

NOTICE OF PENDING CLASS ACTION

If you purchased NFL Sunday Ticket, a class action lawsuit may affect your rights.

This Notice is being provided by order of the U.S. District Court for the Central District of California. It is not a solicitation from a lawyer. You are not being sued.

Para una notificación en español, visite www.NFLSundayTicketLawsuit.com

A lawsuit is pending in the United States District Court for the Central District of California (the “Court”) against the following defendants (the “Defendants”): the National Football League (“NFL”); Arizona Cardinals Football Club, LLC.; Atlanta Falcons Football Club, LLC.; Baltimore Ravens Limited Partnership; Buffalo Bills, LLC.; Panthers Football, LLC.; The Chicago Bears Football Club, Inc.; Cincinnati Bengals, Inc.; Cleveland Browns Football Company LLC; Dallas Cowboys Football Club, Ltd.; Denver Broncos Team, LLC; The Detroit Lions, Inc.; Green Bay Packers, Inc.; Houston NFL Holdings, L.P.; Indianapolis Colts, Inc.; Jacksonville Jaguars, LLC.; Kansas City Chiefs Football Club, Inc.; Miami Dolphins, Ltd.; Minnesota Vikings Football, LLC; New England Patriots LLC; New Orleans Louisiana Saints, LLC; New York Football Giants, Inc.; New York Jets LLC.; Raiders Football Club, LLC; Philadelphia Eagles, LLC; Pittsburgh Steelers LLC.; Chargers Football Company, LLC; Forty Niners Football Company LLC; Football Northwest LLC; The Los Angeles Rams, LLC; Buccaneers Team LLC; Tennessee Football, LLC.; and Pro-Football, Inc.

This lawsuit involves NFL Sunday Ticket, an out-of-market sports viewing package that provides NFL regular-season games unavailable on local television affiliates.

Plaintiffs Robert Gary Lippincott, Jr., Jonathan Frantz, Ninth Inning Inc. d/b/a The Mucky Duck, 1465 Third Avenue Restaurant Corp. d/b/a Gael Pub, filed this lawsuit on behalf of themselves and proposed classes (defined below), claiming that the Defendants harmed competition and violated federal antitrust law. Defendants deny any wrongdoing and contend that their actions have promoted competition. The Court has not decided whether any laws were broken.

On February 7, 2023, the Court determined that Plaintiffs’ claims against the Defendants could proceed as a class action. There is no money available now and no guarantee there ever will be. However, if you are a member of the certified classes as described in this Notice, your legal rights and options are affected, and you have a choice to make now.

PRODUCTION OF PERSONALLY IDENTIFIABLE INFORMATION

Pursuant to the Satellite Television Extension and Localism Act of 2010, 47 U.S.C. § 338, we are also notifying you and other current and former DIRECTV subscribers that DIRECTV has

been ordered by the United States District Court for the Central District of California in the case discussed in this notice and captioned *In re National Football League's Sunday Ticket Antitrust Litigation*, No. 2:15-ml-02668-PSG-JEM, to produce certain information from DIRECTV's records to the Court-appointed class counsel (the lawyers representing Plaintiffs), that contain personally identifiable information. The information—which will be kept “Highly Confidential” under the protective order in the *Sunday Ticket* litigation, will not be shared publicly, and will be used only to further notify class members about the litigation and effectuate any settlement or judgment—includes the subscribers' names, addresses, account numbers, dates of service, telephone numbers, and email addresses connected to the account. DIRECTV has not yet provided this information to the Court-appointed class counsel, and to date has provided only contact information to the Notice Administrator sufficient to effectuate this Notice. But DIRECTV will provide this information to Court-appointed class counsel on **October 15, 2023**.

CERTIFIED CLASSES

The Court has certified two damages classes and two injunctive-relief classes in this litigation (together, “the Classes”), comprised of residential subscribers and commercial subscribers to Sunday Ticket.

Damages Classes:

- **Residential Damages Class:** All DIRECTV residential subscribers that purchased the NFL Sunday Ticket at any time between June 17, 2011 and February 7, 2023.
- **Commercial Damages Class:** All DIRECTV commercial subscribers that purchased the NFL Sunday Ticket at any time between June 17, 2011 and February 7, 2023.

Injunctive Classes:

- **Residential Injunctive Class:** All DIRECTV residential subscribers that purchased the NFL Sunday Ticket at any time between June 17, 2011 and February 7, 2023.
- **Commercial Injunctive Class:** All DIRECTV commercial subscribers that purchased the NFL Sunday Ticket at any time between June 17, 2011 and February 7, 2023.

All of the Classes include only individuals and commercial entities that paid for NFL Sunday Ticket. Individuals or commercial entities that received the NFL Sunday Ticket only for free, e.g., as part of DIRECTV's program to entice new customers, or that purchased the NFLST.tv streaming service and were not DIRECTV satellite subscribers, are not included in any of the Classes. The Classes also exclude the Defendants and any of their current or former parents, subsidiaries, or affiliates. The Classes also exclude all judicial officers presiding over this action and their immediate family members and staff, and any juror assigned to this action.

YOUR LEGAL RIGHTS AND OPTIONS

If you are a member of the Residential Damages Class or Commercial Damages Class:

EXCLUDE YOURSELF FROM THE DAMAGES CLASS

Get no benefits from lawsuit. Keep certain rights.

If you ask to be excluded from this lawsuit and money is later awarded, you will not be allowed to request a payment. But you or your business will keep your right to file a lawsuit or be part of any other lawsuit asserting claims against Defendants concerning or relating to the claims and factual allegations that were or could have been raised in this lawsuit.

To exclude yourself, or opt out, you must write to the Notice Administrator, JND Legal Administration, by **October 8, 2023**.

DO NOTHING

Stay in this lawsuit and await the outcome.

If you do nothing, you or your business will be bound by the outcome of the case, whether a judgment is rendered for or against Defendants. Unless you exclude yourself or your business, you will not be able to file a lawsuit or be part of any other lawsuit asserting claims against Defendants concerning or relating to the claims and factual allegations that were or could have been raised in this lawsuit.

If you are a member of the Residential Injunctive Class or Commercial Injunctive Class:

DO NOTHING

You or your business will be bound by the outcome of the litigation. You do not have the ability to opt out of the Injunctive Classes.

THESE RIGHTS AND OPTIONS AND THE DEADLINES TO EXERCISE THEM ARE EXPLAINED IN THIS NOTICE.

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BASIC INFORMATION ABOUT THIS LAWSUIT

1. What is this lawsuit about?

The name of the case is *In re National Football League's "Sunday Ticket" Antitrust Litigation*, and it is pending in the United States District Court for the Central District of California (Case No. 2:15-ml-02668-PSG (JEMx)).

This is an antitrust matter brought by the Plaintiffs against the Defendants based on agreements that are alleged to work together to suppress competition for the sale of professional football game telecasts in violation of Sections 1 and 2 of the Sherman Act. Specifically, acting on behalf of the 32 individual NFL teams, the NFL entered into: (1) agreements in which CBS and Fox create a single telecast for every Sunday afternoon NFL game and are permitted to broadcast only a limited number of games in regional windows through free, over-the-air television; and (2) an agreement allowing DIRECTV to obtain all of the live telecasts produced by CBS and Fox and bundle them into a subscription package called NFL Sunday Ticket. Football fans who are not NFL Sunday Ticket subscribers can view only locally available games each Sunday afternoon, but Sunday Ticket subscribers can view both locally available games and out-of-market games.

In other words, fans who want to watch out-of-market games must choose either Sunday Ticket or nothing. Plaintiffs claim that absent the allegedly anticompetitive agreements at issue, the telecasts available on Sunday Ticket would be available through other means, which would result in more access to telecasts of NFL games at lower prices.

2. What is a class action and who is involved?

In a class action lawsuit, one or more individuals or entities called "Class Representatives" sue on behalf of other individuals or entities who have similar claims. That group of individuals or entities is a "Class" made up of "Class Members." The Class Representatives that sued here—and all the Class Members like them—are called the Plaintiffs. The companies they sued are called the Defendants. One court resolves the issues for everyone in the Classes—except for those people who choose to exclude themselves from the Damages Classes.

3. What is the current status of the lawsuit?

The lawsuit continues against the Defendants for violations of federal antitrust laws related to the sale of NFL Sunday Ticket, with a trial scheduled for February 22, 2024.

4. Is there any money available now?

No money or benefits are available now because the lawsuit is not resolved. There is no guarantee that money or benefits ever will be obtained. If they are, a separate notice will be issued about how to ask for a share of any potential money or benefits.

DETERMINING IF YOU ARE A CLASS MEMBER

5. How do I know if I am a member of one or more of the Classes?

The Court has certified two damages classes and two injunctive-relief classes in this litigation (together, “the Classes”), comprised of residential subscribers and commercial subscribers to Sunday Ticket.

Damages Classes:

- **Residential Damages Class:** All DIRECTV residential subscribers that purchased the NFL Sunday Ticket at any time between June 17, 2011 and February 7, 2023.
- **Commercial Damages Class:** All DIRECTV commercial subscribers that purchased the NFL Sunday Ticket at any time between June 17, 2011 and February 7, 2023.

Injunctive Classes

- **Residential Injunctive Class:** All DIRECTV residential subscribers that purchased the NFL Sunday Ticket at any time DIRECTV June 17, 2011 and February 7, 2023.
- **Commercial Injunctive Class:** All DIRECTV commercial subscribers that purchased the NFL Sunday Ticket at any time between June 17, 2011 and February 7, 2023.

6. Who is excluded from the Classes?

The Classes exclude individuals or commercial entities that only received the NFL Sunday Ticket for free, e.g., as part of DIRECTV’s program to entice new customers, or that purchased the NFLST.tv streaming service and were not DIRECTV satellite subscribers. The Classes also exclude the Defendants and any of their current or former parents, subsidiaries, or affiliates. The Classes also exclude all judicial officers presiding over this action and their immediate family members and staff, and any juror assigned to this action.

YOUR OPTIONS AS A CLASS MEMBER

7. How much money can I get?

No money or benefits are available now because the case is not resolved. There is no guarantee that money or benefits ever will be obtained. If they are, you will be notified about how to ask for a share.

8. What are my options as a Class Member?

If you are a member of the Residential Damages Class or Commercial Damages Class, you may exclude yourself from that damages class. You may also choose to do nothing.

You may not opt out of the Residential Injunctive Class or Commercial Injunctive Class and will be bound by the judgment in this litigation with respect to injunctive relief.

9. What does it mean to request to be excluded from the Class?

You can exclude yourself or your business from the Residential Damages Class or Commercial Damages Class. If you do not want to be part of the Residential Damages Class or Commercial Damages Class and you want to keep your right to sue the Defendants for damages in connection with the conduct that was or could have been alleged in *In re: National Football League's "Sunday Ticket" Antitrust Litigation*, then you must take steps to remove yourself or your business from the Residential Damages Class or Commercial Damages Class. This is called excluding yourself, or "opting out," of the Residential Damages Class or Commercial Damages Class. If you exclude yourself, you or your business will not receive any potential payment or anything else from the Residential Damages Class or Commercial Damages Class.

You cannot exclude yourself or your business from the Residential Injunctive Class or Commercial Injunctive Class.

10. How do I opt out of the Residential Damages Class or Commercial Damages Class?

To exclude yourself or your business from the Residential Damages Class or Commercial Damages Class, you must send a letter by mail or email saying that you wish to be excluded. You must include your name, business name (if applicable), address, telephone number, email and signature, and a statement that you want to exclude yourself or your business from the Residential Damages Class or Commercial Damages Class. You cannot exclude yourself or your business by telephone. You must mail or email your request for exclusion, postmarked no later than October 8, 2023, to:

In Re: National Football League's "Sunday Ticket" Antitrust Litigation

c/o JND Legal Administration

PO Box 91316

Seattle, WA 98111

Unless you exclude yourself or your business, you or your business will be bound by the outcome of the case. You will not be able to file a lawsuit or be part of any other lawsuit asserting claims against Defendants concerning or relating to the claims and factual allegations that were or could have been raised in this lawsuit.

11. What is the legal significance of excluding myself or my business?

If you exclude yourself or your business, you keep the right to file your own lawsuit against the Defendants for damages concerning or relating to the claims and factual allegations that were or could have been raised in this action.

12. If I don't exclude myself or my business, can I sue later?

No. Unless you exclude yourself or your business, you or your business will be bound by the outcome of the case. You will not be able to file a lawsuit or be part of any other lawsuit asserting claims against Defendants concerning or relating to the claims and factual allegations that were or could have been raised in this lawsuit.

13. Can I exclude myself from the Residential Injunctive Class or the Commercial Injunctive Class?

No. You are not able to exclude yourself or your business from the Residential Injunctive Class or the Commercial Injunctive Class. Those classes do not seek any money damages from the Defendants. Those classes seek only injunctive relief—*i.e.*, they seek to modify Defendants' conduct.

IF YOU DO NOTHING

14. What happens if I do nothing at all?

If you do nothing, you will be bound by the outcome of this lawsuit. If you remain in the Residential Damages Class or Commercial Damages Class and Plaintiffs obtain money or other value from this lawsuit—either as a result of any ruling, trial or Court-approved settlement—you may qualify for a payment. Unless you exclude yourself or your business, you will not be able to file a lawsuit or be part of any other case asserting claims against Defendants concerning or relating to the claims and factual allegations that were or could have been raised in this lawsuit.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer representing my interests in this class action?

Yes. The Court has appointed lawyers to represent you and other members of the Classes. These lawyers are called the Plaintiffs' Co-Lead Counsel. You will not be charged individually for these lawyers.

THE LAWYERS REPRESENTING YOU

<p>Marc M. Seltzer SUSMAN GODFREY L.L.P. 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 (310) 789-3100</p>	<p>Scott Martin HAUSFELD LLP 33 Whitehall Street, 14th Floor New York, NY 10004 (646) 357-1100</p>	<p>Howard Langer LANGER GROGAN AND DIVER PC 1717 Arch Street, Suite 4020 Philadelphia, PA 19103 (215) 320-5660</p>
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16. How will the lawyers be compensated? Will the named Plaintiffs receive an incentive award?

In the event of a judgment against Defendants after trial or a settlement, Plaintiffs’ Co-Lead Counsel will ask the Court to approve and award attorneys’ fees and expenses incurred in connection with the litigation. They also may ask for service or “incentive” awards for the Class Representatives. The amount of these fees, costs, and awards, will ultimately be determined by the Court.

17. Should I get my own lawyer?

You do not need to hire your own lawyer, but if you hire a lawyer to speak for you or your business or appear in court, your lawyer must file a notice of appearance. If you hire your own lawyer, you will have to pay for that lawyer.

GETTING MORE INFORMATION

18. Where do I get more information?

This Notice contains a summary of relevant court filings and orders. Complete copies of public pleadings, Court rulings, and other filings are available for review and copying at the Clerk’s office or online at <https://pacer.uscourts.gov>. The address is U.S. District Court for the Central District of California, First Street Courthouse, 350 West 1st Street, Los Angeles, California 90012. Chief Judge Philip S. Gutierrez of the United States District Court for the Central District of California is overseeing this class action.

Please do not contact the Court or Judge Gutierrez.

19. Should I contact the Defendants?

No. The Defendants cannot provide you with legal advice concerning your options in this lawsuit.

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*Additional information about the class action is available at
www.NFLSundayTicketLawsuit.com, or you can call the Notice Administrator toll-free at 866-
848-0814.*

DATED: July 10, 2023.

BY ORDER OF THE UNITED STATES
DISTRICT COURT FOR THE CENTRAL
DISTRICT OF CALIFORNIA