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Co-Lead Class Counsel

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JEANENE POPP, LUIS PONCE, and
JACOB ROBERTS, on behalf of
themselves and all those similarly
situated,

Plaintiffs,

vs.

LIVE NATION
ENTERTAINMENT, INC., and
TICKETMASTER LLC,

Defendants.

Case No. 2:22-cv-00047-GW-KES

The Hon. George H. Wu
The Hon. Karen E. Scott

**PLAINTIFFS' NOTICE OF
UPDATED PROPOSED NOTICE
FORM DOCUMENTS**

Discovery Cutoff: June 30, 2026
Pre-Trial Conference: June 24, 2027
Trial: July 6, 2027

1 **NOTICE OF UPDATED PROPOSED NOTICE FORM DOCUMENTS**

2 PLEASE TAKE NOTICE that Plaintiffs Jeanene Popp, Luis Ponce, and Jacob
3 Roberts (“Plaintiffs”), on behalf of themselves and all others similarly situated,
4 provide the attached updated proposed notice form documents for their Motion for
5 Approval of Class Notice Plan (Dkt. 555) in response to the Court’s requested edits
6 (Dkt. 567).

7 Redline versions indicating changes from the previously filed forms of notice
8 are attached as Exhibits A-C. Clean versions of the new forms of notice are attached
9 as Exhibits D-F. Plaintiffs’ proposed timeline for sending the notices is also attached
10 as Exhibit G.

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1 Dated: April 17, 2026

Respectfully submitted,

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By */s/ Kevin Y. Teruya*

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Co-Lead Class Counsel

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SIGNATURE ATTESTATION

I am the ECF user whose identification and password are being used to file the foregoing document. Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), I, Kevin Y. Teruya, attest that I have obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

Dated: April 17, 2026

/s/ Kevin Y. Teruya

Kevin Y. Teruya

EXHIBIT A

NOTICE OF PENDENCY OF CLASS ACTION

If you purchased a primary ticket for an event at certain concert venues directly from Ticketmaster or an affiliate Live Nation entity and paid fees for primary ticketing services at any point since 2010, a class action has been filed that may affect your rights

A federal court authorized this Notice. This is not a solicitation from a lawyer. Please read this Notice carefully and in its entirety.

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

- A lawsuit known as [Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.](#), Case No. [22-cv-00047-GW-KES](#), is pending in the United States District Court for the Central District of California (the “Court”). [The case Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C. was previously captioned Heckman, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.](#)
- Plaintiffs have sued Defendants Live Nation Entertainment, Inc. (“Live Nation”) and Ticketmaster LLC (“Ticketmaster”) to recover alleged damages they suffered from paying allegedly supracompetitive fees on primary ticket purchases from Ticketmaster’s online platforms.
- Live Nation and Ticketmaster deny Plaintiffs’ claims and deny any liability.
- The Court has not decided who is right. There is no money available now, and no guarantee that there will be; however, your legal rights are affected, and **you have a choice to make now.**
- The Court has decided that the legal claims brought by Plaintiffs can proceed as a nationwide class action. Specifically, the Court certified a class consisting of all individuals in the United States who purchased a ticket directly from Ticketmaster or an affiliate Live Nation entity for a concert event that occurred at what Plaintiffs call a “major concert venue” (defined by Plaintiffs as the top 500 United States concert venues by ticket sales according to *Pollstar* in any year from 2010 to the present) in the U.S. and paid fees for primary ticketing services at any point since 2010.

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YOUR LEGAL RIGHTS AND OPTIONS

DO NOTHING	<ul style="list-style-type: none"> • Stay a class member. • Keep the possibility of getting money or benefits that may come from a trial or a settlement. • Be bound by the Court or jury’s decision. • Give up your right to sue Defendants separately about the same legal claims in this lawsuit.
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Questions? Visit www.TicketmasterFeeClassAction.com or call toll-free at 1-xxx-xxx-xxxx

YOUR LEGAL RIGHTS AND OPTIONS	
EXCLUDE YOURSELF BY [DATE]	<ul style="list-style-type: none">• Remove yourself from the class.• Give up your right to get any money or benefits that may come from a trial or a settlement.• You will not be bound by the Court or jury's decision.• Keep your right to sue Defendants separately about the same legal claims in this lawsuit.

Questions? Visit www.TicketmasterFeeClassAction.com or call toll-free at 1-xxx-xxx-xxxx

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Questions? Visit www.TicketmasterFeeClassAction.com or call toll-free at 1-xxx-xxx-xxxx

BASIC INFORMATION

1. Why should I read this Notice?

You may be a part of a class action lawsuit that is now pending against Defendants Ticketmaster and Live Nation in the United States District Court for the Central District of California, entitled [Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C., Case No. 22-cv-00047-GW-KES](#). The lawsuit has been certified by the Court to proceed as a class action on behalf of a group of consumers who purchased a ticket directly from Ticketmaster or an affiliate Live Nation entity for a concert event at what Plaintiffs call a “major concert venue” (defined by Plaintiffs as the top 500 United States concert venues by ticket sales according to *Pollstar* in any year from 2010 to the present) in the U.S. and paid fees for primary ticketing services at any point since 2010.

Live Nation and Ticketmaster deny Plaintiffs’ legal claims and do not admit any liability. The Court has not decided who is right.

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

In a class action lawsuit, one or more people called “Plaintiffs” or “class representatives” sue on behalf of themselves and other people who have similar claims. All of the people together are a “class” and are called “class members.” The companies they sue (in this case, Ticketmaster and Live Nation) are referred to as the “Defendants.”

A class action allows a court to resolve claims or decide common issues for the entire class without requiring each class member to file their own separate, individual lawsuit. All of the members of the class are bound by the result of the class action lawsuit, except for those people who choose to exclude themselves from the class (as described in [section II](#) below).

The Court appointed Plaintiffs Luis Ponce, Jeanene Popp, and Jacob Roberts as class representatives in this case.

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3. Am I part of the class?

You are a class member if you meet **ALL** of the criteria below:

- ✓ You are an individual in the United States.
- ✓ You purchased a primary ticket and paid associated fees for primary ticketing services.
- ✓ Your ticket was purchased for a concert event at what Plaintiffs call a “major concert venue” ([as defined above](#)) in the United States.
- ✓ Your ticket was purchased *directly* from Ticketmaster or one of its affiliated entities owned, directly or indirectly, by Live Nation Entertainment, Inc.
- ✓ Your ticket was purchased at any point since 2010.

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Excluded from the class are Defendants; the officers, directors or employees of Defendants; any entity in which any Defendant has a controlling interest; any affiliate, legal representative, heir or assign of Defendants; federal, state or local governmental entities; any judicial officer presiding over this action and the members of his/her immediate family and judicial staff; any juror assigned to this action; and any purchaser that is judicially determined in this case to be subject to an

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Questions? Visit www.TicketmasterFeeClassAction.com or call toll-free at 1-xxx-xxx-xxxx

enforceable arbitration agreement with Ticketmaster or Live Nation that governs the claims asserted in [Popp, et. al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C., Case No. 22-cv-00047-GW-KES](#).

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4. I'm still not sure if I am included.

If you are still not sure whether you are a class member, you can get free help at www.TicketmasterFeeClassAction.com or by calling or writing to the lawyers in this case, at the phone number or address listed in [section 12](#) below.

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THE CLAIMS IN THE LAWSUIT

5. What claims are alleged in this class action lawsuit?

In this class action, Plaintiffs allege that Defendants have monopoly power in an alleged market for primary ticketing services for what Plaintiffs call "major concert venues" [\(as defined above\)](#) and in the alleged market for concert promotion services for alleged "major concert venues." Plaintiffs allege that Defendants engaged in anticompetitive conduct through (1) exclusive dealing; (2) coercive tying arrangements; and (3) the use of economic threats and coercion. As a result of Defendants' actions, Plaintiffs claim that all class members were overcharged by the difference between the allegedly supracompetitive fees actually paid and the fees class members would have paid in a competitive market.

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6. How do Defendants respond?

Live Nation and Ticketmaster deny Plaintiffs' claims and deny any liability.

7. Has the Court decided who is right?

The Court hasn't decided whether the Plaintiffs or Defendants are right. By certifying the class and authorizing this [Notice](#), the Court is not suggesting which side will win or lose this case.

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8. What are Plaintiffs asking for?

Plaintiffs are asking for monetary damages for the class and injunctive relief.

9. Is there any money available now?

No money or benefits are available now because the Court has not yet decided whether Defendants did anything wrong, and the two sides have not settled the case. There is no guarantee that money or benefits will be obtained. If they are, you will be notified about how to ask for a share.

YOUR RIGHTS AND OPTIONS

Class members may: (1) do nothing or (2) ask to be excluded ("opt-out") from the class.

10. What happens if I do nothing at all?

If you do nothing, then you will remain in the class, which will indicate that you wish to pursue

Questions? Visit www.TicketmasterFeeClassAction.com or call toll-free at 1-xxx-xxx-xxxx

your rights against Defendants in this case, and you will be bound by all past, present, and future orders, findings, and judgments in this class action, whether favorable or unfavorable. If any money is awarded to the class, through either settlement or judgment after trial, you may get a share of the award. But by staying in the class, you will give up your right to sue Defendants separately for the claims in this case, whether individually or as part of a class.

11. How do I exclude myself from the class?

If you are a member of the class defined in [section 3](#) above and choose to be excluded from the class, you must notify the [Notice Administrator](#) (address below) in writing by [\[date\]](#). By doing so, you will “opt-out” of this class action. If you properly opt-out, you will NOT be bound by any orders, findings, or judgments in this class action. You will NOT get a share of any award of money that may be recovered on behalf of the class. But you MAY individually sue Defendants with regard to the issues in this class action, at your own expense.

To opt-out of the class, you must send a written request by mail and include: (1) a statement that “I wish to opt-out of the class in [Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.](#)” or words to similar effect that make clear your intention to be excluded from the class, (2) your full name, email address, telephone number, and mailing address, and (3) your handwritten signature and the date. Your request for exclusion must be mailed and postmarked on or before [\[date\]](#), to the following address:

x
c/o JND Legal Administration
P.O. Box x
Seattle, WA 98111

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in this case?

The Court appointed the law firms of Quinn Emanuel Urquhart & Sullivan, LLP and Keller Postman LLC to represent the class. Together the law firms are called “Class Counsel.” They are experienced in handling similar cases. Class Counsel’s contact information is below:

Kevin Y. Teruya
kevinteruya@quinnemanuel.com
Adam B. Wolfson
adamwolfson@quinnemanuel.com
William R. Sears
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Washington, D.C., 20005
Telephone: (202) 918-1123
150 N. Riverside Plaza, Suite 4100
Chicago, IL 60606
Telephone (312) 741-5220

Deleted: You may wish to consider that 20 States are also pursuing damages on behalf of their residents for the same or similar violations as those alleged in this case in a separate case proceeding in New York, *United States of America et al. v. Live Nation Entertainment, Inc. et al.*, No. 1:24-cv-03973-AS (S.D.N.Y.). The 20 States are: Arizona, Colorado, Connecticut, Florida, Illinois, Indiana, Michigan, Nevada, New Hampshire, New Jersey, New York, North Carolina, Rhode Island, South Carolina, Utah, Washington, West Virginia, Wisconsin, the Commonwealth of Pennsylvania, and the District of Columbia.

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Questions? Visit www.TicketmasterFeeClassAction.com or call toll-free at 1-xxx-xxx-xxxx

13. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you will have to pay that lawyer. For example, you can ask your own lawyer to appear in Court for you if you want someone other than Class Counsel to speak for you.

14. How will the lawyers be paid?

If Class Counsel recovers money or benefits for the class, they may ask the Court for fees and expenses. You will not be individually responsible for paying any attorneys' fees or costs to Class Counsel regardless of whether there is any recovery for the class.

THE TRIAL

15. How and when will the Court decide who is right?

The trial date is set for July 6, 2027, at 9:00 a.m. at the United States District Court for the Central District of California, located at First Street U.S. Court House, Los Angeles, in Courtroom 9D, 9th Floor. During the trial, a jury will hear evidence to help them reach a decision about whether the Plaintiffs or Defendants are right about the claims in the lawsuit. For updates, please visit www.TicketmasterFeeClassAction.com.

16. Do I have to come to the trial?

No. You do not need to come to the trial. Class Counsel will present the case for the Plaintiffs, and Defendants will present the defenses. You or your own lawyer are welcome to come at your own expense.

17. Will I get money after the trial?

If the Plaintiffs obtain money or benefits as a result of the trial or a settlement, you will be notified about how to ~~submit claims to receive a portion of any moneys or other benefits~~. We do not know how long this will take.

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GETTING MORE INFORMATION

18. Are more details available?

This Notice summarizes the class action. For more information, you can contact Class Counsel at the information listed in [section 12](#) above, or access the Court docket in this case, through the Court's Public Access to Court Electronic Records (PACER) system. You can also visit the website <https://ecf.cacd.uscourts.gov/>, or call the Notice Administrator at 1-xxx-xxx-xxxx, or obtain additional information at www.TicketmasterFeeClassAction.com.

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PLEASE DO NOT CONTACT THE COURT TO INQUIRE ABOUT THIS CASE

Questions? Visit www.TicketmasterFeeClassAction.com or call toll-free at 1-xxx-xxx-xxxx

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Tomi Gadpaille

4/17/2026 6:08:00 PM

EXHIBIT B

From: info@TicketmasterFeeClassAction.com
To: x
Re: Ticketmaster Fee Class Action Notice

NOTICE OF PENDENCY OF CLASS ACTION

Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.,
Case No. 22-cv-00047-GW-KES
United States District Court for the Central District of California

If you purchased a primary ticket for certain concert events directly from Ticketmaster or an affiliate Live Nation entity since 2010, a class action has been filed that may affect your rights

A federal court authorized this Notice. This is not a solicitation from a lawyer.

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

This Notice is to inform you about your rights in a lawsuit known as *Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C., Case No. 22-cv-00047-GW-KES* that is pending in the United States District Court for the Central District of California (the "Court"). Plaintiffs bring this class action against Defendants Live Nation Entertainment, Inc. ("Live Nation") and Ticketmaster LLC ("Ticketmaster") to recover alleged damages they suffered from paying allegedly supracompetitive fees on primary ticket purchases from Ticketmaster's online platforms. The case *Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.* was previously captioned *Heckman, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.*

Live Nation and Ticketmaster deny Plaintiffs' claims and deny any liability. The Court has not decided who is right.

Am I part of the class?

The Court has decided that the legal claims brought by Plaintiffs can proceed as a nationwide class action.

You are a class member if you meet **ALL** of the criteria below:

- ✓ You are an individual in the United States.
- ✓ You purchased a primary ticket and paid associated fees for primary ticketing services.
- ✓ Your ticket was purchased for a concert event at what Plaintiffs call a "major concert venue" (defined by Plaintiffs as the top 500 United States concert venues by ticket sales according to *Pollstar* in any year from 2010 to the present) in the United States.
- ✓ Your ticket was purchased *directly* from Ticketmaster or one of its affiliated entities owned, directly or indirectly, by Live Nation.
- ✓ Your ticket was purchased at any point since 2010.

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Excluded from the class are Defendants; the officers, directors or employees of Defendants; any entity in which any Defendant has a controlling interest; any affiliate, legal representative, heir or assign of Defendants; federal, state or local governmental entities; any judicial officer presiding over this action and the members of his/her immediate family and judicial staff; any juror assigned to this action; and any purchaser that is judicially determined in this case to be subject to an enforceable arbitration agreement with Ticketmaster or Live Nation that governs the claims asserted in *Popp, et. al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C., Case No. 22-cv-00047-GW-KES*.

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Deleted: *Popp, et. al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C., Popp v. Live Nation Ent., Inc., Case No. 2:22-cv00047-GW-KESx (C.D. Cal.)*

What are my options?

If you are a class member, you can: (1) do nothing or (2) ask to be excluded (“opt-out”) from the class.

Do Nothing: If you do nothing, then you will remain in the class, which will indicate that you wish to pursue your rights against Defendants in this case, and you will be bound by all past, present, and future orders, findings, and judgments in this class action, whether favorable or unfavorable. If any money is awarded to the class, through either settlement or judgment after trial, you may get a share of the award. But by staying in the class, you will give up your right to sue Defendants separately for the claims in this case, whether individually or as part of a class.

Exclude Yourself: You will NOT be bound by the Court or jury’s decision. You will keep your right to sue Defendants separately about the same legal claims in this lawsuit. But you will not get any money or benefits that may come from a trial or settlement. To opt-out of the class, you must send a written request including: (1) a statement that “I wish to opt-out of the class in *Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.*” or words to similar effect that make clear your intention to be excluded from the class, (2) your full name, email address, telephone number, and mailing address, and (3) your handwritten signature and the date. Your request for exclusion must be mailed and postmarked on or before [date] to:

Deleted: You may wish to consider that 20 States are also pursuing damages on behalf of their residents for the same or similar violations as those alleged in this case in a separate case proceeding in New York, *United States of America et al. v. Live Nation Entertainment, Inc. et al.*, No. 1:24-cv-03973-AS (S.D.N.Y.). The 20 States are: Arizona, Colorado, Connecticut, Florida, Illinois, Indiana, Michigan, Nevada, New Hampshire, New Jersey, New York, North Carolina, Rhode Island, South Carolina, Utah, Washington, West Virginia, Wisconsin, the Commonwealth of Pennsylvania, and the District of Columbia....

x Class Action
c/o JND Legal Administration
P.O. Box x
Seattle, WA 98111

When is the trial?

The trial date is set for July 6, 2027. For updates, please visit www.TicketmasterFeeClassAction.com. The Court appointed the law firms of Quinn Emanuel Urquhart & Sullivan, LLP, and Keller Postman LLC to represent the class as “Class Counsel.” You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you will have to pay that lawyer. For example, you can ask your own lawyer to appear in Court for you if you want someone other than Class Counsel to speak for you.

How do I get more information?

This Notice summarizes the class action. For more information, visit www.TicketmasterFeeClassAction.com or contact Class Counsel whose contact information can be found at this website; contact the Notice Administrator at 1-xxx-xxx-xxxx; or access the Court docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cacd.uscourts.gov/>.

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Questions? Visit
or call toll-free at 1-xxx-xxx-xxxx

**PLEASE DO NOT CONTACT THE COURT
TO INQUIRE ABOUT THIS CASE**

[Unsubscribe](#)

EXHIBIT C

If you purchased a primary ticket for certain concert events directly from Ticketmaster or an affiliate Live Nation entity any point since 2010, a class action **has been filed that** may affect your rights

SEATTLE/ **Month x**, 2026/[JND Legal Administration](#)

A class action lawsuit known as *Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.* Case No. [22-cv-00047-GW-KES](#) is pending in the United States District Court for the Central District of California (the “Court”). [The case *Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.* was previously captioned *Heckman, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.*](#) Plaintiffs bring this class action against Defendants Live Nation Entertainment, Inc. (“Live Nation”) and Ticketmaster LLC (“Ticketmaster”) to recover alleged damages they suffered from paying allegedly supracompetitive fees on primary ticket purchases from Ticketmaster’s online platforms.

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Live Nation and Ticketmaster deny Plaintiffs’ claims and deny any liability. The Court has not decided who is right.

Am I part of the class?

The Court has decided that the legal claims brought by Plaintiffs can proceed as a nationwide class action.

You are a class member if you meet **ALL** of the criteria below:

- ✓ You are an individual in the United States.
- ✓ You purchased a primary ticket and paid associated fees for primary ticketing services.
- ✓ Your ticket was purchased for a concert event at what Plaintiffs call a “major concert venue” (defined by Plaintiffs as the top 500 United States concert venues by ticket sales according to *Pollstar* in any year from 2010 to the present) in the United States.
- ✓ Your ticket was purchased *directly* from Ticketmaster or one of its affiliated entities owned, directly or indirectly, by Live Nation.
- ✓ Your ticket was purchased at any point since 2010.

Excluded from the class are Defendants; the officers, directors or employees of Defendants; any entity in which any Defendant has a controlling interest; any affiliate, legal representative, heir or assign of Defendants; federal, state or local governmental entities; any judicial officer presiding over this action and the members of his/her immediate family and judicial staff; any juror assigned to this action; and any purchaser that is judicially determined in this case to be subject to an enforceable arbitration agreement with Ticketmaster or Live Nation that governs the claims asserted in [Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.](#), Case No. [2:22-cv-00047-GW-KES](#).

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What are my options?

If you are a class member, you can: (1) do nothing or (2) ask to be excluded (“opt-out”) from the class.

Do Nothing: If you do nothing, then you will remain in the class, which will indicate that you wish to pursue your rights against Defendants in this case, and you will be bound by all past, present, and future orders, findings, and judgments in this class action, whether favorable or unfavorable. If any money is

awarded to the class, through either settlement or judgment after trial, you may get a share of the award. But by staying in the class, you will give up your right to sue Defendants separately for the claims in this case, whether individually or as part of a class.

Exclude Yourself: You will NOT be bound by the Court or jury’s decision. You will keep your right to sue Defendants separately about the same legal claims in this lawsuit. But you will not get any money or benefits that may come from a trial or settlement. To opt-out of the class, you must send a written request including: (1) a statement that “I wish to opt-out of the class in *Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.*” or words to similar effect that make clear your intention to be excluded from the class, (2) your full name, email address, telephone number, and mailing address, and (3) your handwritten signature and the date. Your request for exclusion must be mailed and postmarked on or before [date] to:

x Class Action
c/o JND Legal Administration
P.O. Box x
Seattle, WA 98111

When is the trial?

The trial date is set for July 6, 2027. For updates, please visit www.TicketmasterFeeClassAction.com. The Court appointed the law firms of Quinn Emanuel Urquhart & Sullivan, LLP, and Keller Postman LLC to represent the class as “Class Counsel.” You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you will have to pay that lawyer. For example, you can ask your own lawyer to appear in Court for you if you want someone other than Class Counsel to speak for you.

How do I get more information?

This Notice summarizes the class action. For more information, visit www.TicketmasterFeeClassAction.com or contact Class Counsel whose contact information can be found at this website; contact the Notice Administrator at 1-xxx-xxx-xxxx; or access the Court docket in this case through the Court’s Public Access to Court Electronic Records (PACER) system at <https://ecf.cacd.uscourts.gov/>.

Deleted: You may wish to consider that 20 States are also pursuing damages on behalf of their residents for the same or similar violations as those alleged in this case in a separate case proceeding in New York, *United States of America et al. v. Live Nation Entertainment, Inc. et al.*, No. 1:24-cv-03973-AS (S.D.N.Y.). The 20 States are: Arizona, Colorado, Connecticut, Florida, Illinois, Indiana, Michigan, Nevada, New Hampshire, New Jersey, New York, North Carolina, Rhode Island, South Carolina, Utah, Washington, West Virginia, Wisconsin, the Commonwealth of Pennsylvania, and the District of Columbia.

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EXHIBIT D

NOTICE OF PENDENCY OF CLASS ACTION

If you purchased a primary ticket for an event at certain concert venues directly from Ticketmaster or an affiliate Live Nation entity and paid fees for primary ticketing services at any point since 2010, a class action has been filed that may affect your rights

A federal court authorized this Notice. This is not a solicitation from a lawyer. Please read this Notice carefully and in its entirety.

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

- A lawsuit known as *Popp, et. al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.*, Case No. 22-cv-00047-GW-KES is pending in the United States District Court for the Central District of California (the “Court”). The case *Popp, et. al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.* was previously captioned *Heckman, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.*
- Plaintiffs have sued Defendants Live Nation Entertainment, Inc. (“Live Nation”) and Ticketmaster LLC (“Ticketmaster”) to recover alleged damages they suffered from paying allegedly supracompetitive fees on primary ticket purchases from Ticketmaster’s online platforms.
- Live Nation and Ticketmaster deny Plaintiffs’ claims and deny any liability.
- The Court has not decided who is right. There is no money available now, and no guarantee that there will be; however, your legal rights are affected, and **you have a choice to make now.**
- The Court has decided that the legal claims brought by Plaintiffs can proceed as a nationwide class action. Specifically, the Court certified a class consisting of all individuals in the United States who purchased a ticket directly from Ticketmaster or an affiliate Live Nation entity for a concert event that occurred at what Plaintiffs call a “major concert venue” (defined by Plaintiffs as the top 500 United States concert venues by ticket sales according to *Pollstar* in any year from 2010 to the present) in the U.S. and paid fees for primary ticketing services at any point since 2010.

YOUR LEGAL RIGHTS AND OPTIONS	
DO NOTHING	<ul style="list-style-type: none"> • Stay a class member. • Keep the possibility of getting money or benefits that may come from a trial or a settlement. • Be bound by the Court or jury’s decision. • Give up your right to sue Defendants separately about the same legal claims in this lawsuit.

Questions? Visit www.TicketmasterFeeClassAction.com or call toll-free at 1-XXX-XXX-XXXX

YOUR LEGAL RIGHTS AND OPTIONS	
EXCLUDE YOURSELF BY [DATE]	<ul style="list-style-type: none">• Remove yourself from the class.• Give up your right to get any money or benefits that may come from a trial or a settlement.• You will not be bound by the Court or jury's decision.• Keep your right to sue Defendants separately about the same legal claims in this lawsuit.

Questions? Visit www.TicketmasterFeeClassAction.com or call toll-free at 1-xxx-xxx-xxxx

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Questions? Visit www.TicketmasterFeeClassAction.com or call toll-free at 1-xxx-xxx-xxxx

BASIC INFORMATION

1. Why should I read this Notice?

You may be a part of a class action lawsuit that is now pending against Defendants Ticketmaster and Live Nation in the United States District Court for the Central District of California, entitled *Popp, et. al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.*, Case No. 22-cv-00047-GW-KES. The lawsuit has been certified by the Court to proceed as a class action on behalf of a group of consumers who purchased a ticket directly from Ticketmaster or an affiliate Live Nation entity for a concert event at what Plaintiffs call a “major concert venue” (defined by Plaintiffs as the top 500 United States concert venues by ticket sales according to *Pollstar* in any year from 2010 to the present) in the U.S. and paid fees for primary ticketing services at any point since 2010.

Live Nation and Ticketmaster deny Plaintiffs’ legal claims and do not admit any liability. The Court has not decided who is right.

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

In a class action lawsuit, one or more people called “Plaintiffs” or “class representatives” sue on behalf of themselves and other people who have similar claims. All of the people together are a “class” and are called “class members.” The companies they sue (in this case, Ticketmaster and Live Nation) are referred to as the “Defendants.”

A class action allows a court to resolve claims or decide common issues for the entire class without requiring each class member to file their own separate, individual lawsuit. All of the members of the class are bound by the result of the class action lawsuit, except for those people who choose to exclude themselves from the class (as described in section 11 below).

The Court appointed Plaintiffs Luis Ponce, Jeanene Popp, and Jacob Roberts as class representatives in this case.

3. Am I part of the class?

You are a class member if you meet **ALL** of the criteria below:

- ✓ You are an individual in the United States.
- ✓ You purchased a primary ticket and paid associated fees for primary ticketing services.
- ✓ Your ticket was purchased for a concert event at what Plaintiffs call a “major concert venue” (as defined above) in the United States.
- ✓ Your ticket was purchased *directly* from Ticketmaster or one of its affiliated entities owned, directly or indirectly, by Live Nation Entertainment, Inc.
- ✓ Your ticket was purchased at any point since 2010.

Excluded from the class are Defendants; the officers, directors or employees of Defendants; any entity in which any Defendant has a controlling interest; any affiliate, legal representative, heir or assign of Defendants; federal, state or local governmental entities; any judicial officer presiding over this action and the members of his/her immediate family and judicial staff; any juror assigned to this action; and any purchaser that is judicially determined in this case to be subject to an

Questions? Visit www.TicketmasterFeeClassAction.com or call toll-free at 1-xxx-xxx-xxxx

enforceable arbitration agreement with Ticketmaster or Live Nation that governs the claims asserted in *Popp, et. al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.*, Case No. 22-cv-00047-GW-KES.

4. I'm still not sure if I am included.

If you are still not sure whether you are a class member, you can get free help at www.TicketmasterFeeClassAction.com or by calling or writing to the lawyers in this case, at the phone number or address listed in section 12 below.

THE CLAIMS IN THE LAWSUIT

5. What claims are alleged in this class action lawsuit?

In this class action, Plaintiffs allege that Defendants have monopoly power in an alleged market for primary ticketing services for what Plaintiffs call “major concert venues” (as defined above) and in the alleged market for concert promotion services for alleged “major concert venues.” Plaintiffs allege that Defendants engaged in anticompetitive conduct through (1) exclusive dealing; (2) coercive tying arrangements; and (3) the use of economic threats and coercion. As a result of Defendants’ actions, Plaintiffs claim that all class members were overcharged by the difference between the allegedly supracompetitive fees actually paid and the fees class members would have paid in a competitive market.

6. How do Defendants respond?

Live Nation and Ticketmaster deny Plaintiffs’ claims and deny any liability.

7. Has the Court decided who is right?

The Court hasn’t decided whether the Plaintiffs or Defendants are right. By certifying the class and authorizing this Notice, the Court is not suggesting which side will win or lose this case.

8. What are Plaintiffs asking for?

Plaintiffs are asking for monetary damages for the class and injunctive relief.

9. Is there any money available now?

No money or benefits are available now because the Court has not yet decided whether Defendants did anything wrong, and the two sides have not settled the case. There is no guarantee that money or benefits will be obtained. If they are, you will be notified about how to ask for a share.

YOUR RIGHTS AND OPTIONS

Class members may: (1) do nothing or (2) ask to be excluded (“opt-out”) from the class.

10. What happens if I do nothing at all?

If you do nothing, then you will remain in the class, which will indicate that you wish to pursue

Questions? Visit www.TicketmasterFeeClassAction.com or call toll-free at 1-xxx-xxx-xxxx

your rights against Defendants in this case, and you will be bound by all past, present, and future orders, findings, and judgments in this class action, whether favorable or unfavorable. If any money is awarded to the class, through either settlement or judgment after trial, you may get a share of the award. But by staying in the class, you will give up your right to sue Defendants separately for the claims in this case, whether individually or as part of a class.

11. How do I exclude myself from the class?

If you are a member of the class defined in section 3 above and choose to be excluded from the class, you must notify the Notice Administrator (address below) in writing by [date]. By doing so, you will “opt-out” of this class action. If you properly opt-out, you will NOT be bound by any orders, findings, or judgments in this class action. You will NOT get a share of any award of money that may be recovered on behalf of the class. But you MAY individually sue Defendants with regard to the issues in this class action, at your own expense.

To opt-out of the class, you must send a written request by mail and include: (1) a statement that “I wish to opt-out of the class in *Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.*” or words to similar effect that make clear your intention to be excluded from the class, (2) your full name, email address, telephone number, and mailing address, and (3) your handwritten signature and the date. Your request for exclusion must be mailed and postmarked on or before [date], to the following address:

x
c/o JND Legal Administration
P.O. Box x
Seattle, WA 98111

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in this case?

The Court appointed the law firms of Quinn Emanuel Urquhart & Sullivan, LLP and Keller Postman LLC to represent the class. Together the law firms are called “Class Counsel.” They are experienced in handling similar cases. Class Counsel’s contact information is below:

Kevin Y. Teruya
kevinteruya@quinnemanuel.com
Adam B. Wolfson
adamwolfson@quinnemanuel.com
William R. Sears
willsears@quinnemanuel.com

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017-2543
Telephone: (213) 443-3000

Warren Postman
wdp@kellerpostman.com
Jessica Beringer
jessica.beringer@kellerpostman.com

KELLER POSTMAN LLC

1100 Vermont Avenue, N.W., 12
Washington, D.C., 20005
Telephone: (202) 918-1123

150 N. Riverside Plaza, Suite 4100
Chicago, IL 60606
Telephone (312) 741-5220

Questions? Visit www.TicketmasterFeeClassAction.com or call toll-free at 1-xxx-xxx-xxxx

13. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you will have to pay that lawyer. For example, you can ask your own lawyer to appear in Court for you if you want someone other than Class Counsel to speak for you.

14. How will the lawyers be paid?

If Class Counsel recovers money or benefits for the class, they may ask the Court for fees and expenses. You will not be individually responsible for paying any attorneys' fees or costs to Class Counsel regardless of whether there is any recovery for the class.

THE TRIAL

15. How and when will the Court decide who is right?

The trial date is set for July 6, 2027, at 9:00 a.m. at the United States District Court for the Central District of California, located at First Street U.S. Court House, Los Angeles, in Courtroom 9D, 9th Floor. During the trial, a jury will hear evidence to help them reach a decision about whether the Plaintiffs or Defendants are right about the claims in the lawsuit. For updates, please visit www.TicketmasterFeeClassAction.com.

16. Do I have to come to the trial?

No. You do not need to come to the trial. Class Counsel will present the case for the Plaintiffs, and Defendants will present the defenses. You or your own lawyer are welcome to come at your own expense.

17. Will I get money after the trial?

If the Plaintiffs obtain money or benefits as a result of the trial or a settlement, you will be notified about how to submit claims to receive a portion of any moneys or other benefits. We do not know how long this will take.

GETTING MORE INFORMATION

18. Are more details available?

This Notice summarizes the class action. For more information, you can contact Class Counsel at the information listed in section 12 above, or access the Court docket in this case, through the Court's Public Access to Court Electronic Records (PACER) system. You can also visit the website <https://ecf.cacd.uscourts.gov/> or call the Notice Administrator at 1-xxx-xxx-xxxx or obtain additional information at www.TicketmasterFeeClassAction.com.

PLEASE DO NOT CONTACT THE COURT TO INQUIRE ABOUT THIS CASE

Questions? Visit www.TicketmasterFeeClassAction.com or call toll-free at 1-xxx-xxx-xxxx

EXHIBIT E

From: info@TicketmasterFeeClassAction.com

To: x

Re: Ticketmaster Fee Class Action Notice

NOTICE OF PENDENCY OF CLASS ACTION

Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.,

Case No. 22-cv-00047-GW-KES

United States District Court for the Central District of California

If you purchased a primary ticket for certain concert events directly from Ticketmaster or an affiliate Live Nation entity since 2010, a class action has been filed that may affect your rights

A federal court authorized this Notice. This is not a solicitation from a lawyer.

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

This Notice is to inform you about your rights in a lawsuit known as *Popp, et. al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.*, Case No. 22-cv-00047-GW-KES that is pending in the United States District Court for the Central District of California (the “Court”). Plaintiffs bring this class action against Defendants Live Nation Entertainment, Inc. (“Live Nation”) and Ticketmaster LLC (“Ticketmaster”) to recover alleged damages they suffered from paying allegedly supracompetitive fees on primary ticket purchases from Ticketmaster’s online platforms. The case *Popp, et. al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.* was previously captioned *Heckman, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.*

Live Nation and Ticketmaster deny Plaintiffs’ claims and deny any liability. The Court has not decided who is right.

Am I part of the class?

The Court has decided that the legal claims brought by Plaintiffs can proceed as a nationwide class action.

You are a class member if you meet **ALL** of the criteria below:

- ✓ You are an individual in the United States.
- ✓ You purchased a primary ticket and paid associated fees for primary ticketing services.
- ✓ Your ticket was purchased for a concert event at what Plaintiffs call a “major concert venue” (defined by Plaintiffs as the top 500 United States concert venues by ticket sales according to *Pollstar* in any year from 2010 to the present) in the United States.
- ✓ Your ticket was purchased *directly* from Ticketmaster or one of its affiliated entities owned, directly or indirectly, by Live Nation.
- ✓ Your ticket was purchased at any point since 2010.

Excluded from the class are Defendants; the officers, directors or employees of Defendants; any entity in which any Defendant has a controlling interest; any affiliate, legal representative, heir or assign of Defendants; federal, state or local governmental entities; any judicial officer presiding over this action and the members of his/her immediate family and judicial staff; any juror assigned to this action; and any purchaser that is judicially determined in this case to be subject to an enforceable arbitration agreement with Ticketmaster or Live Nation that governs the claims asserted in *Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.*, Case No. 22-cv-00047-GW-KES.

What are my options?

If you are a class member, you can: (1) do nothing or (2) ask to be excluded (“opt-out”) from the class.

Do Nothing: If you do nothing, then you will remain in the class, which will indicate that you wish to pursue your rights against Defendants in this case, and you will be bound by all past, present, and future orders, findings, and judgments in this class action, whether favorable or unfavorable. If any money is awarded to the class, through either settlement or judgment after trial, you may get a share of the award. But by staying in the class, you will give up your right to sue Defendants separately for the claims in this case, whether individually or as part of a class.

Exclude Yourself: You will NOT be bound by the Court or jury’s decision. You will keep your right to sue Defendants separately about the same legal claims in this lawsuit. But you will not get any money or benefits that may come from a trial or settlement. To opt-out of the class, you must send a written request including: (1) a statement that “I wish to opt-out of the class in *Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.*” or words to similar effect that make clear your intention to be excluded from the class, (2) your full name, email address, telephone number, and mailing address, and (3) your handwritten signature and the date. Your request for exclusion must be mailed and postmarked on or before **[date]** to:

x Class Action
c/o JND Legal Administration
P.O. Box **x**
Seattle, WA 98111

When is the trial?

The trial date is set for July 6, 2027. For updates, please visit www.TicketmasterFeeClassAction.com. The Court appointed the law firms of Quinn Emanuel Urquhart & Sullivan, LLP, and Keller Postman LLC to represent the class as “Class Counsel.” You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you will have to pay that lawyer. For example, you can ask your own lawyer to appear in Court for you if you want someone other than Class Counsel to speak for you.

How do I get more information?

This Notice summarizes the class action. For more information, visit www.TicketmasterFeeClassAction.com or contact Class Counsel whose contact information can be found at this website; contact the Notice Administrator at 1-xxx-xxx-xxxx; or access the Court docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cacd.uscourts.gov/>.

Questions? Visit
or call toll-free at 1-xxx-xxx-xxxx

**PLEASE DO NOT CONTACT THE COURT
TO INQUIRE ABOUT THIS CASE**

[Unsubscribe](#)

EXHIBIT F

If you purchased a primary ticket for certain concert events directly from Ticketmaster or an affiliate Live Nation entity any point since 2010, a class action has been filed that may affect your rights

SEATTLE/ **Month x**, 2026/[JND Legal Administration](#)

A class action lawsuit known as *Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.* Case No. 22-cv-00047-GW-KES is pending in the United States District Court for the Central District of California (the “Court”). The case *Popp, et. al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.* was previously captioned *Heckman, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.* Plaintiffs bring this class action against Defendants Live Nation Entertainment, Inc. (“Live Nation”) and Ticketmaster LLC (“Ticketmaster”) to recover alleged damages they suffered from paying allegedly supracompetitive fees on primary ticket purchases from Ticketmaster’s online platforms.

Live Nation and Ticketmaster deny Plaintiffs’ claims and deny any liability. The Court has not decided who is right.

Am I part of the class?

The Court has decided that the legal claims brought by Plaintiffs can proceed as a nationwide class action.

You are a class member if you meet **ALL** of the criteria below:

- ✓ You are an individual in the United States.
- ✓ You purchased a primary ticket and paid associated fees for primary ticketing services.
- ✓ Your ticket was purchased for a concert event at what Plaintiffs call a “major concert venue” (defined by Plaintiffs as the top 500 United States concert venues by ticket sales according to *Pollstar* in any year from 2010 to the present) in the United States.
- ✓ Your ticket was purchased *directly* from Ticketmaster or one of its affiliated entities owned, directly or indirectly, by Live Nation.
- ✓ Your ticket was purchased at any point since 2010.

Excluded from the class are Defendants; the officers, directors or employees of Defendants; any entity in which any Defendant has a controlling interest; any affiliate, legal representative, heir or assign of Defendants; federal, state or local governmental entities; any judicial officer presiding over this action and the members of his/her immediate family and judicial staff; any juror assigned to this action; and any purchaser that is judicially determined in this case to be subject to an enforceable arbitration agreement with Ticketmaster or Live Nation that governs the claims asserted in *Popp, et. al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.*, Case No. 2:22-cv-00047-GW-KES.

What are my options?

If you are a class member, you can: (1) do nothing or (2) ask to be excluded (“opt-out”) from the class.

Do Nothing: If you do nothing, then you will remain in the class, which will indicate that you wish to pursue your rights against Defendants in this case, and you will be bound by all past, present, and future orders, findings, and judgments in this class action, whether favorable or unfavorable. If any money is

awarded to the class, through either settlement or judgment after trial, you may get a share of the award. But by staying in the class, you will give up your right to sue Defendants separately for the claims in this case, whether individually or as part of a class.

Exclude Yourself: You will NOT be bound by the Court or jury's decision. You will keep your right to sue Defendants separately about the same legal claims in this lawsuit. But you will not get any money or benefits that may come from a trial or settlement. To opt-out of the class, you must send a written request including: (1) a statement that "I wish to opt-out of the class in *Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.*" or words to similar effect that make clear your intention to be excluded from the class, (2) your full name, email address, telephone number, and mailing address, and (3) your handwritten signature and the date. Your request for exclusion must be mailed and postmarked on or before **[date]** to:

x Class Action
c/o JND Legal Administration
P.O. Box **x**
Seattle, WA 98111

When is the trial?

The trial date is set for July 6, 2027. For updates, please visit www.TicketmasterFeeClassAction.com. The Court appointed the law firms of Quinn Emanuel Urquhart & Sullivan, LLP, and Keller Postman LLC to represent the class as "Class Counsel." You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you will have to pay that lawyer. For example, you can ask your own lawyer to appear in Court for you if you want someone other than Class Counsel to speak for you.

How do I get more information?

This Notice summarizes the class action. For more information, visit www.TicketmasterFeeClassAction.com or contact Class Counsel whose contact information can be found at this website; contact the Notice Administrator at 1-**xxx-xxx-xxxx**; or access the Court docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cacd.uscourts.gov/>.

EXHIBIT G



Popp, et al. v. Live Nation Entertainment, Inc. and Ticketmaster L.L.C.
 Notice Administration Timeline

Event	Weekday	Date	Notes
Order Granting Approval of Class Notice Plan	Monday	April 20, 2026	Estimated
Website Live Date	Monday	May 04, 2026	Within two weeks of Order
Email Notice Campaign (Commence)	Monday	May 04, 2026	Email Notice campaign to commence within two weeks of Order
Press Release	Monday	May 04, 2026	Within two weeks of Order
Supplemental Digital Notice (Commence)	Friday	May 08, 2026	Supplemental Digital Notice campaign to commence four days after Website Live Date
Email Notice Campaign (Complete)	Friday	May 29, 2026	Email Notice campaign to be completed within 25 days of commencement
Supplemental Digital Notice (Complete)	Friday	June 05, 2026	Supplemental Digital Notice campaign to be completed within 28 days of commencement
Exclusion Deadline (Postmarked)	Monday	July 06, 2026	Exclusion Deadline is 60 calendar days from Email Notice Commence. USPS offices are closed on July 3rd in observance of July 4th Federal Holiday. Pushed Exclusion Deadline forward to Monday, July 6th.
JND to provide declaration regarding Class Notice Plan and exclusion requests	Monday	July 27, 2026	Within 21 days of Exclusion Deadline

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SKOT HECKMAN, LUIS PONCE,
JEANENE POPP, and JACOB
ROBERTS, on behalf of themselves
and all those similarly situated,

Plaintiffs,

vs.

LIVE NATION ENTERTAINMENT,
INC., and TICKETMASTER LLC,

Defendants.

Case No. 2:22-cv-00047-GW-KES

The Hon. George H. Wu
The Hon. Karen E. Scott

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION FOR
APPROVAL OF CLASS NOTICE
PLAN**

Discovery Cutoff: June 30, 2026
Pre-Trial Conference: June 24, 2027
Trial: July 6, 2027

1 **PLAINTIFF’S PROPOSED ORDER**

2 THIS MATTER comes before this Court upon Plaintiffs’ Motion for Approval
3 of Class Notice Plan. The Court finds the proposed Notice Plan sufficient to meet the
4 requirements of Rule 23 and due process. After full consideration of the parties’
5 briefing on the matter, Plaintiffs’ Motion for Approval of Class Notice Plan is
6 GRANTED.

7

8 IT IS SO ORDERED.

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10 Date: _____

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HON. GEORGE H. WU

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