

# Exhibit C

**Exhibit A to Bacon et al. v. ABG et al.  
Settlement Agreement**

**(Email Notice)**

To: [Class Member Email Address]  
From: Payless GSO/RSP Settlement Administrator  
Subject: Notice of Class Action and Proposed Settlement

**Class Member ID:**  
**Confirmation Code:**

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY**

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**If you are a U.S. resident who paid a Gas Service Option (“GSO”) and/or Roadside Protection (“RSP”) Charge in connection with renting from Payless in the U.S. from January 1, 2016 through November 25, 2023, you may be eligible for a payment from a class action Settlement.**

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*A federal court authorized this notice. This is not a solicitation from a lawyer.*

- A Settlement has been reached with Avis Budget Group, Inc. (“ABG”) and Payless Car Rental, Inc. (“Payless”) (collectively, the “Defendants”) in a class action lawsuit about GSO/RSP Charges. If the Court gives final approval to the Settlement, Defendants will provide for each Class Member to receive a cash payment depending on eligibility (“Settlement Payment”). The Court in charge of this Action has preliminarily approved the Settlement and must decide whether to give final approval to the Settlement. The relief provided to Class Members will be provided only if the Court gives final approval to the Settlement and, if there are any appeals, after the appeals are resolved in favor of the Settlement. Please be patient.
- You are receiving this email because your email address was associated with a rental in Payless’s records. You are included in this Settlement as a Class Member if you are a U.S. and Canada residents who (1) rented from Payless in the United States from January 1, 2016 through November 25, 2023 (“Class Period”), and (2) in connection with that rental, you incurred charges for GSO and/or RSP.
- Your rights are affected whether you act or don’t act. Please read this Notice carefully.

<b>SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>		<b>DEADLINE</b>
<b>EXCLUDE YOURSELF</b>	If you exclude yourself from the Settlement, you will not receive a Settlement Payment under the Settlement. Excluding yourself is the only option that allows you to sue, continue to sue, or be part of another lawsuit against the Defendants related to the legal claims this Settlement resolves. You will also cease receiving notice about this case.	<b>[Deadline Date]</b>

<b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>	If you do not exclude yourself from the Settlement, you may object to it by writing to the Court about why you don't like the Settlement and think it should not be approved. You may object to the Settlement and ask the Court for permission to speak at the Final Approval Hearing about your objection. Filing an objection does not exclude you from the Settlement.	<b>[Deadline Date]</b>
<b>Do NOTHING</b>	You will receive a Settlement Payment under the Settlement. You will also give up your right to object to the Settlement or be part of another lawsuit against the Defendants about the legal claims resolved by this Settlement.	No Deadline

**Why am I receiving this notice?**

You received this Notice because a Settlement has been reached in this case. According to Defendants' available records you might be a member of the Settlement Class and may be eligible for the relief detailed below. This Notice explains the nature of the case, the general terms of the proposed Settlement, and your legal rights and obligations. To obtain more information about the Settlement, including information about how you can see a copy of the Settlement Agreement go to [www.\\_\\_\\_\\_\\_com](http://www._____com).

**What is this lawsuit about?**

Plaintiffs filed a class action against Defendants Avis Budget Group, Inc. and Payless Car Rental, Inc., alleging that Defendants violated the New Jersey Consumer Fraud Act by charging for ancillary products and services, such as gas service option ("GSO") and roadside protection ("RSP") when they rented vehicles from them. Defendants deny all the allegations in the litigation and believe that the claims asserted against them are without merit.

**Am I a Class Member?**

You are included in this Settlement as a Class Member if you are a U.S. resident who (1) rented from Payless in the United States from January 1, 2016 to November 25, 2023 ("Class Period") and (2) in connection with that rental, paid a charge for GSO and/or RSP.

**What does the Settlement provide?**

If the Settlement is approved by the Court, Defendants will pay \$19,000,000 into a Settlement Fund to pay cash payments, notice and administration costs, attorneys' fees and costs, and service awards.

**What benefit can I get from the Settlement?**

If the Court grants final approval of the Settlement and the Settlement becomes effective (the "Effective Date"), you may be entitled to reimbursement for some or all of your past out-of-pocket expenses incurred for GSO and RSP. Class Members with GSO charges may receive up to \$20 per rental, and Class Members with RSP charges may receive up to \$12 per rental. If you are a Class Member, you will automatically receive your reimbursement. You may opt to receive your payment electronically via Venmo, Zelle, or e-check by following these steps:

1. Visit the Settlement website [www.\\_\\_\\_\\_\\_com](http://www._____com).
2. Click the "Payment Election" tab.
3. Login using your unique Class Member ID [Class Member ID]
4. Follow the prompts on the following screens to select your payment method of choice.

If you do not elect a payment type, payment will be made to you by digital payment or check as determined by the Settlement Administrator. If you do not want your information exposed to Zelle, you should make another election as set forth above.

**Can I exclude myself from the class?**

If you don't want to be legally bound by the Settlement, your request to be excluded must be mailed postmarked no later than [deadline date], or you will not be able to sue, or continue to sue, the Defendants about the claims and

allegations in this case. Refer to the settlement website and the full Notice for information and instructions on how to exclude yourself.

**Can I tell the Court if I don't like the Settlement?**

If you want to stay in the Settlement Class, but you don't like some part of the Settlement, you can object to it. You can give reasons why you think the Court should not approve it. Your objection must be filed with the Court **no later than [deadline date]**. Refer to the settlement website and the full Notice for information and instructions on how to object. **Do I have a lawyer in this case?**

Yes, if you are a Class Member. The Court has appointed the law firm of Nagel Rice, LLP to represent the Class. These attorneys are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by another lawyer, you may hire one to appear in Court for you at your own expense.

**The Court's Final Approval Hearing.**

The Court's Final Approval Hearing will take place on **DATE at TIME** at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102. At this hearing, the Court will determine whether the Settlement is fair, adequate, and reasonable and whether the objections by Class Members, if any, have merit. If you have filed an objection on time, you may attend and ask to speak, but you don't have to. However, the Court will only listen to people who have asked to speak at the hearing. At this hearing, the Court will also decide the service payments for the Class Representatives, as well as the attorney's fees for the lawyers representing the Class Members. We do not know how long the Court's decision will take, and the hearing date may change due to other court business. You should monitor [www.\[to be inserted\].com](http://www.[to be inserted].com) to find out if any dates have changed and to learn if the Court has approved the Settlement. You may appear at the Final Hearing, but you don't need to.

**Where can I get more information?**

Please visit the settlement website at [website URL] or call toll free 1-XXX-XXX-XXXX to obtain more complete information about the proposed settlement and your rights.