

Verizon ETF Settlement Frequently Asked Questions

What is this lawsuit about?

The lawsuit claims that Verizon Wireless violated California consumer protection law and similar state and federal laws by imposing flat Early Termination Fees (ETFs). The suit seeks to recover monetary damages and restitution, and declaratory and injunctive relief.

What is a class action and who is involved?

In a class action lawsuit, one or more people (in this case Molly White, Christina Nguyen, Patricia Brown and Harold Schroer) have sued on behalf of other people (called "Class Members") who have similar claims. One court resolves the issues for everyone—except for those people who choose to exclude themselves from the class. The company sued in this case, Verizon Wireless, is called the Defendant.

How do I know if I am I part of this Class?

You are a member of the class if:

You were a Verizon Wireless customer in the U.S. who has a contract with Verizon Wireless for personal wireless telephone service who was charged or paid a flat ETF from July 23, 1999 to August 10, 2008;

OR

You are or were a Verizon Wireless customer in the U.S. whose contract with Verizon Wireless for personal wireless telephone service includes or included a provision for payment of a flat ETF from July 23, 1999 to August 10, 2008.

What are the terms of the settlement?

The settlement provides that Verizon Wireless will pay \$21 million into a fund that will include money for class members to be provided on a pro rata basis, after deducting payment of the costs of administering the settlement, including the costs of this notice, attorneys fees, costs of the litigation and any payments allowed by the Court to the named plaintiffs, known as the "class representatives." The settlement does not relieve class members of any existing or future obligations to pay ETFs they owe to Verizon Wireless. .

If approved by the Court, payments will be made to class members under a "Plan of Allocation" that allows—after payment of the fees and costs described above—payment on a pro rata basis to class members who paid an ETF and payment to class members that were charged but did not pay an ETF and prove that they suffered economic harm as a result of the ETF. Class members who can prove that they paid an ETF, or that Verizon Wireless's records indicate paid an ETF may submit a claim up to \$175 per ETF paid. Class members who submit a claim in which they represent under penalty of perjury that they paid in ETF may submit a claim of \$25. Class members who can prove that they were charged an ETF, or that Verizon Wireless's records indicate were charged an ETF, and who submit a claim in which they represent under penalty of perjury that they suffered concrete economic harm may submit a claim of \$25. The amount paid to class members may be larger or smaller than the amount of the claim, depending on how many claims are submitted. You can read more about the Plan of Allocation here: www.verizonetfsettlement.com

The settlement provides that Verizon Wireless will be ordered by the Court not to impose flat ETFs in its contracts with new subscribers for a minimum of 24 months. The settlement does not require Verizon Wireless to modify its existing contracts. Verizon Wireless has reserved its right to collect unpaid balances from its subscribers, including unpaid ETFs. The settlement will release claims that subscribers may have against Verizon Wireless relating to its ETFs, unless the individual excludes him/her self from the settlement.

What are my rights and options as a Class Member?

If you fall within the definition of a Class Member as described above, you may: (1) participate in the lawsuit by completing and submitting a Proof of Claim Form, available at www.verizonetfsettlement.com, to the address indicated by the Settlement Administrator by **October 14, 2008**; (2) object to the settlement by writing to the address indicated by the Settlement Administrator by **October 7, 2008** (please note you must remain a class member in order to object to the lawsuit) **or**: (3) remove yourself from the lawsuit by submitting a request to be excluded from the lawsuit to the address indicated by the Settlement Administrator by **September 30, 2008**.

When is the Settlement Fairness Hearing?

On October 21, 2008, at 2 p.m., a hearing will be held in Department 17 of the Superior Court of the State of California for the County of Alameda, located at 1221 Oak Street, 4th Floor Oakland, California 94612, to determine whether the Settlement should be approved by the Court as fair, reasonable, and adequate.