

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SVETLANA SHOLOPA and MILICA
MILOSEVIC, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

TURK HAVA YOLLARI A.O. (d/b/a Turkish
Airlines, a foreign corporation), and TURKISH
AIRLINES, INC., a New York Corporation,

Defendants.

Case No. 1:20-cv-03294-ALC

Hon. Andrew L. Carter

DECLARATION OF BRONYN
HEUBACH ON NOTICE PLAN AND
SETTLEMENT ADMINISTRATION

I, Bronyn Heubach, hereby declare and state as follows:

1. I am an Assistant Director at JND Legal Administration. JND is a legal administration services provider with its headquarters located in Seattle, Washington. JND has extensive experience in all aspects of legal administration and has administered class actions in hundreds of cases.

2. JND is serving as the Settlement Administrator in the above-captioned litigation (the “Action”) pursuant to the Court’s Order Granting Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement, filed April 4, 2023 (ECF 86).

3. This Declaration describes the implementation of the Notice Plan, as described in the Settlement Agreement, filed December 20, 2022 (ECF 78-1) and provides an update on the claims administration process. The Notice Plan was designed to inform Class Members of the proposed Settlement and their rights and options.

CAFA NOTICE

4. On December 30, 2022, on behalf of Defendants Türk Hava Yollari A.O. (d/b/a Turkish Airlines) and Turkish Airlines, Inc. (“Defendants”), JND mailed notice of the Turkish Airlines Settlement to the United States Attorney General and to the appropriate State officials pursuant to Class Action Fairness Act of 2005.

DIRECT NOTICE

Class Member Identification

5. On April 14, 2023, Defendants provided JND with class data containing the names, ticket reservation numbers, and contact information for potential Class Members.

6. Despite Defendants’ best efforts, many records were missing contact information that would allow JND to send the Notice either by mail or email. For records with phone numbers, JND conducted advanced address research to look up email and mailing addresses. JND then analyzed, de-duplicated, and standardized the data and identified 247,682 unique potential Class Member records.

7. JND promptly loaded these records into a secure, case-specific database for the Settlement. A unique identification number (“Unique ID”) was assigned to each Class Member to identify them throughout the administration process.

Direct Email Notice

8. On May 18, 2023, JND commenced sending the Email Notice to all potential Class Members for whom JND obtained at least one valid email address. The Email Notice completed sending on June 5, 2023. The Email Notice included the potential Class Member’s Unique ID and PIN to facilitate logging in to the online claim portal and filing a claim electronically. The Email Notice contained links to the Settlement Website, deadlines to object, request exclusion, and

submit a Claim Form, the date of the Fairness Hearing, and Settlement Administrator contact information. A representative copy of the Email Notice is attached as Exhibit A.

9. In total, JND sent a total of 179,982 Email Notices to 154,711 unique Class Members, of which 6,893 emails bounced back and were not deliverable.

Direct Mail Notice

10. JND supplemented the Email Notice effort by sending a Summary Notice (“Postcard Notice”) to all potential Class Members for whom an Email Notice was undeliverable, or for whom a valid email address was not obtained. The Postcard Notice included the potential Class Member’s Unique ID and PIN to facilitate logging in to the online claim portal and filing a claim electronically. The Postcard Notice contained the URL for the Settlement Website, deadlines to object, request exclusion, and submit a Claim Form, the date of the Fairness Hearing, and Settlement Administrator contact information. JND mailed the Postcard Notices on June 16, 2023 to 14,091 potential Class Members. A representative copy of the Postcard Notice is attached as Exhibit B.

Reminder Email Notices

11. On June 16, 2023, a reminder Email Notice campaign commenced to all potential Class Members with at least one valid email address. Email addresses that were undeliverable in the initial Email Notice campaign were not included. A total of 175,591 emails were sent to 151,655 unique Class Members, of which 7,216 bounced back. A representative copy of the reminder Email Notice is attached as Exhibit C.

INDIRECT PUBLICATION NOTICE

12. In order to reach as much of the Class as possible, JND supplemented the Direct Notice effort with indirect noticing efforts, including digital media, a press release, an internet search campaign, and sponsorships on popular class action websites.

13. The combined reach for the direct email notice and digital effort is 83%. While not measurable, the internet search campaign, press release, and two class action sponsorships (i.e., TopClassActions.com and ClassActions.org) extended reach further.

Digital Notice Campaign

14. On May 18, 2023, JND launched a four-week digital ad campaign through the Google Display Network (“GDN”), Facebook/Instagram, and Twitter, consisting of 117 million digital impressions designed to reach potential Class Members using multiple targeting strategies. The digital ads included an embedded link to the Settlement Website, where potential Class Members could get more information about the Settlement and file a claim online.

15. As of the date of this Declaration, a total of 126,076,651 impressions (i.e. display of the ad on a search result page or other site on the Google Network) were delivered through GDN, Facebook/Instagram, and Twitter, which resulted in 15,455 clicks. Copies of representative digital ads are attached as Exhibit D.

Internet Search Campaign

16. On May 18, 2023, JND implemented an internet search campaign to assist potential Class Members with locating the Settlement Website. JND purchased ads tied to keywords related to the Settlement so when those terms were searched, an advertisement with a hyperlink to the Settlement Website would appear on the results page.

17. As of the date of this Declaration, a total of 13,655 impressions were delivered through keyword searches, resulting in 1,071 clicks.

Press Release and Class Action Site Sponsorships

18. To further assist in getting “word of mouth” out about the Settlement, JND distributed a press release through PR Newswire which reaches over 15,000 media outlets (English and Spanish) nationwide. A copy of the press release is attached as Exhibit E.

19. Certain class action websites are frequented for updates on class action lawsuits. These sites help drive potential Class Members to the official settlement websites by featuring sponsored actions in a prominent area on the sites’ home pages and providing additional details on pages specific to the individual settlements. JND provided notice of the Settlement through sponsorship opportunities with TopClassActions.com and ClassAction.org. Screenshots of our sponsored features through TopClassActions.com and ClassAction.org are attached as Exhibit F.

SETTLEMENT WEBSITE AND OTHER CLASS MEMBER NOTICE

Settlement Website

20. On May 15, 2023, JND launched an interactive, case-specific Settlement Website at www.TASettlement.com, and this URL was listed in the Direct Notices. The Website provides comprehensive information about the Settlement, including answers to frequently asked questions, contact information for the Settlement Administrator, key dates, and links to important case documents, including the Long Form Notice, the Summary Notice, the Claim Form, and the Settlement Agreement.

21. The Settlement Website also features an online Claim Form for the submission of claims. Additionally, as noted above, a Claim Form is posted on the Settlement Website for download for those Class Members who prefer to submit a Claim Form by mail.

22. As of the date of this Declaration, the Settlement Website has tracked a total of 35,954 unique users who registered 140,825 page views. JND will continue to update and maintain the Settlement Website throughout the settlement administration process.

Settlement Administrator Toll-Free Number

23. On May 15, 2023, JND launched a 24-hour, toll-free information line that Class Members can call to obtain pre-recorded information about the Settlement.

24. As of the date of this Declaration, JND has received 737 calls to the toll-free number. JND will continue to maintain and update the toll-free number throughout the settlement administration process.

Settlement Administrator Post Office Box

25. JND established a post office box, Turkish Airlines Settlement, c/o JND Legal Administration, PO Box 91455, Seattle, WA 98111, to administer the Settlement to receive Class Member correspondence, paper Claim Forms, exclusion requests, and objections.

CLAIMS RECEIVED

26. The Notices informed Class Members they may file claims electronically through the Settlement Website. Class Members who do not wish to submit their claim online may download and print a Claim Form from the Website or request a mailed copy of the Claim Form by writing the Settlement Administrator. The deadline to file claims is August 18, 2023.

27. As of the date of this Declaration, JND has received a total of 8,886 Claim Forms. JND continues to receive and process Claim Form submissions and will continue to report to Counsel on the status of the claim intake and review.

OBJECTIONS

28. The Notices informed recipients that any Class Member who wanted to object to the proposed Settlement could do so by submitting a written statement on or before July 17, 2023.

29. As of the date of this Declaration, JND has received one (1) objection. A copy of the objection is attached as Exhibit G. JND will promptly report to Counsel any additional objections that are received.

REQUESTS FOR EXCLUSION

30. The Notices also informed Class Members of their right to opt out of the Settlement by submitting a written request for exclusion. The deadline to opt out is July 17, 2023.

31. As of the date of this Declaration, JND has received twenty-four (24) requests for exclusion. A list of exclusion requests is attached as Exhibit H. JND will promptly report to Counsel any additional exclusion requests that are received.

I declare under penalty of perjury that the foregoing is true and correct. Executed June 29, 2023, at Seattle, Washington.



BRONYN HEUBACH

EXHIBIT A

From: info@tasettlement.com
Sent: Thursday, May 18, 2023
To:
Subject: IMPORTANT NOTICE: Turkish Airlines Class Action Settlement

Dear

Unique ID:
PIN:

COURT ORDERED NOTICE

Sholopa et al. v. Turk Hava Yollari A.O. (d/b/a Turkish Airlines) et al.
Case No. 1:20-cv-03294-ALC

If you purchased a flight on Turkish Airlines scheduled to fly to or from the United States between March 1, 2020 and December 31, 2021 and your flight was cancelled by Turkish Airlines, you may be eligible for benefits from a class action settlement.

A federal court authorized this notice. This is not a solicitation from a lawyer.

A Settlement has been reached in a class action lawsuit. In the lawsuit, Plaintiffs allege Turk Hava Yollari A.O. (d/b/a Turkish Airlines) ("Turkish Airlines") breached its General Conditions of Carriage ("GCC") by failing to refund them for cancelled flights at all or within a reasonable amount of time. Turkish Airlines maintains that it did not breach the GCC, that it did provide refunds within a reasonable amount of time particularly given Covid-19's impact on Turkish Airlines' operations and the airline industry generally, and it denies that it did anything wrong. The Court has not decided who is right. Instead, the Parties agreed to a Settlement. Defined terms (with initial capitals) used herein and not otherwise defined have the same meaning as set forth in the Settlement Agreement.

Who is included? The Settlement Class includes all United States residents who purchased tickets for travel on a Turkish Airlines flight scheduled to operate to, from, or within the United States between March 1, 2020 and December 31, 2021 whose flights were cancelled by Turkish Airlines.

What are the Settlement Terms? Under the Settlement, Settlement Class Members who have already received a refund from Turkish Airlines and who submit a Claim Form will have the option to elect either (1) the Cash Option: \$10.00 USD per person, or (2) the Voucher Option: a Voucher for future travel

on Turkish Airlines in the amount of \$45.00 USD. Settlement Class Members who have not, to date, received a refund (but are entitled to one) can request a refund on the Claim Form and, upon submission of a Valid Claim, Turkish Airlines will pay (i) the full amount of the refund, and (ii) an additional Interest Payment of one percent (1%) of the unused ticket price, or in the case of partially used tickets, one percent (1%) of the price of the unused flight segment (i.e., a 101% refund). Settlement Class Members may submit a Claim Form through the mail or at www.TASettlement.com. **The deadline to file a Claim Form is August 18, 2023.**

Your Other Options. If you do not want to be legally bound by the Settlement, you must exclude yourself or “opt out” by **July 17, 2023**. If you do not opt out, you will release Claims that were or could have been made against Turkish Airlines related to this case. If you stay in the Settlement, you may object to it by **July 17, 2023**. The Long Form Notice on the website explains how to opt out or object. The Court has scheduled a hearing on August 24, 2023 to consider whether to approve the Settlement. You can appear at the hearing, but you do not have to do so.

For more information, including the Long Form Notice and information about attorneys’ fees being sought, visit www.TASettlement.com or call toll-free 1-855-678-0528.

To unsubscribe from this list, please click on the following link: [Unsubscribe](#)

EXHIBIT B

COURT ORDERED NOTICE

*Sholopa et al. v. Turk Hava Yollari
A.O. (d/b/a Turkish Airlines) et al.*

Case No. 1:20-cv-03294-ALC

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*A federal court authorized this notice.
This is not a solicitation from a lawyer.
You are not being sued.*

Turkish Airlines Settlement

c/o JND Legal Administration
PO Box 91455
Seattle, WA
98111

<<**BARCODE**>>

Postal Service: Please do not mark barcode

«Fullname»

«AddressLine1»

«AddressLine2»

«City», «State» «Zip»

«Country»

A Settlement has been reached in a class action lawsuit. In the lawsuit, Plaintiffs allege Turk Hava Yollari A.O. (d/b/a Turkish Airlines) (“Turkish Airlines”) breached its General Conditions of Carriage (“GCC”) by failing to refund them for cancelled flights at all or within a reasonable amount of time. Turkish Airlines maintains that it did not breach the GCC, that it did provide refunds within a reasonable amount of time particularly given Covid-19’s impact on Turkish Airlines’ operations and the airline industry generally, and it denies that it did anything wrong. The Court has not decided who is right. Instead, the Parties agreed to a Settlement. Defined terms (with initial capitals) used herein and not otherwise defined have the same meaning as set forth in the Settlement Agreement.

Who is included? You received this Summary Notice because Turkish Airlines’ records indicate that you may be a Settlement Class Member. The Settlement Class includes all United States residents who purchased tickets for travel on a Turkish Airlines flight scheduled to operate to, from, or within the United States between March 1, 2020 and December 31, 2021 whose flights were cancelled by Turkish Airlines.

What are the Settlement Terms? Under the Settlement, Settlement Class Members who have already received a refund from Turkish Airlines and who submit a Claim Form will have the option to elect either (1) the Cash Option: \$10.00 USD per person, or (2) the Voucher Option: a Voucher for future travel on Turkish Airlines in the amount of \$45.00 USD. Settlement Class Members who have not, to date, received a refund (but are entitled to one) can request a refund on the Claim Form

and, upon submission of a Valid Claim, Turkish Airlines will pay (i) the full amount of the refund, and (ii) an additional Interest Payment of one percent (1%) of the unused ticket price, or in the case of partially used tickets, one percent (1%) of the price of the unused flight segment (*i.e.*, a 101% refund). Settlement Class Members may submit a Claim Form through the mail or at www.TASettlement.com. **The deadline to file a Claim Form is August 18, 2023.**

Your Other Options. If you do not want to be legally bound by the Settlement, you must exclude yourself or “opt out” by July 17, 2023. If you do not opt out, you will release Claims that were or could have been made against Turkish Airlines related to this case. If you stay in the Settlement, you may object to it by July 17, 2023. The Long Form Notice on the website explains how to opt out or object. The Court has scheduled a hearing on August 24, 2023 to consider whether to approve the Settlement. You can appear at the hearing, but you do not have to do so. More information, including the Long Form Notice and information about attorneys’ fees being sought, is available at the website and the toll-free number below.

WWW.TASETTLEMENT.COM

1-855-678-0528

Unique ID: <#####>

PIN: <#####>

Carefully separate this Address Change Form at the perforation.

Name: _____

Current Address: _____

Place
Stamp
Here

Address Change Form

To make sure your information remains up-to-date in our records, please confirm your address by filling in the above information and depositing this postcard in the U.S. Mail.

Turkish Airlines Settlement
c/o JND Legal Administration
P.O. Box 91455
Seattle, WA 98111

EXHIBIT C

From: info@tasettlement.com
Sent: Friday, June 16, 2023
To:
Subject: REMINDER NOTICE: Turkish Airlines Class Action Settlement

Unique ID:

PIN:

COURT ORDERED NOTICE

Sholopa et al. v. Turk Hava Yollari A.O. (d/b/a Turkish Airlines) et al.
Case No. 1:20-cv-03294-ALC

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refund on the Claim Form and, upon submission of a Valid Claim, Turkish Airlines will pay (i) the full amount of the refund, and (ii) an additional Interest Payment of one percent (1%) of the unused ticket price, or in the case of partially used tickets, one percent (1%) of the price of the unused flight segment (i.e., a 101% refund). Settlement Class Members may submit a Claim Form through the mail or at www.TASettlement.com. **The deadline to file a Claim Form is August 18, 2023.**

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10 Day
Weekend
Monthly
Radar
Video
More Forecasts

Monthly Weather - Los Angeles, CA

As of 10:29 am PDT

< Apr
May 2023
View
Jun >

SUN	MON	TUE	WED	THU	FRI	SAT
30 68° 55°	1 66° 51°	2 65° 48°	3 64° 50°	4 64° 53°	5 66° 50°	6 69° 52°
7 70° 54°	8 71° 54°	9 66° 54°	10 70° 54°	11 70° 53°	12 73° 56°	13 75° 58°
14 78° 60°	15 72° 57°	16 74° 56°	17 73° 57°	18 75° 59°	19 75° 59°	20 75° 60°

Thu 18 | Day

75°

11% SSW 6 mph

Mostly cloudy early, then sunshine for the afternoon. High near 75F. Winds SSW at 5 to 10 mph.

Thu 18 | Night

59°

7% S 5 mph

Mostly clear early followed by mostly cloudy skies overnight. Low 59F. Winds light and variable.

LEGAL NOTICE

Purchasers of a CANCELLED Turkish Airlines flight between March 2020 - December 2021 may get a payment from a class action settlement

FILE A CLAIM

Almanac

May 18	High	Low	Precip
Averages	74°F	58°	--

1:44



nbclosangeles.com

4 66°

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4 WEATHER ALERTS

[See full forecast](#)

LEGAL NOTICE

Purchasers of a **CANCELLED** Turkish Airlines flight between March 2020-December 2021 may get a payment from a class action settlement

[FILE A CLAIM](#)

LOCAL [See all](#)



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SUBSCRIBE AND GET 1 YEAR FOR \$24.99 \$10. PLUS, THE 2023 HOT LIST.

-
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- NEWS

Argentina

This South American country is perennially popular. But a pair of openings plays to both its urban and bucolic appeal: In Mendoza, the country's first female enologist, Susana Balbo, opened SB Winemaker's House and Spa Suites inside a 100-year old property with art, exceptional cuisine, and a hyper focus on wine. It may just be a game changer in terms of places to stay in this area. And back in Buenos Aires, the revolutionary *Kōnā Corner* is from acclaimed Argentine chef Narda Lepes and her passion for all things Japanese. The standout dishes include agedashi tofu, Hanetsuki gyoza, tonkatsu, miso beurre blanc trou, and fukusai.

Oslo

When it comes to big Scandinavian cities, Oslo often plays understudy to foodie Copenhagen or stylish Stockholm. But we think this is the year for Norway's capital to really take center stage. One reason is the new, buzzy *Sommerro* hotel. Located in the heart of the city's Frogner neighborhood, the 231-room property channels the building's 1930s origins, tapping into the period's glamour with gusto—hand-knotted rugs, inlaid wooden headboards, and deco chandeliers. With seven smart bars and restaurants, including Tak Oslo, a Nordic-Japanese spot and the city's only rooftop restaurant, the hotel has become a lodestar for the city's cool crowd. Adding to Oslo's fresh shine is the new *National Museum*, which brought the collections of the former National Gallery, the Museum of Contemporary Art, and the Norwegian Museum of Decorative Arts and Design together in one very large, minimalist-

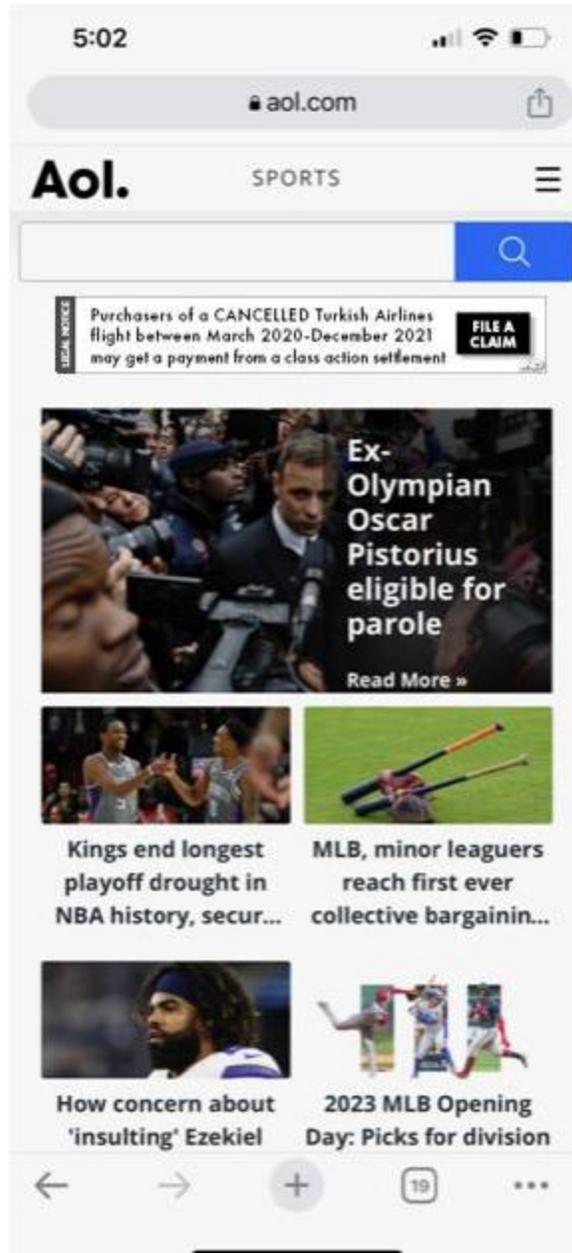


How It Feels To Visit A Traditional Nordic Sauna

LEGAL NOTICE

Purchasers of a CANCELLED Turkish Airlines flight between March 2020-December 2021 may get a payment from a class action settlement

FILE A CLAIM



LEGAL NOTICE Purchasers of a CANCELLED Turkish Airlines flight between March 2020-December 2021 may get a payment from a class action settlement **FILE A CLAIM**

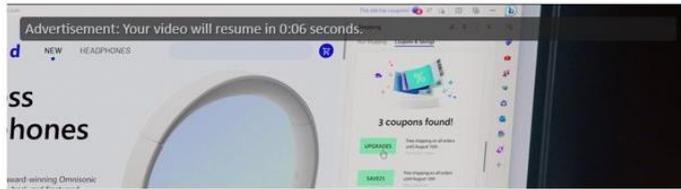


EXCLUSIVE

John Stamos Shares the Heart-Melting Fatherhood Advice Bob Saget Gave Him About Son Billy

In an exclusive interview with E! News, John Stamos shared the words of wisdom he received from *Full House* co-star Bob Saget about fatherhood before the comedian's death in 2022.

By **GABRIELLE CHUNG** MAY 17, 2023 9:23 PM TAGS



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where to travel to



Ad - www.tasettlement.com

Turkish Airlines Settlement | Cancelled Flight and No Refund | Affects Ticket Purchasers

Purchasers of cancelled flights between March 2020 and December 2021 may get a payment. Turkish Airline travelers who were not refunded for cancelled flights must file a claim.

People also ask :

What is your best place to travel? ▼

What countries are good to travel to now? ▼

What is the #1 visited vacation spot in the US? ▼

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Dec 9, 2021

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|-------------------|-------------|-------------|-----------------------|
| 1. Abruzzo, Italy | 2. Alaska | 3. Anguilla | 4. Antarctica |
| 5. Bahamas | 6. Barbados | 7. Belize | 8. Budapest, Hunga... |



1:27   



 **Class Action Notice** ⋮
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**Purchasers of a CANCELLED
Turkish Airlines flight between
March 2020-December 2021 may get a
payment from a class action settlement**

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Turkish Airlines Settlement

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5:55

Class Action Notice

Purchasers of a CANCELLED Turkish Airlines flight between March 2020-December 2021 may get a payment from a class action settlement



See more

The image is a screenshot of a mobile notification. At the top, the status bar shows the time 5:55, signal strength, Wi-Fi, and battery icons. Below that is a notification header with a green speaker icon, the text 'Class Action Notice', and a close button. The main body of the notification contains the text: 'Purchasers of a CANCELLED Turkish Airlines flight between March 2020-December 2021 may get a payment from a class action settlement'. Below the text is a photograph showing the silhouette of a person standing in an airport terminal, looking out a large window at an airplane on the tarmac. At the bottom of the notification, there are three interactive elements: a share icon on the left, a 'See more' button in the center, and a thumbs-up icon on the right.

5:13   

Instagram  

 Class Action Notice
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Purchasers of a CANCELLED
Turkish Airlines flight between
March 2020-December 2021 may get a
payment from a class action settlement

Learn more 

 agirhasnopresident
agirhasnopresident · Original audio 

1:29

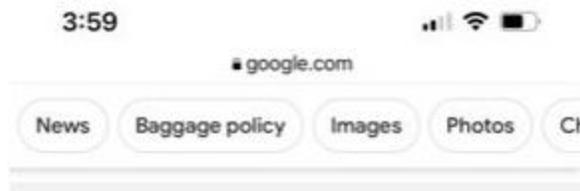
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Purchasers of a CANCELLED
Turkish Airlines flight between
March 2020-December 2021
may get a payment from a
class action settlement



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Turkish Airlines Settlement | Affects Ticket Purchasers | Cancelled Flight an...

Purchasers of cancelled flights between March 2020 and December 2021 may get a payment. Turkish Airlines travelers who were not refunded for cancelled flights must file a claim.

[File a Claim](#)

[FAQ](#)

[Key Dates](#)

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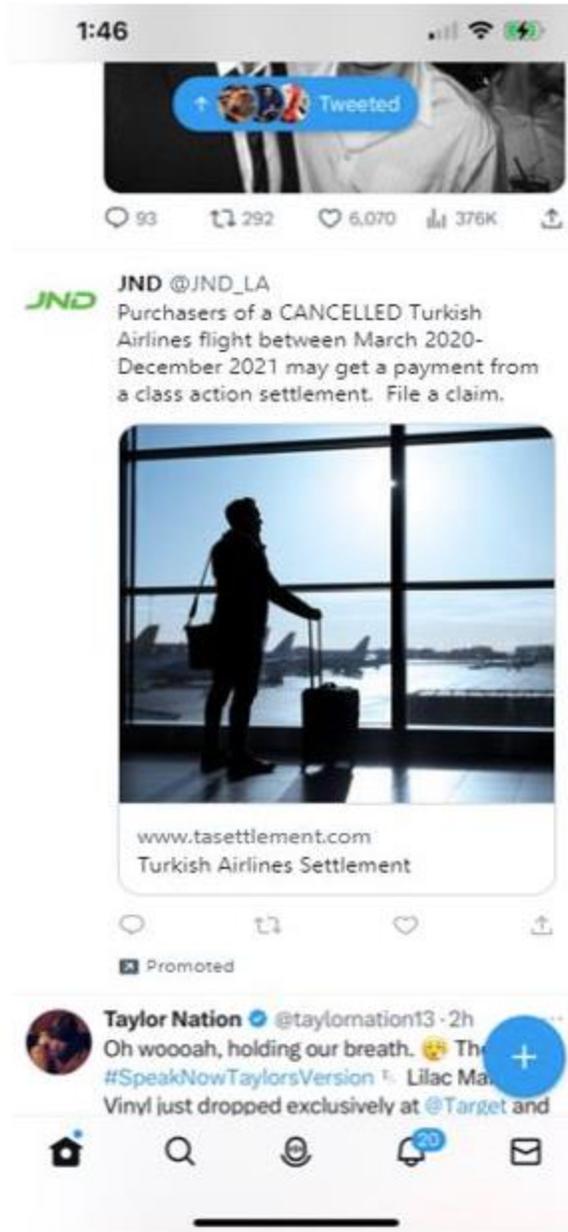


EXHIBIT E

If you purchased a flight on Turkish Airlines scheduled to fly to or from the United States between March 1, 2020 and December 31, 2021 and your flight was cancelled by Turkish Airlines, you may be eligible for benefits from a class action settlement

NEWS PROVIDED BY
JND Legal Administration →
18 May, 2023, 09:18 ET

SEATTLE, May 18, 2023 /PRNewswire/ -- JND Legal Administration

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SOURCE JND Legal Administration



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Si compró un vuelo en Turkish Airlines programado para volar hacia o desde los Estados Unidos entre el 1 de marzo de 2020 y el 31 de diciembre de 2021 y su vuelo fue cancelado por Turkish Airlines, puede ser elegible para beneficios de un acuerdo de demanda colectiva

NEWS PROVIDED BY
JND Legal Administration →
19 May, 2023, 15:58 ET

SEATTLE, 19 de mayo de 2023 /PRNewswire-HISPANIC PR WIRE/ -- JND Legal Administration

Un tribunal federal autorizó este aviso. No se trata de una solicitud de un abogado.

Se ha llegado a un Acuerdo en una demanda colectiva. En la demanda, los Demandantes alegan que Turk Hava Yollari A.O. (d/b/a Turkish Airlines) ("Turkish Airlines") incumplió sus Condiciones Generales de Transporte (General Conditions of Carriage, "GCC") al no reembolsar los vuelos cancelados en absoluto o dentro de un plazo razonable. Turkish Airlines sostiene que no violó las GCC, que proporcionó reembolsos dentro de un plazo razonable, en particular dado el impacto de la Covid-19 en las operaciones de Turkish Airlines y en la industria aérea en general, y niega que haya hecho algo malo. El Tribunal no ha decidido quién tiene razón. En cambio, las partes acordaron llegar a un Acuerdo. Los términos definidos (con iniciales en mayúscula) utilizados en el presente documento y no definidos de otra manera tienen el mismo significado que se establece en el Acuerdo de Conciliación.

¿Quién está incluido? La Demanda Colectiva del Acuerdo incluye a todos los residentes de los Estados Unidos que compraron boletos para viajar en un vuelo de Turkish Airlines programado para operar desde o dentro de los Estados Unidos entre el 1 de marzo de 2020 y el 31 de diciembre de 2021, cuyos vuelos fueron cancelados por Turkish Airlines.

¿Cuáles son los términos del Acuerdo? En virtud del Acuerdo, los Miembros de la Demanda Colectiva que ya hayan recibido un reembolso de Turkish Airlines y presenten un Formulario de Reclamación tendrán la opción de elegir (1) la Opción de Efectivo: USD \$10.00 por persona, o (2) la Opción del Cupón: un cupón para viajes futuros en Turkish Airlines por un monto de USD \$45.00. Los Miembros de la Demanda Colectiva del Acuerdo que no hayan, hasta la fecha, recibido un reembolso (pero que tengan derecho a uno) pueden solicitar un reembolso en el Formulario de Reclamación y, al presentar una Reclamación Válida, Turkish Airlines pagará (i) el monto total del reembolso y (ii) un Pago de Intereses adicional del uno por ciento (1%) del precio del boleto no utilizado, o en el caso de boletos parcialmente usados, el uno por ciento (1%) del precio del segmento de vuelo no utilizado (*es decir*, un reembolso del 101%). Los Miembros de la Demanda Colectiva del Acuerdo pueden enviar un Formulario de Reclamación por correo postal o en www.TASettlement.com. **La fecha límite para presentar un Formulario de Reclamación es el 18 de agosto de 2023.**

Otras opciones para usted. Si no desea estar legalmente obligado por el Acuerdo, debe excluirse a más tardar el **17 de julio de 2023**. Si no se excluye, será parte de las Reclamaciones que se hayan emitido o puedan haberse emitido contra Turkish Airlines en relación con este caso. Si permanece en el Acuerdo, puede objetarlo antes del **17 de julio de 2023**. El Aviso de Formulario Largo en el sitio web explica cómo excluirse u objetar. El Tribunal ha programado una audiencia para el 24 de agosto de 2023 con el objetivo de considerar si aprueba el Acuerdo. Usted puede comparecer en la audiencia, pero no está en obligación de hacerlo.

Para obtener más información, incluyendo el Aviso de Formulario Largo y la información sobre los honorarios de los abogados a los que se aspira, visite www.TASettlement.com o llame al número gratuito 1-855-678-0528.

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EXHIBIT F

OPEN SETTLEMENTS

Class Action Settlements

Claim Your Rebate Today

Every year, millions of dollars are left on the table in unclaimed settlement funds. In some cases, this is simply because people are unaware of their rights to claim settlement money – or are confused as to what’s involved in staking their claims.

At ClassAction.org, part of our mission is to break some myths about [class action lawsuits](#) and to provide insight into what actually goes into the filing – and resolution of – a lawsuit.

To view a list of current lawsuits and investigations, [click here](#).

STAY CURRENT



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Featured Settlements

Facebook Location Tracking	Turkish Airlines Cancellations	Facebook User Privacy																		
<p>84 Days Left</p> <p>• Featured</p>	<p>91 Days Left</p> <p>• Featured</p>	<p>98 Days Left</p> <p>• Featured</p>																		
<table border="1"> <tr> <th>TYPICAL SETTLEMENT</th> <th>CLAIM DEADLINE</th> <th>PROOF REQUIRED?</th> </tr> <tr> <td>Varies</td> <td>8/11/23</td> <td>No</td> </tr> </table>	TYPICAL SETTLEMENT	CLAIM DEADLINE	PROOF REQUIRED?	Varies	8/11/23	No	<table border="1"> <tr> <th>TYPICAL SETTLEMENT</th> <th>CLAIM DEADLINE</th> <th>PROOF REQUIRED?</th> </tr> <tr> <td>Varies</td> <td>8/18/23</td> <td>No</td> </tr> </table>	TYPICAL SETTLEMENT	CLAIM DEADLINE	PROOF REQUIRED?	Varies	8/18/23	No	<table border="1"> <tr> <th>TYPICAL SETTLEMENT</th> <th>CLAIM DEADLINE</th> <th>PROOF REQUIRED?</th> </tr> <tr> <td>Varies</td> <td>8/25/23</td> <td>No</td> </tr> </table>	TYPICAL SETTLEMENT	CLAIM DEADLINE	PROOF REQUIRED?	Varies	8/25/23	No
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TYPICAL SETTLEMENT	CLAIM DEADLINE	PROOF REQUIRED?																		
Varies	8/25/23	No																		
<p>If you were a Facebook user in the United States and your Location Services setting for the Facebook application was turned off at any point between January 30, 2015 and April 18, 2018, inclusive, you may be included in this class action settlement.</p>	<p>If you purchased Turkish Airlines tickets for travel between March 1, 2020 and December 31, 2021 and your flight was canceled, you may be included in this settlement.</p>	<p>If you were a Facebook user in the United States between May 24, 2007 and December 22, 2022, you may be included in this class action settlement.</p>																		
<p>Visit Official Settlement Website Share</p>	<p>Visit Official Settlement Website Share</p>	<p>Visit Official Settlement Website Share</p>																		

ClassAction.org

Claim Deadline: Aug 17, 2023

Turkish Airlines Class Action Settlement



If you purchased tickets for a Turkish Airlines flight scheduled to fly to or from the United States between March 1, 2020 and December 31, 2021 and your flight was canceled, **you may be entitled to money** from a recent **class action settlement**.

The link below will take you to the official website for the Turkish Airlines settlement.

[TAKE ME TO THE OFFICIAL SETTLEMENT SITE](#)

FAQs

What's Going On?

Turkish Airlines has agreed to settle a class action lawsuit that claimed the airline **failed to properly refund customers for flights canceled** because of the COVID-19 pandemic. According to the suit, Turkish Airlines either provided no refund at all or failed to refund customers within a reasonable amount of time.

Who's Eligible for the Settlement?

The settlement covers **United States residents who purchased tickets for travel to, from, or within the United States between March 1, 2020 and December 31, 2021 and whose flight was canceled by Turkish Airlines**. The settlement does not include customers who canceled their flights themselves, failed to show up for the first leg of a flight that was later canceled, already received a voucher or rebooking from Turkish Airlines, or already received a chargeback from their credit card provider for the canceled flight.

How Much Could I Get?

Customers who already received a refund from Turkish Airlines can file a claim for either **\$10 cash or a \$45 voucher** to use on future Turkish Airlines flights. These amounts could potentially be reduced if the total value of the cash and voucher claims exceeds \$1 million.

Customers who have not received a refund from Turkish Airlines can file a claim to **receive a refund of 101% of their unused ticket price**.

How Do I File a Claim?

You can file a claim over on the official settlement website.

You can access the online claim form [right here](#).

MAY 21, 2023

New Settlements from Facebook, Turkish Airlines

In this issue, we'll cover a couple of settlement sites that just recently went live -- one from Facebook over location tracking and one from Turkish Airlines over flight cancellations. Everything you need to know about filing claims can be found below.

From there, attorneys are investigating auto insurance providers over the suspicion that when it comes to cars that are considered a total loss, these companies have been cutting off drivers' rental car payments sooner than they should. Then, if you took classes on LibertyCap and have a Facebook account, your privacy rights may have been violated -- and attorneys are gathering people to take action. Keep reading for the details.

By Katherine Wilson (previous Manager)

Facebook Location Tracking Settlement: File a Claim



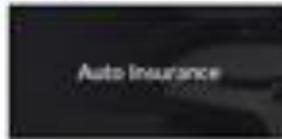
If you were a Facebook user in the United States and you had your Location Services setting for the Facebook application turned off at any point between January 30, 2015 and April 30, 2018, inclusive, you can file a claim with a recent class action settlement.

The \$37.5 million settlement resolves allegations that those improperly inferred the location of Facebook users through their IP addresses even when their iOS or Android Location Services setting for the social media app was turned off.

Class members submitting valid claims have the potential to receive equal shares of the settlement fund after administrative costs and other expenses are deducted. HOWEVER, if the court finds that the number of claims submitted makes it economically or administratively infeasible to make cash payments to consumers, the money will be donated to non-profit organizations as approved by the Court.

August 15, 2023 is the deadline for filing a claim, so make sure to submit your claim before then. Information on the settlement, as well as a link to the official settlement website, can be found [here](#).

Rental Car Total Loss Insurance



Most auto insurance policies provide 30 days of coverage for a rental car when the insured vehicle is deemed a total loss, but attorneys working with ClassAction.org believe insurance companies may be cutting off consumers' rental car payments too soon.

They're now looking into whether these insurers violated the terms of their policies and, if so, whether class action lawsuits can be filed. A successful lawsuit could help consumers get back any money they should have received from their insurance companies for rental car expenses. It could also force insurers to provide the full amount of transportation expense coverage in their policies for total loss claims.

The attorneys are looking into all potential insurance companies, including (but not limited to) State Farm, Geico, Progressive, Allstate, USAA, Liberty Mutual, Farmers, Nationwide, American Family and Truist -- so if your insurance company notified you that it would only pay for your rental car for a limited number of days after your vehicle was totaled, head over to [this page](#) for the details.

IN OTHER NEWS

Turkish Airlines Flight Cancellation Settlement: File a Claim

If you purchased tickets for a Turkish Airlines flight scheduled for between March 7, 2020 and December 31, 2021 and your flight was canceled, you may be entitled to money from a recent class action settlement.

The deal was reached to resolve a lawsuit that accused the airline of failing to properly inform customers -- in all or within a reasonable amount of time -- of flights cancelled during the COVID-19 pandemic. Customers who received a refund will be eligible for a cash payment or credit, and those who have not received refunds can file a claim for 100% of their unused ticket price.

You can find a link to the official settlement site and some additional details, [right here](#) -- and be sure to get your claim in before the deadline on August 16, 2023.

Liberty Under Investigation Over Potential Privacy Violations

If you're a Facebook user with a Liberty account who has taken a course on Liberty.com, your privacy rights may have been violated.

Attorneys working with ClassAction.org suspect that Liberty, Inc. may have used a tracking tool on its website to learn about customers' activities -- specifically, which instructional video courses they watched -- and secretly share this data with Facebook in violation of the Video Privacy Protection Act (VPPA). The attorneys are now gathering Liberty.com account holders to take action against the company via a legal process known as mass arbitration.

If you have both a Liberty account and a Facebook account and have taken a course on Liberty.com, you may have a claim worth as much as \$2,500. Learn more about the process and how you can sign up [here](#).

SETTLEMENTS

New Settlements

Health Insurance Associates -- Unwanted Calls

You may be included in this settlement if you received two or more telemarketing calls from Health Insurance Associates within a 12-month period more than 30 days after your number was registered with the National Do-Not-Call Registry.

Home Depot -- Vehicle Tracking Fees (BMC)

If you paid more than \$25 after your car was towed by B & M Towing, B & M Electronics, Diagnostic Repair Service or B*P Towing to certain Home Depot stores during 2017 or 2018, you may be included in this settlement.

United Services Transportation

This settlement provides compensation to those who were improperly fully vaccinated by United Services Corp. between February 11, 2018 and March 31, 2020 and the 100 awarded 24 performance hours.

To view a complete list of settlements and to find out how you can file a claim, [click here](#).

Settlements Ending Soon

- Google Play -- App Developers (May 31, 2023)
- L&M Coffee Co. -- Kona Coffee (May 31, 2023)
- Lufi All-Writing System (June 5, 2023)
- Yinos, Magasin (Offshore) (June 5, 2023)
- Viny Mart Settlement (June 6, 2023)

Interested in a Settlement?

Interested in a Settlement?

Have someone who might be interested in our newsletter?

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Turkish Airlines flight cancellations class action settlement



Top Class Actions | May 18, 2023

Category: Covid-19

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OPEN CLASS ACTION SETTLEMENTS



Allura fiber cement siding \$12.5M class action settlement

Settlement	Deadline
Varies	06/23/2023

[SUBMIT A CLAIM](#) →

Turkish Airlines flight cancellations class action settlement

Settlement	Deadline
Up to \$10 cash or a \$45 voucher	08/18/2023

[SUBMIT A CLAIM](#) →

EXHIBIT G

Mickie Hazlewood



Received
JUN 26 2023
by JNDLA

June 9, 2023

Turkish Airlines Settlement
C/O JND Legal Administration
P.O. Box 91455
Seattle, Washington 98111
info@tasettlement.com

Subject: Objection to Settlement Agreement *Sholopa et al. v. Turk Hava Yollari A.O. (d/b/a Turkish Airlines) et al.* Case No. 1:20-cv-03294-ALC

To JND Legal Administration,

I hope this letter finds you well. I am writing as a settlement class member in the *Sholopa et al. v. Turk Hava Yollari A.O. (d/b/a Turkish Airlines) et al.* Case No. 1:20-cv-03294-ALC to formally object to the settlement agreement on the grounds that the records indicate I received a refund from Turkish Airlines, while in reality, I have not received any refund.

I have thoroughly reviewed the settlement agreement and the accompanying documentation, including the notices and correspondence provided. However, contrary to the information contained in the records, I can provide evidence that I did not receive a refund from Turkish Airlines as stated.

Attached to this letter is an email correspondence from Turkish Airlines dated July 8, 2020, which clearly indicates that the total amount refunded to me was zero. This email serves as proof that I have not been compensated in any form as mentioned in the settlement agreement.

Based on the above evidence, it is clear that an error has occurred in recording the refund status for my case. Therefore, I respectfully request that you amend the records to reflect the accurate status of my refund and ensure that I receive the complete refund I am entitled to as a settlement class member.

I understand that the settlement agreement has established a specific process for addressing objections. I have followed the provided guidelines and am submitting this objection within the

designated time frame. I kindly request that my objection be duly considered and thoroughly reviewed in light of the evidence presented.

Please acknowledge the receipt of this objection letter and provide me with information regarding any further steps I need to take or any additional documentation required to support my objection.

Thank you for your attention to this matter. I trust that the settlement administrator will handle my objection fairly and promptly. If necessary, I am prepared to provide any additional information or attend a hearing to present my case.

I look forward to a satisfactory resolution.

Sincerely,

A handwritten signature in cursive script that reads "Mickie Hazlewood".

Mickie Hazlewood

Fwd: Turkish Airlines - Online Ticket - Cancellation Message

Mickie Hazlewood [REDACTED]

Fri 6/9/2023 11:02 AM

To: Mickie Hazlewood [REDACTED]

CAUTION: This email might have originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Begin forwarded message:

From: [REDACTED]
Date: June 9, 2023 at 9:07:59 AM PDT
To: [REDACTED]
Subject: Fwd: Turkish Airlines - Online Ticket - Cancellation Message

Sent from my iPad

Begin forwarded message:

From: [REDACTED]
Date: July 8, 2020 at 5:13:43 PM PDT
To: [REDACTED]
Subject: Fwd: Turkish Airlines - Online Ticket - Cancellation Message

Sent from my iPad

Begin forwarded message:

From: [REDACTED]
Date: July 8, 2020 at 5:02:23 PM PDT
To: [REDACTED]
Subject: Turkish Airlines - Online Ticket - Cancellation Message

Dear ROBERTA REBER, your ticket has been cancelled. You



can find cancellation/refund details below.

Summary

Transaction date:
Thursday, July 9, 2020,
6:00 AM



Booking Reference

Refund after cancellation 100.54 EUR

Journey price breakdown

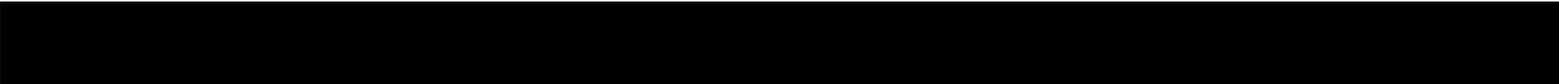
2 Adult	Fee	1,018 EUR
Taxes and other fees	Non-refundable	0 EUR
Ticket service fee	Non-refundable	0 EUR

Original amount 0 EUR

Total non-refundable amount 100.54 EUR

The total amount to be refunded 0 EUR

Refund method



Master Card

Payment method

Your cancelation/refund has been carried out for everyone on your reservation. To make changes to the travel insurance you purchased along with your ticket please contact the service provider. You can still have a refund request processed if the credit card used to make payment has been canceled or has expired. If you are no longer with the bank which issued the card, obtain an official letter from the bank explaining this, and present the letter at one of our sales offices. If you are still with the bank which issued the card but you are now using a different card, your refund can be made to this card. For more information please contact our call center or one of our sales offices. This e-mail may contain private or confidential information. The information contained in this e-mail must not be given, communicated or distributed to anyone other than its intended recipients. If you believe you have received this e-mail in error, please inform the sender and delete it and its attachments.

**Any
questions?**

For more information [click](#).

www.turkishairlines.com



JUN 26 2023

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Turkish Airlines Settlement
C/O JND Legal Administration
~~XXXXXXXXXX~~ 91455
P.O. Box 91455
Seattle, Washington 98111



JUN 26 2023



EXHIBIT H



TURKISH AIRLINE SETTLEMENT
Exclusion Requests
(as of June 28, 2023)

#	Name
1	NANCYHESHAM ALSHELLEH
2	KATHERINEMARIE ANDERSON
3	VICKEY R CHRISTOPHER
4	WILLIE RAY CHRISTOPHER
5	ASEFEMIR COBAN
6	MARIKA CVETKOVSKA
7	YASEMIN DORMEN
8	MARQUESALLAN DUNHAM
9	BRIANNAGAIL GEORGIE
10	BRENDALOU HAMMONDS
11	RONNIELYNN HAMMONDS
12	NESLIN KOSEOGLUCOBAN
13	JOANNE NEAL
14	JAMES ANTHONY NEAL
15	TEENAMARIE PHILLIPS
16	VALENTINA RAIKO
17	ZACHARYDOYLE ROWLEY
18	RACHEL SCHEMENAUR
19	RISHAT SITDIKOV
20	LILIYA SITDIKOVA
21	ISAAC SSEMAGANDA
22	LINA VASILE
23	GHEORGHE VASILE
24	ASUMAN YILMAZ