

**From:** [PSLClassActionSettlement@ClaimsAdministratorDomain.com](mailto:PSLClassActionSettlement@ClaimsAdministratorDomain.com)  
**To:** JonQClassMember@domain.com  
**Re:** St. Louis Rams PSL - Legal Notice of Class Action Settlement

## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

*McAllister v. The St. Louis Rams, LLC*, No. 4:16-CV-00172-SNLJ  
*Envision v. The St. Louis Rams, LLC*, No. 4:16-CV-00262  
*Arnold v. The St. Louis Rams, LLC*, No. 4:16-CV-00297

(United States District Court for the Eastern District of Missouri)

You are receiving this notice because you may have owned a St. Louis Rams personal seat license (“PSL”) at the end of the 2015 NFL football season.

This notice informs you of a proposed settlement of three class action lawsuits called *McAllister v. The St. Louis Rams, LLC*, No. 4:16-CV-00172-SNLJ, *Envision v. The St. Louis Rams, LLC*, No. 4:16-CV-00262, and *Arnold v. The St. Louis Rams, LLC*, No. 4:16-CV-00297. The proposed settlement resolves claims about whether The St. Louis Rams, LLC, owner of the St. Louis Rams franchise in the NFL from 1995-2015, violated the plaintiffs’ rights under certain contracts. Those contracts gave the plaintiffs licenses, called “personal seat licenses” or “PSLs.” Two PSL contracts exist. The first, “the FANS PSL Agreement,” was used by an entity known as FANS, Inc., to sell PSLs until March 31, 1996. The second, “the Rams PSL Agreement,” was used by the Rams to sell PSLs after FANS, Inc. stopped selling them.

The plaintiffs allege that the Rams violated certain provisions of the FANS PSL Agreement and the Rams PSL Agreement when the Rams relocated to Los Angeles, California, in 2016. The Rams deny all claims of wrongdoing and have agreed to a proposed settlement in order to avoid incurring further expenses and burdens relating to this litigation.

**Am I a Class Member?** Our records indicate you may be a Class Member. There are two types of Class Members (one for each type of PSL Agreement): FANS Class Members and Rams Class Members.

FANS Class Members are all persons or entities who, at the conclusion of the 2015 season, owned a PSL purchased from FANS, Inc. that was not later transferred or upgraded to a higher-priced tier and who (a) had purchased Rams season tickets for the 2015 season or (b) did not purchase Rams season tickets for the 2015 season but did not receive a written PSL cancellation notice.

Rams Class Members are:

- A) All persons or entities who:
  - 1) purchased PSLs directly from the Rams; or
  - 2) had any Rams or FANS PSL transferred to them; or
  - 3) upgraded their PSL tier (e.g. from a \$500 PSL to a \$1000 PSL); and
- B) purchased Rams season tickets for the 2015 season; or

- C) did not purchase Rams season tickets for the 2015 season but did not receive a written PSL cancellation notice from the Rams.

For more information to help you determine whether you are a Class Member, go to [www.RamsPSLClassActionSettlement.com](http://www.RamsPSLClassActionSettlement.com).

**What Can I Get?** If you meet the qualifications to be a Class Member, the proposed settlement, if approved, will allow you to file a claim to receive an Award based on the tier price for each PSL in the Dome at America's Center that you owned at the end of the 2015 NFL football season, as follows:

<b>PSL Tier Price</b>	<b>Pay-Out for Qualified Claim</b>
\$250	\$75
\$500	\$150
\$1,000	\$300
\$2,500	\$750
\$3,000	\$900
\$4,500	\$1,350

There is a settlement cap, or limitation, on the settlement payments that the Rams may be required to pay to Class Members. Specifically, the Rams will pay no more than \$24,000,000 to the Claimants, divided evenly between the Rams Class (\$12,000,000 cap) and FANS Class (\$12,000,000 cap). If the number of claims filed would require payment of more than the settlement cap for either class, then the payment for each qualified claim in the affected class will be adjusted on a pro rata basis.

**How Do I Get a Payment?** To be eligible for payment, Class Members must submit a claim form, which is available at [www.RamsPSLClassActionSettlement.com](http://www.RamsPSLClassActionSettlement.com). You may complete and submit the claim form online at the settlement website or mail your completed and signed claim form to the settlement administrator listed on the claim form. The claim form must be postmarked or submitted online no later than **[60 days after final approval hearing date]**. A settlement administrator will determine if you qualify to receive a payment.

**What are My Other Options?** If you do not want to be legally bound by the proposed settlement, you must exclude yourself by **[75 days after preliminary approval hearing date]**. If you do not exclude yourself, you will release any claims you may have against the Rams and the settlement will be binding on you, as more fully described in the Settlement Agreement, available at the settlement website. If you are a Class Member and do not exclude yourself, you may object to the terms of the proposed settlement by **[75 days after preliminary approval hearing date]**. For more information about excluding yourself from, or objecting to, the proposed settlement, please visit [www.RamsPSLClassActionSettlement.com](http://www.RamsPSLClassActionSettlement.com). The timeliness of requests for exclusion and objections will be conclusively determined by the post-mark date or other like proof of the date of mailing or delivery.

**Who Represents Me?** The Court appointed the following law firms to represent you and other Class Members. These lawyers are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

**FANS CLASS COUNSEL**

**THE BRUNING LAW FIRM, LLC**

Anthony S. Bruning  
Anthony S. Bruning, Jr.  
Ryan L. Bruning  
Edward M. Roth  
555 Washington Avenue, Suite 600  
St. Louis, MO 63101  
P. 314-735-8100 / F. 314-735-8020

**LAW OFFICE OF RICHARD S.  
CORNFELD**

Richard S. Cornfeld  
1010 Market Street, Suite 1645  
St. Louis, MO 63101  
P. 314-241-5799 / F. 314-241-5788

**GOLDENBERG HELLER &  
ANTOGNOLI, P.C.**

Mark Goldenberg  
Thomas P. Rosenfeld  
Kevin P. Green  
2227 South State Route 157  
Edwardsville, IL 62025  
P. 618-656-5150 / F. 618-656-6230

**RAMS CLASS COUNSEL**

**BERMUDEZ LAW STL, LLC**

Fernando Bermudez  
7701 Forsyth Blvd., Suite 950  
Clayton, Missouri 63105  
Phone: 314-339-3082

**LAW OFFICES OF MARTIN M. GREEN, P.C.**

Martin M. Green  
7701 Forsyth Blvd., Suite 950  
Clayton, Missouri 63105  
Phone: 314-862-6800  
Fax: 314-862-1606

**DANNA MCKITRICK, P.C.**

David R. Bohm  
Michael R. Cherba  
7701 Forsyth Blvd., Suite 800  
St. Louis, MO 63105-3907  
(314) 726-1000/(314) 725-6592 fax

**When Will the Court Consider the Proposed Settlement?** The Court will hold a Hearing on [\[insert date\]](#) to consider whether to approve the proposed settlement and a request for attorneys' fees and expenses and a service award to the Class Representatives. The Rams have agreed not to oppose Class Counsel's request for payments up to \$7,400,000 for attorney's fees and expenses and \$50,000 in the aggregate to the class representatives. The amount awarded by the Court will be paid separately by the Rams and will not be applied to the caps described above. You may appear at the hearing, either by appearing yourself or through an attorney hired by you, but you don't have to. For more information, visit the website or call the number below.

[www.RamsPSLClassActionSettlement.com](http://www.RamsPSLClassActionSettlement.com)

[\[insert phone number\]](#)

**How Do I Get More Information?** For more information, including a more detailed Long Form Notice, Claim Form, a copy of the Settlement Agreement, and other documents, go to [www.RamsPSLClassActionSettlement.com](http://www.RamsPSLClassActionSettlement.com) or contact the Claims Administrator at [\[insert phone number\]](#).