

If you received a text message from American Motor Company, LLC d/b/a InstantCarOffer.com sent on behalf of Off Lease Only, Inc., you may be entitled to benefits under a class action settlement.

A federal Court authorized this Notice. This is not a solicitation from a lawyer.

- Plaintiff alleges that American Motor Company, LLC d/b/a InstantCarOffer.com (“ICO”) sent text messages on behalf of Off Lease Only, Inc. (“OLO”) without prior express consent or express written consent in violation of the Telephone Consumer Protection Act (“TCPA”). OLO denies Plaintiff’s allegations and denies any wrongdoing whatsoever. The Court has not ruled on the merits of Plaintiff’s claims or OLO’s defenses. By entering into the Settlement, OLO has not conceded the truth or validity of any of the claims against it.
- OLO has agreed to make payments to the Settlement Class Members (defined below) and pay for attorneys’ fees and the Incentive Payment to Plaintiff (the “Settlement Fund”) to fully settle and release claims of persons who received a text message on his or her cellular telephone from ICO, on behalf of OLO, through the use of the Twilio platform, after placing an advertisement on craigslist.org in connection with the sale of a vehicle from September 4, 2011 to July 12, 2017 (the “Settlement Class Members”).
- The Settlement Fund shall be used to pay all amounts related to the Settlement, including payment up to \$50 each to Settlement Class Members who submit a valid and timely claim form to receive payment (“Claim Form”), attorneys’ fees approved by the Court not to exceed one-third of the Settlement Fund, and an Incentive Payment for Plaintiff approved by the Court not to exceed \$12,500.
- Your rights and options, and the deadlines to exercise them, are explained in this Notice. Your legal rights are affected whether you act or don’t act. Read this Notice carefully.
- The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved. Please be patient.

<p>SUBMIT A CLAIM FORM</p>	<p>If you submit a valid Claim Form by May 21, 2019, you will receive a payment and will give up your rights to pursue or continue to pursue a Released Claim, as defined in the Settlement Agreement, against OLO and/or any other Released Parties. Claim Forms may be submitted online through the Settlement Website www.mohamedtcpasettlement.com or sent by mail to: Mohamed v Off-Lease Only, c/o Settlement Administrator, P.O. Box 58118, Philadelphia, PA 19102</p>
<p>EXCLUDE YOURSELF OR “OPT-OUT” OF THE SETTLEMENT</p>	<p>If you ask to be excluded, you will not receive a payment. This is the only option that allows you to pursue or continue to pursue a Released Claim against OLO and/or other Released Parties on your own. The deadline for excluding yourself is May 21, 2019.</p>
<p>OBJECT TO THE SETTLEMENT</p>	<p>You may write to the Court about why you believe the Settlement is unfair in any respect. The deadline for objecting May 21, 2019. To obtain a benefit from this Settlement, you must still submit a Claim Form. If you only submit an objection, you will not receive any benefit from the Settlement and you will give up your rights to pursue or continue to pursue a Released Claim against OLO and/or any other Released Parties.</p>
<p>DO NOTHING</p>	<p>If you do nothing, you will not receive any monetary award and you will give up your rights, if any, to pursue or continue to pursue a Released Claim against OLO and/or any other Released Parties.</p>
<p>GO TO THE FINAL APPROVAL HEARING</p>	<p>You may ask to speak in Court about the fairness of the Settlement, if you object to the Settlement. To speak at the Final Approval Hearing, you must comply with the requirements set forth in Question 21 below no later than May 21, 2019.</p>

BASIC INFORMATION

1. What is the purpose of this Notice?

The purpose of this Notice is to inform you that a proposed Settlement has been reached in the class action lawsuit styled *Mohamed v. American Motor Company, LLC et al.*, Case No. 1:15-cv-23352-MGC (S.D. Fla.). Because your rights will be affected by this Settlement, it is extremely important that you read this Notice carefully. This Notice summarizes the Settlement and your rights under it.

2. What does it mean if I received a postcard about this Settlement?

If you received a postcard describing this Settlement, it is because ICO's records indicate that you may be a member of the Settlement Class in this action. You are a member of the Settlement Class if you received a text message on your cellular telephone from ICO, on behalf of OLO, through the use of the Twilio platform, after placing an advertisement on craigslist.org in connection with the sale of a vehicle from September 4, 2011 to July 12, 2017 (the "Settlement Class Members").

3. What is this class action lawsuit about?

In a class action, one or more people called Class Representatives (here, Plaintiff) sue on behalf of people who allegedly have similar claims. This group is called a class and the persons included are called class members. One court resolves the issues for all of the class members, except for those who exclude themselves from the class.

Here, Plaintiff alleges that ICO violated the TCPA by sending text messages to persons without their prior express consent or express written consent and that OLO is vicariously responsible for these alleged violations of the TCPA. OLO denies these allegations and denies any wrongdoing. The Court has conditionally certified a class action for settlement purposes. The Honorable Marcia G. Cooke is the judge in charge of the lawsuit.

4. Why is there a settlement?

The Court did not decide in favor of Plaintiff or OLO. Instead, both sides agreed to this Settlement. That way, they avoid the risk and cost of a trial, and the Settlement Class Members will receive compensation. Plaintiff and Class Counsel think the Settlement is best for all Settlement Class Members.

WHO IS IN THE SETTLEMENT CLASS?

5. How do I know if I am part of the Settlement Class?

The Court has certified this case as a class action for settlement purposes only. The Settlement Class is defined as:

all subscribers within the United States (i) who received a text message (ii) on his or her cellular telephone (iii) from InstantCarOffer.com, on behalf of Off Lease Only, Inc., (iv) through the use of the Twilio platform (v) after placing an advertisement on craigslist.org in connection with the sale of a vehicle (vi) from September 4, 2011 to July 12, 2017. Persons meeting this definition are referenced herein collectively as the "Settlement Class," and individually as "Settlement Class Members."

Notwithstanding the foregoing, this class specifically excludes persons in the following categories: (A) individuals who are or were during the Class Period

officers or directors of Off Lease Only or any of its respective affiliates; (B) the district judge and magistrate judge presiding over this case, the judges of the United States Court of Appeals for the Eleventh Circuit, their spouses, and persons within the third degree of relationship to either of them; and (C) all persons who file a timely and proper request to be excluded from the Settlement Class in accordance with Section I.JJ of the Settlement Agreement.

If you are still not sure whether you are included in the Settlement Class, you can visit other sections of the Settlement Website, www.mohamedtcpasettlement.com, you may write to the Claims Administrator at Mohamed v Off-Lease Only, c/o Claims Administrator, P.O. Box 58118, Philadelphia, PA 19102, or you may call the Toll-Free Settlement Hotline, 1-855-447-2249, for more information.

THE LAWYERS REPRESENTING YOU

6. Do I have lawyers in this case?

The Court has appointed lawyers from the law firms of Scott D. Owens, P.A., Hiraldo P.A., Bret Lusskin, P.A. and Edwards Pottinger LLC as Class Counsel to represent you and the other persons in the Settlement Class. You will not be personally charged by these lawyers. You may hire your own attorney to appear for you, but you will have to pay for that attorney.

7. How will Class Counsel be paid?

Class Counsel will ask the Court to approve payment of up to one-third of the Settlement Fund to them for attorneys' fees. Class Counsel also will ask the Court to approve payment of up to \$12,500 to Plaintiff for his service as Class Representative. The Court may award less than these amounts.

THE SETTLEMENT BENEFITS – WHAT YOU GET

8. What does the settlement provide?

Settlement Fund. OLO will pay as follows: (1) payments to Settlement Class Members who submit timely and valid claim forms; (2) an award of attorneys' fees to Class Counsel, in an amount not to exceed one-third of the Settlement Fund; (3) an Incentive Payment to Plaintiff, in an amount not to exceed \$12,500, as approved by the Court; and (4) the costs of notice and administration of the Settlement. OLO has agreed to make available a Settlement Fund in the amount of \$1,450,750 to cover items one through four above.

Payments. All Settlement Class Members are eligible to submit a Claim Form and receive a payment. To submit a Claim Form, follow the procedures described under Question 11 below.

9. How much will my payment be?

If you submit a valid and timely claim, the amount of the payment you will receive will be up to \$50.

10. What am I giving up by staying in the Settlement Class?

Unless you exclude yourself from the Settlement, you will be part of the Settlement Class and will be bound by the Release of claims in the Settlement. This means that if the Settlement is approved, you cannot pursue or continue to pursue any Released Claim against OLO or any other Released Parties, whether on your own or as part of any other lawsuit, as explained in the Settlement

Agreement. It also means that all of the Court's orders will apply to you and legally bind you. Unless you exclude yourself from the Settlement, you agree to release OLO and any other Released Parties, as defined in the Settlement Agreement, from any and all claims that were or could be asserted in the litigation and all claims that relate to or arise from OLO sending text messages without prior express consent or express written consent.

In summary, the Release includes, without limitation, all claims that arise, could arise, were asserted or could have been asserted based on ICO sending text messages without prior express consent or express written consent, including, but not limited to, claims under the TCPA or any other statute or the common law, for any form of relief.

If you have any questions about the Release or what it means, you can speak to Class Counsel, listed under Question 6, for free, or you can, at your own expense, talk to your own lawyer. The Release does not apply to persons in the Settlement Class who timely exclude themselves.

HOW TO OBTAIN A PAYMENT

11. How can I get a payment?

To receive a payment, you must submit a Claim Form by the deadline stated below. You may get a Claim Form on the Settlement Website, www.mohamedtcpasettlement.com, or by calling the Toll-Free Settlement Hotline, 1-855-447-2249. **Read the instructions carefully, fill out the form completely and accurately, sign it under penalty of perjury, and submit it on a timely basis.** To be valid, the Claim Form must be completed fully and accurately, signed under penalty of perjury and submitted timely. A Claim Form may be submitted by mail to the Settlement Administrator at: Mohamed v Off-Lease Only, c/o Settlement Administrator, P.O. Box 58118, Philadelphia, PA 19102. The Claim Form must be received by May 21, 2019.

WHEN WILL I RECEIVE MY SETTLEMENT PAYMENT?

12. When will I receive a Settlement payment?

The Court will hold a hearing to decide whether to approve the Settlement. If the Court approves the Settlement, after that, there may be appeals. It is always uncertain whether these appeals can be resolved, and resolving them can take time, perhaps more than a year. Everyone who sends in a Claim Form will be informed of the progress of the Settlement through information posted on the Settlement Website at www.mohamedtcpasettlement.com. Please be patient.

EXCLUDING YOURSELF FROM THE SETTLEMENT

13. How can I get out of the Settlement?

If you want to keep your rights to pursue or continue to pursue any Released Claim against OLO and/or any Released Parties, as defined in the Settlement Agreement, then you must take steps to get out of the Settlement Class. This is called excluding yourself from, or opting-out of, the Settlement Class.

To exclude yourself from the Settlement, you must send an exclusion request to the Claims Administrator. To be valid, a member of the Settlement Class who wishes to be excluded from the Settlement Class shall mail a written notice of exclusion to the Claims Administrator, so that it is received no later than 45 days after the Class Notice Date, or May 21, 2019 (the "Opt-Out Deadline"), and shall clearly state the following in the written notice of exclusion: (a) identify the case name; (b) identify the name, address, and telephone number of the Settlement Class Member;

(c) identify the telephone number where the person received a text message from OLO; (d) be personally signed by the Settlement Class Member requesting exclusion; and (e) contain a statement that indicates a desire to be excluded from the Settlement Class in the Litigation, such as “I hereby request that I be excluded from the proposed Settlement Class in *Mohamed v. American Motor Company, LLC and Off Lease Only, Inc*, Case No. 1:15-cv-23352.” No request for exclusion will be valid unless all of the information described above is included. No person in the Settlement Class, or any person acting on behalf of or in concert or participation with that person in the Settlement Class, may exclude any other person in the Settlement Class from the Settlement Class.

To be valid, your exclusion request must be filed in writing with Class Counsel (or the Administrator) no later than May 21, 2019 to the Settlement Administrator Mohamed v Off-Lease Only, c/o Settlement Administrator, P.O. Box 58118, Philadelphia, PA 19102.

14. If I do not exclude myself, can I sue OLO for the same thing?

No. If you do not exclude yourself, you give up any rights to pursue (or continue to pursue) any Released Claims against OLO and/or any Released Parties.

15. If I exclude myself, can I get a benefit from this Settlement?

No. If you ask to be excluded, you will not be able to submit a Claim Form for a Settlement payment, and you cannot object to the Settlement.

OBJECTING TO THE SETTLEMENT

16. How do I tell the Court that I do not think the Settlement is fair?

If you are in the Settlement Class, you can object to the Settlement or any part of the Settlement that you think the Court should reject, and the Court will consider your views. If you do not provide a written objection in the manner described below, you shall be deemed to have waived any objection and shall forever be foreclosed from making any objection to the fairness, reasonableness, or adequacy of the Settlement or the award of any attorneys’ fees and/or Incentive Payment.

To be valid, the written objection must include: (a) the case name and number; (b) the name, address, and telephone number of the Settlement Class Member objecting and, if represented by counsel, of his/her counsel; (c) the telephone number where he/she received a text message from OLO relating to the Litigation; (d) copies of any papers, exhibits, or other evidence that the objecting Settlement Class Member will present to the Court in connection with the Final Approval Hearing.

Any Settlement Class Member who fails to object to the Settlement in the manner described above shall be deemed to have waived any such objection, shall not be permitted to object to any terms or approval of the Settlement at the Final Approval Hearing, and shall be foreclosed from seeking any review of the Settlement or the terms of the Settlement Agreement by appeal or other means.

To be considered, you must file your objections with the Court. Your objections must also be mailed to the addresses below and received no later than May 21, 2019.

For Plaintiff:

Scott D. Owens
Scott D. Owens, P.A.
3800 S. Ocean Dr., Suite 235
Hollywood, Florida 33019

Manuel S. Hiraldo
Hiraldo P.A.
401 E. Las Olas Boulevard, Suite 1400
Ft. Lauderdale, Florida 33301

Bret L. Lusskin
Bret Lusskin, P.A.
20803 Biscayne Blvd., Suite 302
Aventura, Florida 33180

Seth M. Lehrman
Edwards Pottinger LLC
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301

For OLO:

Franklin L. Zemel
Alan R. Poppe
Saul Ewing Arnstein & Lehr LLP
200 East Las Olas Boulevard, Suite 1000
Fort Lauderdale, Florida 33301

Even if you timely and properly object, to obtain a benefit from this Settlement, you must submit a Claim Form. If you object, but fail to submit a Claim Form, you will not receive any monetary award.

17. What is the difference between objecting and excluding yourself?

Objecting is telling the Court that you oppose something about the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself means that you do not want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

IF YOU DO NOTHING

18. What happens if I do nothing at all?

If you do nothing, you will not receive any monetary award and you will give up your rights, if any, to pursue or continue to pursue Released Claims against OLO and/or any other Released Parties. For information relating to what rights you are giving up, see Question 10.

THE FINAL APPROVAL HEARING

19. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing at May 22, 2019 at Room 11-2 in the United States District Court for the Southern District of Florida, at the Wilkie D. Ferguson, Jr. United States Courthouse, 400 North Miami Avenue, Miami, Florida 33128. At this hearing, the Court will

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consider whether the Settlement is fair, reasonable and adequate. If there are valid objections that comply with the requirements in Question 16 above, the Court will also consider them and will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay to Class Counsel and Plaintiff.

The Final Approval Hearing may be moved to a different date or time without additional notice, so it is a good idea to check the Settlement Website for updates.

20. Do I have to come to the hearing?

No. Class Counsel will appear on behalf of the Settlement Class. But, you are welcome to come, or have your own lawyer appear, at your own expense.

21. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing, but only in connection with an objection that you have timely submitted to the Court according to the procedure set forth in Question 16 above. To speak at the Final Approval Hearing, you must also file a document with the Court stating your intention to appear. For this document to be considered, it must include the case name and number; your name, address, telephone number, and signature; the telephone number where you received a text message from OLO; and copies of any papers, exhibits, or other evidence that you will present to the Court in connection with the Final Approval Hearing. The document must be filed with the Court no later May 21, 2019. You cannot speak at the hearing if you exclude yourself from the Settlement.

GETTING MORE INFORMATION

22. How do I get more information?

This Notice is only a summary of the proposed Settlement. You can get a complete copy of the Settlement Agreement by visiting the Settlement Website, www.mohamedtcpasettlement.com, or you can write to Mohamed v Off-Lease Only, c/o Settlement Administrator, P.O. Box 58118, Philadelphia, PA 19102, or call the Toll-Free Settlement Hotline, 1-855-447-2249

DO NOT CALL OR WRITE TO THE COURT, THE CLERK OF THE COURT, OLO, OR OLO'S COUNSEL ABOUT THE SETTLEMENT. ALSO, TELEPHONE REPRESENTATIVES WHO ANSWER CALLS MADE TO THE TOLL-FREE NUMBER ARE NOT AUTHORIZED TO CHANGE THE TERMS OF THE SETTLEMENT OR THIS NOTICE.