

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT KANSAS CITY

If you are a Missouri citizen who received a debt collection letter from Martin Leigh PC and its predecessor Martin, Leigh, Laws & Fritzlen, PC between 2007 and the present where Martin Leigh PC was acting on behalf of a debt purchaser, a class action lawsuit may affect your rights.

A state court authorized this class action notice. This is not a solicitation from a lawyer.

- The class includes Missouri citizens who received a debt collection letter from Martin Leigh PC, and its predecessor Martin, Leigh, Laws & Fritzlen, PC between 2007 and the present where Martin Leigh PC was acting on behalf of a debt purchaser.
- The class action lawsuit alleges that Martin Leigh, PC violated the Missouri Merchandising Practices Act.
- The Court has allowed the lawsuit to be a class action on behalf of all Missouri citizens who received a debt collection letter from Martin Leigh PC, and its predecessor Martin, Leigh, Laws & Fritzlen, PC between 2007 and the present where Martin Leigh PC was acting on behalf of a debt purchaser.
- To qualify, you must have been or be a Missouri citizen who received a debt collection letter from Martin Leigh PC, and its predecessor Martin, Leigh, Laws & Fritzlen, PC between 2007 and the present where Martin Leigh PC was acting on behalf of a debt purchaser, and comply with the instructions provided below.
- The Court has not decided whether Martin Leigh did anything wrong. There is no money available now. However, your legal rights are affected whether you act or don't act, and you have a choice to make now. Read this notice carefully.

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 a settlement. But, you give up any rights to sue Martin Leigh, PC separately about the same legal claim in this lawsuit.
Ask To Be Excluded	Get out of this lawsuit. Get no benefits from it. Keep rights. If you ask to be excluded and money or benefits are later awarded, you won't share in those. But you keep any rights to sue Martin Leigh, PC separately about the same legal claim in this lawsuit.

- These rights and options - **and the deadlines to exercise them** - are explained in this notice. To be excluded, you must act before September 4, 2020.
- Lawyers must prove the claims against Martin Leigh, PC at a trial to be scheduled in the future. If money or benefits are obtained from Martin Leigh you will be notified about how to ask for a share.
- **Any questions? Read on and call 1-877-283-7767**

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION **PAGE 4**

1. Why did I get this 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?

THE CLAIMS IN THE LAWSUIT **PAGE 5**

5. What does the lawsuit complain about?
6. How does Martin Leigh, PC answer?
7. Has the Court decided who is right?
8. What is the Plaintiff asking for?
9. Is there any money available now?

WHO IS IN THE CLASS **PAGE 6**

10. Am I part of this Class?
11. Which Missouri citizens who received a debt collection letter from Martin Leigh PC, and its predecessor Martin, Leigh, Laws & Fritzlen, PC between 2007 and the present where Martin Leigh PC was acting on behalf of a debt purchaser are included?
12. Are there any Missouri citizens who received a debt collection letter from Martin Leigh PC, and its predecessor Martin, Leigh, Laws & Fritzlen, PC between 2007 and the present where Martin Leigh PC was acting on behalf of a debt purchaser not in the class?
13. I'm still not sure if I am included.

YOUR RIGHTS AND OPTIONS **PAGE 7**

14. What happens if I do nothing at all?
15. Why would I ask to be excluded?
16. How do I ask the Court to exclude me from the Class?

THE LAWYERS REPRESENTING YOU **PAGE 8**

17. Do I have a lawyer in this case?
18. Should I get my own lawyer?
19. How will the lawyers be paid?

THE TRIAL **PAGE 8**

20. How and when will the Court decide who is right?
21. Do I have to come to the trial?
22. Will I get money after the trial?

GETTING MORE INFORMATION **PAGE 9**

23. Are more details available?

QUESTIONS? CALL 1-877-283-7767

BASIC INFORMATION

1. Why did I get this notice?

Martin Leigh, PC's records show that you are a Missouri citizen who received a debt collection letter from Martin Leigh PC, and its predecessor Martin, Leigh, Laws & Fritzlen, PC between 2007 and the present where Martin Leigh PC was acting on behalf of a debt purchaser.

This notice explains that the Court has allowed, 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. The trial is to decide whether the claim being made against Martin Leigh, PC, on your behalf, are correct. Judge J. Dale Youngs of the Circuit Court of Jackson County, Missouri at Kansas City is overseeing this class action. The lawsuit is known as Yvette Baker v. Ocean 18, LLC, et al., Case No. 1816-CV32043.

2. What is this lawsuit about?

The lawsuit is about whether Martin Leigh, PC violated Missouri's Merchandising Practices Act by deceiving, concealing, suppressing, or omitting from Missouri citizens material facts related to the debt purchaser's absence of a legal right to enforce the alleged debt and charging excessive fees along the way from 2007 to the present.

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

In a class action lawsuit, one or more people called "Class Representatives" (in this case Yvette Baker) sued on behalf of other people who have similar claims. The people together are a "Class" or "Class Members." The people who have sued – and all of the Class Members like them – are called the Plaintiffs. The parties they sued for classwide relief (in this case Martin Leigh) is called the Defendant. One court resolves the issues for everyone in the Class – except for those people who choose to exclude themselves from the Class.

QUESTIONS? CALL 1-877-283-7767

4. Why is this lawsuit a class action?

The Court decided that this lawsuit can be a class action and move towards a trial because it meets the requirements of Missouri Rule of Civil Procedure 52.08, which governs class actions in state courts. Specifically, the Court found that:

- There are numerous Missouri citizens who received a debt collection letter from Martin Leigh PC, and its predecessor Martin, Leigh, Laws & Fritzlen, PC between 2007 and the present where Martin Leigh PC was acting on behalf of a debt purchaser;
- There are legal questions and facts that are common to each of them;
- Yvette Baker's claim is typical of the claim of the rest of the Class;
- Yvette Baker, as Class Representative, and Gregory Leyh, P.C. and Kessinger Law Firm, P.C., as Class Counsel, will fairly and adequately represent the Class' interests;
- The common legal questions and facts are more important than questions that affect only individuals; and
- This class action will be more efficient than having many individual lawsuits.

More information about why the Court is allowing this lawsuit to be a class action is in the Court's Order Certifying the Class, which may be requested by calling 1-877-283-7767.

THE CLAIMS IN THE LAWSUIT

5. What does the lawsuit complain about?

In the lawsuit, the Plaintiff says that Martin Leigh, PC violated Missouri's Merchandising Practices Act by deceiving, concealing, suppressing, or omitting from Missouri citizens material facts related to the debt purchaser's absence of a legal right to enforce the alleged debt and charging excessive fees along the way from 2007 to the present. You may request a copy of the Plaintiff's First Amended Class Action Petition by calling 1-877-283-7767.

6. How does Martin Leigh, P.C. answer?

Martin Leigh, PC denied wrongdoing in its pleadings in response to the First Amended Class Action Petition. Martin Leigh's Answer to the First Amended Class Action Petition may be requested by calling 1-877-283-7767.

7. Has the Court decided who is right?

The Court hasn't decided whether Martin Leigh or the Plaintiff is correct. By establishing the Class and issuing this Notice, the Court is not suggesting that the Plaintiff will win or lose this case. The Plaintiff must prove her claim at a trial. (See "The Trial" below on page 8.)

QUESTIONS? CALL 1-877-283-7767

8. What is the Plaintiff asking for?

The Plaintiff is asking for money damages for Martin Leigh, PC's violations of the Missouri Merchandising Practices Act.

9. Is there any money available now?

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

WHO IS IN THE CLASS

You need to decide whether you are affected by this lawsuit.

10. Am I part of this Class?

Judge Youngs defined the class as follows:

All Missouri citizens who received a debt collection letter from Martin Leigh PC, and its predecessor Martin, Leigh, Laws & Fritzlen, PC between 2007 and the present where Martin Leigh PC was acting on behalf of a debt purchaser.

11. Which Missouri citizens who received a debt collection letter from Martin Leigh PC, and its predecessor Martin, Leigh, Laws & Fritzlen, PC between 2007 and the present where Martin Leigh PC was acting on behalf of a debt purchaser are included?

If you are a Missouri citizen who received a debt collection letter from Martin Leigh PC, and its predecessor Martin, Leigh, Laws & Fritzlen, PC between 2007 and the present where Martin Leigh PC was acting on behalf of a debt purchaser, you are in the Class.

12. Are there any Missouri citizens who received a debt collection letter from Martin Leigh PC, and its predecessor Martin, Leigh, Laws & Fritzlen, PC between 2007 and the present where Martin Leigh PC was acting on behalf of a debt purchaser not in the class?

If you are a Missouri citizen who did not receive a debt collection letter from Martin Leigh PC, and its predecessor Martin, Leigh, Laws & Fritzlen, PC between 2007 and the present where Martin Leigh PC was acting on behalf of a debt purchaser, you are not in the class.

QUESTIONS? CALL 1-877-283-7767

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

If you are still not sure whether you are included, you can get free help by calling 1-877-283-7767, or by writing to the lawyers in this case, at the phone number or address listed in question 23.

YOUR RIGHTS AND OPTIONS

You have to decide whether to stay in the Class or ask to be excluded before the trial, and you have to decide now.

14. What happens if I do nothing at all?

You don't have to do anything now if you want to keep the possibility of getting money or benefits from this lawsuit. By doing nothing you are staying in the Class. If you stay in and the Plaintiff obtains money or benefits, either as a result of the trial or a settlement, you will be notified about how to apply for a share (or how to ask to be excluded from any settlement). Keep in mind that if you do nothing now, regardless of whether the Plaintiff wins or loses the trial, you will not be able to sue, or continue to sue, Martin Leigh, PC – as a party of any other lawsuit – about the same legal claims that are the subject of this lawsuit. You will also be legally bound by all the Orders the Court issues and judgments the Court makes in this class action.

15. Why would I ask to be excluded?

If you already have your own lawsuit against Martin Leigh, PC and want to continue with it, you need to ask to be excluded from the Class. If you exclude yourself from the Class – which also means to remove yourself from the Class, and is sometimes called “opting-out” of the Class – you won't get any money or benefits from this lawsuit even if the Plaintiff obtains them as a result of the trial or from any settlement (that may or may not be reached) between Martin Leigh, PC and the Plaintiff. However, you may then be able to sue or continue to sue Martin Leigh, PC about the same legal claims that are the subject of this lawsuit. If you exclude yourself, you will not be legally bound by the Court's judgments in this class action.

If you start your own lawsuit against Martin Leigh, PC after you exclude yourself, you'll have to hire and pay your own lawyer for that lawsuit, and you'll have to prove your claims. If you do exclude yourself so you can start or continue your own lawsuit against Martin Leigh, PC, you should talk to your own lawyer soon, because your claims may be subject to a statute of limitations.

QUESTIONS? CALL 1-877-283-7767

Note that if you exclude yourself from this lawsuit and you are a Missouri citizen who received a debt collection letter from Martin Leigh PC, and its predecessor Martin, Leigh, Laws & Fritzlen, PC between 2007 and the present where Martin Leigh PC was acting on behalf of a debt purchaser, any changes made to Martin Leigh, PC's debt collection policies and practices would still apply to you.

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

To ask to be excluded, you must send an "Exclusion Request" in the form of a letter sent by mail, stating that you want to be excluded from Yvette Baker v. Ocean 18, LLC, et al., Case No. 1816-CV32043. Be sure to include your name and address, and sign the letter. You must mail your Exclusion Request postmarked by September 4, 2020 to: Martin Leigh, PC Class Action, Gregory Leyh, P.C., 104 NE 72 St., Suite A, Gladstone, Missouri 64118.

THE LAWYERS REPRESENTING YOU

17. Do I have a lawyer in this case?

The Court decided that the law firms of Gregory Leyh, P.C. and Kessinger Law Firm, P.C. are qualified to represent you and all Class Members. The law firms are called "Class Counsel." Class Counsel is experienced in handling similar cases against other defendants. More information about Class Counsel, its practices, and Class Counsel's experience is available at www.leyhlaw.com.

18. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, you have a right to be represented by a different lawyer, at your cost, if you choose. For example, you can ask him or her to appear in Court for you if you want someone other than Class Counsel to speak for you.

19. How will the lawyers be paid?

If Class Counsel get money or benefits for the Class, they may ask the Court for fees and expenses. You won't have to pay these fees and expenses. If the Court grants Class Counsel's request, the fees and expenses would be either deducted from any money obtained for the Class or paid separately by Martin Leigh, PC.

THE TRIAL

The Court has not yet scheduled the date for trial to decide who is right in this case.

QUESTIONS? CALL 1-877-283-7767

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

As long as the case isn't resolved by a settlement or otherwise, Class Counsel will have to prove the Plaintiff's claim at a trial. The trial will be scheduled at a future date, and will take place in the Circuit Court of Jackson County, Missouri at Kansas City at 415 E. 12th Street, Kansas City, Missouri 64106, in Division 6. During the trial, a Jury or the Judge will hear all of the evidence to help them reach a decision about whether the Plaintiff or Defendants are right about the claims in the lawsuit. There is no guarantee that the Plaintiff will win, or that she will get any money for the Class.

21. Do I have to come to the trial?

You do not need to attend the trial. Class Counsel will present the case for the Plaintiff, and the counsel for Martin Leigh, P.C. will present the defenses. You or your own lawyer are welcome to come at your own expense.

22. Will I get money after the trial?

If the Plaintiff obtains money or benefits as a result of the trial or a settlement, you will be notified about how to participate. We do not know how long this will take.

GETTING MORE INFORMATION

23. Are more details available?

You may call 1-877-283-7767 and request the Court's Order Certifying the Class, the First Amended Class Action Petition, and the Answer to the First Amended Class Action Petition that the Plaintiff and Martin Leigh, PC submitted. You may also speak to one of the lawyers by calling 1-877-283-7767 or by writing to: Martin Leigh, PC Class Action, Gregory Leyh, P.C., 104 NE 72 St., Suite A, Gladstone, Missouri 64118.

QUESTIONS? CALL 1-877-283-7767