

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

A lawsuit is currently pending in the United States District Court for the Southern District of Florida entitled, *Wade Glenn Whitworth, Jr., et al. v. HH-Entertainment, Inc. d/b/a Hustler Hollywood*, United States District Court for the Southern District of Florida, Case No. 9:17-cv-80487-KAM-Civ (Marra). In that lawsuit, claims have been asserted against Defendant HH-Entertainment, Inc. by the Plaintiff Wade Glenn Whitworth J.R. on behalf of himself and on behalf of a putative class of similarly situated individuals based upon allegations that Defendant, in violation of the Fair and Accurate Credit Transactions Act, printed receipts that allegedly displayed more than the last five digits and/or the expiration date of customer credit and/or debit cards. However, because of the expense and uncertainty of litigation, the parties have mutually proposed to settle this matter.

**BECAUSE THE LAWSUIT IS A CLASS ACTION, THE PROPOSED SETTLEMENT
MAY AFFECT YOUR RIGHTS, PLEASE READ THIS NOTICE CAREFULLY**

YOUR RIGHTS AND CHOICES:

YOU MAY:	DUE DATE:
Do Nothing and Remain Part of the Settlement and NOT Receive a Portion of the Settlement Sum.	N/A
Participate In The Settlement Sum and Remain Part of The Settlement By Signing The Affidavit Enclosed In This Notice.	Postmarked by: July 21, 2018
Exclude Yourself From The Settlement By Signing the Exclusion Form Enclosed In This Notice.	Postmarked by: June 6, 2018
Object To The Settlement	Postmarked by: June 6, 2018

1. Who Is Included In This Lawsuit:

As determined by the Court, members of the settlement class (the “Class”) include:

All persons within the United States who (1) used a credit or debit card; (2) for a transaction at one of Defendant’s retail locations; and (3) were provided a point of sale receipt that displayed more than the last 5 digits of the card’s account number and/or the expiration date of the card; (4) from April 18, 2015 to and including the date of preliminary approval of the class action settlement.

NOTE THAT IF THIS NOTICE IS ADDRESSED TO YOU, A DETERMINATION HAS ALREADY BEEN MADE THAT YOU MAY BE INCLUDED IN THIS LAWSUIT.

PROPOSED SETTLEMENT TERMS

2. What Are The Terms Of The Settlement?

A tentative common fund class action settlement in the amount of Seven Hundred Fifty Thousand Dollars and No Cents (\$750,000.00) has been reached, inclusive of attorneys' fees, costs, incentive payments, and administrative expenses. After the common fund is reduced by the aforementioned payments, and any other payments ordered by the Court, a *pro rata* share of the remaining amount will be distributed to members of the Class who sign the Affidavit Form enclosed herein. Members who exclude themselves timely from the settlement by signing the Exclusion Form enclosed herein will not receive any settlement sum and will not be party to this Settlement Agreement. Each member of the Class who does *not* exclude itself from the Settlement and who *does* sign the Affidavit Form will receive a pro rata share of the Settlement Amount.

If the settlement is approved by the Court, counsel for the Class will be requesting an award from the Court of attorneys' fees, and an award for reimbursement of all necessary and reasonable costs and other expenses. In addition, and if approved by the Court, Class Representative Wade Glenn Whitworth J.R. will receive an Incentive Award in recognition of his time and participation as representative of the Class in this lawsuit. Class counsel, if approved by the Court, shall be paid from the fund established for settlement in this case.

PLEASE TAKE PARTICULAR NOTE OF THE FOLLOWING TERMS OF THE SETTLEMENT AGREEMENT

3. What Rights Am I Giving Up If I Remain In The Class?

IF YOU ARE A MEMBER OF THE CLASS, AND THE SETTLEMENT IS APPROVED BY THE COURT, YOU WILL BE BOUND BY THE SETTLEMENT AND YOU WILL BE BARRED FROM PURSUING AN INDIVIDUAL CLAIM FOR ANY INJURIES, LOSSES, PENALTIES, OR DAMAGES ARISING OUT OF OR IN ANY WAY RELATED TO HH-ENTERTAINMENT, INC.'S ALLEGED FAILURE TO PROVIDE RECEIPTS COMPLIANT WITH THE FAIR AND ACCURATE CREDIT TRANSACTIONS ACT, AS SET FORTH ABOVE, UNLESS YOU TIMELY OPT OUR PURSUANT TO THE PROCEDURES SET FORTH BELOW.

4. Do I Need To Submit A Claim To Participate In The Settlement?

You need to submit the Affidavit Form to participate in the settlement sum. Regardless, however, of whether you submit the Affidavit Form, as long as you do not opt-out of the settlement and so long as the final settlement is approved, you will be deemed a member of the settlement class, and will become a party to the release of certain settling parties. Completed Affidavit Forms must be postmarked no later than July 21, 2018, and should be sent to the following address: HH-Entertainment, Inc. Litigation, Settlement Administrator, 1801 Market Street, Suite 660, Philadelphia, PA 19103. To the extent there is a dispute regarding whether a particular member of the Class is entitled to monetary relief as set forth herein, the parties will make a reasonable and good faith effort to resolve the dispute informally. **Please note that if you**

do not submit a timely and completed Affidavit Form, you will nonetheless be bound by the settlement and barred from receiving any settlement sum and barred from pursuing an individual claim.

5. If I Qualify For A Settlement Payment, When Will I Get Paid?

The process by which settlement benefits are paid will commence upon final approval of this settlement by the Court. “Final Approval” means the date on which the time for filing a notice of appeal has expired or any and all appeals which have been filed have become final. The Claims Administrator will complete the processing of the payment as soon as possible after the final approval of the settlement. In the event a settlement payment is returned to the Claims Administrator as undeliverable, Defendant and/or the settlement Claims Administrator shall make reasonable efforts to obtain a current address for forwarding of the settlement payment.

YOUR RIGHTS – PARTICIPATE IN THE SETTLEMENT SUM

6. How Do I Participate In The Settlement Sum?

If you wish to be bound by the settlement, and participate in the Settlement Sum, by receiving a pro rata share of the cash benefit or monetary payment under the settlement, you must submit a timely and complete the Affidavit Form. An Affidavit Form is enclosed. Completed Affidavit Forms must be postmarked no later than July 21, 2018, and should be to the following address: HH-Entertainment, Inc. Litigation, Settlement Administrator, 1801 Market Street, Suite 660, Philadelphia, PA 19103. **Please note that if you do not submit a timely and completed Affidavit Form, you will nonetheless be bound by the settlement, you will not participate in the Settlement Sum and you will be barred from pursuing an individual claim.**

YOUR RIGHTS – EXCLUDING YOURSELF FROM THE SETTLEMENT

7. How Do I Exclude Myself From The Settlement?

If you do not wish to be bound by the settlement, and you want to preserve your right to pursue an individual claim, you must submit a timely and complete Exclusion Form. An Exclusion Form is enclosed. Completed Exclusion Forms must be postmarked no later than June 6, 2018, and should be sent to the following address: HH-Entertainment, Inc. Litigation, Settlement Administrator, 1801 Market Street, Suite 660, Philadelphia, PA 19103. **Please note that if you do not submit a timely and completed Exclusion Form, you will nonetheless be bound by the settlement and will be barred from pursuing an individual claim.**

YOUR RIGHTS – OBJECTING TO THE SETTLEMENT

8. How Do I Tell The Court If I Do Not Like The Settlement?

If you wish to remain a part of the Class, but you object to any aspect of the proposed settlement, you may appear personally or through a lawyer of your own choice at the Fairness Hearing and have your objections heard by the Court. The date, time, and place of the hearing are

listed below. For an objection to be considered by the Court, the objection must be postmarked no later than 30 days before the Final Approval Hearing, as set forth in this Notice. To be valid, an objection must include the following information:

- a. the name of the Action
- b. the objector's full name, address and telephone number;
- c. an explanation of the basis upon which the objector claims to be a Settlement Class Member;
- d. all grounds for the objection, accompanied by any legal support for the objection known to the objector or his counsel;
- e. the number of times in which the objector has objected to a class action settlement within the five years preceding the date that the objector files the objection, the caption of each case in which the objector has made such an objection, and a copy of any orders related to or ruling upon the objector's prior such objections that were issued by the trial and appellate courts in each listed case;
- f. the identity of all counsel who represent the objector, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement or Fee Application;
- g. a copy of any orders related to or ruling upon counsel's or the counsel's law firm's prior objections made by individuals or organizations represented by that were issued by the trial and appellate courts in each listed case in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the preceding 5 years the objector's counsel;
- h. any and all agreements that relate to the objection or the process of objecting— whether written or oral—between objector or objector's counsel and any other person or entity;
- i. the identity of all counsel (if any) representing the objector who will appear at the Final Approval Hearing;

To be heard or to have papers or briefs considered by the Court, you or your lawyer must file with the Court a notice of intention to appear along with any papers or documents showing the basis for your objections. Submit your written objections, along with any other supporting materials, to the Clerk, United States District Court, Southern District of Florida, Paul G. Rogers Federal Building and Courthouse, 701 Clematis Street, West Palm Beach, Florida 33401. Be sure to put the name of the case and case number 9:17-cv-80487-KAM-Civ (Marra) on the front of your papers. Your papers must be received by the Court no later than June 6, 2018. In addition, you must also send copies of all documents you file with the court to:

Class Counsel:	Counsel for Defendants:
<p>Manuel S. Hiraldo, Esq. Hiraldo P.A. 401 E. Las Olas Boulevard Suite 1400 Ft. Lauderdale, Florida 33301 954.400.4713 (tel.)</p>	<p>Craig J. Mariam, Esq. cmariam@grsm.com GORDON REES SCULLY MANSUKHANI 633 West Fifth Street, 52nd Floor Los Angeles, CA 90036 213.576.5000 (tel.)</p>
<p>Andrew J. Shamis, Esq. Shamis & Gentilre, P.A. 14 NE 1st Avenue, Suite 400 Miami, Florida 33132 305.479.2299 (tel.)</p>	<p>Karin A. Curtis kcurtis@grsm.com Capri Trigo ctrigo@grsm.com GORDON REES SCULLY MANSUKHANI 100 SE Second Street Suite 3900 Miami, FL 33131 305.428.5300 (tel.)</p>
<p>Adam M. Ludwin Ludwin Law Group, P.A. 1732 S. Congress Ave. Suite 326 Lake Worth, Florida 33461 561.613.7392 (tel.)</p>	

Any Class member who does not timely file and serve a written objection and a notice of intention to appear shall not be permitted to object or appear at the Fairness Hearing, except on good cause shown.

YOUR RIGHTS – IF YOU DO NOTHING

9. What Happens If I Do Nothing At All?

If you do nothing, you will be bound by the settlement and you will **not** receive a pro rata share of the cash benefit or monetary payment under the settlement.

YOUR RIGHTS – APPEARING IN THE LAWSUIT

10. Can I Appear or Speak In This Lawsuit and Settlement?

As long as you do not exclude yourself, you can (but do not have to) speak for yourself in this lawsuit and Settlement. If you want yourself or your lawyer instead of Class Counsel to participate or speak for you in this lawsuit, you must give the Court a paper entitled “Notice of Appearance.” Your Notice of Appearance can also say you or your lawyer would like to speak at the Court’s Fairness Hearing on the Settlement. The Notice of Appearance must be filed with the Court by June 6, 2018. The address of the Court for filing the Notice of Appearance is United

States District Court for the Southern District of Florida, Paul G. Rogers Federal Building and Courthouse, 701 Clematis Street, West Palm Beach, Florida 33401.

THE COURT'S FAIRNESS HEARING

11. When and Where Will the Court Decide Whether To Approve The Settlement?

A fairness hearing will be held on Friday, July 6, 2018 at 9:00 a.m. in Courtroom 4 of the United States District Court, Southern District of Florida located in the Paul G. Rogers Federal Building and Courthouse, 701 Clematis Street, West Palm Beach, Florida 33401. At that hearing, the Court will consider whether the settlement should be granted final approval as fair, adequate, and reasonable and in the best interest of the Class. The Court will also decide how much to pay Class counsel for its time and expenses, and how much of an incentive award should be allocated to the class representative. Although you may attend this hearing, you are not required to do so in order to participate in the settlement.

CHANGE OF ADDRESS

12. What If I Move Before the Settlement Is Completed?

If you move after receiving this notice, or if notice was misaddressed, you should supply your name and correct address to: HH-Entertainment, Inc. Litigation, Settlement Administrator, 1801 Market Street, Suite 660, Philadelphia, PA 19103.

This is important to ensure that any future notices, as well as your share of the settlement, reach you.

IF YOU HAVE FURTHER QUESTIONS

13. How Do I Get More Information?

If you have any further questions, you may contact Class Counsel, Manuel S. Hiraldo, Esq., Hiraldo P.A. 401 E. Las Olas Boulevard, Suite 1400, Ft. Lauderdale, Florida 33301, telephone: 954.400.4713, or consult with your own personal attorney. **PLEASE DO NOT CALL OR WRITE THE COURT WITH ANY QUESTIONS.** Court personnel are prohibited from giving legal advice.