

**IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA, IN AND FOR POLK COUNTY
CIVIL DIVISION**

NORMAN GUNDEL, WILLIAM MANN,
and **BRENDA N. TAYLOR**, individually
and on behalf of all similarly situated persons,

Plaintiffs,

vs

Case No.: 17-CA-001446

Division: 11

**AV HOMES, INC., and AVATAR
PROPERTIES, INC.,**

Defendants.

**DECLARATION OF ERIC J. MILLER
REGARDING DISTRIBUTION OF CLASS FUNDS**

I, Eric J. Miller, declare as follows:

1. I am the Senior Vice President of A.B. Data, Ltd.'s Class Action Administration Company ("A.B. Data") with its principal offices in Milwaukee, Wisconsin. My business address is 5080 PGA Blvd, Suite 209, Palm Beach Gardens, FL 33418, and my telephone number is 561-336-1801.

2. This declaration (the "Declaration") is based upon my personal knowledge and information provided by my associates and staff. I am over 24 years of age and am not a party to this action.

3. Pursuant to the Court's Order Appointing Class Administrator, Class Counsel and Approving Class Notice dated April 3, 2020, A.B. Data was appointed as Class Administrator in the above captioned action (the "Action"). As Class Administrator, A.B. Data has, among other

things: (i) mailed the Class Notice to potential class Members, (ii) created and maintained a toll-free helpline for inquiries during the course of the administration, (iii) created and maintained a website and posted case-specific documents on it, (iv) received and processed exclusion requests, and (v) received and processed transactional data which contained the Classes Club Membership fees records received from the Defendant.

4. In accordance with the Court's Order Regarding Plaintiffs' Motion Approving Partial Distribution, and Awarding Class Counsel Fees and Expenses, and Incentive Awards to Name Plaintiffs dated January 27, 2025 ("**January 2025 Distribution Order**"), A.B. Data prepared and issued reports of transactional data to class members with an opportunity to correct transactional information and further distributed funds to class members as detailed below.

TRANSACTIONAL LETTER MAILING

5. On February 14, 2025, in accordance with the January 2025 Distribution Order, A.B. Data mailed 9,846 transactional letters to Class Members. Each letter contained a detailed statement of the Class Member's Club Membership Fee transactions for review. The letter requested that any Class Member who disputed the transactional data contact A.B. Data, the Class Administrator, by letter or email describing the discrepancy and provide documentation supporting the amount they believed to be correct. A.B. Data received more than 4,000 emails and 5,000 phone calls in response to the transactional letters with inquiries regarding the transactional information. A.B. Data reviewed and processed over 550 Class Members' responses disputing the transactional data contained in their letters. In consultation with Plaintiffs' Counsel and Defendants' Counsel, A.B. Data made all necessary corrections to the Class Members' records. An example of the transactional letter is attached hereto as **Exhibit A**.

PARTIAL DISTRIBUTION

6. On June 6, 2025, the distribution account was funded in the amount of \$39,403,034.91 pursuant to the January 2025 Distribution Order.¹ From that amount, \$346,000.00 was paid for tax obligations associated with the fund. Additional funds were reserved to address any tax liabilities and resolution of disputed claims.

7. On July 2, 2025, A.B. Data caused 8,970 checks, totaling \$35,539,549.32, to be distributed to Class Members who did not dispute the information contained in their transactional letters. On October 31, 2025, A.B. Data caused an additional 495 checks, totaling \$1,718,984.15, to be distributed to Class Members who had disputed their transactional letters and whose records were subsequently corrected. In total, 9,465 checks, totaling \$37,258,533.47, were distributed to Class Members.

8. As in other distributions A.B. Data has administered, A.B. Data reissued and re-mailed checks to Class Members in this matter because: a) the original check was returned to A.B. Data by the United States Postal Service (“USPS”) with a forwarding address; b) the original check was returned to A.B. Data by the USPS without a forwarding address but A.B. Data was able to obtain an updated address for the Class Member; or c) the original check was stale-dated, lost or damaged and the Class Member requested that a new check be issued.

9. A.B. Data has made additional efforts to increase the number of payments cashed by Class Members. These efforts include processing uncashed payments through an address trace service to locate updated addresses and working with Class Counsel and named Plaintiffs to locate updated information for Class Members.

¹ The difference in amount (-35,841.09) from the January 2025 Distribution Order represented service fees incurred while the funds were invested and held at Raymond James through the date of distribution.

10. In A.B. Data's experience, it is common for a certain number of distribution checks to remain uncashed because either the USPS returns some checks without a forwarding address and, after performing all due diligence consistent with A.B. Data's standard and customary procedures (discussed above), A.B. Data cannot ascertain the Class Members' current addresses, or the checks presumably reached their destination, but they simply were never cashed.

11. Of the 9,465 payments totaling \$37,258,533.47 that were originally issued, as referenced in ¶6 above, as of June 23, 2026, 1,343 checks for Class Members totaling \$2,890,750.63 were not cashed. A listing of the uncashed payments is attached hereto as **Exhibit B**.

12. Consistent with A.B. Data's standard and customary procedures in other similar actions, A.B. Data considered these checks to be "unclaimed funds" because they remained uncashed well past the "void" date. These unclaimed funds were reverted to the class common fund, leaving a current balance of \$4,173,517.00 including the funds reserved for tax liabilities and disputed claims.

13. Based on my experience administering class action distributions, it is customary for funds associated with uncashed or otherwise unclaimed distribution checks to revert back to the fund and be made available for a subsequent redistribution to participating class members who timely negotiated their initial partial distribution checks. This approach helps maximize the distribution of proceeds to class members, reduces the likelihood that funds will remain undistributed, and is consistent with common class action administration practices designed to ensure that available funds are distributed to eligible class members to the fullest extent practicable.

SETTLEMENT OF APPEAL

14. On February 20, 2026, Plaintiffs and Defendants reached a settlement in the amount of \$22,600,000. The Class has been notified of this settlement through the court approved class website. Pending the Court's approval of the settlement, additional funds will be available for distribution to the Class. After payment of attorneys' fees (\$8,814,000), it is anticipated that there will be an additional \$13,786,000 available for distribution to the Class as further described below.

FEES AND EXPENSES

15. As of the date of this Declaration, and as a result of administrative and service work performed pursuant to the January 2025 Distribution Order, A.B. Data's activity has far exceeded the estimates that were originally anticipated. Since the commencement of the mailing of transactional letters and distribution process, the toll-free hotline established for this matter has received more than 10,000 calls, including over 6,800 calls that required assistance from live call center representatives, resulting in approximately 978 billable call center hours. In addition, A.B. Data has received and responded to more than 5,000 emails submitted to the case-specific email address established for this matter. These communications were related to address updates, payment inquiries, transactional letter responses, check reissuance requests, and other Class Member communications. As a result, A.B. Data incurred additional unpaid fees and expenses in the amount of \$460,411.44 for services since January 2025 and seeks approval to be paid from the remaining balance in the Class Fund.

16. In addition, A.B. Data prepared an estimate for fees and expenses that it will incur through the completion of the second distribution. A.B. Data estimates that an additional \$187,040.00 in professional fees and expenses will be necessary to complete the remaining administration tasks, including continued check reissuances, follow-up with Class Members with

uncashed payments, Class Member communications, and an additional distribution to Class Members.

DISTRIBUTION PLAN

17. A.B. Data recommends the following distribution plan:
 - a. establishment of a reserve of the common fund to pay additional taxes, costs, and administration fees. (Any funds remaining from the reserve after the distribution will be included as part of an additional distribution to the members of the Class);
 - b. the remaining common fund will be allocated on a *pro rata* basis to Class Members that cashed their previous partial distribution payment;
 - c. A.B. Data will promptly mail Class Members their appropriate share of the common fund. These checks will have a stale date of 120 days to encourage Class Members to promptly cash their distribution checks and to avoid or reduce future expenses related to unpaid distributions. For any checks returned as undeliverable or not cashed, A.B. Data will make reasonable and diligent efforts to have Class Members cash their checks. At such time that Class Counsel and A.B. Data have determined that reasonable and diligent efforts have been exhausted, but no earlier than one hundred twenty days from the issue of the checks, the payments to Class Members that have not been cashed will revert back to the common fund;
 - d. if there is a balance remaining in the common fund after reasonable and diligent efforts to have Class Members negotiate their payments, and at least 120 days from the date of the distribution, and after any necessary adjustments in

payments upon sufficient proof and/or to pay additional taxes, costs, and administration fees, A.B. Data will consult with Class Counsel and conduct a final distribution if feasible and economical. A.B. Data will redistribute the remaining funds, along with any remaining balance of the reserve, on a *pro rata* basis after reserving any additional taxes, costs, and administration fees to the Class Members who cashed their initial distribution checks and who would receive at least \$10.00 from such redistribution; and

- e. at such time as Class Counsel, in consultation with A.B. Data, determines that further distribution of the funds remaining in the common fund is not cost-effective, the remaining funds may be made available for donation to one or more 501(c)(3) non-profit organization(s) proposed by Class Counsel and approved by the Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this June 29, 2026, Palm Beach Gardens, Florida.


Eric J. Miller

EXHIBIT A

EXHIBIT A

Norman Gundel, et al. v. AV Homes, Inc. et al.,

Case No. 2017-CA-001446

UNCASHED CHECKS – FIRST DISTRIBUTION

Claim Number	First Payment
504446859	\$136.83
504446869	\$2,435.60
504446898	\$2,489.12
504446901	\$504.66
504446950	\$354.53
504446956	\$243.12
504446958	\$2,435.81
504446963	\$2,279.38
504446968	\$243.12
504446970	\$3,617.53
504446975	\$1,844.82
504446976	\$243.12
504446986	\$502.76
504446998	\$418.85
504447004	\$2,649.40
504447010	\$243.12
504447022	\$2,435.37
504447053	\$2,142.34
504447054	\$1,779.30
504447079	\$870.68
504447084	\$1,918.77
504447096	\$7,146.24
504447142	\$1,648.55
504447143	\$1,524.63
504447145	\$2,266.28
504447149	\$628.47
504447151	\$1,844.51
504447173	\$5,146.68
504447177	\$62.92
504447282	\$1,088.18
504447295	\$1,377.52

504447327	\$1,246.90
504447348	\$4,648.75
504447357	\$2,138.29
504447368	\$553.81
504447374	\$3,683.63
504447375	\$549.42
504447376	\$3,807.73
504447399	\$2,410.34
504447405	\$156.43
504447411	\$551.32
504447412	\$6,426.15
504447420	\$252.21
504447421	\$1,322.93
504447442	\$1,154.49
504447492	\$970.69
504447494	\$5,334.38
504447499	\$807.18
504447517	\$4,441.34
504447518	\$2,435.59
504447520	\$2,429.75
504447522	\$1,561.34
504447523	\$147.43
504447524	\$599.68
504447579	\$6,288.49
504447596	\$243.12
504447606	\$243.12
504447609	\$243.12
504447610	\$5,024.40
504447618	\$229.22
504447631	\$1,336.70
504447632	\$873.09
504447642	\$2,138.10
504447647	\$60.17
504447650	\$308.64
504447651	\$7,145.76
504447654	\$219.15

504447659	\$418.06
504447660	\$1,442.32
504447710	\$243.12
504447715	\$2,142.34
504447721	\$243.12
504447726	\$440.48
504447762	\$3,095.99
504447770	\$4,691.26
504447802	\$1,364.44
504447814	\$243.12
504447821	\$7,151.78
504447827	\$81.52
504447833	\$243.12
504447837	\$744.79
504447848	\$243.12
504447851	\$243.12
504447852	\$803.61
504447857	\$2,429.75
504447866	\$67.72
504447867	\$243.12
504447879	\$243.12
504447884	\$3,545.20
504447901	\$243.12
504447912	\$243.12
504447913	\$243.12
504447918	\$1,558.86
504447944	\$622.79
504447947	\$2,134.72
504447955	\$1,160.54
504447961	\$243.12
504447966	\$243.12
504447980	\$4,519.86
504447984	\$243.12
504447985	\$243.12
504447986	\$2,586.15
504447992	\$146.42

504448001	\$2,429.75
504448008	\$585.27
504448028	\$765.78
504448029	\$242.30
504448057	\$243.12
504448060	\$243.12
504448061	\$243.12
504448062	\$2,754.10
504448104	\$1,247.39
504448107	\$2,518.24
504448121	\$4,893.92
504448127	\$208.47
504448129	\$243.12
504448134	\$243.12
504448141	\$243.12
504448145	\$243.12
504448147	\$4,710.42
504448171	\$771.95
504448175	\$5,185.05
504448187	\$243.12
504448192	\$243.12
504448199	\$243.12
504448203	\$997.29
504448216	\$1,501.93
504448236	\$243.12
504448237	\$243.12
504448247	\$3,216.65
504448249	\$3,926.19
504448250	\$2,429.54
504448251	\$243.12
504448268	\$166.32
504448291	\$249.59
504448295	\$2,529.70
504448296	\$2,139.86
504448346	\$8,186.25
504448353	\$656.33

504448361	\$608.54
504448362	\$1,220.99
504448372	\$4,701.01
504448416	\$2,105.21
504448426	\$1,221.56
504448427	\$2,137.01
504448435	\$361.51
504448445	\$912.64
504448450	\$728.76
504448463	\$2,517.18
504448507	\$1,727.33
504448508	\$2,122.10
504448512	\$662.91
504448547	\$2,435.59
504448550	\$6,578.66
504448571	\$5,470.31
504448599	\$3,848.93
504448613	\$1,160.54
504448614	\$2,308.85
504448615	\$4,513.22
504448618	\$999.49
504448672	\$83.48
504448690	\$1,257.15
504448761	\$5,140.92
504448781	\$1,704.96
504448783	\$2,128.86
504448818	\$9,258.51
504448834	\$5,742.00
504448840	\$392.46
504448841	\$2,435.81
504448842	\$243.12
504448849	\$243.12
504448861	\$243.12
504448867	\$1,473.36
504448877	\$7,227.31
504448889	\$243.12

504448893	\$243.12
504448902	\$243.12
504448907	\$243.12
504448908	\$156.22
504448918	\$5,729.81
504448938	\$243.12
504448949	\$1,241.85
504448950	\$243.12
504448960	\$243.12
504448963	\$243.12
504448964	\$2,043.76
504448967	\$239.09
504448968	\$1,844.82
504448980	\$2,435.81
504448988	\$146.42
504448990	\$1,734.53
504448997	\$628.47
504449003	\$243.12
504449008	\$243.12
504449009	\$2,138.29
504449013	\$243.12
504449018	\$243.12
504449027	\$4,277.06
504449032	\$73.30
504449037	\$243.12
504449039	\$2,785.91
504449042	\$243.12
504449045	\$243.12
504449053	\$243.12
504449057	\$243.12
504449061	\$6,306.42
504449085	\$243.12
504449090	\$243.12
504449094	\$243.12
504449099	\$2,720.17
504449101	\$243.12

504449116	\$1,844.82
504449157	\$243.12
504449159	\$243.12
504449162	\$243.12
504449166	\$243.12
504449174	\$243.12
504449180	\$243.12
504449184	\$1,122.81
504449190	\$2,022.64
504449204	\$4,706.97
504449212	\$3,705.94
504449235	\$243.12
504449237	\$243.12
504449248	\$3,622.50
504449254	\$243.12
504449257	\$243.12
504449271	\$327.59
504449283	\$243.12
504449287	\$243.12
504449295	\$243.12
504449296	\$243.12
504449299	\$1,949.28
504449301	\$243.12
504449306	\$243.12
504449322	\$243.12
504449328	\$243.12
504449332	\$243.12
504449334	\$243.12
504449367	\$4,165.82
504449375	\$313.71
504449376	\$243.12
504449378	\$243.12
504449383	\$3,188.14
504449384	\$2,435.38
504449388	\$243.12
504449391	\$539.27

504449395	\$243.12
504449404	\$243.12
504449409	\$243.12
504449417	\$2,857.26
504449418	\$1,185.13
504449431	\$3,910.89
504449463	\$1,844.82
504449467	\$4,438.76
504449499	\$814.25
504449502	\$700.19
504449504	\$3,584.78
504449515	\$2,249.81
504449516	\$514.94
504449536	\$2,002.79
504449537	\$2,512.91
504449551	\$1,431.79
504449557	\$7,139.09
504449568	\$1,109.09
504449576	\$1,844.82
504449577	\$243.12
504449585	\$954.24
504449589	\$243.12
504449590	\$5,101.07
504449598	\$656.33
504449607	\$561.64
504449610	\$1,914.02
504449613	\$6,427.82
504449617	\$7,118.39
504449663	\$3,219.73
504449690	\$1,843.85
504449729	\$391.20
504449738	\$1,725.16
504449746	\$2,435.81
504449749	\$480.17
504449750	\$1,962.91
504449764	\$4,391.03

504449766	\$1,907.47
504449778	\$366.57
504449780	\$7,141.16
504449795	\$1,782.37
504449796	\$2,664.01
504449806	\$6,306.42
504449830	\$4,154.74
504449857	\$2,401.41
504449865	\$1,729.10
504449882	\$1,354.96
504449883	\$60.17
504449885	\$1,316.47
504449889	\$334.78
504449895	\$2,834.87
504449899	\$1,961.65
504449912	\$188.40
504449932	\$2,429.12
504449955	\$496.43
504449957	\$2,427.84
504449969	\$2,724.85
504449971	\$1,583.45
504449986	\$246.13
504450057	\$1,416.49
504450086	\$1,843.69
504450096	\$1,571.05
504450098	\$3,897.81
504450103	\$313.59
504450116	\$71.31
504450186	\$485.88
504450187	\$59.29
504450198	\$1,373.83
504450226	\$7,118.72
504450254	\$2,137.92
504450256	\$2,141.96
504450257	\$1,963.96
504450283	\$496.43

504450292	\$7,140.18
504450306	\$2,016.32
504450309	\$331.80
504450312	\$2,063.28
504450329	\$6,306.42
504450390	\$4,168.13
504450443	\$5,272.50
504450454	\$1,428.47
504450467	\$1,324.52
504450472	\$999.62
504450483	\$2,435.81
504450490	\$3,520.13
504450497	\$2,115.08
504450498	\$4,729.77
504450514	\$2,401.00
504450516	\$1,393.78
504450521	\$366.42
504450522	\$414.35
504450533	\$73.30
504450550	\$2,211.15
504450571	\$946.93
504450583	\$1,765.91
504450595	\$2,435.81
504450596	\$4,574.50
504450607	\$2,345.87
504450608	\$2,211.21
504450615	\$5,040.02
504450618	\$15.62
504450672	\$4,237.18
504450683	\$3,002.99
504450687	\$2,142.34
504450705	\$1,304.66
504450735	\$2,691.11
504450757	\$1,090.92
504450768	\$1,804.96
504450772	\$1,566.64

504450797	\$2,659.86
504450799	\$2,252.03
504450800	\$2,458.12
504450828	\$3,176.20
504450845	\$385.13
504450859	\$335.77
504450899	\$5,948.13
504450905	\$4,705.20
504450911	\$668.97
504450913	\$2,514.19
504450917	\$1,235.79
504450919	\$814.97
504450948	\$2,435.81
504450953	\$2,135.28
504450977	\$69.88
504450991	\$5,468.77
504451030	\$5,384.84
504451038	\$1,716.07
504451066	\$3,242.94
504451076	\$7,991.98
504451123	\$1,844.82
504451126	\$3,954.97
504451138	\$3,051.15
504451141	\$97.67
504451147	\$3,364.67
504451150	\$1,844.82
504451165	\$64.06
504451174	\$496.43
504451175	\$950.71
504451187	\$249.17
504451255	\$1,889.64
504451275	\$1,463.39
504451282	\$1,935.95
504451292	\$2,052.50
504451293	\$1,844.17
504451298	\$4,283.82

504451330	\$1,183.78
504451333	\$1,684.83
504451339	\$3,517.65
504451340	\$1,844.82
504451352	\$159.69
504451374	\$8,424.13
504451378	\$7,156.65
504451427	\$4,710.43
504451428	\$2,246.63
504451429	\$2,435.81
504451442	\$895.82
504451450	\$243.12
504451451	\$9,015.39
504451453	\$5,218.58
504451476	\$1,700.05
504451489	\$634.35
504451495	\$245.38
504451497	\$2,556.59
504451498	\$660.88
504451530	\$3,116.46
504451537	\$1,595.72
504451552	\$1,878.46
504451569	\$4,887.87
504451574	\$2,614.61
504451604	\$6,606.97
504451608	\$2,603.96
504451610	\$2,434.53
504451613	\$321.66
504451614	\$4,569.77
504451625	\$1,400.51
504451635	\$2,142.34
504451646	\$2,435.38
504451658	\$2,332.40
504451663	\$467.40
504451678	\$6,432.10
504451693	\$1,856.47

504451695	\$1,587.33
504451697	\$2,083.08
504451716	\$414.52
504451747	\$2,435.81
504451798	\$481.17
504451825	\$5,081.68
504451831	\$2,435.81
504451837	\$1,597.43
504451856	\$1,844.82
504451863	\$9,252.45
504451867	\$1,079.03
504451874	\$4,892.58
504451877	\$2,248.61
504451893	\$7,115.49
504451896	\$4,710.43
504451898	\$2,435.81
504451927	\$4,709.99
504451932	\$2,897.51
504451945	\$2,284.33
504451953	\$1,987.48
504451956	\$3,445.95
504451968	\$2,429.75
504451985	\$4,998.87
504451988	\$2,512.17
504451989	\$1,324.95
504451994	\$1,126.19
504452020	\$2,138.11
504452035	\$1,287.73
504452036	\$2,435.81
504452050	\$83.48
504452095	\$7,114.18
504452113	\$1,856.30
504452118	\$1,648.39
504452121	\$2,435.81
504452126	\$2,023.41
504452138	\$1,647.88

504452149	\$1,115.40
504452158	\$5,914.80
504452176	\$2,823.56
504452178	\$1,103.30
504452219	\$1,324.95
504452235	\$1,467.99
504452240	\$1,574.74
504452261	\$1,474.61
504452286	\$4,345.66
504452331	\$653.60
504452362	\$4,454.42
504452371	\$2,401.41
504452396	\$2,013.46
504452414	\$1,316.86
504452416	\$2,357.29
504452431	\$6,423.22
504452450	\$2,112.99
504452454	\$5,155.14
504452463	\$4,431.58
504452465	\$334.54
504452484	\$3,050.67
504452485	\$1,723.29
504452494	\$2,401.41
504452504	\$2,863.23
504452505	\$238.03
504452506	\$6,182.99
504452517	\$2,001.65
504452536	\$6,306.42
504452559	\$1,354.28
504452585	\$4,738.98
504452599	\$573.38
504452615	\$1,844.82
504452616	\$1,595.45
504452621	\$1,844.82
504452622	\$2,429.75
504452636	\$279.53

504452637	\$2,095.22
504452643	\$5,468.53
504452658	\$1,725.27
504452677	\$5,444.65
504452708	\$2,200.85
504452709	\$1,673.46
504452748	\$5,470.66
504452777	\$3,625.84
504452854	\$164.72
504452880	\$62.16
504452886	\$2,627.06
504452890	\$5,467.81
504452920	\$2,435.81
504452938	\$2,123.31
504452939	\$47.09
504452943	\$3,207.69
504452950	\$297.45
504452954	\$416.83
504452958	\$4,944.22
504452965	\$1,844.82
504452967	\$3,517.32
504453002	\$59.75
504453017	\$5,960.00
504453020	\$221.82
504453038	\$833.20
504453076	\$5,083.38
504453077	\$1,844.66
504453080	\$2,429.75
504453089	\$1,844.66
504453090	\$3,624.87
504453123	\$3,446.42
504453149	\$955.22
504453151	\$1,413.64
504453152	\$1,790.03
504453154	\$414.62
504453170	\$2,896.20

504453173	\$1,132.00
504453177	\$1,785.37
504453191	\$2,387.66
504453204	\$299.10
504453243	\$2,031.46
504453249	\$2,429.75
504453252	\$4,710.43
504453267	\$2,013.04
504453271	\$2,297.20
504453284	\$6,051.35
504453303	\$938.56
504453316	\$1,653.73
504453317	\$1,844.82
504453368	\$1,844.82
504453406	\$8,186.25
504453409	\$4,165.23
504453458	\$1,063.45
504453465	\$4,522.28
504453497	\$927.34
504453517	\$5,835.64
504453534	\$607.23
504453535	\$744.81
504453537	\$2,174.51
504453552	\$4,170.72
504453560	\$1,582.53
504453578	\$938.56
504453587	\$62.96
504453588	\$1,122.07
504453606	\$83.48
504453609	\$1,760.67
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504453623	\$381.31
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504453656	\$1,627.30

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504453666	\$1,843.85
504453683	\$1,093.10
504453692	\$3,284.86
504453708	\$2,429.75
504453709	\$549.85
504453714	\$334.78
504453716	\$4,370.99
504453722	\$3,785.61
504453737	\$5,366.16
504453768	\$1,767.32
504453773	\$1,844.66
504453806	\$909.30
504453807	\$2,138.29
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504453811	\$789.41
504453814	\$2,857.77
504453827	\$3,898.63
504453828	\$1,041.86
504453850	\$2,368.23
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504453870	\$1,792.60
504453876	\$2,435.81
504453879	\$83.48
504453892	\$243.12
504453898	\$243.12
504453899	\$1,700.96
504453934	\$582.31
504453948	\$2,107.05
504453952	\$1,844.82
504453957	\$2,798.58
504453964	\$625.03
504453969	\$2,103.38
504453983	\$4,033.80
504453985	\$744.79
504453992	\$3,167.37

504453999	\$4,841.14
504454005	\$681.67
504454007	\$3,002.32
504454008	\$216.76
504454010	\$2,759.21
504454019	\$468.58
504454038	\$898.94
504454039	\$1,567.74
504454042	\$2,142.34
504454050	\$2,138.29
504454089	\$238.76
504454095	\$1,386.97
504454096	\$1,518.45
504454116	\$1,478.41
504454122	\$63.12
504454130	\$2,013.03
504454153	\$4,729.93
504454188	\$6,819.07
504454191	\$2,204.31
504454210	\$1,844.82
504454211	\$352.50
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504454218	\$6,538.35
504454223	\$1,532.19
504454230	\$457.10
504454240	\$4,238.72
504454247	\$377.20
504454253	\$938.86
504454255	\$1,933.70
504454265	\$211.97
504454268	\$1,172.09
504454276	\$9,253.87
504454308	\$1,519.81
504454311	\$2,749.17
504454314	\$471.00
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504454328	\$2,381.97
504454331	\$2,370.71
504454337	\$2,627.36
504454368	\$5,470.66
504454400	\$476.43
504454401	\$1,105.30
504454402	\$402.88
504454427	\$9,009.34
504454481	\$1,963.96
504454496	\$1,630.46
504454508	\$2,037.08
504454532	\$997.29
504454538	\$4,763.05
504454546	\$3,214.56
504454548	\$347.04
504454553	\$2,893.81
504454557	\$1,946.18
504454560	\$198.92
504454579	\$1,639.09
504454582	\$483.74
504454596	\$119.46
504454635	\$3,370.95
504454666	\$846.64
504454667	\$5,456.89
504454691	\$1,418.68
504454694	\$1,844.17
504454698	\$2,421.35
504454707	\$1,345.89
504454738	\$5,467.54
504454754	\$7,143.41
504454762	\$1,773.29
504454778	\$2,137.13
504454798	\$519.58
504454800	\$3,207.92
504454806	\$1,246.66
504454830	\$1,972.82

504454836	\$9,257.69
504454847	\$1,042.45
504454863	\$557.80
504454864	\$486.53
504454865	\$1,433.15
504454869	\$2,204.41
504454881	\$2,010.94
504454882	\$7,109.73
504454918	\$2,138.29
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504454932	\$2,428.28
504454936	\$1,441.27
504454938	\$590.01
504454956	\$1,446.93
504454963	\$2,626.14
504454967	\$2,429.75
504454981	\$2,770.16
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504454995	\$2,091.62
504455003	\$2,143.92
504455018	\$1,244.52
504455031	\$2,730.35
504455032	\$2,776.66
504455042	\$2,002.44
504455061	\$5,365.97
504455076	\$8,187.00
504455085	\$3,184.43
504455095	\$4,059.55
504455097	\$252.21
504455104	\$2,888.96
504455117	\$4,102.33
504455170	\$2,027.42
504455189	\$163.80
504455192	\$4,457.31
504455201	\$1,305.74
504455229	\$2,002.44

504455240	\$2,196.31
504455269	\$4,710.43
504455270	\$335.85
504455281	\$774.33
504455303	\$471.22
504455350	\$1,440.68
504455352	\$5,470.66
504455356	\$1,778.16
504455373	\$6,742.78
504455390	\$5,497.75
504455391	\$1,324.31
504455415	\$2,946.29
504455439	\$3,624.13
504455466	\$4,651.47
504455480	\$807.67
504455485	\$838.78
504455496	\$1,153.34
504455514	\$2,655.80
504455523	\$4,954.92
504455524	\$1,942.29
504455536	\$1,844.82
504455545	\$843.55
504455585	\$3,990.84
504455587	\$2,312.25
504455588	\$335.39
504455592	\$370.63
504455632	\$752.94
504455639	\$938.56
504455688	\$2,108.39
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504455735	\$7,140.18
504455745	\$858.28
504455767	\$2,380.22
504455793	\$5,543.71
504455805	\$2,138.38

504455820	\$2,435.37
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504455910	\$3,105.87
504455921	\$2,577.63
504455933	\$1,167.72
504455954	\$1,644.72
504455973	\$1,520.61
504455974	\$490.81
504456001	\$2,435.81
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504456039	\$2,435.81
504456040	\$1,356.35
504456042	\$2,357.70
504456071	\$435.89
504456128	\$3,611.69
504456151	\$721.47
504456180	\$1,235.54
504456181	\$182.10
504456209	\$2,138.29
504456267	\$2,356.12
504456272	\$2,149.37
504456278	\$4,142.90
504456329	\$7,141.59
504456343	\$84.28
504456354	\$189.97
504456374	\$3,759.63
504456381	\$7,146.24
504456437	\$618.12
504456440	\$1,789.62
504456471	\$3,408.90
504456479	\$1,235.79
504456501	\$251.36
504456508	\$2,429.75
504456530	\$1,316.67

504456569	\$562.81
504456578	\$484.64
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504456593	\$1,896.60
504456619	\$5,406.03
504456630	\$5,716.84
504456642	\$1,546.44
504456666	\$2,898.00
504456668	\$1,221.53
504456678	\$729.64
504456679	\$2,211.59
504456682	\$2,429.75
504456688	\$1,257.15
504456704	\$4,827.29
504456711	\$2,429.75
504456764	\$4,662.75
504456771	\$4,989.28
504456806	\$660.38
504456841	\$5,307.56
504456855	\$5,102.88
504456860	\$59.75
504456876	\$3,749.82
504456880	\$119.50
504456892	\$4,709.55
504456899	\$4,539.86
504456912	\$3,064.11
504456921	\$426.71
504456965	\$63.12
504456985	\$392.71
504456989	\$3,116.78
504457007	\$2,532.13
504457040	\$1,241.01
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504457109	\$2,429.75
504457125	\$681.69
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504457134	\$5,402.77
504457136	\$1,906.46
504457147	\$188.40
504457158	\$2,429.75
504457162	\$7,143.07
504457163	\$366.96
504457175	\$142.62
504457178	\$282.97
504457190	\$428.40
504457194	\$7,139.54
504457200	\$2,429.75
504457250	\$2,429.75
504457267	\$9,226.56
504457280	\$2,435.81
504457296	\$2,817.59
504457298	\$1,362.82
504457300	\$3,609.07
504457304	\$5,470.66
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504457312	\$4,437.00
504457332	\$2,494.96
504457335	\$567.84
504457351	\$3,498.55
504457352	\$1,971.50
504457357	\$5,965.68
504457375	\$3,070.65
504457384	\$148.56
504457432	\$6,669.11
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504457555	\$6,310.47
504457594	\$2,273.33
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504457651	\$2,428.69
504457655	\$3,132.87
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504457713	\$2,380.25
504457714	\$2,429.33
504457719	\$6,226.52
504457725	\$2,624.85
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504457731	\$2,083.91
504457732	\$4,965.63
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504457847	\$618.15
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504457931	\$2,435.81
504457945	\$363.51
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504458020	\$84.28
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504458056	\$2,112.07
504458058	\$4,142.03
504458178	\$252.21
504458180	\$2,429.75
504458214	\$73.11

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504458253	\$1,929.39
504458254	\$2,429.33
504458265	\$2,541.04
504458269	\$2,104.16
504458276	\$1,565.75
504458279	\$6,191.03
504458319	\$5,114.59
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504458331	\$455.01
504458340	\$1,427.11
504458382	\$1,997.70
504458407	\$1,085.13
504458409	\$404.70
504458413	\$6,041.01
504458444	\$5,107.05
504458495	\$1,324.72
504458504	\$120.36
504458557	\$8,002.71
504458562	\$1,844.51
504458570	\$2,583.05
504458651	\$6,353.47
504458672	\$2,429.75
504458673	\$1,844.82
504458683	\$428.68
504458687	\$201.16
504458707	\$2,550.79
504458754	\$377.36
504458770	\$2,625.00
504458786	\$762.28
504458790	\$2,098.53
504458803	\$2,588.24
504458804	\$706.12
504458846	\$679.37
504458852	\$2,822.61

504458857	\$251.69
504458867	\$1,844.82
504458953	\$1,844.33
504458954	\$2,884.95
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504459007	\$2,214.90
504459019	\$4,096.65
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504459047	\$549.85
504459104	\$705.46
504459112	\$2,624.35
504459126	\$56.51
504459127	\$2,804.15
504459128	\$356.13
504459129	\$1,835.99
504459170	\$1,078.83
504459180	\$2,435.81
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504459184	\$1,122.72
504459193	\$3,295.81
504459203	\$4,780.46
504459213	\$1,265.73
504459229	\$2,429.75
504459257	\$790.66
504459285	\$7,973.56
504459289	\$7,139.07
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504459529	\$2,199.87
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504459624	\$9,252.46
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504459666	\$1,891.77
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504459766	\$6,437.84
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504459799	\$1,727.33
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504460407	\$764.24
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504460487	\$345.49
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504461096	\$1,645.14
504461097	\$243.12
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504461131	\$6,043.77
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504461258	\$2,479.31
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504461437	\$954.55
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504461478	\$243.12
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504461482	\$2,138.29
504461500	\$999.46
504461520	\$1,153.43
504461540	\$2,943.19
504461553	\$998.83
504461578	\$60.17
504461589	\$1,585.43
504461595	\$6,560.10
504461616	\$497.85
504461623	\$2,429.75
504461634	\$543.11
504461646	\$3,910.10
504461658	\$2,394.08
504461682	\$2,701.06
504461683	\$1,859.38
504461686	\$391.28
504461688	\$2,998.55
504461702	\$2,105.20
504461704	\$3,940.24
504461705	\$1,977.22
504461709	\$2,522.19
504461717	\$1,275.85
504461718	\$3,596.81
504461782	\$1,844.51
504461787	\$1,072.97
504461796	\$1,257.14
504461825	\$549.42
504461828	\$5,420.86

504461834	\$1,583.38
504461835	\$60.17
504461837	\$8,347.11
504461867	\$4,048.03
504461952	\$491.39
504461972	\$6,820.26
504461976	\$1,788.87
504461996	\$2,429.75
504462003	\$2,925.77
504462008	\$2,141.23
504462047	\$3,490.12
504462054	\$1,371.10
504462055	\$825.09
504462059	\$3,824.03
504462070	\$1,147.60
504462072	\$167.77
504462091	\$2,577.75
504462102	\$2,138.29
504462174	\$2,582.81
504462178	\$78.11
504462180	\$2,500.88
504462185	\$2,435.81
504462198	\$6,819.76
504462202	\$6,821.88
504462248	\$2,043.13
504462282	\$544.39
504462289	\$2,136.59
504462316	\$4,043.45
504462318	\$634.72
504462319	\$1,746.05
504462322	\$1,306.42
504462323	\$2,434.95
504462331	\$2,058.81
504462350	\$1,990.68
504462357	\$1,516.95
504462388	\$4,102.32

504462389	\$2,429.75
504462408	\$1,251.14
504462409	\$243.12
504462415	\$2,138.00
504462473	\$732.03
504462504	\$2,278.55
504462519	\$935.50
504462530	\$2,435.59
504462543	\$1,063.25
504462550	\$9,251.21
504462554	\$2,679.29
504462556	\$9,244.44
504462560	\$991.24
504462561	\$1,756.68
504462570	\$471.16
504462588	\$3,400.11
504462601	\$1,160.54
504462608	\$1,631.38
504462613	\$2,833.47
504462632	\$1,722.57
504462647	\$1,714.11
504462654	\$411.56
504462661	\$877.14
504462672	\$2,404.08
504462673	\$3,199.39
504462679	\$84.28
504462710	\$1,108.34
504462720	\$4,218.61
504462722	\$5,036.65
504462723	\$243.12
504462742	\$944.98
504462761	\$2,435.81
504462766	\$243.12
504462769	\$1,723.29
504462778	\$1,319.27
504462784	\$6,045.29

504462791	\$243.12
504462808	\$7,146.24
504462830	\$4,215.60
504462840	\$615.97
504462841	\$1,550.51
504462861	\$4,443.38
504462866	\$728.76
504462910	\$5,580.53
504462914	\$705.46
504462963	\$485.06
504462964	\$6,010.56
504462971	\$1,978.98
504462979	\$2,137.92
504462980	\$142.24
504462989	\$2,605.86
504462992	\$2,084.05
504463008	\$4,891.63
504463019	\$1,907.13
504463055	\$705.69
504463061	\$6,696.93
504463062	\$1,357.39
504463070	\$304.16
504463079	\$153.30
504463091	\$781.53
504463099	\$961.47
504463102	\$36.62
504463119	\$243.12
504463136	\$61.75
504463147	\$2,435.81
504463148	\$2,137.19
504463149	\$243.12
504463202	\$778.87
504463211	\$1,439.54
504463216	\$6,186.45
504463221	\$2,439.06
504463225	\$243.12

504463226	\$243.12
504463228	\$243.12
504463236	\$2,001.13
504463237	\$790.66
504463238	\$2,200.85
504463240	\$363.95
504463243	\$1,833.19
504463244	\$2,112.99
504463245	\$315.64
504463246	\$326.28
504463247	\$641.68
504463248	\$1,844.33
504463249	\$1,235.78
504463251	\$484.83
504463254	\$1,161.48
504463255	\$832.56
504463282	\$360.34
504463285	\$84.28
504463287	\$335.48
504463288	\$314.84
504463290	\$63.12
504463291	\$1,058.97
504463293	\$569.96
504463294	\$83.48
504463295	\$662.93
504463296	\$572.72
504463297	\$81.73
504463298	\$948.65
504463299	\$582.53
504463300	\$414.04
504463301	\$981.84
504463305	\$313.06
504463306	\$396.73
504463307	\$393.76
504463308	\$765.40
504463309	\$695.40

504463310	\$470.12
504463312	\$2,435.37
504463317	\$188.40
504463318	\$1,478.41
504463319	\$1,844.82
504463327	\$518.79
504463329	\$1,907.78
504463330	\$2,435.81
504463336	\$1,851.57
504463343	\$250.28
504463344	\$1,523.71
504463345	\$820.24
504463346	\$494.16
504463347	\$490.39
504463348	\$607.11
504463349	\$738.52
504463350	\$83.48
504463351	\$993.46
504463352	\$410.57
504463354	\$275.54
504463355	\$1,722.19
504463357	\$832.78
504463358	\$1,403.80
504463366	\$1,601.13
504463369	\$801.02
504463375	\$87.02
504463376	\$701.46
504463387	\$2,428.59
504463389	\$78.11
504463394	\$1,648.39
504463402	\$1,193.33
504463404	\$2,429.75
504463422	\$1,844.82
504463423	\$2,509.82
504463425	\$1,889.54
504463426	\$238.17

504463427	\$988.75
504463429	\$2,107.47
504463431	\$2,435.81
504463432	\$1,077.89
504463433	\$2,484.53
504463434	\$869.81
504463444	\$2,429.75
504463446	\$1,276.98
504463479	\$2,512.91
504463497	\$790.66
504463505	\$1,033.86
504463506	\$2,278.53
504463515	\$2,429.75
504463558	\$1,192.68
525081817	\$56.35
504460510	\$4,719.56

Total Uncashed Checks: 1343 | Total Amount Outstanding: \$2,890,750.63

EXHIBIT B

AVATAR CLASS ACTION
C/O A.B. DATA, LTD.
PO BOX 170500
MILWAUKEE, WI 53217


{Name And Address}

DATE: {PostmarkDate}
RE: Solivita Class Action
CLAIM NUMBER: {ClaimNumber}
RESPONSE DEADLINE: {ResponseDeadline}

Dear Claimant:

We have processed the transactional data received from the Defendant, Avatar Properties, Inc., related to Club Membership Fees you paid during the period of April 26, 2013 through November 30, 2024.

Please carefully review the attached Appendix A. Appendix A includes the name we will use on the distribution check and your mailing address. Appendix A also lists the Solivita address associated with the Club Account for this Claim Number, Club Membership Fees paid by you and the payment dates.

If you agree with the information contained in Appendix A, you do not need to do anything further. Any distribution you are entitled to will be issued to the name and address listed.

You must contact the Claims Administrator by letter at AVATAR CLASS ACTION, C/O A.B. DATA, LTD., PO BOX 170500, MILWAUKEE, WI 53217 or by email at info@SolivitaClassAction.com no later than Month 00, 2025. Please reference the Claim Number listed above in any communication:

1. If you disagree with the transactional information. Your letter or email must describe the discrepancy along and include documentation supporting the amount you believe is correct.
2. To request a name change to which the check will be issued. Name changes require supporting documentation. For example, if the Class Member is deceased, Letters of Administration from an estate.
3. To request a change to the address where the check will be mailed. Address changes require supporting documentation. For example, a copy of a utility bill in the name of the Class Member showing the new address.

If you have any questions about this notice or if you want to confirm the status of your Claim after you submit a response to this notice, please contact us at 1-800-494-9209 or email us at info@SolivitaClassAction.com. Please reference the Claim Number listed above in any communication.

Sincerely yours,

A.B. DATA, LTD.
Claims Administrator

Appendix A

Name
Street Address
City, State 00000

Your payment will be issued to the name and address above. Please contact the Claims Administrator with any changes to this information.

CLAIM NUMBER 000000
SOLIVITA ADDRESS: _____

Account Number	Charged Date	Paid Date	Amount

TOTAL PAID CLUB MEMBERSHIP FEES AS REPORTED: \$ 00000000