

NOTICE OF PENDENCY OF CLASS ACTION

**IF YOU RECEIVED A TEXT MESSAGE FROM DEBT COLLECTOR NATIONAL RECOVERY AGENCY AFTER MESSAGING ‘STOP,’ A CLASS ACTION MAY AFFECT YOUR RIGHTS**

*A federal court authorized this Notice.*

**PLEASE READ THIS NOTICE CAREFULLY**

This Notice explains that the Court certified a class action lawsuit and that your rights may be affected. The lawsuit alleges debt collector NRA Group, LLC, which does business as National Recovery Agency (referred to here as “NRA”), sent debt collection text messages to consumers after being asked to “stop” communicating with the consumers. The lawsuit alleges that NRA’s text messages violated the Fair Debt Collection Practices Act (“FDCPA”). The lawsuit seeks relief for class members (defined below). NRA denies that it violated the FDCPA.

The lawsuit is pending in federal court in Harrisburg, Pennsylvania (the “Court”). The purpose of this Notice is to inform you about how the lawsuit may affect your rights if you fall within the definition of the Class and what steps you may take. This Notice is not an expression by the Court of any opinion as to the merits of any of the claims or defenses asserted by either side in this lawsuit.

This Notice provides a summary of the lawsuit. It also describes who is included in the Class, the effect of remaining in this lawsuit as a Class Member, and how to request exclusion from the Class.

**Your legal rights and options in this lawsuit are summarized below.**

<b>YOUR LEGAL RIGHTS AND OPTIONS</b>	
<b>DO NOTHING AT THIS TIME</b>	If you fall within the definition of the Class and wish to remain in the Class, you do not need to do anything at this time.
<b>ASK TO BE EXCLUDED BY APRIL 21, 2025</b>	<p>If you do not wish to remain in the Class, you can exclude yourself. If you exclude yourself, you can sue NRA yourself. You will not be entitled to share in any relief from any judgment or any possible settlement from this lawsuit. You will not be legally bound by any judgment entered for or against the class and you will be able to pursue any legal claims that you have on your own.</p> <p>To exclude yourself, you must mail a written request for exclusion, postmarked by April 21, 2025. Your written request for exclusion must be send to the address listed below:</p> <p style="text-align: center;">Chamberlain v. NRA Group, LLC c/o CPT Group, Inc. 50 Corporate Park Irvine, CA 92606</p> <p>If you fall within the definition of the Class and decide you do not want to participate in the Class and you do not make a timely request for exclusion as described above, you will still be bound by the any verdict.</p>

QUESTIONS? CALL 1-888-373-2581

## WHAT THIS NOTICE CONTAINS

BACKGROUND INFORMATION .....	PAGE 3
1. Why is there a Notice?	
2. What is this lawsuit about?	
3. What is a class action and who is involved?	
4. Why is this lawsuit a class action?	
WHO IS IN THE CLASS .....	PAGE 4
5. Am I in the Class?	
6. I am still not sure if I am included.	
YOUR RIGHTS AND OPTIONS .....	PAGE 4
7. How do I participate in this class action?	
8. Why would I ask to be excluded?	
9. How do I ask the Court to exclude me from the Class?	
THE ATTORNEYS REPRESENTING YOU .....	PAGE 6
10. Do I have a lawyer in the case?	
11. Should I get my own attorney?	
GETTING MORE INFORMATION .....	PAGE 6
12. How do I get more information?	

# BACKGROUND INFORMATION

## 1. Why is there a Notice?

This Notice explains that the Court has “certified” a class action lawsuit that may affect your rights. This Notice informs you of the nature of the litigation and describes your rights and options. Judge Karoline Mehalchick of the United States District Court for the Middle District of Pennsylvania is overseeing this lawsuit. The lawsuit is known as *Chamberlain v. NRA GROUP, LLC d/b/a National Recovery Agency*, and the case number is 1:21-cv-00281-KM. The Court has authorized this Notice to inform Class Members of their rights.

## 2. What is this lawsuit about?

The lawsuit is about NRA’s alleged practice of continuing to send debt collection text messages to consumers who asked NRA to “stop” communicating with them. Plaintiff alleges that NRA sent her and thousands of other class members debt collection text messages after they had previously messaged NRA either ‘STOP,’ ‘Stop’ or ‘stop.’

Plaintiff alleges that NRA’s text messages violated the Fair Debt Collection Practices Act (FDCPA), which provides that “[i]f a consumer notifies a debt collector in writing . . . that the consumer wishes the debt collector to cease further communication with the consumer, the debt collector shall not communicate further with the consumer with respect to such debt.” 15 U.S.C. § 1692c(c).

NRA denies any wrongdoing or liability for the claims alleged.

The Court has not decided who is right. During any trial or dispositive proceedings, the Court or jury will hear all of the evidence and will reach a decision about whether Plaintiff has proven the merits of her claims. There is no guarantee that the Plaintiff will win, or that She will get any relief for the Class.

You do not need to attend the trial. Plaintiff will present the Plaintiff’s case for the Class, and NRA will present its defenses.

## 3. What is a class action and who is involved?

In a class action, one person called the “Class Representative” (in this case, Plaintiff Autumn Chamberlain) sues on behalf of herself and other people with similar claims. All of the people together are called a “Class” or “Class Members.” One court resolves the issues for everyone in the Class, except for those people who choose to exclude themselves from the Class.

The company the Class Representative has sued (in this case NRA Group, LLC) is called the Defendant.

## 4. Why is this lawsuit a class action?

The Court decided that the Class Representative’s claims against NRA can proceed as a class action because they meet the requirements of Federal Rule of Civil Procedure 23, which governs class actions in federal courts. Specifically, the Court has allowed the Class to proceed with respect to claims for violation of section 1692c(c) of the Fair Debt Collection Practices Act.

## WHO IS IN THE CLASS

### 5. Am I in the Class?

All persons meeting the following definition are in the Class:

All persons within the United States to whom NRA or its agents and/or employees sent a debt collection text message between November 19, 2020 and February 16, 2021, after said person had previously messaged “STOP,” “Stop” or “stop” to NRA.

Therefore, you are a member of the class if you sent a text messages to NRA containing the words “STOP,” “Stop” or “stop” and thereafter received another text message from NRA between November 19, 2020 and February 16, 2021.

Excluded from the Class are: (1) NRA and its employees or agents; and (2) all persons who submit a valid request for exclusion following this Notice of Pendency of Class Action in this litigation.

Your receipt of a Postcard Notice does not mean you are necessarily a member of the Class. Only people who meet the foregoing class definition are members of the Class.

### 6. I am still not sure if I am included.

If you are still not sure whether you are a member of Class, you can call or write to Class Counsel at the phone numbers or address listed below. Do not call the Court.

## YOUR RIGHTS AND OPTIONS

**If you fall within the definition of the Class, you must decide whether to stay in the Class or ask to be excluded (sometimes called “opting out”) of the Class. You have until [insert date], to exclude yourself.**

### 7. How do I participate in this class action?

If you fall within the definition of the Class set forth above, you are a Class Member. As a Class Member, you will be bound by any judgment or settlement, whether favorable or unfavorable, in this lawsuit, and will be able to participate in any relief obtained by Plaintiff in the case. Whether Plaintiff wins or loses, you will not be able to bring individual legal claims against NRA based on the same claims certified for class treatment, nor will you be able to obtain any relief in connection with such claims, other than the relief obtained by the Class. You will also be bound if a judgment is rendered in favor of NRA.

### **IF YOU FALL WITHIN THE CLASS DEFINITION AND WISH TO REMAIN A CLASS MEMBER, YOU DO NOT NEED TO DO ANYTHING**

By doing nothing, you will remain part of the case and you will give up your rights to sue NRA separately about the same claims involved in this action. No judgment or settlement has occurred at this time. If you do not ask to be excluded from the Class now, you will not have the right to seek exclusion later, such as at the time of settlement or judgment. However, in the event of a settlement, Class Members will be notified and have an opportunity to present an objection to the Court if they disagree with the terms of any settlement.

QUESTIONS? CALL 1-888-373-2581

## **8. Why would I ask to be excluded?**

You may want to exclude yourself if you qualify as a member of the Class but do not want to participate in this litigation at all. If you exclude yourself from the Class—which means to remove yourself from the Class and is sometimes called “opting out” of the Class—you will not get any benefits from this litigation.

If your exclusion request is complete and properly submitted before the deadline, you will not be bound by the outcome of the litigation, and you will be free, if you choose, to pursue your own lawsuit against NRA based on the same text messages at issue in this lawsuit. Any separate litigation you choose to bring may be subject to a statute of limitations, or other time-sensitive requirements.

## **9. How do I ask the Court to exclude me from the Class?**

If you wish to be excluded from the Class and retain all your rights, you must submit a written request for exclusion by U.S. Mail, postmarked by April 21, 2025. Be sure to sign the written request for exclusion. To mail your exclusion request, you must send it to the address listed below:

Chamberlain v. NRA Group, LLC  
c/o CPT Group, Inc.  
50 Corporate Park  
Irvine, CA 92606

**IF YOU CHOOSE TO BE EXCLUDED: (1) you will NOT be entitled to share in any relief from any judgment or settlement that results from this lawsuit; (2) you will NOT be bound by any judgment or settlement release entered in this lawsuit; and (3) at your own expense, you MAY pursue any claims that you have by filing separate litigation.**

## THE ATTORNEYS REPRESENTING YOU

### 10. Do I have an attorney in this case?

The Court has appointed the attorneys at Lemberg Law, LLC (43 Danbury Road, Wilton, CT 06897; telephone number (203) 653-2250) to represent the Class and Class Members in this litigation. You will not be charged for these lawyers.

### 11. Should I get my own attorney?

You may retain your own attorney at your own cost. Your attorney will not represent the class, only Class Counsel represents the class. If you retain your own lawyer you will still be a member of the class unless and until you opt out by submitting a request for exclusion.

## GETTING MORE INFORMATION

### 12. How do I get more information?

This Notice summarizes the Class and the nature of the litigation. For more information on the Class and the litigation, you may contact Class Counsel or the Notice Administrator using the contact information below. You may also access the Court's docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://pacer.uscourts.gov/>; or by visiting the office of the Clerk of the Court for the United States District Court for the Middle District of Pennsylvania, Sylvia H. Rambo United States Courthouse, 1501 North 6<sup>th</sup> Street, Harrisburg, PA 17102, between 8:30 a.m. and 5:00 p.m., Monday through Friday, excluding Court holidays.

#### *Court-Appointed Class Counsel*

Stephen Taylor

Joshua Markovits

LEMBERG LAW, L.L.C.

43 Danbury Road, 3rd Floor Wilton, CT 06897

Telephone: (203) 653-2250

Email: [staylor@leberglaw.com](mailto:staylor@leberglaw.com)

Email: [jmarkovits@leberglaw.com](mailto:jmarkovits@leberglaw.com)

#### *Notice Administrator*

CPT Group, Inc.

50 Corporate Park

Irvine, CA 92606

***PLEASE DO NOT CALL OR WRITE THE COURT, THE COURT CLERK, OR NRA ABOUT THE CLASS ACTION OR THE LITIGATION PROCESS.***

QUESTIONS? CALL 1-888-373-2581