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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

**ORDER GRANTING PRELIMINARY, NON-BINDING APPROVAL TO PROPOSED
CLASS ACTION SETTLEMENT, APPROVING FORM OF CLASS SETTLEMENT
NOTICE AND NOTICE DISTRIBUTION PLAN, AND
SCHEDULING A DATE FOR THE FORMAL PUBLIC FAIRNESS HEARING**

This matter having come before the Court upon an unopposed motion by Plaintiffs under N.J.C.R. 4:32-1, et seq. for preliminary, non-binding approval of a proposed class action settlement, Court approval of a proposed form of the Class Notice and Claim Form, and Court approval of the proposed plan of notice publication and setting a hearing date for the formal public fairness hearing on whether to grant final approval to the proposed class settlement, and the Court having considered the motion papers, and for good cause shown;

IT IS HEREBY ORDERED this _____ day of _____ 11th day of June, 2021 as follows:

1. The Court grants preliminary, non-binding approval of the proposed class action

settlement;

2. This matter shall preliminarily proceed as a class action with a Settlement Class defined as follows:

All New Jersey citizens who, between October 9, 2012 and the date of preliminary approval, rented a motor vehicle from Budget Rent A Car, returned said vehicle to a New Jersey facility, and paid a Cleaning Fee.

3. The Court preliminarily appoints Plaintiff Anthony Celestin as the named Class Representative and preliminarily appoints Stephen DeNittis, Esq. of DeNittis Osefchen Prince, P.C. as Class Counsel.

4. It is apparent from the file and presentation of counsel that the proposed Settlement Class meets the requirements of N.J. Court Rule 4:32-1, et seq. such that class notice should be provided.

5. The Court appoints RG2 Claims Administration, LLC as the Settlement Administrator.

6. The Court approves the content of the proposed Class Notice and Claim Form submitted by Counsel and the proposed manner of notice distribution set forth in the Settlement Agreement. The Court directs the Defendants to provide to the Settlement Administrator a list of any and all persons whom Defendants' records indicate may be class members and their last known addresses within 30 days of this Order. The Court further directs that within 30 days of this Order, the Class Notice and Claim Form shall be sent by first class mail by the Settlement Administrator to all persons whom Defendants' records indicate may be class members, at their last known address. In addition, within 30 days of this Order, the Settlement Administrator shall be responsible for publishing the Class Card Notice for one week through a banner advertisement online.

7. Within 30 days of this order, the Settlement Administrator shall create a Settlement Website www.avisNJcleaningfeesettlement.com which will contain information describing the settlement and will contain the following: Class Notice (Exhibit B of the Settlement Agreement); a Claim Form (Exhibit A of the Signed Settlement Agreement); Class Counsel's contact information; a copy of the Settlement Agreement; and a copy of Plaintiffs' complaint. The cost for the Settlement Website will be paid for from the Administrative Fee paid to RG2 from the Settlement Fund. The Class Notice and Claim Form will also be posted by Class Counsel in a prominent location on Class Counsel's website www.denittislaw.com.

8. Any objections to the proposed Class Settlement, or requests for exclusion from the class, must be submitted to the Clerk, post-marked no later than twenty (20) days prior to the Fairness Hearing scheduled in this matter. Pursuant to N.J.C.R. 4:32-1, *et seq.*, a formal, public fairness hearing on whether to grant final, binding approval to the proposed class action settlement shall be held on _____, 2021 (~~suggested date August 25, 2021 or later~~) August 25, 2021 at the Superior Court of New Jersey, Mercer County, 175 South Broad Street, 3rd Floor, Trenton, NJ 08650 at 9:00 a.m._____.

9. Any memoranda of law or other documents in support of final approval of the proposed class settlement, copies of any objections or requests from exclusion that have been submitted to class counsel or defense counsel, and an affidavit attesting that class notice has been distributed in a manner consistent with this Order, must be submitted to the Court no later than 20 days prior to the hearing on final approval.

10. In the event that the proposed settlement as provided in the Settlement Agreement is not granted final approval by the Court, then the Settlement Agreement, and all drafts, negotiations, discussions and documentation related thereto and orders entered by the Court in connection

