

DiLorenzo v. Bitdefender Inc., et al.

c/o CPT Group, Inc.

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**IF YOU PURCHASED SOFTWARE OR ANOTHER PRODUCT FROM
BITDEFENDER INC., BITDEFENDER S.R.L, AVANGATE, INC., OR AVANGATE B.V.
IN RESPONSE TO AN AUTOMATIC RENEWAL OR CONTINUOUS SERVICE OFFER,
YOU MAY BE ENTITLED TO MONEY**

Summary Notice of Class Action Settlement

DiLorenzo v. Bitdefender Inc., et al.

San Diego County Superior Court, Case No. 37-2019-00066655-CU-BT-CTL

What is the Lawsuit about? Defendants Bitdefender Inc., Avangate, Inc. d/b/a 2Checkout.com, and their respective parent, subsidiary, or affiliated entities (“Defendants”), market and sell computer- or Internet-related software or products. The Lawsuit alleges that Defendants enrolled certain California consumers in automatically renewing programs, and posted charges to the consumer’s credit card, debit card, or third party payment account, without first presenting the consumer with all of the automatic renewal offer terms in a clear and conspicuous manner as required by law. Defendants deny the claims in the Lawsuit and the Court has not decided which party is right. The parties have agreed to a Settlement to provide certain benefits to eligible Class Members and to resolve the case without any admission of liability or wrongdoing.

Am I a Class Member? Based on the business records of Defendants, between December 16, 2015 and September 16, 2020, the individual identified on this Summary Class Notice purchased software or another product from Defendants and received an automatic renewal offer or continuous service offer, and therefore has the right to participate in the Settlement.

What relief does the Settlement provide? Defendants have agreed to pay the principal Settlement Amount of Nine Hundred Twenty-Five Thousand Dollars (\$925,000.00). If the Court grants final approval of the Settlement, each Participating Class Member will receive a pro-rata share of the Net Settlement Amount. The “Net Settlement Amount” is the Settlement Amount reduced by any sums awarded by the Court for attorneys’ fees, litigation expenses, any class representative service payment, and expenses of settlement administration. The Settlement also provides for injunctive relief.

What are my options? If you want to participate in the Settlement, you must submit a timely Claim to the Settlement Administrator on or before April 19, 2021, which must be validated by the Settlement Administrator. You may submit a Claim through the settlement Website, www.SoftwareAutorenewalSettlement.com

PLEASE USE THE ID NUMBER LOCATED ON THE OTHER SIDE OF THIS POSTCARD TO ACCESS YOUR CLAIM FORM ON THE SETTLEMENT WEBSITE.

If you do not want to be legally bound by the Settlement, you must exclude yourself by April 19, 2021. If you exclude yourself from the Settlement, you will not receive any money from the Settlement, but you will retain whatever legal rights you may have against Defendants. Any judgment entered by the Court will bind all Class Members who do not request exclusion. If you stay in the Settlement, you may object to it by April 19, 2021. The Long Form Class Notice, which is available on the Settlement Website, explains how to exclude yourself or object. If you do not request to be excluded from the Class, you may, if you so desire, enter an appearance through counsel. The Court will hold a hearing on May 14, 2021 at 9:00 a.m. to consider whether to approve the Settlement and a request by the lawyers representing all Class Members for attorneys’ fees and costs, and for a service award to the class representative. You may ask to appear at the hearing, but you don’t have to.

More information? For complete information about the Settlement and its terms, to view the Long Form Class Notice, Settlement Agreement, related Court documents, and to learn more about how to exercise your various options under the Settlement, including how to submit a Claim, go to www.SoftwareAutorenewalSettlement.com. You may also email the Settlement Administrator at SoftwareAutoRenewalSettlement@cptgroup.com or call 1-888-413-3118.