

If you obtained an appraisal from LandSafe in connection with a loan originated by Countrywide during the period January 1, 2003 through December 31, 2008, a class action lawsuit may affect your rights.

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

- Barbara Waldrup, Elizabeth Williams, Becky Reaster and Rebecca Murphy (“Plaintiffs”) sued Countrywide Home Loans, Inc., Countrywide Financial Corporation, Bank of America Corporation, Bank of America, National Association, LandSafe, Inc., and LandSafe Appraisal Services, Inc. (collectively referred to as “Defendants”), alleging that Defendants entered into an unlawful relationship and engaged in a fraudulent scheme to charge each Class member approximately \$300-\$550 for real estate appraisals that failed to comply with the Uniform Standards of Professional Appraisal Practice (USPAP).
- The Court has certified the lawsuit as a class action on behalf of all U.S. residents who, during the period January 1, 2003 through December 31, 2008, received an appraisal from LandSafe in connection with a loan originated by Countrywide. The Court also has certified a Class of Texas residents during the same time period.
- At this point, Plaintiffs have made allegations and Defendants have denied them. The Court has not yet determined if the allegations of the lawsuits are true or if the Plaintiffs and Classes are entitled to any relief. In addition to denying the allegations, the Defendants have asserted a number of defenses. The Court or jury will ultimately decide these issues.
- There are no damages or monetary benefits available now and no guarantee there ever will be. However, because the case has been certified as a class action, your legal rights may be affected, and you have a choice to make now.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
DO NOTHING	Stay in this lawsuit. Await the outcome. Give up certain rights. By doing nothing, you keep the possibility of getting money or benefits that may come from a trial or settlement. However, you give up any rights you may have to sue Defendants separately concerning the same legal claims in this lawsuit. You will be bound by the outcome of any trial, whether Plaintiffs win or lose.
ASK TO BE EXCLUDED	Get out of this lawsuit. Get no benefits from it. Keep any rights you may have to sue on your own. If you ask to be excluded and money or benefits are later awarded, you will not share in them. However, if you ask to be excluded, you will keep any rights you may have to sue Defendants separately concerning the same legal claims in this lawsuit.

- Your options are explained in this notice. To ask to be excluded, you must act before March 19, 2019. Your Legal Rights will be affected whether you act or do not act.
- The Plaintiffs must prove their claims against Defendants at trial, but the trial date has not yet been set. If money or other benefits are obtained from Defendants for Plaintiffs and the Classes,

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you will be notified. You also will be notified if the Court determines the Classes should no longer be certified or if the Defendants have prevailed.

PLEASE READ THIS NOTICE CAREFULLY.

Any questions? Contact the Notice Administrator at 877-835-0768.

BASIC INFORMATION

1. Why did I receive a notice?

Defendants' records show that an appraisal from LandSafe was conducted in connection with a loan you may have received that was originated by Countrywide at any time from January 1, 2003 through December 31, 2008. This notice explains that the Court has ordered, or "certified," a class action lawsuit that may affect you. You have legal rights and options that you may exercise before the Court holds a trial or the case is otherwise resolved. Judge Christina A. Snyder, of the United States District Court for the Central District of California, is overseeing these class actions. The actions are comprised of two consolidated lawsuits, called *Waldrup v. Countrywide Financial Corporation*, Case No. 2:13-cv-08833-CAS (AGRx) and *Williams v. Countrywide Financial Corporation*, Case No. 2:16-cv-04166-CAS (AGRx).

2. What is this lawsuit about?

Plaintiffs in this case are Barbara Waldrup, Elizabeth Williams, Becky Reaster and Rebecca Murphy. They allege, on behalf of themselves and other similarly situated persons, that appraisals conducted by LandSafe Appraisal Services, Inc. in connection with mortgage loans originated by Countrywide Home Loans, Inc. and Countrywide Bank did not meet certain legal requirements and applicable appraisal standards, including the Uniform Standards of Professional Appraisal Practice (USPAP). Plaintiffs also allege that Defendants entered into an unlawful relationship and engaged in a fraudulent scheme to charge each Class member approximately \$300-\$550 for residential real property appraisals that failed to comply with USPAP. Plaintiffs assert claims for violation of the Racketeer Influenced and Corrupt Organizations Act on behalf of themselves and the Nationwide Class. Plaintiff Barbara Waldrup asserts a claim for Unjust Enrichment on behalf of herself and the Texas Class. Plaintiff Barbara Waldrup asserts for herself alone claims for fraud and violation of the California Unfair Competition Law. A copy of the Plaintiffs' complaint is available at www.WaldrupWilliamsAppraisalLawsuit.com.

The companies Plaintiffs sued (in this case Countrywide Home Loans, Inc., Countrywide Financial Corporation, LandSafe Appraisal Services, Inc., LandSafe, Inc., Bank of America, N.A., and Bank of America Corporation) are called the "Defendants." All the Defendants deny they have acted unlawfully or improperly, deny that the class certification is appropriate, and deny Plaintiffs and the classes are entitled to any relief. A copy of the Defendants' answer is available at www.WaldrupWilliamsAppraisalLawsuit.com.

3. What is a class action and what is involved?

In a class action lawsuit, one or more people called "Class Representatives" (in this case Barbara Waldrup, Elizabeth Williams, Becky Reaster and Rebecca Murphy) sue on behalf of themselves and on behalf of other people who have similar claims ("the Class" or "the Classes"). The Class Representatives are obligated to represent the Classes and will seek to prove their own claims and those of the Classes. Defendants deny Plaintiffs' allegations as to the Class Representatives and as to all the Class members. Defendants will try to disprove the claims of the Class Representatives and Classes' claims and will seek to prove Defendants' defenses. One court resolves the issues for

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both the Class Representatives and everyone in the Class – except for those people who choose to exclude themselves from the Class. The Court and a jury will hear the evidence and arguments presented by both sides and will decide who should prevail.

4. Why is this lawsuit a class action?

The Court has decided that this lawsuit can be a class action and move towards a trial because it meets the requirements of Federal Rule of Civil Procedure 23, which governs class actions in federal courts.

More information about why the Court certified this lawsuit as a class action is in the Court's February 6, 2018 Civil Minutes and Order, which is available at www.WaldrupWilliamsAppraisalLawsuit.com.

THE CLAIMS IN THE LAWSUIT

5. How do Defendants answer?

Countrywide, LandSafe, and all Defendants deny that Plaintiffs' claims have merit and deny that Plaintiffs are entitled to any recovery in the lawsuits. Defendants contend they have not acted unlawfully or improperly. Countrywide, LandSafe, and all Defendants contend they have acted properly and prudently with regard to the mortgage loan appraisals at issue in the lawsuits, including compliance with USPAP. Defendants also deny that the matter should be certified as a class action and deny that the Classes are entitled to any recovery in the lawsuits.

6. Has the Court decided who is right?

The Court has not decided whether Plaintiffs or Defendants are correct. That will be done through future proceedings in the case. By establishing the Class and authorizing this notice, the Court is not suggesting that Plaintiffs will win or lose this case. Plaintiffs must prove their claims. Defendants will have an opportunity to prove defenses. The trial has not yet been scheduled.

7. What are the Plaintiffs asking for?

Plaintiffs seek an award for damages including payment by Defendants to the Class of all appraisal fees as well as treble damages and other relief sufficient to compensate for Defendants' allegedly unlawful acts.

8. Is there any money available now?

No benefits are available now. The Court has not yet decided whether Plaintiffs can prove their claims for relief and whether Defendants can prove their defenses. There is no guarantee that benefits will ever be obtained. If benefits become available, and you have not excluded yourself from the Class, another notification will be distributed about the available benefits.

WHO IS IN THE CLASS

9. Am I part of this Class?

The Court defined a "Nationwide Class" of all individuals who meet the following requirements:

All residents of the United States of America who, during the period January 1,

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2003 through December 31, 2008, obtained an appraisal from LandSafe in connection with a loan originated by Countrywide.

The Court defined a “Texas Unjust Enrichment Class” of all individuals who meet the following requirements:

All residents of the State of Texas who, during the period January 1, 2003 through December 31, 2008, obtained an appraisal from LandSafe in connection with a loan originated by Countrywide.

You are receiving this Notice because Defendants' records indicate that you may be a resident of the United States who obtained a loan from Countrywide Homes Loans, Inc. or Countrywide Bank, N.A. and an appraisal may have been conducted by LandSafe Appraisal Services, Inc. in connection with that loan relating to residential real property during the time period January 1, 2003 through December 31, 2008.

10. I'm still not sure if I'm included in the Class.

If you are still not sure if you are included in the Class, you can call the Notice Administrator, toll-free 877-835-0768 who may be able to answer some of your questions. The Notice Administrator cannot provide legal advice. Or, you may call or write to the lawyers representing the Classes in this case at the phone number or address listed in Section 16 below.

YOUR RIGHTS AND OPTIONS

You must now decide whether to stay in the Class or ask to be excluded from the Class and the case.

11. What happens if I do nothing at all?

If you do nothing you will remain a member of the Class. You do not need to do anything at this time. If you remain a Class Member, you will be bound by the result of this lawsuit. If the lawsuit is successful, you will share in any money or benefits that may be recovered. If the lawsuit is unsuccessful, you will not receive anything, and you will be barred from seeking other relief against Defendants for the claims asserted in this lawsuit. There is no guarantee that any relief or money will ever be obtained. However, if money or other relief is obtained, you will be notified. You also will receive information about how claims will be paid and instructions explaining what you must do to receive your share (if any) if you are a Class Member and do not exclude yourself.

12. How do I ask the Court to exclude me from the Class?

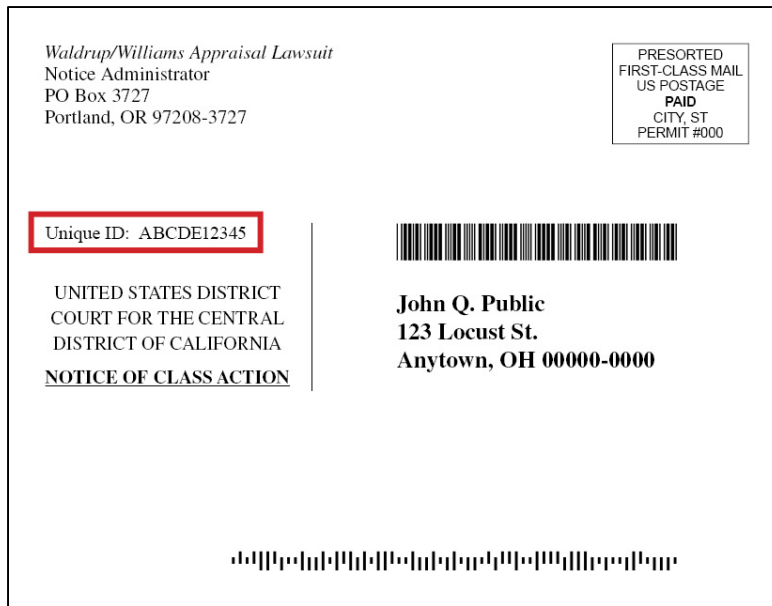
If you ask to be excluded from the Class, you will not be entitled to any recovery of money or benefits, if any is ultimately awarded in connection with this case. However, you will retain any rights you may have now to sue Defendants about the same legal claims that are the subject of this lawsuit on your own.

To exclude yourself from the lawsuit, you must send a letter stating that you want to exclude yourself from the lawsuit to the below address. Your exclusion request must include:

- Your Name,
- Current Mailing Address,
- Address of the mortgaged property which involved the LandSafe appraisal and Countrywide mortgage loan (if different from your current address),

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- The 10 digit Identifier on the Notice Postcard you received (as shown in the example below),



- A statement: “I/We request to be excluded from the Classes in this lawsuit.” and
- Your signature and the signature of any co-borrower under the mortgage loan.
 - If the signature of the co-borrower cannot be obtained, please provide a brief explanation of the circumstances.

You must mail the request letter to the below address and it must be postmarked no later than **March 19, 2019**.

Waldrup/Williams Appraisal Lawsuit
 Notice Administrator
 P.O. Box 3727
 Portland, OR 97208-3727

If you have questions, you can call the Notice Administrator toll-free at 877-835-0768. However, exclusions via telephone or email will not be effective. Exclusions executed by someone besides you on your behalf will not be effective. You must sign the exclusion request.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in this case?

The Court has appointed the law firms of Baron & Budd, P.C. and Hagens Berman Sobol Shapiro LLP as “Class Counsel.” Daniel Alberstone, Roland Tellis, Mark Pifko, and Evan Zucker of Baron & Budd, P.C. and Steve Berman, Thomas Loeser, and Christopher Pitoun of Hagens Berman Sobol Shapiro LLP are the attorneys working on this matter. Their contact information is provided below in Section 16.

14. Should I get my own lawyer?

If you wish to remain a Class Member, you do not need to hire your own lawyer because Class Counsel is working on your behalf. You may make an appearance in the case through another attorney if you choose. If you wish to pursue your own case separate from this one, you will need

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to file a request for exclusion. If you do so, you will need to decide whether to hire your own attorney at your own cost.

15. How will the lawyers be paid?

If Plaintiffs and Class Counsel obtain benefits for the Class, they will ask the Court for fees and expenses. You will not have to pay these fees and expenses. If the Court grants Class Counsel's request or makes an award in a different amount, the fees and expenses would either be deducted from any benefits obtained for the Class or paid separately by Defendants.

16. How do I get more information?

You may review FAQs at www.WaldrupWilliamsAppraisalLawsuit.com. You will also find important documents related to the lawsuit including the Court's Order on Class Certification, the Third Amended Class Complaint, and Defendants' Answer. Please check the website regularly for updated information regarding the lawsuit. You may also access the Court's publically available legal files at the U.S. District Court for the Central District of California in Los Angeles, California.

You may also contact one of the following attorneys at the law firms appointed by the Court to serve as Class Counsel:

Daniel Alberstone Roland Tellis Mark Pifko Evan Zucker Baron & Budd, P.C. 15910 Ventura Boulevard, Suite 1600 Encino, CA 91436 Telephone: (818) 839-2333 Facsimile: (818) 986-9698	Steve Berman Thomas Loeser Christopher Pitoun Hagens Berman Sobol Shapiro LLP 301 North Lake Avenue, Suite 920 Pasadena, CA 91101 Telephone: (213) 330-7150 Facsimile: (213) 330-7152
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PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE.

Dated: December 17, 2018

The Honorable Christina A. Snyder
District Judge,
United States District Court for the
Central District of California