

NOTICE OF PENDING CLASS ACTION

Jeffrey Kearns v. loanDepot.com, LLC

Case No. 8:22-cv-01217 – United States District Court for the Central District of California

You have been notified of this Class Action because you have been identified in the call records of loanDepot.com, LLC (“loanDepot”) as loanDepot having attempted one or more prerecorded voicemails to your cellular phone after you provided your contact information on the www.lendingtree.com website.

Please read this notice carefully. It explains your rights and options regarding this class action.

YOUR LEGAL RIGHTS AND OPTIONS	
DO NOTHING	If you do nothing, you preserve the possibility of receiving money from this class action if Mr. Kearns wins his case. However, if you do nothing and loanDepot wins at trial, you will also lose alongside Mr. Kearns and give up your right to file (at your own expense), or proceed with, an individual action against loanDepot for the claims at issue in this class action.
EXCLUDE YOURSELF BY November 13, 2026	If you exclude yourself, you will maintain your rights, if any, against loanDepot. By doing so you will give up the possibility of receiving money from this class action if Mr. Kearns wins his case. However, if you exclude yourself, you will have the opportunity to file or proceed with an individual action against loanDepot (no matter which side wins at summary judgment or at trial). In that event, you will not be bound by any orders or judgments that the court issues in connection with this class action.

QUESTIONS?
www.LTLDKearnsTCPA.com

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BASIC INFORMATION

1. Why is there a Notice?

A federal court authorized this notice to inform you that this class action may affect your rights.

You are receiving this notice because you have been identified in the call records of loanDepot as loanDepot having attempted one or more prerecorded voicemails to your cellular phone after you submitted your information on the www.lendingtree.com website.

2. What is this litigation about?

Jeffrey Kearns filed a class action lawsuit against loanDepot, alleging loanDepot violated the Telephone Consumer Protection Act (“TCPA”) by placing prerecorded voice calls to cellular telephone numbers without consent. On October 20, 2025, the United States District Court for the Central District of California certified the following class:

All persons in the United States (1) whose cellular telephone number appears in “Exhibit A” to Defendant’s Court Ordered Supplemental Discovery Responses; (2) whose telephone number Defendant obtained solely via the www.lendingtree.com website; and (3) who received a call from Defendant utilizing a prerecorded message on the date reflected in “Exhibit A” and did not return that call.

The Court has not yet decided who is right.

The case is pending in the following federal court: United States District Court for the Central District of California.

3. What is the TCPA?

The TCPA is a federal law that restricts telephone solicitations and the use of prerecorded voice calls to cellular telephones without prior express written consent. The TCPA authorizes consumers to recover \$500 per call placed by a company in violation of the TCPA.

4. What is a class action?

In a class action, one person called the “Class Representative” (in this case, Jeffrey Kearns) sues on behalf of themselves and other people with similar claims.

All of the people who have claims similar to the Class Representative are Class Members, except for those who exclude themselves from the class, among others.

5. Who are the Class Members?

The Court certified the following Class:

All persons in the United States (1) whose cellular telephone number appears in “Exhibit A” to Defendant’s Court Ordered Supplemental Discovery Responses; (2) whose telephone number Defendant obtained solely via the www.lendingtree.com website; and (3) who received a call from Defendant utilizing a prerecorded message on the date reflected in “Exhibit A” and did not return that call.

You can find additional information about the court’s decision to certify the class in the court’s memorandum decision and order, which is available at www.LTLDKearnsTCPA.com, in the “Court Documents” section.

If you have any questions about whether you are a Class Member, please contact Epiq, the Settlement Administrator, whose contact information is listed below.

Kearns v. loanDepot
Settlement Administrator
PO Box 5349
Portland, OR. 97228-5349

QUESTIONS?
www.LTLDKearnsTCPA.com

6. What does Mr. Kearns seek for himself and the Class Members?

Mr. Kearns intends to file a motion for summary judgment, requesting the Court award him and each member of the Class \$500 per call received in violation of the TCPA.

loanDepot denies that it did anything wrong and denies that it violated the TCPA.

The Court has not yet decided who is right.

EXCLUDING YOURSELF FROM THE CASE

7. How do I exclude myself?

You may exclude yourself from this class action—*in which case you will maintain your rights, if any, against loanDepot. By doing so, you will not receive any payment as a result of this class action if Mr. Kearns wins his case but give up your opportunity to pursue claims against loanDepot on an individual basis (no matter which side wins at trial)*—by mailing a written request for exclusion to the claims administrator, at the address set forth below, postmarked by **November 13, 2026**.

You must include in your request for exclusion your:

- Full name;
- Address;
- The cellular telephone number that loanDepot called; and
- A clear and unambiguous statement that you want to be excluded from this case, such as “I request to be excluded from the class in *Jeffrey Kearns v. loanDepot, Inc.*”

You must sign your request personally. If any person signs on your behalf, that person must attach a copy of a power of attorney authorizing his or her signature.

8. If I do not exclude myself, can I sue loanDepot for the same thing later?

No. Unless you exclude yourself, you give up the right to sue loanDepot. You must exclude yourself from this class action in order to pursue your own lawsuit against loanDepot.

9. If I exclude myself, can I still get a payment if Mr. Kearns wins at summary judgment or at trial?

If you exclude yourself, you will maintain your rights, if any, against loanDepot. By doing so, you will give up the possibility of receiving any money resulting from this class action in the event that Mr. Kearns wins his case. However, if you exclude yourself, you will have the opportunity to file or proceed with an individual action against loanDepot (no matter which side wins at summary judgment or at trial), but at your own expense. You will, upon being excluded from the class, not be bound by any orders or judgments that the court issues in connection with this class action.

THE LAWYERS REPRESENTING YOU

10. Do I have a lawyer in the case?

The Court has appointed several lawyers as “Class Counsel” to represent the Class Members, including:

EDELSBERG LAW, PA

Scott Edelsberg, Esq.
Cal Bar No. 330990
1925 Century Park E, Ste 1700
Los Angeles, CA 90067-2740
scott@edelsberglaw.com

LAW OFFICES OF JIBRAEL S. HINDI

Jibrael S. Hindi, Esq.
110 SE 6th Street, Suit 1744
Fort Lauderdale, FL 33301
jibrael@jibraellaw.com

You will not be charged for these lawyers. If you want to be represented by another lawyer, you may hire one to appear in Court for you at your own expense.

IF YOU DO NOTHING

11. What happens if I do nothing at all?

If you are a class member, and you do nothing, you will remain in the class and preserve the possibility of receiving money as a result of this class action if Mr. Kearns wins his case. Additionally, if you are a class member, and do nothing, and loanDepot wins at trial, you will also lose alongside Mr. Kearns and will give up your right to file (at your own expense), or proceed with, an individual action on your own behalf against loanDepot for the claims at issue in this class action (no matter which side wins at summary judgment or at trial). You will also be bound by all orders and judgments that the court issues in connection with this class action.

GETTING MORE INFORMATION

12. How do I get more information?

You may review all documents filed with the court at the United States District Court for the Central District of California. In addition, pertinent documents are available at **www.LTLDKearnsTCPA.com**. If you would like additional information about this class action, please contact Mr. Kearns’ attorneys. Please do not call the judge about this class action. Neither he, nor any court personnel, will be able to give you advice about this class action. Furthermore, because neither loanDepot nor loanDepot’s attorneys represent you, they cannot give you legal advice about this class action.

To update your contact information, you may contact the Settlement Administrator by mail to:

Kearns v. loanDepot.com
Settlement Administrator
PO Box 5349
Portland, OR 97228-5349

QUESTIONS?
www.LTLDKearnsTCPA.com