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11 ANN WEST

12 **SUPERIOR COURT OF CALIFORNIA**

13 **COUNTY OF SAN FRANCISCO**

14
15
16 VALENTINA MONTAGNA, on behalf of
17 herself and behalf of all other similarly situated,

18 Plaintiff,

19 v.
20

21 FOX CORPORATION, TUBI, INC., and DOES
22 1 to 50,
inclusive,

23 DEFENDANT.
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25
26
27
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Case No. CGC-25-622792

**DECLARATION OF CHANTAL
SOTO-NAJERA WITH RESPECT TO
SETTLEMENT
ADMINISTRATION AND CLASS
NOTICE**

Date: February 20, 2026

Time: 10:00 a.m.

Dept: 613

Judge: Hon. Jeffrey S. Ross

ELECTRONICALLY

FILED

Superior Court of California,
County of San Francisco

01/15/2026

Clerk of the Court

BY: JEFFREY FLORES

Deputy Clerk

1 I, Chantal Soto-Najera, declare as follows:
2

3 1. I am a Case Manager for CPT Group, Inc. ("CPT"), the Court-approved class
4 action Settlement Administrator for *Montagna v. Fox Corporation et al.* I have personal
5 knowledge of the facts set forth in this declaration and, if called upon to testify, I could and
6 would testify competently to such facts.

7 2. CPT has extensive experience in providing notice of class actions and
8 administering class action settlements. In the past 30 plus years, we have provided notification
9 and/or settlement administration services in over one thousand class action cases. CPT was
10 selected by all parties to provide notice of the settlement and process exclusions in this action.
11 In this capacity, CPT was charged with administering the settlement terms and conditions
12 detailed herein, included but not limited to:

- 13 a) preparing, printing and mailing the Notice of Proposed Class and Collective Action
14 Settlement and Final Approval Hearing (herein referred to as "Notice Packet");
15 b) processing undeliverable mail and locating updated addresses for Class Members;
16 c) establishing and maintaining a toll-free case hotline where Class Members can speak
17 to case representatives regarding case specific questions;
18 d) receiving inquiries and other communications about the settlement;
19 e) establishing and maintaining a case email address where Class Members can email
20 with case representatives regarding case specific questions;
21 f) establishing a case specific static website with key dates and documents;
22 g) processing Class Members' inquiries about the Notice Packet, and Disputes,
23 Requests for Exclusion, and Objections;
24 h) providing Class Counsel and Counsel for Defendants a declaration attesting to the
25 completion of the notice process, in addition to weekly updates during the response
26 period;
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- i) establishing and administering a qualified settlement fund to disburse all settlement payments;
- j) calculating Individual Settlement Payments for each Class and Collective Member;
- k) issuing and distributing Class Counsel's fees and costs, the Named Plaintiff's enhancement award, the LWDA payment and Settlement Payments to Class Members;
- l) calculating and mailing the Class Settlement Share Checks, Collective Settlement Share Checks, and PAGA Payment Checks to Participating Class Members, Collective Action Plaintiffs, and PAGA Group Members, as well as completing any associated tax withholding and reporting to the State and Federal tax authorities;
- m) preparing, printing, and mailing check reminder postcards to all Participating Class and Collective Members whose settlement checks remain uncashed more than 120 days after issuance. In addition, the Settlement Administrator will conduct follow-up outreach to these individuals through an email reminder campaign and will attempt to contact them by telephone where contact information is available.

3. CPT received the Court-approved text for the Notice Packet from Counsel on October 14, 2025.

4. CPT prepared a draft of the Notice Packet for mailing to the Class Members, Collective Action Plaintiffs, and PAGA Group Members, consisting of a 7-page Notice of Proposed Class and Collective Action Settlement and Final Approval Hearing, in English. CPT received approval from the Parties and a sufficient number of Notice Packets were printed according to the anticipated class size. Attached hereto as Exhibit "A" is a true and correct copy of the Notice Packet.

5. On October 29, 2025, CPT received a data file from Defendant containing each Class Member's name, last known address, and Social Security number and necessary information to calculate their estimated settlement amounts. The mailing list contained 309 Class Members.

1 6. On November 4, 2025, CPT conducted a National Change of Address (NCOA)
2 search in an attempt to update the class list of addresses as accurately as possible. A search of
3 this database provides updated addresses for any individual who has moved in the previous four
4 years and notified the U.S. Postal Service of their change of address. As a result of the NCOA,
5 CPT was able to locate 25 new or updated addresses.

6 7. The Notice Packets were enclosed in envelopes with the names and known
7 addresses printed on them. On November 13, 2025, the Notice Packets were mailed via U.S.
8 First-Class mail to all Class Members, Collective Action Plaintiffs, and PAGA Group Members.
9 The deadline to submit disputes, requests for exclusion, or written objections was December 28,
10 2025, and the date to object orally was February 20, 2026.

11 8. Additionally on November 13, 2025, Counsel for Defendant advised CPT that a
12 Class Member was inadvertently missed from the class list. The Notice Packet to the additional
13 Class Member was mailed on November 20, 2025. The mailing list ultimately contains 310
14 Class Members.

15 9. On December 5, 2025, CPT was advised of a Supplemental Mailing applicable
16 to 47 class members. Data to complete the Supplemental Mailing was received on December 8,
17 2025.

18 10. On December 12, 2025, the Supplemental Notice Packets were enclosed in
19 envelopes with the names and known addresses printed on them and mailed via U.S. First-Class
20 mail to those 47 Class Members whose data Defendants had provided on December 8, 2025.
21 The deadline to submit disputes, requests for exclusion, or written objections for these class
22 members is January 12, 2026. Attached hereto as Exhibit "B" is a true and correct copy of the
23 Supplemental Notice Packet.

24 11. As of the date of this declaration, four (4) Notice Packets have been returned to
25 our office by the U.S. Postal Service as undeliverable, none of which had a forwarding address.
26 CPT attempted to locate a current mailing address using Accurint, one of the most
27 comprehensive address databases available for skip tracing. Accurint utilizes hundreds of
28

different databases supplied by credit supporting agencies, public records, and a variety of other national databases.

12. As a result of a forwarding address and skip trace efforts, a total of four (4) Notice Packets were re-mailed to Class Members. As of the date of this declaration, zero (0) Notice Packets remain undeliverable with no forwarding address and where no new address could be found through skip trace.

13. As of the date of this declaration, CPT has not received any disputes.

14. As of the date of this declaration, CPT has received three (3) timely and valid requests for exclusion.

15. Pursuant to the Settlement Agreement, the Individual PAGA Payments will be made to all PAGA Group Members, which (consistent with the Settlement Agreement) includes individuals regardless of whether they opt out of the Class or opt in to the Collective.

16. As of the date of this declaration, CPT will report that a total of 307 Class Members will be issued an Individual Settlement Payment, which represents a 99.03% participation rate.

17. Pursuant to the Settlement Agreement, the entire Net Settlement Amount was used to calculate the settlement payment amount for each Participating Class Member. The Net Settlement Amount is calculated as set forth below:

Gross Settlement Amount	\$4,600,000.00
Less Class and Collective Counsel Fees Payment (Requested)	- \$1,380,000.00
Less Class and Collective Counsel Litigation Expenses Payment (Requested)	- \$31,054.41
Less Class Representative Service Payment (Requested)	- \$10,000.00
Less the PAGA Payment	- \$50,000.00
<u>Less Settlement Administration Costs</u>	<u>- \$21,500.00</u>
Net Settlement Amount	\$3,107,445.59

1 18. The **Class Fund** will comprise 50% of the Net Settlement Amount, or
2 \$1,553,722.80, and will be paid out automatically to all Class Members who are identified in
3 Defendants' records as women who held a Qualifying Position between August 29, 2020 and
4 February 27, 2025. There are currently 307 Participating Class Members. Prior to the deduction
5 of employee-side state and federal taxes, the average Class Individual settlement payment is
6 estimated to be \$5,060.99. The highest settlement payment is estimated to be \$31,691.67 and
7 the lowest estimated payment is \$2.10.

8 19. The **Collective Fund** will comprise 50% of the Net Settlement Amount, or
9 \$1,553,722.80, and will be paid out to all Collective Members who are identified in Defendants'
10 records as women who held a Qualifying Position between August 29, 2021 and February 27,
11 2025 and who choose to include themselves in the Collective by signing and depositing their
12 Collective settlement check. There are currently 292 Participating Collective Class Members.
13 Prior to the deduction of employee-side state and federal taxes, the average Collective
14 Individual settlement payment is estimated to be \$5,320.97. The highest settlement payment is
15 estimated to be \$31,600.82 and the lowest estimated payment is \$2.16.

16 20. The **PAGA Fund** will comprise \$17,500 and will be paid out to all PAGA
17 Members who are identified in Tubi's records as women who held a Qualifying Position
18 between October 30, 2023, and February 27, 2025. There are currently 253 PAGA Class
19 Members receiving a portion of the PAGA Fund. The average PAGA Payment is estimated to
20 be \$69.17.

21 21. No later than January 30, 2026, CPT will file a supplemental declaration
22 updating the Court on whether any additional responses are received after the January 12, 2026
23 response deadline for the 47 employees who received the Supplemental Mailing.

24 22. CPT will charge a total of \$21,500.00 for costs associated with the
25 administration of the settlement. This amount includes all costs incurred to date (other than
26 costs associated with the Supplemental Mailing, addressed below) as well as the estimate costs
27 required to complete the settlement administration.
28

23. CPT requests approval of costs in excess of the originally anticipated cap of \$17,250.00, as the initial estimate did not include several services required. These additional services include maintaining and responding to a case-specific email inbox, conducting a reminder phone and email campaign regarding settlement checks, and printing and issuing separate checks to class members based on their respective settlement classes.

24. In addition, CPT incurred supplemental mailing costs in the amount of \$637.77 for a mailing completed to forty-seven (47) class members. These supplemental mailing costs are separate from the administration costs described above and will be paid independently of the Gross Settlement Amount by Defendant.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration is executed this 13th day of January 2026 at Irvine, California.

Chantal Soto-Najera
Chantal Soto-Najera

EXHIBIT A

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

VALENTINA MONTAGNA, on behalf of herself
and behalf of all others similarly situated,

Plaintiff,

v.

FOX CORPORATION, TUBI, INC., and DOES 1
through 50, inclusive,
Defendants.

Case No. CGC-25-622792

Assigned to: The Hon. Jeffrey S. Ross
Dept.-613

NOTICE OF PROPOSED CLASS AND
COLLECTIVE ACTION SETTLEMENT AND
FINAL APPROVAL HEARING

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

YOU MAY BE ENTITLED TO THREE CASH PAYMENTS UNDER THIS SETTLEMENT.

YOU ARE RECEIVING THIS NOTICE BECAUSE YOU ARE A WOMAN WHO WORKED FOR TUBI AT THE SENIOR VICE PRESIDENT LEVEL OR BELOW IN A JOB ORGANIZATION (EXCEPT FOR SALES) BETWEEN AUGUST 29, 2020 AND FEBRUARY 27, 2025 THAT IS COVERED BY A CLASS AND COLLECTIVE SETTLEMENT.

IF YOU ARE A MEMBER OF THE CLASS, YOU WILL BE ENTITLED TO ONE CHECK AND WILL BE BOUND BY THIS SETTLEMENT. YOUR RIGHTS WILL BE AFFECTED BY THIS LITIGATION UNLESS YOU EXCLUDE YOURSELF FROM THE CLASS AS EXPLAINED BELOW.

IF YOU ARE A MEMBER OF THE COLLECTIVE, YOU WILL BE ENTITLED TO A SECOND CHECK AND WILL BE BOUND BY THIS SETTLEMENT IF YOU INCLUDE YOURSELF IN THE COLLECTIVE AS EXPLAINED BELOW.

IF YOU ARE A MEMBER OF THE PAGA GROUP, YOU ARE ENTITLED TO A THIRD CHECK AND WILL BE BOUND BY THIS SETTLEMENT.

PLEASE READ THIS NOTICE CAREFULLY. YOUR LEGAL RIGHTS MAY BE AFFECTED WHETHER YOU ACT OR DON'T ACT. YOUR ENTITLEMENT TO UP TO THREE CASH PAYMENTS MAY BE AFFECTED WHETHER YOU ACT OR DON'T ACT.

Questions? Contact the Settlement Administrator toll free at 1-888-453-0418

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:	
Do Nothing	If you do nothing, you will receive up to three checks. These three checks will include a Class check, a Collective check, and/or a PAGA check. For further information on your entitlement to a Class check, a Collective check, and/or a PAGA check (including the amounts of each check), refer to Section 4.C, on page 4 below. For further information on the difference between the Class, Collective, and PAGA action, refer to Section 3 on pages 3-4 below.
Exclude Yourself	If you want to exclude yourself from the Class Settlement, you must write a request to the Settlement Administrator to opt out. If you exclude yourself from the Class Settlement, you will not receive a Class payment and you cannot object to the Settlement. For further information on how to exclude yourself from the Class Settlement, refer to Section 5.A on page 5 below. If you want to exclude yourself from the Collective Settlement, you should not deposit your Collective Check. If you exclude yourself from the Collective Settlement, you will not receive a Collective payment. For further information on how to exclude yourself from the Collective Settlement, refer to Section 5.B on page 5 below. You cannot exclude yourself from the PAGA Settlement. For further information, refer to Section 5.C on page 5 below. Deadline for Exclusion Requests: December 28, 2025.
Object	If you want to object to the Settlement, you may write or speak to the Court about why you believe the Settlement is not fair or reasonable. For further information on how to object to the Settlement, refer to Section 5.D on pages 5-6 below. Deadline to Object in Writing: December 28, 2025. Date to Object Orally: February 20, 2026.

1. WHY DID YOU RECEIVE THIS NOTICE?

This notice explains the nature of a class action lawsuit filed against Fox Corporation and Tubi, Inc. (“Defendants”) in the Superior Court of the State of California, County of San Francisco, called *Montagna v. Fox Corporation, et al.*, Case No. CGC-25-622792 (the “Lawsuit”), as well as a proposed Settlement of this Lawsuit, and informs you of your legal rights under that proposed Settlement. You are receiving this notice because Defendants’ records show that you identify as a woman and worked at Tubi as a regular, full-time employee at the Senior Vice President level or below in any job organization except for Sales (a “Qualifying Position”) during the relevant time period.

The Court authorized this notice because you have a right to know about a proposed Settlement of the Lawsuit (the “Settlement”), and about your options, before the Court decides whether to grant final approval of the Settlement. If the Court approves the Settlement, after any objections and appeals are resolved, a third-party administrator appointed by the Court will make the payments that the Settlement authorizes.

This notice explains the Lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

2. WHAT IS THIS LAWSUIT ABOUT?

Plaintiff Valentina Montagna claims that Defendants’ policies and practices regarding compensation, promotion, and hiring violated federal and state laws by unlawfully discriminating against individuals identifying as women who worked in a Qualifying Position between August 29, 2020 and February 27, 2025. The Lawsuit asked the Court to require Defendants to provide financial compensation to those current and former employees.

Defendants deny that they did anything wrong or that there are any discriminatory differentials in compensation, promotion, or hiring. Defendants maintain that women were properly paid all wages due, that it complied with the relevant laws at all times, and that no penalties are due. Defendants also deny that the claims can proceed on a class or collective basis or are appropriate for class or collective treatment, except for purposes of this Settlement only.

The Court has not ruled on the merits of Plaintiff’s claims, Defendants’ defenses, or the substantive contentions of the parties. This notice is not meant to imply that there has been any violation of law or wrongdoing by any party or that a recovery after trial could be had if the litigation is not settled.

3. WHAT ARE CLASS, COLLECTIVE, AND PAGA ACTIONS?

In a class or collective action, one or more people, called Class Representatives (in this case, Plaintiff Montagna) sue on behalf of people who they allege have similar claims. In a PAGA action, one or more people (in this case, Plaintiff Montagna) sue on behalf of the State of California and other aggrieved employees who they allege have similar claims.

In a class action, all people who the Court determines have similar claims to the Class Representatives are Class Members. **Class Members do not need to do anything to be part of the class action.** Once a judge decides that a case can proceed as a class action (as the judge here has done for purposes of this Settlement only), all Class Members are included in the Settlement, except for those who exclude themselves (as described in Section 5.A below). The Court then resolves the issues for all Class Members together in one legal proceeding for purposes of this Settlement.

Collective actions are similar to class actions. Some cases, like this one, have a class action component and a collective action component. Here, the federal Equal Pay Act claim is brought as a collective action, on behalf of all Collective Members who identify as women according to Defendants’ records and who affirmatively opt in (i.e., by cashing their settlement check). Everyone who opts in to the Equal Pay Act collective claim is a Collective Member. Unlike a class action, no one is included by default or without taking some affirmative action to be included; a person must opt in to be included (as described in Section 5.B below). Similar to a class action, one court resolves the issues for all Collective Members together in one legal proceeding. **Here, if you sign the back of your Settlement check and deposit your Settlement check, you are opting in to the Collective. You do not need to do anything else to opt in.**

PAGA actions are also similar to class and collective actions. In a PAGA action, all people who the Court determines have similar claims to the Plaintiff(s) are PAGA Members. Everyone is included by default and no one can opt out (as described in Section 5.C below). By bringing a PAGA claim, the Plaintiff asks the Court to award penalties to PAGA Members and

the State of California as an additional amount on top of the alleged unpaid wages. Similar to a class and collective action, one court resolves the issues for all PAGA Members together in one legal proceeding.

4. SUMMARY OF THE SETTLEMENT

A. Why is there a Settlement?

The Court did not decide in favor of Plaintiff or Defendants. Plaintiff thinks she would have prevailed on her claims at a trial. Defendants do not think Plaintiff would have won anything from a trial and have asserted legal and factual defenses to the claims. But there was no trial. Instead, both sides agreed to the Settlement. The Settlement reflects an amicable resolution between both parties and allows Tubi to move forward under its new leadership team. And, for their part, Plaintiff and Class and Collective Counsel think the Settlement is fair, reasonable and adequate and in the best interests of all members of the Class and Collective.

B. What does the Settlement provide?

The parties have agreed to settle this matter for the total sum of \$4,600,000.00 (the “Gross Settlement Amount”), which will cover Settlement payments to Class and Collective Members, Court-approved service payments to the Class Representative in recognition of her services to the Class and Collective Members, Court-approved payment of Class and Collective Counsel’s attorneys’ fees and costs, certain taxes, payment pursuant to the Private Attorneys General Act of 2004 (the “PAGA Payment”), and payment of the costs of administering the Settlement.

C. How will my share of the Settlement fund be calculated?

The monetary relief provided by the Settlement is divided into three funds: the Class Fund, the Collective Fund, and the PAGA Fund. The Class Fund and the Collective Fund cover lost compensation and damages resulting from alleged discrimination and unequal pay, promotion, and hiring. The PAGA Fund covers penalties resulting from alleged unpaid wages.

The Settlement Administrator will first deduct from the Gross Settlement Amount any Court-ordered payments to the Class Representative, Class and Collective Counsel, the fees and costs of administering the Settlement of up to \$21,500.00, and the PAGA Payment. The PAGA Payment and the remainder (the “Net Settlement Amount”) will be distributed to Class Members who do not exclude themselves, Collective Members who include themselves, and PAGA Members as follows:

The Class Fund will comprise 50% of the Net Settlement Amount and will be paid out automatically to all Class Members who are identified in Defendants’ records as women who held a Qualifying Position between August 29, 2020 and February 27, 2025.

Your estimated share of the Net Settlement Amount in the Class Fund is «SubClass1 Amt». This amount is subject to change based on the number of Class Members who exclude themselves from the Settlement, and the payment is subject to applicable tax withholdings. Each Class Member’s share of the Class Fund depends on the total compensation earned while employed in a Qualifying Position during the relevant time frame.

The Collective Fund will comprise 50% of the Net Settlement Amount and will be paid out to all Collective Members who are identified in Defendants’ records as women who held a Qualifying Position between August 29, 2021 and February 27, 2025 and who choose to include themselves in the Collective.

Your estimated share of the Net Settlement Amount in the Collective Fund is «SubClass2 Amt». This payment is subject to applicable tax withholdings. Each Collective Member’s share of the Collective Fund depends on the total compensation earned while employed in a Qualifying Position during the relevant time frame.

The PAGA Fund will comprise \$17,500 and will be paid out to all PAGA Members who are identified in Tubi’s records as women who held a Qualifying Position between October 30, 2023 and February 27, 2025.

Your estimated share of the PAGA Fund is «PAGAClass Amt». This payment is not subject to tax withholdings, as it is counted as penalties rather than wages for tax purposes. Each PAGA Members’ share of the PAGA Fund will be calculated on a pro rata basis.

D. How will my payment(s) be treated for tax purposes?

For tax purposes, one-third of each share of the Class Fund and the Collective Fund will be considered payment for alleged back wages subject to lawful deductions and W-2 reporting, like a paycheck. For this amount, normal payroll taxes and withholdings will be deducted from your Settlement check(s) pursuant to applicable law. The remaining two-thirds of each share of the Class Fund and the Collective Fund will be considered payment for alleged liquidated and compensatory damages and interest subject to 1099 reporting as non-wage income. Each share of the PAGA Fund will be considered payment for penalties not subject to tax withholdings and will be reported on an IRS Form 1099. At the end of the calendar year, the Settlement Administrator will issue each Class Member, Collective Member, and PAGA Member who has cashed a check both an IRS Form W-2 and an IRS Form 1099.

Class and Collective Counsel and Defendants' Counsel do not intend this notice to constitute tax advice, and to the extent that this notice is interpreted to contain or constitute advice regarding any federal, state or local tax issue, such advice is not intended or written to be used, and cannot be used, by any person for the purpose of avoiding any tax liability or penalties.

E. How can I get my payment?

You do not need to do anything to receive a payment from the Class Fund, the Collective Fund, and/or the PAGA Fund.

F. When will I get my payment?

The date you receive your Settlement check(s) will depend on the date that the Court approves the Settlement. We estimate that payments will be made within 30 days after the Court approves the Settlement.

You must deposit or cash your Settlement check(s) within 180 days from the date on the face of the Settlement check. Any uncashed amounts after that date will be donated to a non-profit organization selected by Plaintiff and Defendants.

G. What is the payment to the Class Representative?

Plaintiff is requesting a Class Representative Enhancement payment of up to \$10,000 from the Court for her service as class representative.

H. What is the payment to Class and Collective Counsel?

Class and Collective Counsel will apply to the Court for an award of reasonable attorneys' fees in the amount of up to \$1,380,000.00, as well as reasonable costs of up to \$150,000.00.

I. What am I giving up to stay in the Class and/or Collective?

Unless you exclude yourself, you will remain as part of the Class and receive a payment, which means that you cannot sue, continue to sue, or be part of any other lawsuit against Defendants asserting the federal and state claims that were or could have been asserted in the Lawsuit. However, if you are a member of the Collective and you do not opt in to the Lawsuit, you will not release your claims under the Fair Labor Standards Act (including the federal Equal Pay Act). If you are a member of the Collective and you opt in to the Lawsuit, you will be releasing all claims that were or could have been asserted in the Lawsuit.

J. Who Are Class and Collective Counsel?

At the Preliminary Approval Hearing, the Court has appointed the following attorneys to represent the Class and Collective:

Michael Alder
Elana R. Levine
ALDER LAW, PC
12800 Riverside Dr., Second Floor
Valley Village, CA 91607

V. Joshua Socks
Elizabeth Malay
SEMPERVIRENS LAW LLP
835 Fifth Ave.
San Rafael, CA 94901

5. EXCLUDING YOURSELF FROM OR OBJECTING TO THE SETTLEMENT

A. Can I opt out of the Class Settlement?

If you do not want a payment from the Class Fund and you want to keep the right to sue Defendants under federal and state law on your own about the legal issues in this case, then you need to take steps to remove yourself from the case. If you have a pending lawsuit, speak to your lawyer in that lawsuit immediately because you may have to exclude yourself from this Settlement to continue your own lawsuit. This is called excluding yourself from—or opting out of—the Settlement. To exclude yourself from the Settlement, you must send a letter by First Class U.S. mail, fax, or email to the Settlement Administrator:

Montagna v. Fox Corporation, Tubi
c/o CPT Group, Inc.
P.O. Box 19504
Irvine, CA 92623
Telephone: 1-888-453-0418
Fax: 1-949-419-3446
Email: TubiSettlement@cptgroup.com

B. Can I opt out of the Collective Settlement?

If you do not want payment from the Collective Fund, and you want to keep the right to sue Defendants under the Fair Labor Standards Act (including the federal Equal Pay Act) on your own about the legal issues in this case, then you should not deposit or cash your Settlement check.

If you do want a payment from the Collective Fund, you must sign the Settlement check and deposit or cash it within 180 days from the date on the face of the Settlement check.

C. Can I opt out the PAGA Settlement?

If you are a PAGA Member, you will receive a payment from the PAGA Fund no matter what. You cannot opt out of the PAGA Fund. Defendants must pay individual payments to all PAGA Members and the PAGA Members must give up their rights to pursue Released Claims.

D. Can I tell the Court that I don't agree with the Settlement or some part of it?

You can object to the Settlement if you don't like any part of it. You must give reasons why you think the Court should not approve it. The Court will consider your views if you follow the instructions in this section. To object in writing, you must send a letter via U.S. mail, fax, or email stating: "I object to the class settlement in *Montagna v. Fox Corporation, et al.*," as well as reasons for the objection. Any reasons you do not include in the statement will not be considered by the Court. Be sure to include your name, address, telephone number, and signature. Mail, fax, or email the objection to:

Montagna v. Fox Corporation, Tubi
c/o CPT Group, Inc.
P.O. Box 19504
Irvine, CA 92623
Telephone: 1-888-453-0418
Fax: 1-949-419-3446
Email: TubiSettlement@cptgroup.com

Your objection must be received no later than December 28, 2025. If you intend to appear in Court when the Court considers your objection, you must indicate that in your written objection. Even if you do not object in writing, you may object orally at the Final Settlement Hearing. You do not need to give any prior notice to appear at the Final Settlement Hearing.

E. What's the difference between objecting to the Settlement and excluding myself?

Objecting is simply telling the Court that you do not like something about the Settlement. You can only object if you remain in the Class. Excluding yourself is telling the Court that you do not want to be part of the Class. If you exclude yourself, you have no basis to object because the Settlement no longer affects you. **If you object and opt out, your objection will not be valid.**

6. THE SETTLEMENT HEARING

The Court will conduct a final fairness hearing regarding the proposed Settlement (the “Final Settlement Hearing”) on February 20, 2026 at 10:00 a.m. in Department 613 of the San Francisco County Superior Court, located at 400 McAllister St.; San Francisco, CA 94102. The Court will determine: (i) whether the lawsuit should be finally certified as a class action solely and exclusively for Settlement purposes; (ii) whether the Settlement should be given the Court’s final approval as fair, reasonable, adequate and in the best interests of the Settlement Class Members, and if so, whether to enter a judgment incorporating the terms of the Settlement; (iii) whether the Class and/or Collective Members should be bound by the terms of the Settlement, including the release of claims; (iv) the amount of the attorneys’ fees and expenses award to Class and Collective Counsel; and (v) the amount that should be awarded to Plaintiff for class representative fees. At the Final Settlement Hearing, the Court will hear all properly filed objections, as well as arguments for and against the proposed Settlement. **You have a right to attend this hearing, but you are not required to do so.** You do not need to give any prior notice to appear at the Final Settlement Hearing. You also have the right to hire an attorney to represent you, or to enter an appearance and represent yourself.

The Court has reserved the right to adjourn the Final Settlement Hearing to consider any issue, without further notice of any kind.

7. ARE THERE MORE DETAILS ABOUT THE SETTLEMENT?

If you wish to learn more about this Lawsuit and Settlement, including the precise terms and conditions of the Settlement as set forth in the detailed Class Action Stipulation of Settlement, you may review the pleadings, the orders entered by the Court, and other papers filed in this litigation at the San Francisco County Superior Court website for free by entering either the case number or case name at: <https://sf.courts.ca.gov/online-services/case-information> or on the Settlement Administrator’s website at: www.cptgroupcaseinfo.com/TubiSettlement.

PLEASE DO NOT CONTACT THE COURT OR DEFENDANTS’ COUNSEL FOR INFORMATION.