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VIA U.S. MAIL

Date: August 29, 2025

To: All “Appropriate” Federal and State Officials Per 28 U.S.C. § 1715  
(*see attached service list*)

Re: CAFA Notice for the proposed Settlement in *Matus v. Sport Squad, Inc. d/b/a JOOLA*, 24-cv-60954-DSL, pending in the United States District Court for the Southern District of Florida and the Central District of California

Pursuant to Section 3 of the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1715, Defendant Sport Squad, Inc. d/b/a JOOLA (“Defendant” or “JOOLA”) hereby notifies you of the proposed settlement of the above-captioned action (the “Action”), currently pending in the United States District Court for the Southern District of Florida and the Central District of California (the “Court”).

Please be advised that the proposed settlement was filed with the Court on May 5, 2025, but due to an inadvertent oversight, this notice was not provided at that time.

On May 6, 2025, the motion for preliminary approval of the settlement was referred to a Magistrate Judge for a report and recommendation. On August 11, 2025, the Magistrate Judge issued a report recommending that the motion for preliminary approval of the settlement be granted. On August 20, 2025, the Court adopted the report and recommendation, granting the motion for preliminary approval of the settlement, and referred the matter to another District Judge for further scheduling and proceedings.

Eight items must be provided to you in connection with any proposed class action settlement pursuant to 28 U.S.C. § 1715(b). Each of these items is addressed below, and all exhibits are available for download at [www.CAFANotice.com](http://www.CAFANotice.com) under the folder entitled *Matus v. Sport Squad, Inc. d/b/a JOOLA*:

1. 28 U.S.C. § 1715(b)(1) – a copy of the complaint and any materials filed with the complaint and any amended complaints.

The Class Action Complaint and Amended Class Action Complaint are available as **Exhibit A1 and A2**.

2. 28 U.S.C. § 1715(b)(2) – notice of any scheduled judicial hearing in the class action.

On May 5, 2025, Plaintiff filed a motion for preliminary approval of the class action settlement, which was granted by Order dated August 20, 2025. The Court has not yet scheduled the Final Approval Hearing for this matter.

3. 28 U.S.C. § 1715(b)(3) – any proposed or final notification to class members.

A proposed Class Notice is currently being drafted for approval by the Court, which will be provided to Class Members and will be available on the Settlement Website created for the administration of this matter. The Class Notices will describe, among other things, the Claim submission process and the Settlement Class Members' rights to object or exclude themselves from the Class.

4. 28 U.S.C. § 1715(b)(4) – any proposed or final class action settlement.

The Settlement Agreement is available as **Exhibit B**.

5. 28 U.S.C. § 1715(b)(5) – any settlement or other agreement contemporaneously made between class counsel and counsel for defendants.

There are no other settlements or other agreements between Class Counsel and counsel for Defendant beyond what is set forth in the Settlement Agreement.

6. 28 U.S.C. § 1715(b)(6) – any final judgment or notice of dismissal.

The Court has not yet entered a final judgment or notice of dismissal. Accordingly, no such document is presently available.

7. 28 U.S.C. § 1715(b)(7) – (A) If feasible, the names of class members who reside in each State and the estimated proportionate share of the claims of such members to the entire settlement to that State's appropriate State official; or (B) if the provision of the information under subparagraph (A) is not feasible, a reasonable estimate of the number of class members residing in each State and the estimated proportionate share of the claims of such members to the entire settlement.

The definition of the Settlement Class in the proposed Settlement Agreement means all persons residing within the United States who own and have in their possession a Gen 3 Paddle. Persons who accepted JOOLA's prior offer to return their Gen 3 Paddle are not part of the Settlement Class; however, if a Gen 3 Paddle holder has more than one Gen 3 Paddle and did not already return all of their Gen 3 Paddles, such purchaser is still a member of the class as to the remainder of the Gen 3 Paddles that were not previously returned. Excluded from the Settlement Class are Defendant and its officers, directors, affiliates, legal representatives, employees, assigns and successors, and Defendant's Authorized Retailers.

It is estimated that there are more than 17,000 Gen 3 Paddles that were sold nationwide and would fall under the terms of the settlement. However, due to the nature of the Settlement Class membership, which consists of persons who have in their possession (i) one or more Gen 3 Paddles (ii) that may have been received as a gift or purchased through a third-party retailer, it is not possible to provide an

estimate of the number of class members residing in each State nor their estimated proportionate share of their claims to the entire settlement.

8. 28 U.S.C. § 1715(b)(8) – any written judicial opinion relating to the materials described in 28 U.S.C. § 1715(b) subparagraphs (3) through (6).

The Magistrate Judge's Report and Recommendation is available as **Exhibit C** and the Preliminary Approval Order is available as **Exhibit D**.

If you have any questions about this notice, the Action, or the materials available for download at [www.CAFANotice.com](http://www.CAFANotice.com) under the folder entitled *Matus v. Sport Squad, Inc. d/b/a JOOLA*, please contact the undersigned below.

Respectfully submitted,

Amanda Stallings  
Senior Manager  
[Amanda.Stallings@kroll.com](mailto:Amanda.Stallings@kroll.com)

## CAFA NOTICE SERVICE LIST

### **U.S. Attorney General**

Pamela Bondi  
U.S. Department of Justice  
950 Pennsylvania Avenue NW  
Washington, D.C. 20530

### **Alabama Attorney General**

Steve Marshall  
501 Washington Ave.  
P.O. Box 300152  
Montgomery, AL 36130

### **Alaska Attorney General**

Treg Taylor  
1031 W. 4th Avenue, Suite 200  
Anchorage, AK 99501

### **American Samoa Attorney General**

Fainu'u'ulelei Falefatu Ala'ilima-Utu  
Executive Office Building, Utulei  
3rd FL, PO Box 7  
Utulei, AS 96799

### **Arizona Attorney General**

Kris Mayes  
2005 N Central Ave  
Phoenix, AZ 85004

### **Arkansas Attorney General**

Tim Griffin  
323 Center St., Suite 200  
Little Rock, AR 72201

### **California Attorney General**

Rob Bonta  
1300 I St., Ste. 1740  
Sacramento, CA 95814

### **Colorado Attorney General**

Phil Weiser  
Ralph L. Carr Colorado Judicial Center  
1300 Broadway, 10th Floor  
Denver, CO 80203

### **Connecticut Attorney General**

William Tong  
165 Capitol Avenue  
Hartford, CT 06106

### **Delaware Attorney General**

Kathy Jennings  
Carvel State Office Building  
820 N. French St.  
Wilmington, DE 19801

### **District of Columbia Attorney General**

Brian Schwalb  
400 6th Street NW  
Washington, D.C. 20001

### **Florida Attorney General**

James Uthmeier  
Office of the Attorney General  
The Capitol, PL-01  
Tallahassee, FL 32399

### **Georgia Attorney General**

Chris Carr  
40 Capitol Square, SW  
Atlanta, GA 30334

### **Guam Attorney General**

Douglas Moylan  
Office of the Attorney General ITC Building  
590 S. Marine Corps Dr, Ste 706  
Tamuning, Guam 96913

### **Hawaii Attorney General**

Anne E. Lopez  
425 Queen St.  
Honolulu, HI 96813

### **Idaho Attorney General**

Raúl Labrador  
700 W. Jefferson Street, Suite 210  
P.O. Box 83720  
Boise, ID 83720

**Illinois Attorney General**

Kwame Raoul  
James R. Thompson Ctr.  
100 W. Randolph St.  
Chicago, IL 60601

**Indiana Attorney General**

Todd Rokita  
Indiana Government Center South  
302 West Washington St., 5th Fl.  
Indianapolis, IN 46204

**Iowa Attorney General**

Brenna Bird  
Hoover State Office Building  
1305 E. Walnut  
Des Moines, IA 50319

**Kansas Attorney General**

Kris Kobach  
120 S.W. 10th Ave., 2nd Fl.  
Topeka, KS 66612

**Kentucky Attorney General**

Russell Coleman  
700 Capital Avenue  
Capitol Building, Suite 118  
Frankfort, KY 40601

**Louisiana Attorney General**

Liz Murrill  
1885 North Third St  
Baton Rouge, LA 70802

**Maine Attorney General**

Aaron Frey  
State House Station 6  
Augusta, ME 04333

**Maryland Attorney General**

Anthony G. Brown  
200 St. Paul Place  
Baltimore, MD 21202

**Massachusetts Attorney General**

Andrea Campbell  
1 Ashburton Place, 20<sup>th</sup> Floor  
Boston, MA 02108

**Michigan Attorney General**

Dana Nessel  
P.O. Box 30212  
525 W. Ottawa St.  
Lansing, MI 48909

**Minnesota Attorney General**

Keith Ellison  
445 Minnesota St, Suite 600  
St. Paul, MN 55101

**Mississippi Attorney General**

Lynn Fitch  
Department of Justice, P.O. Box 220  
Jackson, MS 39205

**Missouri Attorney General**

Andrew Bailey  
Supreme Ct. Bldg., 207 W. High St.  
P.O. Box 899  
Jefferson City, MO 65101

**Montana Attorney General**

Austin Knudsen  
Office of the Attorney General, Justice Bldg.  
215 N. Sanders St., Third Floor  
P.O. Box 201401  
Helena, MT 59620

**Nebraska Attorney General**

Mike Hilgers  
2115 State Capitol  
P.O. Box 98920  
Lincoln, NE 68509

**Nevada Attorney General**

Aaron D. Ford  
Old Supreme Ct. Bldg.  
100 N. Carson St.  
Carson City, NV 89701  
\* NVAGCAFAnotices@ag.nv.gov

**New Hampshire Attorney General**

John Formella  
33 Capitol Street  
Concord, NH 03301

\* Preferred

**New Jersey Attorney General**

Matthew J. Platkin  
Richard J. Hughes Justice Complex  
25 Market Street, 8th Floor  
P.O. Box 080  
Trenton, NJ 08625

**New Mexico Attorney General**

Raul Torrez  
P.O. Drawer 1508  
Santa Fe, NM 87504-1508

**New York Attorney General**

Letitia A. James  
Department of Law  
The Capitol, 2nd Floor  
Albany, NY 12224

**North Carolina Attorney General**

Jeff Jackson  
Dept. of Justice, P.O. Box 629  
Raleigh, NC 27602-0629

**North Dakota Attorney General**

Drew Wrigley  
State Capitol  
600 E. Boulevard Ave.  
Bismarck, ND 58505

**Northern Mariana Islands Attorney General**

Edward E. Manibusan  
Administration Building  
P.O. Box 10007  
Saipan, MP 96950

**Ohio Attorney General**

Dave Yost  
State Office Tower  
30 E. Broad St., 14th Floor  
Columbus, OH 43215

**Oklahoma Attorney General**

Gentner Drummond  
313 NE 21st Street  
Oklahoma City, OK 73105

**Oregon Attorney General**

Dan Rayfield  
Oregon Department of Justice  
1162 Court St., NE  
Salem, OR 97301

**Pennsylvania Attorney General**

Dave Sunday  
Pennsylvania Office of Attorney General  
16th Floor, Strawberry Square  
Harrisburg, PA 17120

**Puerto Rico Attorney General**

Janet Parra-Mercado  
P.O. Box 9020192  
San Juan, PR 00902

**Rhode Island Attorney General**

Peter F. Neronha  
150 S. Main St.  
Providence, RI 02903

**South Carolina Attorney General**

Alan Wilson  
Rembert C. Dennis Office Bldg.  
P.O. Box 11549  
Columbia, SC 29211

**South Dakota Attorney General**

Marty Jackley  
1302 East Highway 14, Suite 1  
Pierre, SD 57501

**Tennessee Attorney General**

Jonathan Skrmetti  
PO Box 20207  
Nashville, TN 37202

**Texas Attorney General**

Ken Paxton  
Capitol Station  
P.O. Box 12548  
Austin, TX 78711

**U.S. Virgin Islands Attorney General**

Gordon C. Rhea  
3438 Kronprindsens Gade  
GERS Building, 2nd Floor  
St. Thomas, Virgin Islands 00802

**Utah Attorney General**

Derek Brown  
State Capitol, Rm. 236  
Salt Lake City, UT 84114-0810

**Vermont Attorney General**

Charity R. Clark  
109 State St.  
Montpelier, VT 05609

**Virginia Attorney General**

Jason Miyares  
202 North Ninth Street  
Richmond, VA 23219

**Washington Attorney General**

Nick Brown  
1125 Washington St. SE  
P.O. Box 40100  
Olympia, WA 98504

**West Virginia Attorney General**

John McCuskey  
State Capitol Complex, Bldg. 1, Rm. E-26  
1900 Kanawha Blvd. E  
Charleston, WV 25305

**Wisconsin Attorney General**

Josh Kaul  
Wisconsin Department of Justice State  
Capitol, Room 114 East  
P.O. Box 7857  
Madison, WI 53707

**Wyoming Attorney General**

Ryan Schelhaas  
State Capitol Bldg.  
200 W. 24th Street  
109 State Capitol  
Cheyenne, WY 82002