Exhibit D

If you owned, inherited, or held an interest in property that was foreclosed on for non-payment of property taxes in Josephine County or Klamath County between Oct. 13, 2017 and June 7, 2024, you could be eligible for money from a settlement.

This Notice is authorized by a federal court to advise you that you could be a potential Class Member or an heir of a Class Member. You may be entitled to participate in the proposed Settlement. Your rights and options are detailed in this Notice, along with deadlines to act.

This is only a summary. For more information about this lawsuit and your rights, including complete instructions on how to file a Claim, opt out, or object, visit OregonTaxForeclosure.com, call [PHONE NUMBER], or write to [ADDRESS]. The Court has appointed Class Counsel to act on behalf of Class Members, and you may contact them too. Their contact information is posted on the above website.

What is this about?

A proposed Settlement in a class action lawsuit called *Gabbert, et al. v. Josephine County, et al.*, 1:23-cv-01434-IM, is pending in the U.S. District Court for the District of Oregon. The lawsuit alleges that many Oregon counties violated the rights of real property owners or their heirs by failing to pay them their equity in their tax-foreclosed properties that exceeded the unpaid taxes, fees, and other associated costs. Only Josephine and Klamath Counties are participating in this Settlement.

Who is included?

You are included as a Class Member if you owned, inherited, or otherwise held an interest in real property foreclosed on and sold, donated, transferred, or retained by Josephine or Klamath County between Oct. 13, 2017 and June 7, 2024. (Common examples of interests in real property include ownership, mortgage interests, and other types of liens.) If the original owner or interest holder is deceased or no longer exists, then heirs or successors are included as Class Members.

What does the Settlement provide?

Each Class Member who submits a valid Claim will receive a payment of the surplus associated with their tax-foreclosed property. The total amount of a Claim cannot be calculated until all Claims have been submitted and validated. For most eligible properties that the counties have *sold*, the counties have agreed to pay 100% of the surplus sale proceeds, plus applicable interest. For eligible properties that the counties have *not* sold, the counties will continue to try to sell those properties and make any surplus sale proceeds available to the former owners.

The total Settlement Funds are at least $996,507 for Josephine County and at least $5,300,000 for Klamath County. The Settlement Funds may increase if these counties sell additional properties before the deadline for submitting claims. The Settlement Funds will cover payments to Class Members who submit valid claims, the costs of administering the Settlement, and attorneys' fees, which will not exceed 33% of the Settlement Funds. Class Members do not need to pay anything to participate in the Settlement. **The deadline to submit a Claim is [TIME] on [MONTH DAY, YEAR]**.

What are your rights and options?

- **File a Claim:** You must complete and submit a Claim to qualify for a payment under the Settlement. You may file your Claim online or download a claim form at OregonTaxForeclosure.com. If you submit by U.S. mail, claim forms should be sent to **[ADDRESS]. Claims must be postmarked by [TIME] on [MONTH DAY, YEAR]**.
- **Do Nothing**: If you do nothing, you will **not** receive money, but you will be legally bound by decisions of the Court and will give up any right to sue for the claims resolved by this Settlement.
- **Opt Out**: If you do not want to be bound by the Settlement, **you must exclude yourself by [MONTH DAY, YEAR]**.
- **Object**: You may file an objection with the Clerk of Court and explain why you do not like the Settlement. You may still participate in the Settlement by filing a Claim. **Objections must be filed by [MONTH DAY, YEAR].**

When is the Fairness Hearing?

The Court will hold a hearing on **[MONTH DAY, YEAR]**, at **[TIME]** at the United States Courthouse at 1000 SW Third Ave., Portland, OR 97204, to hear any objections, determine if the Settlement is fair, and consider Class Counsel's request for attorneys' fees. The motion for attorneys' fees and expenses will be posted to the settlement website after it is filed and before the hearing. Class Members may attend the Hearing but aren't required to.

What should you do if someone contacts you seeking to buy your Claim?

If you are contacted by any person or organization who says they want to buy the rights to your Claim, be aware that **the amount they offer you for your Claim may be less than the amount you could receive under this Settlement**. You may contact Class Counsel for advice about any such offers. Class Counsel's contact information is available at **OregonTaxForeclosure.com**.