

notice practicable under the circumstances, including individual notice to all members who can be identified through reasonable effort.” Defendant shall provide to Plaintiffs a database including the names, postal addresses, and email addresses of all individuals who have paid PTIN fees (“PTIN Database”). There are no other records necessary to identify potential class members.

Plaintiffs have retained KCC LLC (“KCC”) to serve as claims administrator. KCC has executed more than 100 notice programs in the United States and Canada, and has served as claims administrator for a wide variety of cases, including ones involving state governments and the federal government.

Proposed Plan

1. Within 30 days of the entry of an Order approving this Plan, but in no event later than October 21, 2016, Plaintiffs, through KCC, will send by email a notice of pendency of class action lawsuit in the form attached hereto as Exhibit 1 to all email addresses identified in the PTIN database.

2. Within 45 days of the entry of an Order approving this Plan, but in no event later than November 7, 2016, Plaintiffs, through KCC, will send by first class mail a postcard notice of pendency of class action lawsuit in the form attached hereto as Exhibit 2 to (1) all persons without an email address in the PTIN Database; and (2) all persons for whom email delivery was unsuccessful.

3. Within 30 days of the entry of an Order approving this Plan, but in no event later than October 21, 2016, Plaintiffs, through KCC, will establish and maintain a website in order to respond to inquiries by potential class members. The website shall include the complete text of the notice attached hereto as Exhibit 3, and other relevant documents.

4. Within 30 days of the entry of an order approving this Plan, but in no event later than October 21, 2016, Plaintiffs, through KCC, will make available to potential class members automated telephone support to handle any inquiries from potential class members.

5. The opt-out period will expire on December 7, 2016.

6. Pursuant to Federal Rule of Civil Procedure 23(c)(2)(B), this Plan sets forth the best notice that is practicable under the circumstances, including individual notice to all members of the Class who can be identified through reasonable effort. This Plan and the Exhibits hereto comply with the requirements of Federal Rule of Civil Procedure 23(c)(2)(B)(i)-(vii) and satisfy due process.

Dated: August 25, 2016

Respectfully submitted,

By: /s/ William H. Narwold
MOTLEY RICE LLC

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the Putative Class*

CERTIFICATE OF SERVICE

I, William H. Narwold, declare that I am over the age of eighteen (18) and not a party to the entitled action. I am a member of the law firm MOTLEY RICE LLC, and my office is located at 20 Church Street, 17th Floor, Hartford, CT 06103.

On August 25, 2016, I caused to be filed the following in the above-captioned case:

Unopposed Motion for Approval of Plan of Class Notice

with the Clerk of Court using the Official Court Electronic Document Filing System, which served copies on all interested parties registered for electronic filing.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 25, 2016

Respectfully submitted,

By: /s/ William H. Narwold
William H. Narwold
MOTLEY RICE LLC