UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

VALERIE MCMULLEN, individually and on behalf of others similarly situated, **Plaintiff.** **v.** **SYNCHRONY BANK, *et al*.,** **Defendants.**	**Civil Action No. 14-cv-1983 (JEB)**

NOTICE OF CLASS ACTION LAWSUIT RELATING TO LINES OF CREDIT ISSUED THROUGH WASHINGTON CHIROPRACTIC, BULLEN WELLNESS AND ONE WORLD FITNESS

1. What is this Notice about?

This court-authorized Notice is to inform you that a class action lawsuit is pending that involves consumers who were issued lines of credit by **JP Morgan Chase & Co. ("Chase")** and **Synchrony Bank ("Synchrony")** through businesses located in Washington, D.C., called **Washington Chiropractic, Bullen Wellness,** and **One World Fitness**. The lawsuit seeks to recover money for those consumers for whom a line of credit was opened by Chase and/or Synchrony through those District of Columbia businesses. The lawsuit also seeks to recover money for those consumers who received charges, including those who made payments toward those charges, that were processed by Chase or Synchrony through Washington Chiropractic, Bullen Wellness and/or One World Fitness. This notice explains what the lawsuit is about, as well as your legal rights and options.

The Defendants in the lawsuit are Karim Steward, Wayne Bullen, Bullen Wellness, Washington Chiropractic, and One World Fitness ("Defendants").

2. What is the lawsuit about?

Plaintiff Valerie McMullen filed a lawsuit against the Defendants claiming that Defendants opened two lines of credit—one with Chase and one with Synchrony—without

her authorization and billed against those lines of credit without her authorization. Ms. McMullen sued the Defendants for fraud, conspiracy to commit fraud, breach of contract, conversion, and unlawful trade practices under the District of Columbia Consumer Protection Procedures Act ("Consumer Protection Act").

Ms. McMullen is seeking to compel the Defendants to pay each Class Member: (1) the amount of damages relating to the unauthorized line of credit that was issued to the Class Member; (2) three times (3x) the amount of damages suffered by the Class Member for Defendants' violations of the Consumer Protection Act; (3) attorney's fees and costs in bringing this lawsuit; and (4) punitive damages.

The Court has not yet determined whether Ms. McMullen will be successful in her claims. There is no money available now, and there is no guarantee that there will be. The Court has only determined that the case should proceed as a class action.

3. Why are You Receiving this Notice?

It has been determined that you may be a member of this Class according to Defendants' records. You are not being sued; rather, a lawsuit has been filed on your behalf against Defendants to obtain money that you may be owed.

This Notice describes the class action claims and explains how you may exclude yourself from this claim. All Class Members who do not exclude themselves from this class action by the date set forth below will be entitled to a portion of the damages recovered through litigation or settlement of the claim, if any, and will be bound by any judgment or other outcome of the class action, including any settlement involving a release of claims.

4. What is a "class action" lawsuit?

Plaintiff McMullen brings her claims as a class action on behalf of herself and all potential Class Members. In a class action, one court resolves the issues for all Class Members, except those who exclude themselves from the Class.

The potential Class Members in this case are:

> **All individuals for whom a line of credit was opened by Chase and/or Synchrony Bank through one or more of the One World Fitness Defendants (One World Fitness, Bullen Wellness, Washington Chiropractic, Bullen, and/or Steward).**

You will automatically be a member of the class action unless you choose to "opt-out" of the class action.

5. Do I have a lawyer in this case?

The Court has appointed the following two law firms as "Class Counsel" to represent you and other Class Members:

Regan Zambri Long PLLC
1919 M Street NW, Suite 350
Washington, DC 20036
Tel: 202-463-0303
Fax: 202-463-0667
Email: szambri@reganfirm.com
Website: www.reganfirm.com

Klaproth Law PLLC
406 5th Street NW, Suite 350
Washington, DC 20001
Tel: 202-618-2344
Fax: 202-618-4636
Email: bklaproth@klaprothlaw.com
Website: www.klaprothlaw.com/

You have the right to choose your own attorney should you choose to do so. Any such individual representation by separate counsel would, however, be at your own expense.

6. What are the decisions that I need to make?

You need to decide if you want to participate in this lawsuit. If you want to participate in the class action described above, you do not need to do anything.

7. How do I exclude myself from the lawsuit?

If you **do not** wish to participate in this lawsuit, you must send a letter by mail to Class Counsel:

Salvatore J. Zambri, Esq.
Regan Zambri Long PLLC
1919 M Street NW, Suite 350
Washington, DC 20036

indicating that you want to be excluded from *McMullen v. Synchrony Bank, et al*., Case No. 2014-cv-01983 (JEB). To be valid, the Opt-Out Request must: (i) identify the case name; (ii) identify the name of the person who is opting out; and (iii) contain a statement that indicates a desire to be excluded from the Class, such as: " I hereby request that I be

excluded from the Class in the action of *McMullen v. Synchrony Bank, et al*." You must mail your request for exclusion so that it is received no later than sixty (60) days after this Notice is mailed.

After Class Counsel receives your correspondence, they will inform the Court and Defendants of your request for exclusion. If you do not exclude yourself, you will be a part of the class action in this lawsuit and you will participate in and be bound by the outcome.

8. What should I do if my address changes after I receive this Notice?

Without a current address, you may not receive a payment to which you may be entitled. Please send a notice of your new address to Class Counsel at the address below:

Salvatore J. Zambri
Regan Zambri Long, PLLC
1919 M Street NW, Suite 350
Washington, DC 20036
Tel: 202-463-0303
Fax: 202-463-0667
Email: szambri@reganfirm.com
Website: www.reganfirm.com

9. Who can I contact if I want further information?

If you have questions about the lawsuit or need help understanding this Notice, you may contact Class Counsel at the number or email address set forth above. A Spanish-language interpreter will be available to assist in communicating with the attorneys.

DO NOT CALL THE COURT OR THE CLERK OF THE COURT.

You may also visit the website https://klaprothlaw.com/mcmullen-v-one-world-fitness-class-action-lawsuit/, where you will find the Court's Order Certifying the Class, the Complaint that the Plaintiff filed with the Court, the Defendants' Answers to the Complaint, as well as updates about the case.

10. What If I Do Nothing in Response to This Notice?

You have the right to do nothing. If you do nothing, you will be part of the class action lawsuit.