

NOTICE OF SETTLEMENT ADMINISTRATION UPDATE
No. 15-MD-2670 DMS (MSB)

1 On September 16, 2026, JND Administration (“JND”), the Claims
2 Administrator for the End User Settlement Class, and BankUnited, the depository
3 bank for the End User Settlement Class distribution, learned that approximately
4 22,850 checks (out of approximately 400,000 checks mailed to End User Settlement
5 Class Claimants) presented for payment were improperly dishonored by BankUnited.
6 Those checks should have been paid and there are sufficient funds in the distribution
7 account to pay the checks. However, the checks were misidentified by BankUnited’s
8 fraud prevention protocols and could not be released for payment in sufficient time
9 to prevent them from being dishonored. The reason for the occurrence is under
10 investigation. No settlement funds have been affected.

11 All affected End User Settlement Class Members will be paid in full and will
12 be made whole for any charges of fees they may have incurred as a result of the event.
13 Class Counsel for the End User Settlement Class have agreed with JND and
14 BankUnited to the following immediate remedial steps:

- 15 (1) BankUnited has implemented procedures to prevent the recurrence of
16 the event as more checks are presented for payment;
- 17 (2) JND has informed all affected End User Settlement Class Members of
18 the occurrence, advising them that replacement checks will be issued
19 and that each affected End User Settlement Class Member will receive
20 \$20 to offset any fees or charges imposed by the class member’s bank
21 as a result of the event;
- 22 (3) JND also has informed all affected End User Settlement Class Members
23 that they may submit a claim for any additional fees or charges imposed
24 by their banks as a result of the event;
- 25 (4) JND has updated the settlement website,
26 <https://www.tunaendpurchasersettlement.com/>, to provide the same
27 information on the website; and
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(5) JND has updated the automated telephone service to provide the same information on that platform as well.

The occurrence did not affect any settlement claims paid by electronic payment or the majority of settlement payments made by check.

The occurrence will not affect the timing or amount of payments made to all other End User Settlement Class Members.

Class Counsel will timely provide further updated information to the Court as necessary.

Dated: September 17, 2026

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Class Counsel for the End Payer Plaintiffs

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