

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,

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