

Exhibit C

United States District Court for the Eastern District of California

The United States District Court for the Eastern District of California authorized this Notice. Please read it carefully. This is not junk mail or a lawyer solicitation. You are not being sued.

YOU SHOULD READ THIS NOTICE AS YOUR RIGHTS MAY BE AFFECTED.

YOU MAY BE ELIGIBLE TO RECOVER FROM A CLASS ACTION SETTLEMENT IF YOU ATTEMPTED TO ACCESS INTER-CONTINENTAL HOTELS CORPORATION’S WEBSITE USING SCREEN READING SOFTWARE.

A settlement has been reached in a class action lawsuit alleging that a website operated by Inter-Continental Hotels Corporation (“IHG”) is inaccessible to individuals using screen reading software. IHG denies these allegations. The Court has not decided who is right.

You may be a Class Member and may be entitled to relief. Generally, the Class includes individuals who attempted to access IHG’s website using screen reading software on or after January 1, 2022. The “California Class” includes legally blind Class Members located in California. Your rights and options—and the deadlines to exercise them—are explained in this Notice.

The Court will hold Hearing on [date] to consider whether to approve the Settlement and a request for attorneys’ fees of up to one third of the \$2,250,000.00 Settlement Fund. The Motion for Fees will be posted on the website after it is filed. You may appear at the hearing, at your own expense, but you don’t have to. For more information, call or visit the Settlement Website at URL TBD

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

<p>Stay as a Class Member</p>	<p>The Parties to the Action have settled the Action. As part of the settlement, if approved, Defendant will pay \$2,250,000.00 and has agreed to make changes to its Website so that it is reasonably accessible to legally blind individuals. If you received this notification, that means you may be a Class Member.</p> <p>Details about the changes Defendant will implement to its Website as part of this settlement are found in the Settlement Agreement, which you may access as further described below. All Class Members are entitled to the benefits of these implemented changes to Defendant’s Website.</p> <p><u>California Class Members are also eligible to receive a monetary payment</u></p> <p>Under the terms of the Settlement, California Class Members may receive a one-time payment of up to \$4,000.00, depending on the number of timely and valid claims made, upon submission of a valid and timely Claim Form. The Claim Form will require California Class Members to attest that they meet certain eligibility criteria and provide the date(s) on which they visited Defendant’s Website. Only one payment will be allowed per household.</p>
<p>Opt Out of the Settlement</p> <p>The deadline to opt out is [Date]</p>	<p>Only California Class Members may opt out, and they may only opt out of the monetary portion of the settlement. If you decide to opt out of this settlement, you will keep the right to sue Defendant for monetary relief at your expense in a separate lawsuit related to the subject matter of the Action, but you give up the right to receive any monetary benefit provided by this settlement, including a Class Payment as a California Class Member.</p>

	<p>This is the only option that allows you to sue, continue to sue, or be part of another lawsuit against Defendant related to the subject matter of the claims in this Action. If you opt out of this settlement, you will not be represented by the lawyers who represent the Classes, known as “Class Counsel.”</p>
<p>Object to the Settlement</p> <p>The deadline to submit a written objection is [Date]</p>	<p>If you do not opt out of the settlement, you may object to it in writing or by asking the Court for permission to speak at the final approval hearing on [Date]. However, you will still be bound by the settlement if the Court overrules your objection and approves the settlement.</p> <p>In addition to deciding whether or not to approve the settlement, the Court will also determine of how much will be paid to Class Counsel and Plaintiff, the individuals who pursued this Action on behalf of the Classes. You are not personally responsible for any payments to Class Counsel or Plaintiff. Class Counsel will seek up to \$562,500.00 in attorneys’ fees, plus costs, and up to \$10,000.00 for the Plaintiff as Class Representative for her services. You can object to the amounts requested if you think they are unreasonable.</p> <p>If the settlement is approved by the Court following your objection, you may still be able to receive a Class Payment if you are a California Class Member who has submitted a timely and valid Claim Form. You may submit both an objection and a Claim Form.</p>
<p>Go to a Hearing on [Date]</p>	<p>You may ask the Court for permission to speak at the Final Approval Hearing where the Parties will request that the Court provide final approval of the settlement. The date for the hearing may change without further notice. For up-to-date information as to the date of the hearing, please check the following website URL TBD or the Court’s electronic docket system/PACER at https://ecf.caed.uscourts.gov/cgi-bin/ShowIndex.pl.</p> <p>You may object to the settlement and ask to speak at the Final Approval Hearing, and, if the settlement is approved by the Court, you may still be able to receive a Class Payment if you are a California Class Member who has submitted a timely and valid Claim Form.</p>

The Court overseeing this Action still has to decide whether to approve the settlement.

This notice summarizes the proposed settlement. For the precise terms of the settlement, please see the Settlement Agreement available at **URL TBD**, by contacting Class Counsel whose contact information is listed below, by accessing the Court docket in this case, for a fee, through the Court’s Public Access to Court Electronic Records (PACER) system at <https://ecf.caed.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Eastern District of California, Robert T. Matsui Courthouse, 501 I Street, Room 4-200, 4th Floor, Sacramento, California 95814, between 9:00 a.m. and 4:00 p.m., Mondays through Fridays, excluding Court holidays.

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**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT'S CLERK'S OFFICE
TO INQUIRE ABOUT THIS NOTICE, THE SETTLEMENT, OR THE PROCESS FOR
RECEIVING A CLASS PAYMENT.**