and including December 26, 2024.

The Court sent this notice because Settlement Class Members have a right to know about this class action lawsuit and Settlement, and about your option to exclude yourself from the class action and Settlement if you so desire.

The Court in charge of the case is the Circuit Court for Prince George's County, Maryland, and the case is known as *Stokes v. NovelPay, LLC*, Case No. C-16-CV-24-001546.

2. What is this lawsuit about?

The lawsuit claims that NovelPay acted as a collection agency in Maryland without a legally-required Maryland collection agency license or bond when it collected amounts due for residential property, such as rent and homeowner's association dues, and that it violated Maryland law by charging Service Fees in connection with that unlicensed activity. NovelPay denies these claims and believes it did nothing wrong.

3. Why is this a class action?

In a class action, one or more individuals called Class Representatives (in this case Samuel Stokes), file claims on behalf of themselves as well as other individuals who have similar claims. If a Court determines that those similar claims should all be handled in one lawsuit, the Court may order that the claims proceed as a class action. The Circuit Court for Prince George's County, Maryland is in charge of this class action.

4. Why is there a settlement?

The Court did not decide any of the issues. The Class Representative alleged the Class should be allowed to recover the Service Fees NovelPay charged to the approximately 61,637 Class Members, after a trial. NovelPay asserts that it did nothing wrong, so the Class should not recover anything. But there was no trial. Instead, both sides agreed to a settlement. That way, they avoid the costs of additional and protracted legal proceedings, potentially including a trial and appeals, and Class Members will get compensation if they file a valid and timely claim. Class Counsel think the Settlement is best for all Class Members.

WHO IS IN THE SETTLEMENT

5. How do I know if I am part of the Settlement?

The parties agreed and the Circuit Court for Prince George's County ordered that everyone who fits the following description is a Settlement Class Member (with some exceptions):

All persons who paid a Service Fee to NovelPay in connection with NovelPay's collection of charges arising from residential real property located in Maryland, including rent and community association dues, from April 19, 2018 through December 26, 2024.

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6. Are there exceptions to being included?

The Settlement Class excludes all employees, officers and directors of NovelPay, and all employees of the Court.

7. I'm still not sure if I am included.

If you are still not sure whether you are included, you can ask for free help. You can call (833) 319-2034 or visit www.StokesClassSettlement.com for more information.

8. What am I giving up to stay in the Settlement?

Unless you exclude yourself from this case, you will remain a Settlement Class Member, and that means that you can't sue, continue to sue, or be part of any other lawsuit against NovelPay about claims sharing the factual predicate of the claims in the Litigation. It also means that all of the Court's orders will apply to you and legally bind you. The full scope of the release is available in the Settlement Agreement on the Settlement Website.

THE SETTLEMENT BENEFITS – WHAT YOU GET

9. What does the Settlement provide?

NovelPay has agreed to pay \$3,000,000 into a common fund (the "Common Fund"). The Common Fund will be used to make payments to all Settlement Class Members who file Valid Claims, after deducting payment to Class Counsel for Court approved expenses and up to 1/3 of the Common Fund in attorneys' fees. In order to make a Valid Claim, Settlement Class Members must choose whether to receive their settlement payment in the form of a paper check, or in the form of an electronic payment. NovelPay has represented that the Settlement Class includes approximately 61,637 persons. Settlement Class Members who file Valid Claims will be entitled to a pro rata payment in proportion to the amount of Service Fees charged to the Settlement Class Member submitting a Valid Claim (according to NovelPay's records) as compared to the total amount of Service Fees charged to all Settlement Class Members who file Valid Claims. Settlement Class Members who file Valid Claims and were charged more in Service Fees will receive larger payments than Settlement Class Members who were charged less in Service Fees; and, each Settlement Class Member's payment amounts will increase or decrease proportionally based upon the total number of Valid Claims filed. Settlement Class Members may file claims by visiting www.StokesClassSettlement.com, or through a paper Claim Form. Under the Settlement, Settlement Class Members give up any right to sue for claims resulting from, arising out of, or regarding the factual predicate alleged in the Litigation.

In addition to the Common Fund, NovelPay has agreed to pay the costs of settlement administration, subject to a right to recoup up to \$150,000 of those costs from any Unclaimed Settlement Payments. NovelPay has also agreed to pay an additional \$15,000 in a service payment to the Named Plaintiff, Samuel Stokes, subject to Court approval.

All claims must be made on or before **August 8, 2025**. If you do not file a Valid Claim, you will not receive any payment. However, even if you do not file a claim you will still be bound by the Settlement if you do not opt-out. You may file a claim on www.StokesClassSettlement.com, or you may submit a paper Claim Form.

10. Can I file more than one claim?

No. Even if you paid multiple Service Fees to NovelPay, you only need to file one claim.

QUESTIONS? CALL (833) 319-2034 TOLL FREE, OR VISIT www.StokesClassSettlement.com

HOW YOU FILE A CLAIM

11. How can I file a claim?

The deadline for filing a claim is **August 8, 2025**.

You must file a claim, either online or by mail, to receive payment.

You may file a claim at www.StokesClassSettlement.com. You may also download a Claim Form on www.StokesClassSettlement.com, print it out, complete it, and deliver it to the Settlement Administrator; or, you may ask the Settlement Administrator to mail you a Claim Form for you to complete and return by calling (833) 319-2034.

Whatever method you choose, you must fully complete the Claim Form and properly submit it to the Settlement Administrator before your claim will be recognized as being filed.

12. If I file a claim, when will I get paid?

The Court will hold a hearing on **April 28, 2025**, to decide whether to approve the Settlement. If the Court approves the Settlement, and there is no appeal, the Settlement Administrator will send payments to Settlement Class Members who have filed valid and completed claims on a date that is the later of forty-five (45) days after: (1) the Effective Date; or (2) the Claims Deadline. The deadline for filing a claim is **August 8, 2025**.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you don't want to stay in the Class, then you must take steps to get out. This is called excluding yourself — or is sometimes referred to as “opting out” of the Class.

13. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must send a letter by mail saying that you want to be excluded from the Class in *Stokes v. NovelPay, LLC*. Be sure to include your name, address, telephone number, and your signature. You must mail your exclusion request postmarked no later than **March 26, 2025** to:

Stokes v. NovelPay, LLC Exclusions
c/o Settlement Administrator
P.O. Box 16
West Point, PA 19486

If you ask to be excluded by the deadline, you will not be eligible for any settlement payment, and you cannot object to the Settlement, but you will not be legally bound by anything that happens in this lawsuit. Full details regarding the exclusion process are available in the Settlement Agreement on the Settlement Website.

14. If I don't exclude myself, can I sue NovelPay later?

No. Unless you exclude yourself, you give up any right to sue the Released Parties for claims resulting from, arising out of, or regarding the factual predicate alleged in the Litigation. If you have another pending lawsuit about the claims in this lawsuit, speak to your lawyer in that case immediately. You must exclude yourself from *this* Settlement Class to continue another lawsuit sharing the same factual predicate as this case. Remember, the exclusion deadline is **March 26, 2025**.

15. If I exclude myself, can I get benefits from this Settlement?

No. If you exclude yourself, you cannot be part of this Settlement.

QUESTIONS? CALL (833) 319-2034 TOLL FREE, OR VISIT www.StokesClassSettlement.com

THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer in this case?

The Court appointed the law firm of Gordon, Wolf & Carney, Chtd., in Hunt Valley, Maryland, to represent you and other Class Members. These lawyers are called Class Counsel. You will **not** be individually charged for these lawyers. If you are a Settlement Class Member and you want to be represented by your own lawyer, and you do not request exclusion, you may hire a lawyer at your own expense and enter an appearance through that lawyer.

17. How will the lawyers be paid?

Class Counsel will ask the Court to approve payment of one-third of the Common Fund for attorneys' fees, plus the expenses they incurred litigating this case. The fees would pay Class Counsel for investigating the facts, litigating the case, and negotiating the Settlement.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you don't agree with the Settlement or some part of it.

18. How do I tell the Court that I don't like the Settlement?

If you're a Settlement Class Member, you can object to the Settlement if you don't like any part of it. You can give reasons why you think the Court should not approve it. To object, you must send a letter saying that you object to the Settlement in *Stokes v. NovelPay, LLC*, Case No. C-16-CV-24-001546. The letter must also include the following: (1) the Settlement Class Member's full name, address and current telephone number; (2) if the individual is represented by counsel, the name and telephone number of counsel, if counsel intends to submit a request for fees and all factual and legal support for that request; (3) all objections and the basis for any such objections stated with specificity, including a statement as to whether the objection applies only to the objector, to a specific subset of the class, or to the entire class; (4) the identity of any witnesses the objector may call to testify; (5) a listing of all exhibits the objector intends to introduce into evidence at the Final Approval Hearing, as well as true and correct copies of such exhibits; and (6) a statement of whether the objector intends to appear at the Final Approval Hearing, either with or without counsel. Representative Plaintiff, Class Counsel, and/or NovelPay may take discovery regarding any objector, their attorney (if applicable), and the basis for any objection, subject to Court approval. By filing an objection, objectors and their counsel submit to the jurisdiction of the Court for all purposes of this Litigation and Settlement, including but not limited to subpoenas and discovery.

Any Settlement Class Member who fails to timely file and serve a written objection pursuant to these requirements shall not be permitted to object to the approval of the Settlement or the Agreement and shall be foreclosed from seeking any review of the Settlement or the terms of the Agreement by appeal or other means. For any objection to be considered, it must include the information described in the above paragraph, and a copy must be mailed to each of these three different places below, postmarked no later than **March 26, 2025**:

COURT	CLASS COUNSEL	NOVELPAY'S COUNSEL
Clerk, Circuit Court for Prince George's County, 14735 Main Street Upper Marlboro, MD 20772	Benjamin H. Carney, Esq. GORDON, WOLF & CARNEY, CHTD. 11350 McCormick Rd. Executive Plaza 1, Suite 1000 Hunt Valley, MD 21031	Mary M. Gardner, Esq. VENABLE LLP 600 Massachusetts Avenue NW Washington, DC 20001

QUESTIONS? CALL (833) 319-2034 TOLL FREE, OR VISIT www.StokesClassSettlement.com

19. What's the difference between objecting and excluding?

Objecting is simply telling the Court that you don't like something about the Settlement and that you don't want it approved. You can object only if you stay in the Settlement Class. Excluding yourself, on the other hand, is telling the Court that you don't want to be part of the Settlement Class. If you exclude yourself, you cannot object because you are excluded from the Settlement Class and the case no longer affects you.

THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the Settlement as fair to the Class. You may attend and you may ask to speak, but you don't have to.

20. When and where will the Court decide whether to approve the Settlement?

The Court is scheduled to hold a Fairness Hearing at 9:00 AM on April 28, 2025, in the Circuit Court for Prince George's County, 14735 Main Street, Upper Marlboro, MD 20772. The time or place of the hearing could change or it could be canceled, and you can contact the Settlement Administrator to find out if there is any change, at (833) 319-2034. At this hearing the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are timely and valid objections, the Court will consider them. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long the Court's decision will take.

21. Do I have to come to the hearing?

No. But you are welcome to come at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as you mailed your written objection on time and included the required information, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

22. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter saying that it is your "Notice of Intention to Appear in *Stokes v. NovelPay, LLC*, Case No. C-16-CV-24-001546". Be sure to include your name, address, telephone number, and your signature. Your Notice of Intention to Appear must be postmarked no later than **March 26, 2025**, and be mailed to the Clerk of the Court, Class Counsel, and NovelPay's Counsel, at the three addresses listed in the answer to question 18. You cannot speak at the hearing if you exclude yourself, or if you fail to timely file a Notice of Intention to Appear.

IF YOU DO NOTHING

23. What happens if I do nothing at all?

If you fit the Class definition above and do nothing, you will not receive any payment. But, unless you exclude yourself, you will still be a Settlement Class Member, you won't be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit sharing the factual predicate of the Litigation.

GETTING MORE INFORMATION

24. Are there more details about the lawsuit and proposed Settlement?

This notice summarizes the lawsuit and proposed Settlement. More details are in the Complaint, Settlement Agreement, and other documents filed in Court. You can get a copy of the Complaint, Settlement Agreement, and other important documents from the Court or by requesting them from the Settlement Administrator. You can also call (833) 319-2034 toll free; write to *Stokes v. NovelPay, LLC*, c/o Settlement Administrator, P.O. Box 16, West Point, PA 19486; or visit the website at **www.StokesClassSettlement.com** where you will find answers to common questions about the lawsuit and other information to help you determine whether you are a Settlement Class Member.

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