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**Attorneys for Plaintiff**

ANTHONY CELESTIN, on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

AVIS BUDGET GROUP, INC. and BUDGET  
RENT A CAR SYSTEM, INC.,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
MERCER COUNTY  
LAW DIVISION

DOCKET NO. MER-L-000102-19

#### **LEGAL NOTICE**

**YOU MAY BE ENTITLED TO A REFUND IF YOU ARE A NEW JERSEY CITIZEN WHO RENTED A MOTOR VEHICLE FROM BUDGER RENT A CAR, RETURNED IT TO NEW JERSEY AND WHO WAS CHARGED A CLEANING FEE BETWEEN OCTOBER 9, 2012 AND JUNE 11, 2021**

**WHAT IS THIS NOTICE ABOUT?** A lawsuit encaptioned Celestin v. Avis Budget Group, Inc., and Budget Rent A Car System, Inc., (“Budget”), Docket No. MER-L-102-19 was filed in the Superior Court of New Jersey, Mercer County on behalf of All New Jersey citizens between October 9, 2012 and the date of preliminary approval who have rented a motor vehicle in New Jersey with Budget Rent A Car and paid a Cleaning Fee between October 9, 2012 and June 11, 2021. The complaint alleges that Budget had a uniform policy of improperly charging New Jersey customers a Cleaning Fee which was not adequately disclosed in its rental agreement. Budget denies any wrongdoing and denies the claims and allegations asserted by Plaintiffs and maintains that the Cleaning Fee it imposes was lawful. The parties nevertheless have agreed to settle the lawsuit.

**WHY SHOULD I READ THIS NOTICE?** You may be a member of the Class. This is a class action lawsuit that the parties have proposed to settle. If the proposed settlement is approved by

the Court, your legal rights may be affected. This notice describes what the lawsuit is about, explains the terms of the proposed settlement, tells you who would be covered and what legal claims would be resolved by the settlement if the Court approves it, and explains how individuals can obtain benefits under the settlement.

**AM I COVERED BY THIS CLASS ACTION LAWSUIT AND THE PROPOSED SETTLEMENT?** You can determine if you are a Class member by reviewing your receipts or credit card statements to see if you rented a motor vehicle from Budget Rent A Car, returned the motor vehicle to a New Jersey facility and were charged a Cleaning Fee between October 9, 2012 and the present, you are a Class member. If you have any questions regarding whether you are a Class member, you can contact the Settlement Administrator at 1-866-742-4955 or send an e-mail to the Settlement Administrator at [info@rg2claims.com](mailto:info@rg2claims.com).

**WHAT ARE THE TERMS OF THE SETTLEMENT?** Budget has agreed to create a \$125,000 Settlement Fund whereby for each class member who submits a claim, Budget will provide a \$250 refund from the Fund. Should the number of Class members' claims exceed the amount of the Settlement Fund, Class members' claims will be pro rata reduced. Budget has also agreed to pay up to \$275,000 to Class counsel in attorney's fees and litigation expenses, separate and apart from the Settlement Fund, subject to court approval. Any attorney's fees and litigation costs awarded will be paid separately by Budget and such fees and expenses will not come out of your refund or the refunds paid to the other class members. The proposed settlement is intended to settle all claims against Budget that arise in any way from the Defendants' conduct in charging cleaning fees which are the subject of this lawsuit. By participating in this Settlement, each Class member is releasing all such claims.

The foregoing is a summary of the basic settlement terms. The full settlement is set forth in a Settlement Agreement that can be obtained by contacting Class Counsel as set forth under the heading below "HOW DO I GET MORE INFORMATION?"

**WHAT ARE MY RIGHTS?** If you are a member of the Class and wish to participate in the settlement, you need to complete and submit a claim form on or before September 20, 2021.

If you are a member of the Class and you do NOT want to remain part of the Class, you must exclude yourself ("opt-out"). To opt-out, you must mail a written request, postage pre-paid, to: Angeion at the address set forth below: Class counsel at DeNittis Osefchen Prince, P.C., 525 Route 73 North, Suite 410, Marlton, NJ 08053 and Defendants' Counsel, Jason E. Hazelwood, Esq., Reed Smith, L.P., Reed Smith Centre, 225 Fifth Avenue, Suite 1200, Pittsburgh, PA 15222. The request must be post-marked on or before August 5, 2021, and contain: the name of the lawsuit; your full name, current address and phone number; your signature; and a specific statement of your intention to exclude yourself from the Settlement Class and any judgment entered pursuant to the proposed Settlement. If you do not opt-out as instructed above, you will be automatically included and bound by any determination of the Court, whether favorable or not, and any claim of yours will be ended by judgment.

You may also file a motion with the Court for permission to intervene in this lawsuit if you wish. You do not have to intervene. If you do not intervene in this case or exclude yourself from the class, your interests will be represented by Class counsel.

You may object to the proposed settlement if you wish. Any objection to the settlement must be sent to the addresses listed above and postmarked no later than August 5, 2021. Any objection should contain the name of this lawsuit; your full name, current address and telephone number; your signature; proof of your membership in the Class; and the specific reason(s) for your objection.

On **Wednesday, August 25, 2021, at 9:00 am**, the Superior Court of New Jersey, Law Division, Mercer County, the **Honorable Douglas H. Hurd, J.S.C.**, Mercer County Civil Courthouse, **3<sup>rd</sup> Floor**, will hold a public hearing to determine whether the proposed settlement is fair, adequate, and reasonable and should be approved. Class members who support the proposed settlement do not need to appear at the hearing or take any other action to indicate their approval. Class members who object to the proposed settlement are not required to attend the settlement hearing. If you want to be heard orally in opposition to the settlement, either personally or through counsel, you must indicate your intention to appear at the hearing in your written objection.

**HOW DO I GET MORE INFORMATION?** Further information about the settlement can be obtained by contacting Class counsel at 856-797-9951, or emailing Class counsel at [sdenittis@denittislaw.com](mailto:sdenittis@denittislaw.com). You can also visit the website at [www.budgetcleaningfeesettlement.com](http://www.budgetcleaningfeesettlement.com).

**PLEASE DO NOT WRITE OR TELEPHONE THE COURT, DEFENDANT OR ANY OF THEIR AGENTS FOR INFORMATION ABOUT THE PROPOSED SETTLEMENT OR THIS LAWSUIT.**

Dated: