

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA  
CENTRAL DIVISION

GREGORY YOUNG, et al.,

Plaintiffs,

v.

WELLS FARGO & CO., and  
WELLS FARGO BANK, N.A.,

Defendants.

Case No. 4:08-cv-00507-RP-CFB

**DECLARATION OF  
JENNIFER M. KEOUGH  
REGARDING NOTICE  
DISSEMINATION AND  
PUBLICATION**

JENNIFER M. KEOUGH declares and states as follows:

1. I am Chief Operating Officer of the Garden City Group, LLC (“GCG”). The following statements are based on my personal knowledge and information provided by other GCG employees working under my supervision and, if called upon to do so, I could and would testify competently thereto.

2. GCG was retained by Plaintiffs in the above-captioned Action and appointed pursuant to Paragraph 8 of the Court’s Order Preliminarily Approving Settlement and Providing for Notice (“Preliminary Approval Order”), to serve as the Claims Administrator. I submit this Declaration Regarding Notice Dissemination and Publication to provide the Court and the parties to the Action with information regarding the administration of the Settlement.<sup>1</sup>

<sup>1</sup> Unless otherwise defined herein, all capitalized terms shall have the same meaning as set forth in the Stipulation and Agreement of Settlement (the “Stipulation of Settlement”) and/or the Preliminary Approval Order.

**DISSEMINATION OF THE NOTICE POSTCARDS**

3. By definition, the Class includes: all Persons who have or had a mortgage serviced by Wells Fargo and owe or paid a property inspection fee assessed during the period of August 1, 2004 through December 31, 2013, inclusive.

4. Pursuant to Paragraph 8(a) of the Preliminary Approval Order, GCG was responsible for disseminating the Court-approved Postcard Notice A and Postcard Notice B to Class Members identified in the Notice Database. A copy of Postcard Notice A and Postcard Notice B are attached hereto as Exhibit A.

5. In June of 2014, Plaintiffs' Co-Lead Class Counsel provided to GCG the names and last known addresses of Class Members from the Notice Database that Wells Fargo produced pursuant to the Court's Order dated May 8, 2014. On September 3, 2015, Plaintiffs' Co-Lead Class Counsel provided to GCG the unique loan identification number and the loan categorization (Active, Paid-in-Full, or Post-Sale) for each Class Member. In total, Class Member name and address data was provided to GCG for 2,709,197 loans.

6. Based on the data received, 921,241 records were categorized as Active; 548,940 records were categorized as Paid-in-Full; and 1,239,016 records were categorized as Post-Sale.

7. GCG loaded this data into a database created for this Action. In September of 2015, GCG checked the last known address of Class Members as reflected in the Notice Database against the United States Post Office National Change of Address Database. Where a more current address was available, GCG updated the address accordingly.

8. Pursuant to Paragraph 3.05 of the Stipulation of Settlement, Postcard Notice A was to be mailed to Class Members identified in the Notice Database whose loans fall into the Active or Paid-in-Full categories and Postcard Notice B was to be mailed to Class Members identified in the Notice Database whose loans fall into the Post-Sale category.

9. Pursuant to a directive from the parties, GCG formatted Postcard Notice A and Postcard Notice B, and caused both to be printed with the name and address of the Persons identified as the primary contact in Defendants' records for each unique loan in the Notice Database. 1,470,181 personalized copies of Postcard Notice A and 1,239,016 personalized

copies of Postcard Notice B were then posted for first-class mail, postage prepaid, and delivered on October 16, 2015 to a United States Post Office for mailing.

10. Pursuant to the Preliminary Approval Order, a total of 2,709,197 postcard notices were mailed to Class Members identified in the Notice Database. In addition, GCG has re-mailed 1,781 copies of Postcard A and 2,485 copies of Postcard B to Persons whose original mail was returned by the United States Postal Service and for whom updated addresses were provided to GCG by the United States Postal Service.

### **PUBLICATION OF THE SUMMARY NOTICE**

11. Paragraph 8(b) of the Court's Preliminary Approval Order also directed that the Summary Notice be published once in the national edition of *The Wall Street Journal*, and once over the *PR Newswire*, no later than October 27, 2015. GCG arranged publication for October 22, 2015. GCG was informed that *The Wall Street Journal* erroneously published the Summary Notice on September 22, 2015. Subsequently, the Summary Notice was published again in the *Wall Street Journal* on October 22, 2015, and over the *PR Newswire* on the same day. A copy of the letter acknowledging the publication error is attached hereto as Exhibit B. A copy of the Summary Notice and confirmations of the publication are attached hereto as Exhibit C.

### **TOLL-FREE NUMBER**

12. Beginning on September 22, 2015, GCG set up and continues to maintain an automated toll-free telephone number (1-855-382-6434), to accommodate inquiries from Class Members and provide general Settlement information. The interactive voice response system dedicated to this Settlement is accessible 24 hours a day, 7 days a week. GCG has and will continue to accommodate Class Member inquiries. For example, as part of the interactive voice response system, Class Members have the option to request a copy of the Notice and Proof of Claim ("Notice Packet"). As of December 7, 2015, GCG has mailed 18,623 Notice Packets in response to Class Member inquiries. All such requests have been, and will continue to be, complied with.

### **WEBSITE**

13. GCG established and is maintaining a website dedicated to this Settlement ([www.WellsFargoPropertyInspectionSettlement.com](http://www.WellsFargoPropertyInspectionSettlement.com)) to provide additional information to Class Members and to answer frequently asked questions. Users of the website are able to download copies of the Notice, Proof of Claim, Stipulation of Settlement, and Preliminary Approval Order. The web address was set forth in the published Summary Notice, Postcard Notices A and B, and the Proof of Claim. Additionally, Post-Sale Class Members are able to file a claim online. The Settlement website was operational beginning on September 22, 2015, and is accessible 24 hours a day, 7 days a week.

### **OPT-OUTS AND OBJECTIONS**

14. In accordance with Paragraph 10 of the Preliminary Approval Order, any Class Member who wishes to be excluded from the Class is required to do so in writing so that the request is postmarked by December 22, 2015. As of December 7, 2015, GCG has received 102 requests for exclusion.<sup>2</sup> When compared against the unique loan identification numbers provided in the Notice Database, the requests for exclusion represent 86 unique loans with qualifying property inspection fee transactions. A summary list of those Persons requesting exclusion is attached hereto as Exhibit D.

15. Paragraph 11 of the Preliminary Approval Order provides that Class Members who wish to object to the Settlement must do so in writing so that the objection is received by the Parties and filed with the Court no later than December 22, 2015. As of December 7, 2015, GCG is aware of four objections from Class Members.

### **SETTLEMENT FUND AND DISTRIBUTION**

16. As the Escrow Agent, on or about September 30, 2015, GCG received from Wells Fargo the Settlement Fund and placed it in an interest-bearing account established for the Settlement, as required by Paragraph 5.01 of the Stipulation of Settlement.

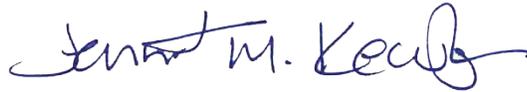
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<sup>2</sup> This statistic includes requests from Persons not identified as Class Members in the Notice Database, qualifying loans which are held by more than one Person, and Persons who have more than one qualifying loan. As appropriate, each exclusion request was connected with one or more unique GCG ID number; the 102 GCG ID numbers associated with each exclusion request are identified in the 'GCG ID #' column of Exhibit D. For the convenience of the Court and the parties in the Action, Exhibit D has been grouped by both loan and requestor.

17. I understand that, pursuant to Paragraph 6.07 of the Stipulation of Settlement, Plaintiffs' Co-Lead Class Counsel will apply to the Court for a Class Distribution Order which will, among other things, request the approval of GCG's administrative determinations concerning the acceptance and rejection of the Claims submitted, and direct the payment of the Net Settlement Fund. GCG will submit an additional declaration at that time updating the Court on the claims administration process.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 8, 2015, 2015, at Seattle, Washington.

A handwritten signature in blue ink that reads "Jennifer M. Keough". The signature is fluid and cursive, with a horizontal line extending from the end of the name.

---

Jennifer M. Keough

# **Exhibit**

## **A**

Para ver este aviso en Español, se puede visitar [www.WellsFargoPropertyInspectionSettlement.com](http://www.WellsFargoPropertyInspectionSettlement.com)

**IF YOU HAVE OR HAD A MORTGAGE SERVICED BY WELLS FARGO AND OWE OR PAID A PROPERTY INSPECTION FEE ASSESSED DURING THE PERIOD AUGUST 1, 2004 THROUGH DECEMBER 31, 2013, YOU MAY BE ENTITLED TO CASH FROM A CLASS ACTION SETTLEMENT.**

A settlement has been reached in a class action lawsuit about property inspection fees Wells Fargo charged certain borrowers. This notice provides a summary of the settlement, and of your rights. Additional information is available at [www.WellsFargoPropertyInspectionSettlement.com](http://www.WellsFargoPropertyInspectionSettlement.com) or by calling (855) 382-6434.

**What is the case about?** The lawsuit claims that Wells Fargo improperly charged borrowers for the cost of property inspections it routinely performed in certain circumstances whenever a borrower was forty-five days or more late in making a mortgage payment, and then ordered subsequent inspections every twenty-five to thirty-five days for as long as the borrower remained delinquent. Plaintiffs claim that the repeated property inspections ordered by Wells Fargo were unnecessary and that their cost should not have been assessed to borrowers. Wells Fargo contends that all of its property inspection policies and procedures complied with the law and that property inspections and related charges to borrowers were reasonable and necessary. Wells Fargo denies all the claims in the lawsuit and that it has done anything wrong.

**Who is included?** If you received this notice, Wells Fargo's records show that you are a Class Member. Generally, the Class includes persons who owe or paid property inspection fees assessed anytime from August 1, 2004 through December 31, 2013.

**What does the settlement provide?** The settlement with Wells Fargo involves a total payment of \$25,750,000. After deductions for costs of settlement administration and notice, class representative service awards, and attorneys' fees and expenses, the remainder (the "Net Settlement Fund") will be distributed to Class Members. The formula for allocation of the Net Settlement Fund amongst Class Members is set forth in the Plan of Allocation, which is contained in the Notice of Proposed Settlement of Class Action ("Notice"). You may obtain a copy of the Notice and the Stipulation and Agreement of Settlement at [www.WellsFargoPropertyInspectionSettlement.com](http://www.WellsFargoPropertyInspectionSettlement.com) or by calling (855) 382-6434. These documents provide additional details of the settlement and your options.

**How can you get a payment?** Wells Fargo's records show that you are one of the Class Members whose loans are currently being serviced by Wells Fargo ("Active Loans") or whose loans have been paid-in-full ("Paid-in-Full Loans"). Because their Recognized Claim will be calculated using Wells Fargo's records, Class Members whose loans fall into these categories will automatically receive a distribution from the Net Settlement Fund after the Settlement becomes final.

**What are your other options?** If you don't want to be legally bound by the settlement and the releases it entails, you must exclude yourself by December 22, 2015, or you won't be able to sue, or continue to sue, Wells Fargo about the legal claims in this case. If you exclude yourself from the settlement with Wells Fargo, you cannot get money from this settlement. If you do not exclude yourself, but disagree with any aspect of the settlement, including the request for attorneys' fees and costs, you may object to the settlement by December 22, 2015. The Notice explains how to exclude yourself or object.

The Honorable Robert W. Pratt will hold a hearing in the case, known as *Young v. Wells Fargo & Co.* Case No. 4:08-CV-507 RP-CFB, on January 21, 2016, at 10:00 a.m., at the United States District Court, Southern District of Iowa, Central Division, U.S. District Courthouse, 123 East Walnut Street, Des Moines, Iowa 50309, to consider whether to approve the settlement, attorneys' fees of up to 33-1/3 % of the \$25,750,000 settlement, reimbursement for lawsuit costs and expenses not to exceed \$400,000, and a payment to each of the Plaintiffs of \$10,000 for their service to the Class. Plaintiffs' Counsel's fee petition will be available online when filed. You or your own lawyer, if you have one, may ask to appear and speak at the hearing at your own cost, but it is not required. For more information, call or go to the website shown below.

*For more information:* Visit the website [www.WellsFargoPropertyInspectionSettlement.com](http://www.WellsFargoPropertyInspectionSettlement.com), call toll free (855) 382-6434, or write to *Wells Fargo Inspection Fee Settlement*, c/o Garden City Group, LLC, P.O. Box 10106 Dublin, OH 43017-3106.

~~Case 4:08-cv-00507-RPS-CEB Document 264-1 Filed 12/08/15 Page 8 of 21~~  
c/o Garden City Group, LLC  
P.O. Box 10106  
Dublin, OH 43017-3106

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**Forwarding Service Requested**

Claim No:

Control No:

Para ver este aviso en Español, se puede visitar [www.WellsFargoPropertyInspectionSettlement.com](http://www.WellsFargoPropertyInspectionSettlement.com)

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**How can you get a payment?** Wells Fargo's records show that you are one of the Class Members whose loans have been subject to a foreclosure sale, short sale, deed-in-lieu or charge-off ("Post-Sale Loans"). Due to the available information with respect to such loans, Class Members whose loans fall into this category must timely complete a Proof of Claim form and provide documentary proof of payment of the property inspection charges claimed. You can submit a claim online at [www.WellsFargoPropertyInspectionSettlement.com](http://www.WellsFargoPropertyInspectionSettlement.com) or by mail by requesting a paper copy of the notice and claim package that contains everything you need.

**What are your other options?** If you don't want to be legally bound by the settlement and the releases it entails, you must exclude yourself by December 22, 2015, or you won't be able to sue, or continue to sue, Wells Fargo about the legal claims in this case. If you exclude yourself from the settlement with Wells Fargo, you cannot get money from this settlement. If you do not exclude yourself, but disagree with any aspect of the settlement, including the request for attorneys' fees and costs, you may object to the settlement by December 22, 2015. The Notice explains how to exclude yourself or object.

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*For more information:* Visit the website [www.WellsFargoPropertyInspectionSettlement.com](http://www.WellsFargoPropertyInspectionSettlement.com), call toll free (855) 382-6434, or write to *Wells Fargo Inspection Fee Settlement*, c/o Garden City Group, LLC, P.O. Box 10106 Dublin, OH 43017-3106.

# **Exhibit**

# **B**

1211 Avenue of the Americas,  
New York, NY 10036

www.dowjones.com  
service@dowjones.com

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**DOW JONES**

*News Corp*

Date:  
September 23, 2015

To:  
Jennifer Trask  
Senior Project Manager  
Garden City Group, LLC  
1531 Utah Avenue, South  
Seattle, WA 98134

Re: Legal Notice Run Date Error

Dear Ms. Trask:

Please accept my apologies on behalf of The Wall Street Journal. The legal notice in the *Wells Fargo Inspection Fee Settlement* matter, scheduled to run on October 22, 2015, incorrectly ran on September 22, 2015. The Wall Street Journal takes full responsibility for this error. Please be advised that we will run the legal notice as originally scheduled on October 22, 2015 at no additional cost. Further, there will be no charge for the legal notice that we ran, in error, on September 22, 2015.

Again, we apologize for any inconvenience this may have caused you and/or your client.

Thank you.

Sincerely,  
Toby Breiten  
Sales Representative

# **Exhibit**

# **C**

BUSINESS NEWS

Business Watch

HORMEL FOODS

Company Veteran Appointed President Hormel Foods Corp. elevated James Snee to president and chief operating officer...

pork and Skippy peanut butter. Mr. Snee, who recently has run Hormel's international division and served as a group vice president, will take over as president from Mr. Ettinger on Oct. 26...

Minn., company's nearly 125-year history. —David Kesmodel Software Maker Bought for \$4.6 Billion Software company SolarWinds Inc. said Wednesday that it has agreed to be acquired by private-equity firms Silver Lake and Thoma Bravo LLC...

\$60.10 a share. SolarWinds said the purchase price represents a 43.5% premium to the closing price of the company's stock on Oct. 8, the day before the board announced it was exploring alternatives. It is a 20% premium to Tuesday's closing price. The deal is pending stockholder and regulatory approval and is expected to close some time in the first three months of next year. SolarWinds, Austin, Texas, makes software that businesses use to manage and improve the performance of their data networks. —Ezequiel Minaya



Biogen's job cuts will span the firm's global operations and units.

Biogen to Cut Jobs as Net Rises

By JOSEPH WALKER AND CHELSEY DULANEY

Biogen Inc., whose share price has tumbled this year amid slowing revenue growth, said it would cut 11% of its workforce by the end of the year as the biopharmaceutical company retrenches. The job reductions will span the company's global operations and business units, a spokesman said, and will save the company about \$250 million annually in expenses. Biogen had about 8,000 employees globally before the cuts, a spokesman said. The company said it would reinvest the savings in its most promising research and development programs, including an experimental treatment for Alzheimer's disease, and discontinue others. Biogen also will use the money to fund increased sales and marketing initiatives, including a direct-to-consumer advertising campaign, for its blockbuster multiple-sclerosis drug Tecfidera, its largest product by revenue. "This year has been a challenging one for those of us here at Biogen," Chief Executive George Scangos said during a conference call with analysts on Wednesday. Even amid the cost-cutting, Biogen said it had spent \$3.9 billion to repurchase its own stock on the open market. The company had \$7.8 billion in cash and marketable securities at the end of the third quarter. In addition to the restructuring, Biogen also reported third-quarter results and updated its 2015 guidance, both of which largely exceeded analyst expectations. The company said profit rose 13% to \$965.6 million, or \$4.15 a share, in the third quarter, up from \$856.9 million, or \$3.62 a share, a year earlier. Revenue grew to \$2.78 bil-

lion from \$2.51 billion. Analysts polled by Thomson Reuters had forecast earnings of \$3.80 a share on \$2.65 billion in revenue. Shares of Biogen, which had fallen 35% over the past three months, rose 4% to \$276.34 in 4 p.m. trading on Wednesday. In July, the company lowered its revenue and profit growth expectations because of slowing growth for Tecfidera. Fewer new patients are being prescribed the drug, Biogen has said, in part because of doctors' concerns about a rare side effect that was linked to a patient death last year. In the third quarter, Tecfidera revenue rose 19% to \$937 million. But the growth rate slowed from the 26% year-over-year increase in the second quarter and the 63% increase in the first quarter. Tecfidera revenue benefited from a price increase, which was partially offset by factors including rebates given to health insurers, Chief Financial Officer Paul Clancy said at the conference call. About \$10 million to \$15 million in Tecfidera sales were the result of increased purchases by government health-care programs seeking to raise their inventory before the end of their fiscal years, Mr. Clancy said. Shares of biopharmaceutical companies have fallen significantly in recent months amid increasing political and media scrutiny of drug prices and concerns that equity valuations had become unreasonable after years of outperforming the market. Separately, Biogen said a late-stage study of its drug Tysabri failed to benefit patients with a severe form of multiple sclerosis. For 2015, Biogen said it now expects revenue to grow 8% to 9% from a year ago, up from its predicted growth of 6% to 8% in July.

ADVERTISEMENT

Legal Notices

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NOTICE OF SALE

NOTICE OF PUBLIC SALE - Property to be Sold

Table with columns: Public Sale No., CUSIP, Issue, Original Face, and Amount. Lists various municipal bonds for sale.

Table with columns: Lot #, CUSIP, Issue, Original Face, and Amount. Lists individual lots for sale.

Table with columns: Lot #, CUSIP, Issue, Original Face, and Amount. Lists individual lots for sale.

Public Sale No. 3: Wednesday October 28, 2015, 2:00 p.m. EDT

Table with columns: Lot #, CUSIP, Issue, Original Face, and Amount. Lists individual lots for sale.

Public Sale No. 3: Thursday October 29, 2015, 10:00 a.m. EDT

Table with columns: Lot #, CUSIP, Issue, Original Face, and Amount. Lists individual lots for sale.

Public Sale No. 4: Thursday October 29, 2015, 2:00 p.m. EDT

Table with columns: Lot #, CUSIP, Issue, Original Face, and Amount. Lists individual lots for sale.

CLASS ACTIONS

SUMMARY NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION

Para ver este aviso en Español, se puede visitar www.WellsFargoPropertyInspectionSettlement.com

TO ALL PERSONS WHO HAVE OR HAD A MORTGAGE SERVICED BY WELLS FARGO AND WHO OWE OR PAID PROPERTY INSPECTION FEES ASSESSED DURING THE PERIOD AUGUST 1, 2004 THROUGH DECEMBER 31, 2013.

THIS NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER SOLICITATION. PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.

YOU ARE HEREBY NOTIFIED that a hearing will be held on January 21, 2016 at 10:00 a.m., before the Honorable Robert W. Pratt, at the United States District Court, Southern District of Iowa, Central Division, U.S. District Courthouse, 123 East Walnut Street, Des Moines, Iowa 50309, to determine whether: (1) the proposed settlement (the "Settlement") of the above-captioned action ("Action") for the sum of \$25,750,000 in cash should be approved by the Court as fair, reasonable, and adequate; (2) the Final Judgment as provided under the Stipulation and Agreement of Settlement ("Stipulation") should be entered, dismissing the Third Amended Class Action Complaint filed in the Action on the merits and with prejudice; (3) the release by the Class of the Released Claims, as set forth in the Stipulation, should be provided to the Released Defendants; (4) to award Plaintiffs' Counsel attorneys' fees and expenses out of the Settlement Fund (as defined in the Notice of Proposed Settlement of Class Action ("Notice"), which is discussed below); (5) to grant Plaintiffs' requests for service awards out of the Settlement Fund for the time and effort they expended in prosecuting this action on behalf of the Class; and (6) the Plan of Allocation should be approved by the Court.

IF YOU HAVE OR HAD A MORTGAGE SERVICED BY WELLS FARGO AND WHO OWE OR PAID PROPERTY INSPECTION FEES ASSESSED DURING THE PERIOD AUGUST 1, 2004 THROUGH DECEMBER 31, 2013, YOUR RIGHTS MAY BE AFFECTED BY THE SETTLEMENT OF THIS ACTION.

To share in the distribution of the Settlement Fund, you may be required to file a Proof of Claim on or before March 16, 2016. If you are required to file a Proof of Claim and do not do so by March 16, 2016, you will not receive any recovery in connection with the Settlement of this Action. If you are a member of the Class and do not request to be excluded, you will be bound by the Settlement and any judgment and release entered in the Action, including, but not limited to, the Final Judgment, whether or not you submit a Proof of Claim.

You may obtain a copy of the Notice, which more completely describes the Settlement and your

rights thereunder (including your right to object to the Settlement), a Proof of Claim form, and a copy of the Stipulation (which among other things contains definitions for the defined terms used in this Summary Notice), online at www.WellsFargoPropertyInspectionSettlement.com, or by writing to:

Wells Fargo Inspection Fee Settlement c/o Garden City Group, LLC P.O. Box 10106 Dublin, OH 43017-3106 Phone: (855) 382-6434

Inquiries should NOT be directed to Defendants, the Court, or the Clerk of the Court.

Inquiries, other than requests for the Notice or for a Proof of Claim form, may be made to Plaintiffs' Lead Counsel:

Deborah Clark-Weintraub SCOTT+SCOTT, ATTORNEYS AT LAW, LLP The Chrysler Building 405 Lexington Avenue, 40th Floor New York, NY 10174

Michael R. Reese REESE LLP 100 West 93rd Street, 16th Floor New York, NY 10025

IF YOU DESIRE TO BE EXCLUDED FROM THE CLASS, YOU MUST SUBMIT A REQUEST FOR EXCLUSION BY DECEMBER 22, 2015, IN THE MANNER AND FORM EXPLAINED IN THE NOTICE. ALL MEMBERS OF THE CLASS WHO HAVE NOT REQUESTED EXCLUSION FROM THE CLASS WILL BE BOUND BY THE SETTLEMENT ENTERED IN THE ACTION.

Dated: September 2, 2015

HONORABLE ROBERT W. PRATT UNITED STATES DISTRICT COURT JUDGE, DIVISION DISTRICT OF IOWA, CENTRAL DIVISION

THE WALL STREET JOURNAL

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You may obtain a copy of the Notice, which more completely describes the Settlement and your

rights thereunder (including your right to object to the Settlement), a Proof of Claim form, and a copy of the Stipulation (which among other things contains definitions for the defined terms used in this Summary Notice), online at [www.WellsFargoPropertyInspectionSettlement.com](http://www.WellsFargoPropertyInspectionSettlement.com), or by writing to:

*Wells Fargo Inspection Fee Settlement*  
c/o Garden City Group, LLC  
P.O. Box 10106  
Dublin, OH 43017-3106  
Phone: (855) 382-6434

Inquiries should NOT be directed to Defendants, the Court, or the Clerk of the Court.

Inquiries, other than requests for the Notice or for a Proof of Claim form, may be made to Plaintiffs' Lead Counsel:

Deborah Clark-Weintraub  
**SCOTT+SCOTT, ATTORNEYS AT LAW, LLP**  
The Chrysler Building  
405 Lexington Avenue, 40th Floor  
New York, NY 10174

Michael R. Reese  
**REESE LLP**  
100 West 93rd Street, 16th Floor  
New York, NY 10025

IF YOU DESIRE TO BE EXCLUDED FROM THE CLASS, YOU MUST SUBMIT A REQUEST FOR EXCLUSION BY DECEMBER 22, 2015, IN THE MANNER AND FORM EXPLAINED IN THE NOTICE. ALL MEMBERS OF THE CLASS WHO HAVE NOT REQUESTED EXCLUSION FROM THE CLASS WILL BE BOUND BY THE SETTLEMENT ENTERED IN THE ACTION.

Dated: September 2, 2015

HONORABLE ROBERT W. PRATT  
UNITED STATES DISTRICT COURT JUDGE,  
SOUTHERN DISTRICT OF IOWA, CENTRAL DIVISION

[www.WellsFargoPropertyInspectionSettlement.com](http://www.WellsFargoPropertyInspectionSettlement.com)

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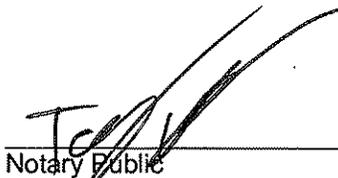
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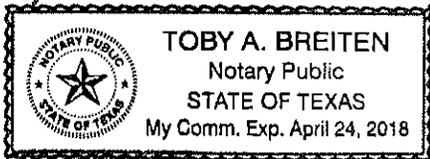
SEP-29-2015; OCT-22-2015

ADVERTISER: Wells Fargo;

and that the foregoing staten

Sworn to before me this  
27 day of October 20

  
Notary Public





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# To All Persons Who Have Or Had A Mortgage Serviced By Wells Fargo And Who Owe Or Paid Property Inspection Fees Assessed During The Period August 1, 2004 Through December 31, 2013

NEW YORK, Oct. 22, 2015 /PRNewswire/ -- The following statement is being issued by Scott+Scott, Attorneys at Law, LLP and Reese LLP regarding the Young v. Wells Fargo & Co., et al. Litigation.

THIS NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER SOLICITATION. PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.

Para ver este aviso en Español, se puede visitar [www.WellsFargoPropertyInspectionSettlement.com](http://www.WellsFargoPropertyInspectionSettlement.com)

YOU ARE HEREBY NOTIFIED that a hearing will be held on January 21, 2016 at 10:00 a.m., before the Honorable Robert W. Pratt, at the United States District Court, Southern District of Iowa, Central Division, U.S. District Courthouse, 123 East Walnut Street, Des Moines, Iowa 50309, to determine whether: (1) the proposed settlement (the "Settlement") of the above-captioned action ("Action") for the sum of \$25,750,000 in cash should be approved by the Court as fair, reasonable, and adequate; (2) the Final Judgment as provided under the Stipulation and Agreement of Settlement ("Stipulation") should be entered, dismissing the Third Amended Class Action Complaint filed in the Action on the merits and with prejudice; (3) the release by the Class of the Released Claims, as set forth in the Stipulation, should be provided to the Released Defendants; (4) to award Plaintiffs' Counsel attorneys' fees and expenses out of the Settlement Fund (as defined in the Notice of Proposed Settlement of Class Action ("Notice"), which is discussed below); (5) to grant Plaintiffs' requests for service awards out of the Settlement Fund for the time and effort they expended in prosecuting this action on behalf of the Class; and (6) the Plan of Allocation should be approved by the Court.

IF YOU HAVE OR HAD A MORTGAGE SERVICED BY WELLSFARGO AND OWE OR PAID PROPERTY INSPECTION FEES ASSESSED DURING THE PERIOD AUGUST 1, 2004 THROUGH DECEMBER 31, 2013, YOUR RIGHTS MAY BE AFFECTED BY THE SETTLEMENT OF THIS ACTION.

To share in the distribution of the Settlement Fund, you may be required to file a Proof of Claim on or before March 16, 2016. If you are required to file a Proof of Claim and do not do so by March 16, 2016, you will not receive any recovery in connection with the Settlement of this Action. If you are a member of the Class and do not request to be excluded, you will be bound by the Settlement and any judgment and release entered in the Action, including, but not limited to, the Final Judgment, whether or not you submit a Proof of Claim.

You may obtain a copy of the Notice, which more completely describes the Settlement and your rights thereunder (including your right to object to the Settlement), a Proof of Claim form, and a copy of the Stipulation (which among other things contains definitions for the defined terms used in this Summary Notice), online at [www.WellsFargoPropertyInspectionSettlement.com](http://www.WellsFargoPropertyInspectionSettlement.com), or by writing to:

*Wells Fargo Inspection Fee Settlement*

c/o Garden City Group, LLC  
P.O. Box 10106  
Dublin, OH 43017-3106  
Phone: (855) 382-6434

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Deborah Clark-Weintraub  
**SCOTT+SCOTT, ATTORNEYS AT LAW, LLP**  
The Chrysler Building  
405 Lexington Avenue, 40th Floor  
New York, NY 10174

Michael R. Reese  
**REESE LLP**  
100 West 93rd Street, 16th Floor  
New York, NY 10025

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Dated: September 2, 2015

HONORABLE ROBERT W. PRATT  
UNITED STATES DISTRICT COURT JUDGE,  
SOUTHERN DISTRICT OF IOWA,  
CENTRAL DIVISION

SOURCE Scott+Scott, LLP

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Word Count: 673

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PR Newswire's Editorial Order Number: 1411436-1-1

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*Young v. Wells Fargo*

## Requests for Exclusion Received as of December 7, 2015

#	GCG ID #	Requestor(s)
1.	14704	SENKA AND JASMIN BURZIC
2.	16266	LINDA CLAYTON
3.	1022134	SYLVIA C SMITH
4.	1022193	SCOTT D FAILING
5.	1145738	KELVIN KING
6.	1254060	MICHELLE TSOLAKIS
7.	1327921	ISAAC MOSER
8.	1456640 and 40168558	CARL A MICK JR and BARBARA J MICK
9.	1460263	BARBARA A GUTHRIE
10.	1507444	JOHN RICHARD BEGG
11.	1532217	Horatio Miller on behalf of ESTATE OF ELEANOR A MILLER
12.	1614754	VUONG NGUYEN
13.	1678238	LALITA DIOTRAGOOL
14.	1680195	KRISTY KOZAKA
15.	1732641	VICTORIA RHOADES
16.	1741724	GARY GREEN
17.	1744741 and 1744743	LISA SAMUELS
18.	1798202	NIKOLAY COATES
19.	1919784	ARLENE STRICKLAND
20.	1931815	CORY CARR
21.	1949568 and 40225866	Pamela A Capen on behalf of ESTATE OF CHARLES R OLIN JR and ESTATE OF BERNETA T OLIN
22.	1959815 and 40275294	JOHN NORTON-GRIFFITHS and MARILYNN NORTON-GRIFFITHS
23.	2010691	ESTATE OF RAY C HUGHES
24.	2018190	NICHOLAS DONOFRIO
25.	2085702	ALEXANDER D J ROOS
26.	2115162	BARBARA HARRIS
27.	2146284	TIFFANY TATE
28.	2174020 and 40339717	JUAN CARLOS CAYCHO PORRAS and AZUCENA D ALCALDE MARCELO
29.	2196644	DOUGLAS A PURKEY
30.	2270568	Karen Hicks on behalf of ESTATE OF DONNA H HICKS
31.	2275169	JUDITH ELAINE NIELSON

#	GCG ID #	Requestor(s)
32.	2308822	Georgia Springer on Behalf ESTATE OF EUGENE F SPRINGER
33.	2347557	GLADYS MARIA MARIL
34.	2350795	RITA THOMAS
35.	2389828	ESTATE OF ORVILLE GRAHAM
36.	2435353	Jacqueline Novak on Behalf ESTATE OF GARRY K NOVAK
37.	2491684	Tanya Guthrie on behalf ESTATE OF JACQUELINE GUTHRIE
38.	2510989	ONOFRIO BARTOLONE
39.	2577828 and 40443366, 2577902 and 40443513	STEPHEN E PENNER and LII M PENNER
40.	2641392	AZILE ROSE
41.	2716675	JOSEPHINE STRINGER
42.	2724143	LESLIE AHR
43.	2845365 and 40517874	JIMMY E HYATT JR and EVA M HYATT
44.	2986505	JESSE STRICKLAND
45.	3005281	CRYSTAL PENNINGTON
46.	3085446	BARBARA A (BRABY) BURNS
47.	3242834	JARED HAMANN
48.	3267144	CHERYL A GRAVES
49.	3273238 and 40578374	GLENN G GILBERT and SHARON L GILBERT
50.	3333183	Lynda L Fraser on behalf PETER J FRASER
51.	3338518	CAROL A HUNTE
52.	3382883	KYOKO CHAPELL
53.	3414926 and 40685908	J CLAUDE CRUMLEY III and ANDREA CRUMLEY
54.	3423261 and 40696510	JAMES SCHWOEGLER and DEBRA SCHWOEGLER
55.	3441851	DONALD A KRISTA
56.	3468765	TAMMY ACUFF
57.	3487114	ESTATE OF DAVID BURROWS
58.	3503738	MARIE-ANGE FLEURANT
59.	3604867	LINDA L GERNAEY
60.	3610008	JACK HICKLE
61.	3644620	KAY L HARAGUCHI
62.	3661821	ARAMIS ARJONA
63.	3717827	BARBARA R PORTER
64.	3765742	JONAE BERTAPELLE
65.	3794474	SONIA PITA
66.	3818193	LINDA SHIFFLETT
67.	3844353	DENISE JUANICO
68.	3901770 and 40872557	KEVIN J TUMINSKI and NOREEN TUMINSKI

#	GCG ID #	Requestor(s)
69.	3934930	LOUNISE GEORGE
70.	3948181	GEORGE J LAWLER
71.	4024655	CAROL J FAWVER
72.	4048356	MARGARET RODRIGUEZ
73.	4165914	ESTATE OF KARIN LEA KOTSCHWAR
74.	4183410	CATALINA M PALAGANAS
75.	4259950	ERIN K DEPAYNE
76.	4290938 and 40960674	RALPH VETRANO, DECEASED and CONSTANCE VETRANO
77.	4294351	CAROL TASSIN
78.	4313704 and 41032293	JOHN P CANTRELL and REBECCA D CANTRELL
79.	4358878	UDAYAN PATEL
80.	4403666 and 40978535	PAMELA M SHEDD and GEORGE P SHEDD JR
81.	4639819	JO ANN DIALE
82.	40151723	MARIE N DUEMAN
83.	40485138	MARY JO HORNE
84.	40486639	MELISSA CHARTIER
85.	40659680	SANDRA L SPAGNOLA
86.	40948769*	JANN GRISMORE

\*The total count of GCG ID numbers is 102.