# Exhibit C

### Summary Notice

### Did you list a Home on MLS Property Information Network? Your rights may be affected by a Settlement.

City, State, Month 00, 2023 /PRNewswire/ -- -- The following statement is being issued by Kroll Settlement Administration regarding the *Nosalek v. MLS Property Information Network* Settlement.

#### What is this lawsuit about?

The lawsuit alleges that MLS Property Information Network, Inc. ("MLS PIN"), a property listing service, and several other Defendant entities conspired to artificially inflate the commission paid by home sellers to buyerbrokers in violation of Section 1 of the Sherman Act, 15 U.S.C. Section 1, by implementing requirements in MLS PIN's listing rules that a seller of a home offer a commission to the broker for the buyer and that the seller may only change the commission offered before a (counter)offer to purchase is tendered by a prospective buyer to the seller. MLS PIN disagrees with Plaintiffs' claims and denies any wrongdoing. This proposed Settlement resolves Plaintiffs' claims against MLS PIN only.

#### Who is a Settlement Class Member?

You are a Settlement Class Member if, from December 17, 2016, through the date of a Final Judgment and Order of Dismissal, you listed (or list) Residential Real Estate on MLS PIN's Pinergy service through a Seller Broker, and you or the Seller Broker paid (or pay) a Buyer-Broker Commission in connection with the sale of that Residential Real Estate. Capitalized terms are defined in the Settlement Agreement, available on the website at **www.MLSPINSETTLEMENT.com**.

#### What are the Settlement benefits?

If approved, the Settlement will provide the following benefits:

- 1. MLS PIN will remove the requirement that the Residential Real Estate seller must offer compensation to the buyer-broker.
- 2. MLS PIN will require the seller broker to provide notice that (a) the seller is not required to offer compensation to the buyer-broker and (b) if the buyer-broker requests compensation, the seller can decline.
- 3. If the seller makes an offer to a buyer broker and the buyer makes a counteroffer (effectively rejecting the seller's offer), then any commission to be paid is negotiated among the seller, the buyer, the seller broker, and the buyer broker.
- 4. MLS PIN has agreed to pay \$3 million into a Settlement Fund. Plaintiffs' counsel intend to seek attorneys' fees, reimbursement of expenses and lead plaintiff awards out of the Settlement Fund as set forth below. The Court has already approved the allocation of approximately \$250,000 for a Notice Plan to provide notice of the Settlement to Class Members. Plaintiffs will request that the balance of the Settlement Fund be held in an interest-bearing United States government money market fund until the conclusion of the litigation against all Defendants, at which time Plaintiffs shall file a motion with the Court seeking an appropriate disposition of the balance of the Settlement Fund.

#### What are your rights?

- **Do nothing:** You are automatically included in the Settlement if it is approved.
- **Object:** You stay in the Settlement, but you may write to the Court and explain why you do not like the Settlement. **The deadline to submit an objection is Month 00, 2023**.

Complete instructions on how to object are found at www.MLSPINSETTLEMENT.com.

The Court will hold a Final Approval Hearing on **Month 00, 2023**, at the [court name & address], to consider whether to approve the Settlement. The Court will hear any objections, determine if the Settlement is fair, and consider Plaintiffs' request for fees and expenses. Plaintiffs intend to ask for up to \$900,000 for attorneys' fees,

up to \$200,000 for reimbursement of expenses already incurred, and up to \$2,500 to each of the three lead plaintiffs as lead plaintiff awards. The Court previously approved approximately \$250,000 to provide notice to Settlement Class Members. You or your own lawyer, if you have one, may ask to appear and speak at the hearing at your own cost, but you do not have to. Plaintiffs' motions for attorneys fees and costs will be posted on the website after they are filed with the Court.

#### Where to get more information?

This notice is only a summary. For detailed information, including the Settlement Agreement, Long Form Notice and other important documents, visit www.MLSPINSETTLEMENT.com, call 1-XXX-XXXX, or write to MLS PIN Settlement, c/o Settlement Administrator, PO Box 0000, Philadelphia PA 19102-0000.

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**Source:** Required for press release to be issued.

**Media Contact(s):** Required for press release to be issued. Not available to the general public, only to registered reporters.

## Postcard'P queg

Nosalek v. MLS PIN et al. c/o Kroll Settlement Administration LLC P.O. Box 0000 New York, NY 10150-0000

A proposed settlement with one of the Defendants has been reached in a class action lawsuit known as *Nosalek v. MLS Property Information Network et al.*, Case No. 1:20-cv-12244-PBS ("lawsuit"), filed in the United States District Court for the District of Massachusetts.

> This is <u>not</u> a solicitation from a lawyer, junk mail, or an advertisement.

> A federal court authorized this notice.

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<<FirstName>> <<LastName>> <<BusinessName>> <<Address>> <<Address2>> <<City>>, <<STATE>> <<Zip>>-<<zip4>> <<Country>> What is this lawsuit about? Plaintiffs claim that MLS Property Information Network, Inc. ("MLS PIN"), a property listing service, and several other Defendant entities conspired to artificially inflate the commission paid by home sellers to buyer-brokers in violation of Section 1 of the Sherman Act, 15 U.S.C. Section 1, by implementing requirements in MLS PIN's listing rules that a seller of a home offer a commission to the broker for the buyer and that the seller may only change the commission offered before a (counter)offer to purchase is tendered by a prospective buyer to the seller. MLS PIN disagrees with Plaintiffs' claims and denies any wrongdoing. This proposed Settlement resolves Plaintiffs' claims against MLS PIN only. The Settlement does not resolve Plaintiffs' claims against any of the other Defendants, and litigation against those Defendants will proceed accordingly.

Who is a Settlement Class Member? You are a Settlement Class Member if, from December 17, 2016, through the date of a Final Judgment and Order of Dismissal, you listed (or list) Residential Real Estate on MLS PIN's Pinergy service through a Seller Broker, and you or the Seller Broker paid (or pay) a Buyer-Broker Commission in connection with the sale of that Residential Real Estate. Capitalized terms are defined in the Settlement Agreement, available on the website at www.MLSPINSETTLEMENT.com.

What are the Settlement benefits? Under the terms of the Settlement, MLS PIN has agreed to adopt specific new language in its rules that eliminates the anticompetitive restraints alleged in the complaint. Accordingly, if the Settlement is approved, sellers of residential real estate in MLS PIN's service area will no longer be subject to the restrictions underlying Plaintiffs' claims. In addition, MLS PIN has agreed to pay \$3 million into a Settlement Fund. Plaintiffs' counsel intend to seek up to \$900,000 of the Settlement Fund attorneys' fees, up to \$200,000 as reimbursement for expenses already incurred, and up to \$2,500 to each of the three lead plaintiffs as lead

plaintiff awards. The Court has already approved the allocation of approximately \$250,000 for a Notice Plan to provide notice of the Settlement to Class Members. Plaintiffs will request that the balance of the Settlement Fund be held in an interest-bearing United States government money market fund until the conclusion of the litigation against all Defendants, at which time Plaintiffs shall file a motion with the Court seeking an appropriate disposition of the balance of the Settlement Fund.

What are your rights? If the Settlement is approved, it will go into effect automatically, with no need for any participation by you. If you want to object to the Settlement (that is, tell the Court why you think the Settlement should not be approved) or to Plaintiffs' request for attorneys' fees, expenses, or lead plaintiff awards, you may do so by filing an objection by \_\_\_\_\_\_, 2023. Detailed instructions on how to object are on the Settlement Website below. The Court will hold the Final Fairness Hearing at \_\_\_\_\_a.m. on \_\_\_\_\_, 2023 to consider whether the proposed settlement is fair, reasonable, and adequate and should be approved, and to consider Plaintiffs' request for attorneys' fees and expenses and for lead plaintiff awards. You or your own lawyer, if you have one, may ask to appear and speak at the hearing at your own cost, but you do not have to.

Where can I get additional information? This is only a summary. You may visit www.MLSPINSETTLEMENT.com or call 1-XXX-XXX-XXXX for additional important information, including a copy of the Settlement Agreement and the proposed rule language changes, Plaintiffs' memorandum of law in support of preliminary approval of the Settlement, other court filings (which will be updated with new documents, including Plaintiffs' motion for final approval of the Settlement and for fees and expenses, once they are filed), and instructions on how to object.

#### www.MLSPINSETTLEMENT.com

#### 1-000-000-0000