

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

If you owned real property in Washington State that was subject to a deed of trust or mortgage serviced or held by Nationstar Mortgage LLC between April 3, 2008 and July 31, 2016, a class action settlement may affect your rights.

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

- A real property owner sued Nationstar Mortgage LLC for trespass, statutory trespass, violation of the Washington Deeds of Trust Act, and violation of the Washington Consumer Protection Act.
- The parties have entered into a Settlement Agreement in a certified class action lawsuit filed on behalf of all persons who own or owned real property in Washington subject to a deed of trust or mortgage serviced or held by Nationstar, whose property Nationstar or its agents deemed vacant prior to the completion of a foreclosure sale between April 3, 2008 and July 31, 2016.
- Your legal rights are affected by the Settlement, and you have a choice to make now:

Your Legal Rights and Options in This Lawsuit	
Do Nothing	<p>Stay in this lawsuit. Receive a payment. Give up certain rights.</p> <p>By doing nothing, you will receive money from the settlement if it is approved by the Court. But, you give up any rights to sue Nationstar Mortgage LLC, the owner of your loan, or vendors working for Nationstar, separately on the claims alleged in this lawsuit or on similar claims.</p>
Ask to be Excluded	<p>Get out of this lawsuit. Get no benefits from it. Keep rights.</p> <p>If you ask to be excluded from the lawsuit you will not receive a payment. But, you keep any rights to sue Nationstar Mortgage LLC, the owner of your loan, or vendors working for Nationstar, separately about the same or similar legal claims in this lawsuit. If you want to be excluded, you must submit your Exclusion Request in writing to the Nationstar Class Administrator via the settlement website or by mail to PO Box 9349, Dublin, OH 43017-4249, postmarked no later than February 25, 2019.</p>
Object to the Settlement	<p>Stay in the Class. File a written objection to the Settlement with the Court.</p> <p>If you disagree with any portion of the Settlement Agreement, you may file a written Objection with the Court, which will be considered at the Final Approval Hearing. You may also ask to speak at the hearing. If you file an Objection you may not exclude yourself from the Settlement. If the Settlement is approved, you will be bound by the Settlement Agreement and you give up any rights to sue Nationstar Mortgage LLC, the owner of your loan, or vendors working for Nationstar, separately about the same or similar legal claims in this lawsuit, but you will still be eligible to receive a payment from the Settlement Fund. Your Objection must be postmarked no later than February 25, 2019.</p>

BASIC INFORMATION

1. Why did I receive this notice?

Nationstar Mortgage LLC's records show that at some time between April 3, 2008 and July 31, 2016 you owned real property in the state of Washington subject to a deed of trust or mortgage serviced or held by Nationstar Mortgage LLC and the property was deemed vacant before a foreclosure sale was complete. This notice explains that the parties have reached an agreement to settle a class action lawsuit that may affect you. You have legal rights and options that you may exercise before the Court decides whether to approve the Settlement. Judge Thomas O. Rice of the United States District Court, Eastern District of Washington, is overseeing this class action. The lawsuit is known as *Laura Zamora Jordan v. Nationstar Mortgage LLC*, Case No. 2:14-cv-0175-TOR.

2. What is this lawsuit about?

Plaintiff and the Class allege that Nationstar Mortgage LLC, without authorization, entered upon Plaintiff's and Class Members' properties for the purpose of inspecting the property, changing locks, performing winterization and other maintenance, and posting notices before completing a foreclosure sale in violation of Washington law. They also allege that Nationstar Mortgage LLC wrongfully charged property owners fees for doing these things.

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called "Class Representatives" (in this lawsuit Laura Zamora Jordan) sue on behalf of other people who have similar claims. The people together are a "Class" or "Class Members." The property owner who sued is called the Plaintiff. The company she sued (in this case Nationstar Mortgage LLC) is called the Defendant. One lawsuit resolves the issues for everyone in the Class—except for those people who choose to exclude themselves from the Class.

THE SETTLEMENT

4. Why is there a Settlement?

The Court did not decide in favor of Plaintiff or Nationstar. Instead, both sides agreed to a settlement. This way, they avoid the cost and risk associated with a trial, and the people affected will receive compensation. The Class Representative and her attorneys think the Settlement is best for the Settlement Class Members.

5. How do I know if I am a part of the Settlement?

You are in the Settlement Class if you own or owned real property in the state of Washington subject to a deed of trust or mortgage serviced or held by Nationstar Mortgage LLC and Nationstar or its agents deemed your property was vacant before foreclosure and between April 3, 2008 and July 31, 2016.

The Settlement Class does not include any persons who validly request exclusion from the Settlement Class, as described under Question 12. A person who does not exclude him or herself is a "Settlement Class Member."

If you have questions about whether you are part of the Class, you may call 1-866-210-1643 or visit www.NationstarMortgageClassAction.com for more information.

THE SETTLEMENT BENEFITS

6. What does the Settlement provide?

To settle this lawsuit, Nationstar has agreed to pay \$17,000,000 into a Settlement Fund which will provide individual payments to all Settlement Class Members, an incentive award payment to the Class Representative, attorneys' fees and reimbursement of out-of-pocket litigation costs, and costs related to settlement administration.

Each Settlement Class Member will receive a single payment from the Settlement Fund based on the following:

- a. Settlement Class Members for whom Class Counsel have identified evidence of a Lock Change shall receive a pro rata payment based on the rental value damages calculated by Plaintiff's expert in this matter, or \$75, whichever is greater.
- b. Settlement Class Members for whom Class Counsel do not have evidence of a Lock Change shall receive \$75 as compensation for the Property Preservation Fees charged to the Settlement Class Member's Loan Account.
- c. Each Class Member's Estimated Gross Payment from the Settlement Fund is set forth on the one-page Notice sent to each Class Member. If you have not received the Notice, please call 1-866-210-1643 to obtain information on your Estimated Gross Payment from the Settlement Fund.

7. How much will my payment be?

The amount of your Settlement payment depends on whether Nationstar changed the locks on your property before completing a foreclosure. Each Settlement Class Member will receive a payment of at least \$75.

Each Class Member's Estimated Gross Payment from the Settlement Fund is set forth on the one-page Notice sent to each Class Member. If you have not received the Notice, please call 1-866-210-1643 to obtain information on your Estimated Gross Payment from the Settlement Fund.

If you have filed for bankruptcy, you may want to consult with your bankruptcy attorney regarding your settlement award. The Court has directed an experienced bankruptcy attorney to review bankruptcy records for Class Members. That attorney may recommend to the Court that your settlement award payment should be sent to your bankruptcy trustee instead of to you. As a result, you may not receive a settlement award payment. If you have questions about this review or want to provide records or other information to the attorney reviewing bankruptcy records, please contact Class Counsel at 1-855-349-7023.

8. What are the tax implications of accepting a settlement payment?

The tax implications may vary based on the amount you receive and other factors, so you should consult a tax professional to assess the specific tax implications of any payment you may receive. Class Counsel cannot advise you with respect to your tax obligations.

HOW TO GET A PAYMENT

9. How do I get a payment?

If you received a Notice and you do not exclude yourself from the settlement, you will be sent a payment. You do not need to submit a claim to get a payment. If your mailing address changes prior to the Settlement payment distribution, you should contact the Class Administrator at 1-866-210-1643 to update your information.

10. When will I get my payment?

If no appeals are filed within 30 days after the Court enters the Final Approval Order, then the Order will become final and the Settlement will be effective. The Class Administrator will mail checks to Settlement Class Members no later than 30 days from the Settlement's Effective Date (roughly 65 days after the Final Approval Hearing). The checks will be valid for 90 days from the date of issuance. However, if an appeal is filed, payments will not be sent until after the appeal is finally resolved.

11. What am I giving up to get a payment and stay in the Settlement Class?

Unless you exclude yourself, you are staying in the Settlement Class and you will be a Settlement Class Member. If the Court approves the Settlement, you and other Settlement Class Members can't sue, continue to sue, or be part of any other lawsuit against Nationstar, the owner of your loan, or a vendor working for Nationstar regarding its entering upon your property, without authorization, for the purpose of inspecting the property, changing locks, performing winterization and other maintenance, and posting notices before completing a foreclosure sale in violation of Washington law. All of the Court's orders will apply to and legally bind you and other Class Members.

The Settlement Agreement (available at www.NationstarMortgageClassAction.com) describes the claims you are releasing (the "Released Claims") and against whom you are releasing claims (Nationstar Mortgage LLC, the owner of your loan, and vendors working for Nationstar) in detail, so read it carefully.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you don't want a payment from this Settlement or if you want to keep the right to sue or continue to sue Nationstar, the owner of your loan, or vendors working for Nationstar, then you must take steps to remove yourself from the Settlement Class. This is called excluding yourself – or is sometimes referred to as "opting out" of the Settlement Class.

12. How do I opt out of the Settlement?

To exclude yourself from the Settlement you must send the request in writing to the Class Administrator saying that you want to be excluded from the *Jordan v. Nationstar Mortgage LLC* settlement. You must include your name and address in the letter. You can mail your exclusion request letter, postmarked no later than February 25, 2019, to the following address:

Nationstar Class Administrator
P.O. Box 9349
Dublin, OH 43017-4249

You may also submit your opt-out request via the settlement website: www.NationstarMortgageClassAction.com. If you ask to be excluded, you will not get any payment, and you cannot object to the Settlement. You will not be legally bound by anything that happens in this lawsuit.

13. Why would I ask to be excluded?

If you already have your own lawsuit against Nationstar, the owner of your loan, or a vendor working for Nationstar regarding its entering upon your property and want to continue with it, you need to ask to be excluded from the Class. If you exclude yourself from the Class—which also means to remove yourself from the Class, and is sometimes called "opting-out"—you won't get any money or benefits from the settlement between Nationstar Mortgage LLC and Plaintiff. However, you may be able to sue or continue to sue Nationstar, the owner of your loan, or a vendor working for Nationstar regarding its entering upon your property on your own. If you exclude yourself, you will not be legally bound by the Court's judgments in this class action.

14. If I exclude myself, can I get anything from this Settlement?

No. You will not receive a payment if you exclude yourself.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this lawsuit?

The Court decided that the law firms of Jeffers, Danielson, Sonn & Aylward, P.S. of Wenatchee, WA, Daudt Law, PLLC, of Seattle, WA, and Terrell Marshall Law Group, PLLC of Seattle, WA, are qualified to represent you and all Class Members. These law firms are referred to as "Class Counsel." You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense. The names and addresses of Class Counsel are:

Beth E. Terrell
Blythe H. Chandler
TERRELL MARSHALL LAW GROUP
PLLC
936 North 34th Street, Suite 300
Seattle, Washington 98103

Clay M. Gatens
JEFFERS, DANIELSON, SONN &
AYLWARD, P.S.
2600 Chester Kimm Road
P.O. Box 1688
Wenatchee, Washington 98807

Michael D. Daudt
DAUDT LAW PLLC
2200 Sixth Avenue, Suite 1250
Seattle, Washington 98121

16. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want to hire your own lawyer, you will have to pay that lawyer. For example, you can ask a lawyer to appear in Court for you if you want someone other than Class Counsel to speak for you.

17. How will the lawyers be paid?

Class Counsel will ask the Court to approve payment of up to 25% of the \$17,000,000 Settlement Fund to them for attorneys' fees and \$210,633 to reimburse their out-of-pocket expenses. These payments would pay Class Counsel for investigating the facts, litigating the case, and negotiating the Settlement. Class Counsel will also request a service award of \$20,000 for the Class Representative, Ms. Jordan, to compensate her for her time and effort during the litigation. Class Counsel's complete request for fees, costs, and the incentive awards to the named Plaintiff will be posted on the Settlement Website www.NationstarMortgageClassAction.com by January 25, 2019. The Court may award less than these amounts.

OBJECTING TO THE SETTLEMENT

18. How do I object to the Settlement?

If you are a Settlement Class Member and you do not exclude yourself from the Settlement Class, you can object to the Settlement if you don't like any part of it. Your written objection must provide your name, address, telephone number, and the reason(s) for your objection. You must file the objection with the Court no later than February 25, 2019, by mailing it to:

Jordan v. Nationstar Mortgage, LLC
Case No. 2:14-cv-00175-TOR
Clerk's Office
U.S. District Court
P.O. Box 1493
Spokane, WA 99210-1493

19. What is the difference between objecting and excluding myself from the Settlement?

Objecting simply means telling the Court that you don't like something about the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself from the Settlement Class is telling the Court that you don't want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT'S FAIRNESS HEARING

20. When and where will the Court hold a hearing on the fairness of the Settlement?

The Court will hold the Final Fairness Hearing on March 21, 2019 at 1:30 p.m., before the Honorable Thomas O. Rice at the United States District Court for the Eastern District of Washington, 920 West Riverside Ave, Spokane, WA 99201, Courtroom 902. The purpose of the hearing is for the Court to determine whether the Settlement is fair, reasonable, adequate, and in the best interest of the Class. At the hearing, the Court will hear any objections and arguments concerning the fairness of the proposed Settlement, including those related to the amount requested by Class Counsel for attorneys' fees and expenses and the incentive award to the Class Representative. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

The date and time of the Final Fairness Hearing are subject to change by Court Order. Any changes will be posted at the Settlement website, www.NationstarMortgageClassAction.com.

21. Do I have to come the hearing?

No. Class Counsel will answer any questions the Court may have. You are welcome to come to the hearing at your own expense. If you send an objection you don't have to come to the Court to talk about it. As long as your written objection was filed or mailed on time, and meets the other criteria described in the Settlement Agreement, the Court will consider it. You may also pay a lawyer to attend, but you don't have to.

22. May I speak at the hearing?

If you do not exclude yourself from the Settlement Class, you may ask the Court for permission to speak at the hearing concerning any part of the proposed Settlement Agreement. If you submit an objection (see Question 18 above) and intend to appear at the hearing, you must state your intention to do so in your objection. To speak, you must send a letter saying that it is your "Notice of Intention to Appear" in "*Jordan v. Nationstar Mortgage, LLC*, Case No. 2:14-cv-00175-TOR." Be sure to include your name, address, telephone number, that you are a Class Member, and your signature. Your Notice of Intention to Appear must be received at the address in Question 18, no later than March 10, 2019. You cannot speak at the hearing if you exclude yourself.

23. What happens if I do nothing at all?

If you do nothing, you will be a member of the Settlement Class and you will be sent a payment.

GETTING MORE INFORMATION

24. Are there more details about the Settlement?

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement. You may review and download or print a copy of the Settlement Agreement via the Settlement Website at www.NationstarMortgageClassAction.com. You can also get a copy of the Settlement Agreement by writing to the Nationstar Class Administrator at PO Box 9349, Dublin, OH 43017-4249.

25. How do I get more information?

You can call 1-866-210-1643 toll free; write to the Nationstar Class Administrator, PO Box 9349, Dublin, OH 43017-4249; or visit the website at www.NationstarMortgageClassAction.com where you will find answers to common questions about the Settlement, the Settlement Agreement, Plaintiff's Second Amended Complaint, Class Counsel's motion for an award of attorneys' fees and costs, and other information.

PLEASE DO NOT CONTACT THE COURT, THE JUDGE, OR THE DEFENDANT WITH QUESTIONS ABOUT THE SETTLEMENT.