

NOTICE OF CLASS ACTION

This Notice concerns a lawsuit entitled *Mary E. Edmondson, et. al. v. Eagle National Bank, et. al.*, Civil Action No.: 1:16-CV-03938-SAG, pending in the U.S. District Court for the District of Maryland (the "Lawsuit"). If you were a borrower or co-borrower on a residential mortgage loan from Eagle National Bank and/or Eagle Nationwide Mortgage Company ("Eagle") (including either an originated, brokered, or funded loan) that was closed by Genuine Title, LLC ("Genuine Title"), between 1/1/2007 and 1/31/2011, you may be a borrower affected by the lawsuit.

A FEDERAL COURT AUTHORIZED THIS NOTICE. THIS IS NOT A LAWYER SOLICITATION.

PLEASE READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS

What is the Lawsuit about? The Plaintiffs in the Lawsuit allege that between 1/1/2007 and 1/31/2011, Genuine Title provided certain unlawful benefits to Eagle employees and/or agents in exchange for their agreement to refer borrowers to Genuine title for the settlement of their residential mortgage loans with Eagle. Plaintiffs also allege that Eagle and Genuine Title agreed to charge borrowers unnecessarily high and fraudulent title and settlement service charges on Eagle loans. Plaintiffs seek to recover money damages for each borrower affected by Eagle's alleged conduct pursuant to 12 U.S.C. § 2607(d)(2). Eagle denies the allegations in the Lawsuit and denies that it is or may be liable for any of the claims asserted. *The Court has not yet made any judgment or other determination of the liability of Eagle in the Lawsuit.*

Why did I get this Notice? You received this Notice because the Court has ruled that the Lawsuit may be maintained as a claim for monetary relief on behalf of the Class and because Genuine Title and Eagle's records show that you are a potential member of the Class described below. This Notice is intended to generally describe the nature of the Lawsuit and your legal rights and obligations.

Who is part of the Class? The Class includes all individuals in the United States who were borrowers on a federally related mortgage loan (as defined under the Real Estate Settlement Procedures Act, 12 U.S.C. § 2602) from, brokered by, originated by Eagle National Bank or Eagle Nationwide Mortgage Company for which Genuine Title provided a settlement service, as identified in Section 1100 on the HUD-1, between January 1, 2007 and January 31, 2011. The Class does not include any person who, during the period of January 1, 2007 and January 31, 2011, was an employee, officer, member and/or agent of Eagle or Genuine Title.

You are receiving this Notice because you are believed to be a potential member of the Class

YOUR LEGAL RIGHTS AND OPTIONS IN THIS CLASS ACTION

IF YOU WISH TO REMAIN A CLASS MEMBER	You are not required to do anything at this time. If you choose to remain a Class Member, any claims against Eagle for monetary relief arising from Eagle's conduct as alleged by the Plaintiffs will be determined in this case and cannot be presented in any other lawsuit.	
IF YOU WISH TO BE EXCLUDED FROM THE CLASS, YOU MUST MAIL A REQUEST FOR EXCLUSION NO LATER THAN OCTOBER 22, 2021	This is the only option that allows you to retain your rights to independently sue Eagle about the claims in this Lawsuit. In order to exclude yourself from the Class, you must follow the procedure described below and mail your Request for Exclusion to Notice Administrator.	The Exclusion Deadline for Requests for Exclusion to be mailed to Notice Administrator: OCTOBER 22, 2021

These Rights and Options are explained in more detail below.

If you have questions concerning the Class Action, you may obtain more information about the Class Action, including a copy of the Complaint and Court Orders relating thereto, through the Notice Administrator's website at eaglegenuinetitleclassaction.com

1. What is this lawsuit about?

Plaintiffs in the Lawsuit allege that Eagle and Genuine Title participated in an alleged kickback scheme, which Plaintiffs contend violated certain federal laws and negatively impacted those borrowers who were referred by Eagle to Genuine Title. Plaintiffs contend that Eagle should be held responsible for the conduct of allegedly accepting unlawful benefits in exchange for an agreement to refer Eagle borrowers to Genuine Title. Eagle denies the allegations in the Lawsuit and denies that it is or may be liable for any of the claims asserted or for the conduct of those employees and/or agents who allegedly accepted benefits from Genuine Title. *The Court has not yet made any judgment or other determination of the liability of Eagle in the Lawsuit.*

2. What is a class action?

In a class action lawsuit, one or more people called Plaintiffs sue on behalf of others who may have similar claims. For a case to proceed as a class action, a court must certify a class. That is what has happened in this case. This ruling by the Court of a class action does not mean that any monetary relief will be obtained for the class members because these are contested issues that have not been decided. Rather, the ruling means that the final outcome of this lawsuit, whether favorable to Plaintiffs or Defendants, will apply in like manner to every member of the class who do not timely elect to be excluded from the class.

3. How do I know if I am part of the Class?

The Court has decided that everyone who fits this description is a Class Member:

All individuals in the United States who were borrowers on a federally related mortgage loan (as defined under the Real Estate Settlement Procedures Act, 12 U.S.C. § 2602) from, brokered by, originated by Eagle National Bank or Eagle Nationwide Mortgage Company for which Genuine Title provided a settlement service, as identified in Section 1100 on the HUD-1, between January 1, 2007 and January 31, 2011. Exempted from this class is any person who, during the period of January 1, 2007 through January 31, 2011, was an employee, officer, member and/or agent of Defendants Eagle National Bank, Eagle Nationwide Mortgage Company, ESSA Bank & Trust, Genuine Title, LLC, Brandon Glickstein, Inc., and/or Competitive Advantage Media Group, LLC.

If a copy of this Notice was addressed and mailed to you, then certain loan records indicate that you are likely a member of the Class.

4. Who represents the Class in the Lawsuit?

The Class is represented by Class Representatives, who are Plaintiffs in the Lawsuit. The court-appointed Class Representative is: Mary Edmondson. The Court has also appointed Plaintiffs' Counsel to serve as Class Counsel for the Class. Class Counsel for the Class are: Michael Paul Smith and Melissa L. English of the law firm, Smith, Gildea & Schmidt, LLC, and Timothy F. Maloney and Veronica B. Nannis of the law firm, Joseph, Greenwald & Laake, P.A. Class Counsel may be contacted using the information identified below. If you desire, you may also appear by your own attorney at your own expense. You may also seek to intervene individually and may advise the Court if at any time you consider that you are not being fairly and adequately represented by Plaintiffs and Class Counsel.

5. What must Class Members do?

If you wish to remain a member of the class, you do not have to do anything. By remaining a Class member, any claims against Eagle for monetary relief arising from Eagle's conduct as alleged by the Plaintiffs will be determined in this case and cannot be presented in any other lawsuit. Your participation in any recovery, which may be obtained from Eagle through trial or settlement, will depend on the results of this lawsuit. If no recovery is obtained for the Class, you will be bound by that result also.

You may be required as a condition of participation in any recovery through settlement or trial to present evidence respecting your membership in the Class, and the monetary relief to which you are entitled. You should, therefore, collect and preserve documents related to your mortgage transaction with Eagle. If you have evidence you believe would be helpful to Counsel, you may communicate with Class Counsel regarding that evidence.

You will be entitled to notice of any ruling reducing the size of the Class in which you are a member and also to notice of, and an opportunity to be heard respecting, any proposed settlement or dismissal of the class claims. For this reason, as well as to participate in any recovery, you are requested to notify Class Counsel of any corrections or changes in your name or address.

6. How do Class Members exclude themselves from the Class?

Any member of the Class shall have the right to opt-out or exclude themselves from the Class by sending a written Request for Exclusion from the Class to the Notice Administrator at the following address:

Notice Administrator
Eagle-Genuine Title Class Action Litigation
PO Box 10037
Towson, MD 21285-0037

An Exclusion Request has been included with this Notice. **To be excluded from the Class, the Class Member must complete this Exclusion Request, sign the Exclusion Request, and mail the Exclusion Request to the Notice Administrator no later than the Exclusion Deadline of October 22, 2021.** A separate request for exclusion should be completed and timely mailed for each person or entity electing to be excluded from the Class. **Co-borrowers on a loan must both submit a valid, timely request for exclusion to be excluded from the Class.**

If you submit a timely and valid Request for Exclusion from the Class, you will not be a part of the Class, will not be eligible to participate in the Lawsuit, will not be bound by any result obtained from this Lawsuit whether or not obtained in favor of Plaintiffs, and will not be precluded from legally pursuing Eagle in an individual capacity.

7. What happens if Class Members request exclusion?

You will not share in any recovery that might be paid to Class members as a result of trial or settlement of this lawsuit.

You will not be bound by any decision in this lawsuit favorable to Eagle.

You may present any claims you have against Eagle by filing your own lawsuit, or you may seek to intervene in this lawsuit.

If you have questions concerning the Lawsuit, including any corrections or changes of name or address, **you should not contact the Court**, but should contact, in writing, Class Counsel at:

Class Counsel
Eagle-Genuine Title Class Action Litigation
600 Washington Avenue, Suite 200
Towson, MD 21204.

If you decide to remain a member of the Class and wish to communicate with Class Counsel as your attorney in this litigation, you may do so by writing or calling the following:

Michael Paul Smith, Esq.
Melissa L. English, Esq.
Smith, Gildea & Schmidt, LLC
600 Washington Avenue, Suite 200
Towson, MD 21204
(410) 821-0070
Email: mpsmith@sgs-law.com
Email: menglish@sgs-law.com

Timothy F. Maloney, Esq.
Veronica B. Nannis, Esq.
Joseph, Greenwald & Laake, P.A.
6404 Ivy Lane, Suite 400
Greenbelt, MD 20770
(301)220-2200
Email: tmaloney@jgllaw.com
Email: vnannis@jgllaw.com

You may of course, seek the advice and guidance of your own attorney if you desire and at your own expense. The pleadings and other records in this litigation may be examined and copied at any time during regular office hours at the office of the clerk, U.S. District Court for the District of Maryland, 101 West Lombard Street, Baltimore, Maryland 21201.

Dated: September 1, 2021

By: Clerk of Court
United States District Court
For the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201