

**UNITED STATES DISTRICT COURT MIDDLE
DISTRICT OF FLORIDA ORLANDO DIVISION**

Heather Venerus, et. al. v. Avis Budget, et. al. Case No. 6:13-CV-921-CEM-GJK

IMPORTANT CLASS ACTION NOTICE

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

PLEASE READ THIS NOTICE CAREFULLY

You may be a member of a class action (a “Class Member”) against Avis Budget Car Rental, LLC and Budget Rent-A-Car System, Inc. (together “Avis Budget”) if: (1) you rented a vehicle in the State of Florida from Avis Budget after June 12, 2008 and before January 1, 2016; and (2) you rented the vehicle pursuant to a prepaid voucher. You received this Notice because Avis Budget’s records indicate you may be a member of the Class defined below.

Excluded from the Class are all such renters who have been involved in accidents and who have outstanding claims for liability or uninsured/underinsured motorist coverage, as well as all such renters whose liability or uninsured/underinsured motorist claims have been paid by Defendants.

HELP IS AVAILABLE TO ASSIST YOUR UNDERSTANDING OF THIS NOTICE.
Call **1-844-412-1945** toll free for more information.

What is This Notice and Why is it Important?

This legal notice has been sent to you by Order of the United States District Court for the Middle District of Florida (referred to as the “District Court”). The purpose of this notice is to:

1. Notify you that you may be a member of the Class (defined below);
2. Notify you that, for Class Members, the District Court decided certain claims may proceed on a class-wide basis; and
3. Explain to you what this legal action is about, how this legal action may affect your rights, and explain what steps you can take to either stay in the case or exclude yourself.

What is a Class Action?

A class action is a lawsuit in which one or more individuals (in this case, Ms. Venerus) bring claims on behalf of other persons or entities. These similarly-situated persons or entities are referred to as a “Class” or “Class Members.” In a class action, the District Court resolves certain issues, legal claims, and/or defenses for all Class Members in a single action, except for those persons or entities who ask in writing to be excluded from the Class. (See pages 4-5 for more information about excluding yourself from the Class.)

What is this Class Action About?

Ms. Venerus alleges that she and other Class Members paid for a third-party liability insurance policy

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QUESTIONS? CALL 844-412-1945 TOLL-FREE, OR VISIT
WWW.AvisBudgetFloridaInsuranceClassAction.com
PARA UNA NOTIFICACIÓN EN ESPAÑOL, LLAMAR 844-412-1945,
O VISITAR www.AvisBudgetFloridaInsuranceClassAction.com.

(supplemental/additional liability insurance) as a part of a car rental from Avis Budget issued by a licensed insurer (Ace American Insurance Company), but that Avis Budget never actually provided the insurance policy promised in the contract.

This class action seeks to recover damages suffered as a result of Avis Budget allegedly never providing the insurance policy promised in the contract. This class action alleges a “breach of contract”. Excluded from the Class are all such renters who have been involved in accidents and who have outstanding claims for liability or uninsured/underinsured motorist coverage, as well as all such renters whose liability or uninsured/underinsured motorist claims have been paid by Defendants.

Avis Budget denies that they acted wrongly or that Class Members are entitled to money damages because of any breach of contract.

The District Court determined that the breach of contract claim is appropriate for class- wide adjudication in a single action. Detailed information about the Class is provided below.

What Do I Need to Do Now?

You must decide whether or not to exclude yourself from this class action certified by the District Court.

How Do I Know If I Am a Class Member?

As mentioned previously, you may be a Class Members if: (1) you rented a vehicle in the State of Florida from Avis Budget after June 12, 2008 and before January 1, 2016; and (2) you rented the vehicle pursuant to a prepaid voucher.

The full Class definition is as follows:

All individuals who (1) rented an Avis or Budget vehicle in the State of Florida after June 12, 2008 and before January 1, 2016, pursuant to a prepaid voucher, and (2) whose Rental Receipt contained the notation “SLI .00/Day Accepted” or “ALI .00/Day Accepted”.

Excluded from the Class are all such renters who have been involved in accidents and who have outstanding claims for liability or uninsured/underinsured motorist coverage, as well as all such renters whose liability or uninsured/underinsured motorist claims have been paid by Defendants.

If I Am a Class Member, What Are My Options?

If you are a Class Member, you have a right to stay in the case as a Class Member, or you can choose to be excluded from the case. You should decide this question as quickly as you can.

Option 1. Do Nothing Now. Stay in the Case.

You have the right to stay in the case as a Class Member and await the outcome of the case. You do not need to do anything if you wish to remain in this case. It will cost you nothing. If you decide to stay in

the case as a Class Member, you will be bound by all orders, judgments, and decisions of the District Court. You may receive a monetary settlement or other benefits awarded as a result of court order, trial, or settlement reached between Ms. Venerus or Avis Budget, or you may receive nothing if the court(s) decide you are not entitled to any money. You do not need to do anything to keep open the possibility of getting money from the lawsuit.

If you stay in the case, Ms. Venerus will pursue the claims on your behalf. You cannot, however, recover or try your claims twice; so, by participating in the class action, you give up any right to individually sue Avis Budget about the same legal claims in this lawsuit. If the Class is awarded money, you will be notified about how to apply for your share. You will be bound by all previous and any future rulings in this case applicable to class claims, whether such rulings were in favor of the Class or in favor of Avis Budget.

The District Court has appointed Ms. Venerus to be the representative of the Class. The District Court has also appointed the following lawyers as Class Counsel for those Class Members that decide to stay in the case:

Edmund Normand, Esq.
Normand PLLC
3165 McCrory Place, Suite 175
Orlando, FL 32803
Telephone: (407) 603-6031
Facsimile: (888) 974-2175
insurance@NormandPLLC.com
NormandPLLC.com

Jacob Phillips, Esq.
Normand PLLC
3165 McCrory Place, Suite 175
Orlando, FL 32803
Telephone: (407) 603-6031
Facsimile: (888) 974-2175
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Christopher J. Lynch
Christopher J. Lynch, P.A.
6915 Red Road, Suite 208
Coral Gables, FL 33143
Telephone: (305) 443-6200
Facsimile: (305) 443-6204
CLynch@HunterLynchLaw.com
HunterLynchLaw.com

These lawyers are experienced in handling class action lawsuits. More information about Class Counsel is available on their websites above.

If Ms. Venerus is successful through trial, motion or settlement, Class Counsel will seek attorneys' fees and out-of-pocket costs (such as the cost of hiring experts), subject to approval by the District Court. If the District Court grants Class Counsel's request, the attorneys' fees and costs will either come from money obtained for the Class and/or will be paid separately by Avis Budget. If you are awarded money damages, the amount you receive may or may not be reduced to pay class counsel fees and/or costs. You will not be personally responsible for any fees, costs or expenses incurred by Class Counsel relating to the prosecution of this case.

Please keep in mind that if you do nothing now and stay in the lawsuit, you will give up your rights to sue Avis Budget separately in another lawsuit about the same legal claims that are part of this case (described above). You also would forego your right to pursue claims based on alternative legal theories in favor of the theory being pursued in this case. However, you will not give up your right to bring a lawsuit based on unrelated or separate issues. If you stay in the case, you will be legally bound by the Orders that the District Court issues in this case, including final judgment.

Option 2. Hire Your Own Lawyer and Enter an Appearance in the Lawsuit.

If you would like to remain a Class Member, but do not want to be represented by Class Counsel listed above, you have the right to enter an appearance in this case through your own lawyer at your own expense. To do this, you and/or your own lawyer must file a Notice of Appearance with the Clerk of the District Court, located at United States District Court, Middle District of Florida, 401 West Central Boulevard, Orland, FL 32801. You will be responsible for all legal fees and costs associated with your own lawyer and costs. If you do not enter an appearance or exclude yourself, your interests in this lawsuit will be represented by the Plaintiff and Class Counsel listed above at no charge to you.

Option 3. Exclude yourself from the Case.

You have the right to not be part of this lawsuit by excluding yourself or “opting out” of the Class. If you wish to exclude yourself, you must do so on or before April 6, 2021, as described below. You do not need to hire your own lawyer to request exclusion from the Class. If you exclude yourself from the Class, you give up your right to receive any money or other benefits awarded in this case, if any, and you will not be bound by any judgments or orders of the District Court, whether favorable or unfavorable. You may keep your right to sue Avis Budget separately in another lawsuit about the same theories in this case if you choose to pursue one, subject to all normal legal and procedural rules and regulations.

If I Want To, How Do I Exclude Myself from the Class?

To exclude yourself from this Class, you must make a request for exclusion in writing, and mail the request for exclusion to the following address (with sufficient prepaid postage):

Heather Venerus, et. al. v. Avis Budget, et. al.
c/o Class Administrator
PO Box 168
Warminster, PA 18974-0168

All requests for exclusion must be postmarked on or before April 6, 2021.

Your request for exclusion must contain the following:

1. The name of the lawsuit;
2. Your full name;
3. Your current address;
4. A clear statement that you wish to be excluded from the Class, such as: “I request exclusion from the Class”; and

5. Your signature.

Class Counsel will file your request for exclusion with the District Court. If you are signing on behalf of a Class Member as a legal representative (such as an estate, trust, or incompetent person), please include your full name, contact information, and the basis for your authority.

IF YOU DO NOT EXCLUDE YOURSELF FROM THE CLASS BY THE POSTMARK DEADLINE OF APRIL 6, 2021, YOU WILL REMAIN PART OF THE CLASS AND WILL BE BOUND BY THE ORDERS OF THE DISTRICT COURT IN THIS LAWSUIT, INCLUDING FINAL JUDGMENT, WHETHER OR NOT IT IS FAVORABLE TO THE CLASS. IF YOU DO NOT WISH TO BE BOUND BY THE DECISIONS IN THIS CASE, YOU MUST REQUEST EXCLUSION FROM THE CLASS ACTION.

How Do I Find Out More About This Lawsuit?

If you have any questions about the lawsuit or any matter raised in this notice, please call toll-free at 1-844-412-1945 or go to www.AvisBudgetFloridaInsuranceClassAction.com.

This www.AvisBudgetFloridaInsuranceClassAction.com website provides:

1. A form that you may use (but are not required to use) to exclude yourself from the class action;
2. A copy of the complaints filed by Plaintiffs;
3. A copy of the District Court's Class Certification Order;
4. Other important pleadings and Orders from the case; and
5. Other general information about the class action.

You also may contact class counsel, whose contact information and websites are provided above.

Complete copies of the documents filed in this lawsuit that are not under seal may be examined and copied at any time at the United States District Court, Middle District of Florida, 401 West Central Boulevard, Orlando, FL 32801.

PLEASE DO NOT TELEPHONE OR CONTACT THE DISTRICT COURT OR THE CLERK OF THE DISTRICT COURT REGARDING THIS NOTICE.

IT IS SO ORDERED, HON. CARLOS MENDOZA, U.S. DISTRICT COURT JUDGE
DATED: NOVEMBER 30, 2020