Exhibit C

CLASS ACTION SETTLEMENT NOTICE

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON

Gabbert, et al. v. Josephine County, et al., 1:23-cv-01434-IM

If you held, or are the heir and successor to a person or entity who held, an ownership interest in, or a valid lien on, real property that was foreclosed on for the non-payment of real property taxes in Josephine or Klamath County between October 13, 2017 and June 7, 2024, you may be entitled to a payment from a class action settlement.

A federal court has authorized this Notice.

- A settlement (the "Settlement") has been proposed in the class action lawsuit referenced above, pending in the United States District Court for the District of Oregon, captioned *Gabbert, et al. v. Josephine County, et al.*, 1:23-cv-01434-IM.

- This class action alleges that Oregon counties—including Josephine and Klamath Counties—violated the rights of Class Members by taking title to tax-foreclosed properties and either selling them or retaining them without returning to the property owners the Surplus in those properties. "Surplus" is defined as the difference between the property's sale price or property value on the one hand, and the amount of unpaid taxes, fees, and related costs on the other hand. Josephine and Klamath Counties have chosen to resolve the claims brought against them by entering into this Settlement.

- The United States District Court for the District of Oregon ordered the issuance of this Notice. Josephine and Klamath Counties deny doing anything wrong and have defended themselves. The Court has not decided who is right. Both sides have agreed to settle the dispute to avoid burdensome and costly litigation. The Settlement offers Surplus payments to members of the Settlement Class who file Eligible Claims.

- The Parties were able to reach this Settlement, which considers the various risks identified above and seeks to end, for the counties participating in the Settlement, liability arising from the United States Supreme Court's decision in *Tyler v. Hennepin County*, 598 U.S. 631 (2023).

- **You are being sent this Notice because you are a potential Class Member or heir of a Class Member and may be entitled to participate in the proposed Settlement. Your rights and options are detailed in this Notice, along with deadlines to act.**

- **Your legal rights are affected whether you act or not. Read this Notice carefully.**

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM BY [DATE]	If you are a member of the Settlement Class or an heir of a Class Member, you must submit a completed Claim to be eligible to receive a Settlement Payment. You may do so online at **OregonTaxForeclosure.com or by mail**.
EXCLUDE YOURSELF BY [DATE]	You may request to be excluded from the Settlement, and if you do, you will **not** receive a Settlement Payment. The deadline to exclude yourself from the Settlement is [DATE]. Excluding yourself from the Settlement is the only way to retain your right to sue Defendants Josephine County or Klamath County on your own over the claims alleged in the lawsuit.
OBJECT BY [DATE]	You may write to the Court and object to any terms of the Settlement. You are still eligible to file a Claim and still remain in the Class if you make an objection.
GO TO THE FAIRNESS HEARING	The Court has scheduled a hearing to evaluate the fairness of the Settlement and Class Counsels' request for attorneys' fees and reimbursement of costs to take place on [DATE], at [TIME] (the "Fairness Hearing"). You may attend the hearing at your own expense, but it is not necessary. You may ask to speak in court about the fairness of the Settlement if you did not exclude yourself, but you must first notify Class Counsel.
DO NOTHING	If you fail to timely submit an Eligible Claim, you will **not** receive a Settlement Payment, and you will give up your right to bring your own lawsuit about the claims in this case, but you will still be bound by all decisions the Court makes in this matter addressing these claims.

- These rights and options—**and the deadlines to exercise them**—are explained in more detail in the rest of this Notice.

- The Court in charge of this case still must decide whether to approve the Settlement. If it does, and after any appeals are resolved, Settlement Payments will be distributed to those who submit Eligible Claims. Please be patient.

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BASIC INFORMATION

1. Why was this Notice issued?

The Court authorized this Notice because you have a right to know about a proposed Settlement of a class action lawsuit. If you are a member of the Settlement Class, you have legal rights and options that you may exercise before the Court decides whether to give final approval to the Settlement, as described below.

2. What is the lawsuit about?

Individuals (the "Plaintiffs") who owned real property in Josephine or Klamath Counties allege that these counties (and other Oregon counties not participating in this Settlement) violated their and Class Members' rights by taking and either selling or retaining tax-foreclosed properties and failing to remit to Plaintiffs and Class Members any surplus equity in those properties. These claims have become known as surplus-proceeds or surplus-equity claims. The defendant counties deny Plaintiffs' allegations.

For additional information about the claims, arguments, and history of the case, you may view the pleadings and other important documents filed in the case at OregonTaxForeclosure.com. The complete docket or court file can be reviewed via the Court's electronic docket known as PACER at ecf.ord.uscourts.gov, but you must register for an account and pay fees to review filings. You may also review the docket for free by visiting any of the court's locations. The addresses and rules governing courthouse entry are also available at ord.uscourts.gov.

3. What is a class action and who is involved?

In a class action, one or more people called "class representatives" sue on behalf of a group of people who may have similar claims. The people together are a "Class" or "Class Members." The individuals who sue—and all Class Members like them—are called the Plaintiffs. The entities they sue are called the Defendants. In a class action, the Court resolves the issues for all Class Members, except for those who choose to exclude themselves from the class. The Court has decided that the claims against Josephine and Klamath Counties may be settled as a class action if they meet certain procedural requirements. Plaintiffs and their attorneys sued a number of Oregon Counties, but only Josephine and Klamath are participating in this Settlement. Accordingly, "Defendants" as used in this Notice refers to Josephine and Klamath Counties only. The lawsuits are continuing against the other counties.

4. Why is there a settlement?

The Court has not found in favor of Plaintiffs or Defendants. Instead, the Plaintiffs and the Defendants have agreed to a Settlement. By agreeing to the Settlement, the Parties avoid the costs

and uncertainty of a trial, and if the Settlement is approved by the Court, the Settlement Class will receive the benefits described in this Notice. The Defendants deny all legal claims in this case but are settling to avoid the uncertainties and costs that come with litigation. The Plaintiffs and their lawyers think the proposed Settlement is best for everyone who is affected.

5. What should I do if another person or organization contacts me about my claim?

A person or company may contact you seeking to buy the rights to a claim you may have in this lawsuit. This has happened in previous similar settlements. **The amount they offer you for your claim may be less than the amount you could receive under this Settlement.** Court-appointed Class Counsel have been litigating this case since 2023. As discussed in more detail below, if you are a Class Member, Class Counsel are your lawyers for purposes of this Settlement, and you may contact them for advice about any offer you may receive seeking to buy the rights to your claim in this lawsuit. Their contact information appears later in this Notice.

WHO IS PART OF THE SETTLEMENT?

6. Am I part of the Class and included in the Settlement?

The Class Members include all persons and entities—and their heirs, successors, and assignees (as defined in the Settlement Agreements)—who held an ownership interest in, or a valid lien on, real property that one of the defendant counties obtained through a foreclosure action to satisfy unpaid real estate taxes or other county or local government taxes, fees, or penalties, where the statutory redemption period for such property expired during the Class Period (as defined in the Settlement Agreements), *and* the county either (1) sold the property for an amount exceeding the unpaid taxes, statutory fees/penalties, and deductible costs associated with that property or (2) donated, transferred, or retained the property and the agreed-upon value of the property exceeded the unpaid taxes, statutory fees/penalties, and deductible costs associated with that property.

The Claims Administrator's website, OregonTaxForeclosure.com, provides a list of the property addresses for which surplus proceeds or surplus equity was obtained. It also provides the Settlement Agreements associated with each county. If you had an ownership interest in one of these properties (including a valid lien interest) at the time of a tax foreclosure, and there are surplus proceeds or surplus equity, you are a member of the Settlement Class.

7. What if I'm still not sure I am a Class Member?

If you are still not sure whether you are included or you have additional questions, you can review the FAQs on the Settlement website, OregonTaxForeclosure.com, or call the Claims Administrator toll free at [PHONE NUMBER].

THE SETTLEMENT BENEFITS

8. What does the Settlement provide?

In consideration for the Settlement and the release and bar order contained in the Settlement Agreements, Josephine County has agreed to pay at least $996,507, and Klamath County has agreed to pay at least $5,300,000. These amounts may increase if these counties sell additional foreclosed properties before the deadline for Class Members to submit Claims. These amounts represent 100% of the surplus sale proceeds that these counties obtained from their sales of most Eligible Properties, plus applicable interest. For those properties that the counties have not sold before the deadline for Class Members to submit Claims, the counties will continue to try to sell those properties and make any surplus sale proceeds available to the former owners.

Each Class Member who submits a valid Claim related to a property that one of the Defendants has sold will receive a Settlement Payment from the respective counties' Settlement Funds based on the Class Member's pro-rata share of the Settlement Fund, after deducting attorneys' fees, expenses, and service awards to class representatives. If more than one valid Claim is made for a property, the total amount available to pay Claims connected with that property will be the share of the proceeds associated with that property. The total amount of the Settlement Payment to be paid to each claimant cannot be calculated until all Claims have been submitted and validated.

The Settlement Funds also will be used to pay for administration of the Settlement, including notice and claims administration costs. Class Counsel intends to ask the Court to award them attorneys' fees in an amount that will not exceed 33% of the Josephine and Klamath County Settlement Funds. From any funds remaining after payment of Settlement administration costs, payment of valid Class Member Claims, and payment of attorneys' fees, the counties will be reimbursed for any payments they make to Potential Claimants who submit a valid request to be excluded from the Class and are paid on or before the end of the Claims Period. In the case of Klamath County, there may follow an Extended Claims Period of three months. After that, Klamath County will be allowed to retain funds equivalent to 75% of the total amount of interest associated with unmade claims. Any funds remaining after that will be allocated to the Defendants' housing authorities or to nonprofit organizations involved with housing issues.

9. How do I file a claim?

To qualify for a Settlement Payment, you must complete and submit a Claim. You can file your Claim online at OregonTaxForeclosure.com or send it by U.S. Mail to:

[ADDRESS]

The deadline to submit a Claim Form is [TIME] on [DATE].

No matter which method you choose to file your Claim, please read the Claim Form carefully and provide all the information required.

You may file the Claim Form on your own. If you have any questions or need help filing your Claim Form, you should contact the Claims Administrator and/or the Class Counsel listed in Section 15 below, who will help you for no additional fee. You may be solicited by companies or services that offer to prepare claims for you and charge you an additional fee for this service. You are not required to use any such services. Any help you need is available through the Court-appointed Claims Administrator and Class Counsel at no additional charge to you.

10. When will I receive my Settlement Payment?

Settlement Payments to Class Members will be made only after the Court grants final approval to the Settlement and after any appeals are resolved (see "Fairness Hearing" below). If there are appeals, resolving them can take time. Please be patient.

EXCLUDING YOURSELF FROM THE SETTLEMENT

11. How do I get out of the Settlement?

If you do not wish to be eligible for a Settlement Payment, and you want to keep the right to sue one of the Defendants on your own about the legal issues in this case, then you must take steps to get out of the Settlement. This is called excluding yourself—or is sometimes referred to as "opting out" of the Class.

To exclude yourself individually from the Settlement, you must send a timely letter by mail to:

[ADDRESS]

Your request to be excluded from the Settlement must include the following: (1) name; (2) current mailing address; (3) telephone number; (4) address, parcel number, and/or legal description of the Eligible Property; (5) county in which the Eligible Property is located; (6) year of post-foreclosure sale of Eligible Property, if applicable; and (7) a statement that the Eligible Claimant wishes to be excluded from the Settlement Class. Any request for exclusion must be signed by the person or entity requesting exclusion (not by an attorney). Unless you exclude yourself or "opt out," you are automatically a member of the Settlement Class.

Your exclusion request must be postmarked by [DATE].

You cannot ask to be excluded on the phone, by email, or at the website. Opt-outs must be made individually and cannot be made on behalf of other members of the Settlement Class.

12. If I do not exclude myself, can I sue the Defendants for the same thing?

No. Unless you exclude yourself, you give up the right to sue Defendants for the claims that the Settlement resolves. You must exclude yourself from this Settlement to pursue your own lawsuit.

13. What am I giving up by staying in the Settlement Class?

Unless you opt out of the Settlement, you cannot sue or be part of any other lawsuit against Defendants about the issues in this case, including any existing litigation, arbitration, or proceeding. Unless you exclude yourself, all of the decisions and judgments by the Court will bind you.

The Settlement Agreements are available at OregonTaxForeclosure.com. The Settlement Agreements provide more detail regarding the Release and describe the Released Claims with specific descriptions in necessary, accurate legal terminology, so read them carefully.

14. If I exclude myself, can I still get a Settlement Payment?

No. If you exclude yourself form the Settlement, you will not get a Settlement Payment from the Settlement Fund.

In order to receive a Settlement Payment, you must remain in the Settlement Class and return your completed Claim Form.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in the case?

The Court has appointed the following law firms to represent the Class. They are called "Class Counsel." They are experienced in handling similar class action cases. You may contact Class Counsel using the information below:

Michael Zhang
Qiu-Qiu Law
5020 Martin Luther King Jr. Blvd., Suite S
Portland, Oregon 97211
michael@qiu-qiulaw.com
908-938-6683

Akeeb Dami Animashaun, Esq.
355 S. Grand Ave., Suite 2450
Los Angeles, California 90071
dami@animashaun.me
929-266-3971

Shakeer Rahman
Law Office of Shakeer Rahman
3435 Wilshire Blvd., Suite 2910
Los Angeles, California 90010
shakeer@loosr.net
323-546-9236

Jacob Loup
Law Office of Jacob Loup
400 Corporate Pointe, Suite 300
Culver City, California 90230
jl@louplaw.com
347-391-5009

16. Should I get my own lawyer?

You are not required to hire your own lawyer, because Class Counsel is working on your behalf. If you want to hire your own lawyer, you certainly can, but you will have to pay that lawyer yourself. If you do hire your own lawyer, they may enter an appearance for you and represent you individually in this case.

17. How will the lawyers be paid?

You do not have to pay Class Counsel, or anyone else, to participate. Instead, Class Counsel intend to apply for a fee award in an amount that will not exceed 33% of the amount paid into Josephine and Klamath Settlement Funds.

OBJECTING TO THE SETTLEMENT

18. How do I tell the Court if I do not like the Settlement?

If you are a member of the Settlement Class (and do not exclude yourself from the Class under the rules outlined in Section 11, above), you can object to any part of the Settlement and/or to Class Counsels' request for an award of attorneys' fees by mailing a timely letter to:

[ADDRESS]

Your letter must include the following:

1) A caption or title that identifies it as "Objection to Class Settlement in *Gabbert, et al. v. Josephine County, et al.*, 1:23-cv-01434-IM";

2) Your name, current address, and telephone number;

3) The name, address, and telephone number of any attorney representing you with respect to the objection, if applicable;

4) The factual basis and legal grounds for the objection, including any documents sufficient to establish the basis for your standing as a Class Member; and

5) The case name, case number, and court for any prior class action lawsuit in which you and/or your attorney (if applicable) have objected to a proposed class action settlement.

Your letter containing your objection must be postmarked by [DATE].

19. What is the difference between objecting and asking to be excluded?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself. Excluding yourself is telling the Court that you do not want to be part of the Settlement. If you exclude yourself, you have no basis to object to the Settlement because it no longer affects you, and you will not be allowed to file a Claim to receive a payment from the settlement.

THE FAIRNESS HEARING

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

The Court has scheduled a Fairness Hearing at **[TIME] on [DATE]**, at the United States District Court for the District of Oregon, 1000 SW Third Ave., Portland, OR 97204.

The hearing may be moved to a different date or time without additional mailed notice, so it is a good idea to check OregonTaxForeclosure.com for updates periodically. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also consider the request by Class Counsel for attorneys' fees and expenses. If there are objections, the Court will consider them at that time. After the hearing, the Court will decide whether to approve the Settlement. It is unknown how long these decisions will take.

21. Do I have to attend the hearing?

No. Class Counsel will answer any questions the Court may have. You are welcome to attend the hearing at your own expense.

22. May I speak at the hearing?

If you attend the Fairness Hearing, you may ask the Court for permission to speak if you have timely objected and you so choose. However, you cannot speak at the hearing if you exclude yourself from the Settlement.

IF YOU DO NOTHING

23. What happens if I do nothing at all?

If you are a member of the Settlement Class and do nothing, meaning you do not file a timely Claim, you will **not** get a Settlement Payment. Further, unless you exclude yourself, you will be bound by the judgment entered by the Court.

GETTING MORE INFORMATION

24. Where do I get more information?

For more information, you may contact the Claims Administrator toll-free at **[NUMBER]** or write to the Claims Administrator at:

[ADDRESS]

For a complete, definitive statement of the Settlement terms, refer to the Settlement Agreements at **OregonTaxForeclosure.com**.

— PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS —