

## **IMPORTANT NOTICE OF CLASS ACTION SETTLEMENT**

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

### **PLEASE READ THIS NOTICE CAREFULLY**

**If you placed an order on AutoZone.com, you could get a \$20 payment from this class action settlement.**

- This Class Action Settlement resolves a disputed lawsuit involving allegations that Settlement Class Members' mouse movements and clicks on AutoZone's website were tracked by a third-party vendor. Defendants AutoZone, Inc. and AutoZone.com, Inc. (together "AutoZone") maintain they used that information only when Class Members reached out after having difficulty on the website with consent so as to provide better customer service. Plaintiffs allege the use of those movements and clicks were without your consent and violated the Pennsylvania Wiretapping and Electronic Surveillance Control Act ("WESCA").
- AutoZone denies all allegations of wrongdoing in the lawsuit. As part of the proposed settlement, AutoZone does not admit to any wrongdoing and continues to deny the allegations against them. The Court has not decided who is correct.

To avoid protracted litigation, AutoZone has agreed to pay a \$20 Cash Benefit to eligible persons ("Settlement Class Members") who file a valid Claim Form.

- Your legal rights are affected whether you act, or do not act. Read this Notice carefully.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:</b>	
<b>SUBMIT A CLAIM FORM BY <u>NOVEMBER 13, 2025</u></b>	This is the only way to receive a payment. This also means you give up the right to ever be part of any other lawsuit against AutoZone and certain other Released Parties (defined in the Settlement Agreement) about the legal claims released in this Settlement.
<b>EXCLUDE YOURSELF BY <u>OCTOBER 14, 2025</u></b>	Get no payment. This is the only option that allows you to be part of any other lawsuit against AutoZone about the legal claims released in this Settlement. If you exclude yourself, you will receive no benefits from the Settlement.
<b>OBJECT BY <u>OCTOBER 14, 2025</u></b>	Write to the Court explaining why you do not like the settlement and/or believe it is unfair. If you object, you may also file a Claim Form to receive a Cash Benefit, but you will give up the right to sue AutoZone and other Released Parties in a separate lawsuit about the legal claims released in this Settlement.
<b>ATTEND A HEARING ON <u>NOVEMBER 25, 2025</u></b>	Ask for you or your attorney to speak in Court about the fairness of the Settlement. You are not required to attend the Final Approval Hearing.
<b>DO NOTHING</b>	Get no payment. And you also give up the right to ever be part of any other lawsuit against AutoZone about the legal claims released in this Settlement.

## **BASIC INFORMATION**

The purpose of this Notice is to let you know that a proposed settlement has been reached in the case *Farst v. AutoZone, Inc. et al.*, Case No. 2024-00002 in the Court of Common Pleas for the County of Cumberland, 9<sup>th</sup> Judicial District, Commonwealth of Pennsylvania. You have legal rights and options that you may act on before the Court decides whether to approve the proposed Class Action Settlement. Because your legal rights will be affected by this settlement, it is extremely important that you read this Notice carefully. This Notice summarizes the settlement and your legal rights under it.

In a class action, one or more people, called class representatives, sue on behalf of people who have similar claims. All of these people are a class, or class members. One court resolves the issues for all class members, except those who exclude themselves from the class by opting out. Here, the class representative alleges that AutoZone violated the WESCA by equipping its website with Session Replay Technology at various times from January 1, 2022 through January 1, 2024. The Court has certified a class for settlement purposes only (the “Settlement Class”). AutoZone denies that they did anything wrong and denies that this lawsuit should be certified as a class action in litigation. The Court has not decided who is correct.

## **THE SETTLEMENT**

The Court did not decide in favor of Plaintiff or AutoZone regarding whether or not AutoZone is liable under the WESCA. This Settlement does not mean that AutoZone did anything wrong. Instead, both sides agreed to a settlement of the legal claims in the complaint to avoid the cost of a trial, the risk and uncertainty of proceeding forward in the lawsuit, and to provide compensation for Settlement Class Members. The class representative and Class Counsel believe that the proposed Class Action Settlement is in the best interests of the Settlement Class.

## **WHO IS IN THE SETTLEMENT CLASS?**

You are in the “Settlement Class” if, while in the while residing in the commonwealth of Pennsylvania, from January 1, 2022 through the present, you (1) placed an order on AutoZone.com; (2) while AutoZone.com was equipped with Session Replay technology; and (3) you were not a member of the AutoZone Rewards program. If you received notice regarding this via email it is because your email was associated with an order on AutoZone.com and therefore you may be a member of the Settlement Class. If you have questions about whether you are in the Settlement Class, you may call 1-833-749-4176 or visit [www.AZSettlement.com](http://www.AZSettlement.com) for more information.

## **THE SETTLEMENT BENEFITS – WHAT YOU GET**

AutoZone has agreed to pay a \$20 Cash Benefit to Settlement Class Members who submit a valid Claim Form. AutoZone has also agreed to pay costs associated with administration of the Class Action Settlement, attorneys’ fees, costs, and expenses awarded to Class Counsel, and a Service Award to the class representative.

## **HOW YOU GET A PAYMENT – SUBMITTING A CLAIM FORM**

To qualify for payment, you must submit a valid Claim Form on or before **November 13, 2025**. There are multiple ways to submit a Claim Form. You may submit a Claim Form online by going to the Settlement Website at [www.AZ-Settlement.com](http://www.AZ-Settlement.com) and following the directions found there. A paper Claim Form is also available upon request by downloading from the settlement website or calling the Settlement Administrator

at 1-833-749-4176. Read the instructions on the Claim Form carefully, fill out the form, sign it, and submit it online or mail it **postmarked** no later than **November 13, 2025**.

The Court will hold a hearing on **November 25, 2025** to decide whether to approve the Class Action Settlement. If the Class Action Settlement is approved, appeals may still follow. It is always uncertain when these appeals can be resolved, and resolving them can take more than a year. No payments will be made until the Court approves the Class Action Settlement at the hearing and all appeals are final. Please be patient.

Unless you exclude yourself by opting out, you will be part of the Settlement Class and will remain a Settlement Class Member, even if you do not submit a Claim Form. That means you cannot sue, continue to sue, or be part of any other lawsuit against AutoZone regarding any privacy claims related to your activity on AutoZone.com during the Class Period, including, but not limited to, claims asserted in the lawsuit or arising out of the facts and circumstances asserted in the lawsuit. If the settlement is approved and becomes final and not subject to appeal, then you and all Settlement Class Members release all “Released Claims” against all “Released Parties.” It also means that all of the Court’s orders will apply to you and legally bind you. The Settlement Agreement (available at [www.AZ-Settlement.com](http://www.AZ-Settlement.com)) describes the legal claims you are releasing (the “Released Claims”) and against whom you are releasing legal claims (“Released Parties”) in detail, so read it carefully. To summarize, the release includes, but is not limited to, WESCA and related privacy claims arising out of the use of the AutoZone Website from January 1, 2022 through the present.

## **EXCLUDING YOURSELF FROM THE SETTLEMENT**

If you do not want a payment from this settlement, but you want to keep the right to sue or continue to sue AutoZone, then you must take steps to remove yourself from the Settlement Class. This is called excluding yourself or “opting out” of the Settlement Class. To exclude yourself from the Settlement, you must submit a written request for exclusion to the Court that includes the following information:

- the case name: *Farst v. AutoZone, Inc. et al., Case No. 2024-00002* (In the Court of Common Pleas of County of Cumberland, 9th Judicial District, Commonwealth of Pennsylvania);
- your full name;
- current address;
- personal signature; and
- the words “Request for Exclusion” or a comparable statement that you do not wish to participate in the Settlement.

You must mail your exclusion request **postmarked** no later than **October 14, 2025** to the following address:

AutoZone WESCA Settlement  
ATTN: Exclusion Request  
P.O. Box 58220  
Philadelphia, PA 19102

You cannot exclude yourself or opt out of the Class Action Settlement on the phone, by text message, online, or email. If you ask to be excluded, you will not get any payment, and you cannot object to the settlement. If you ask to be excluded, you will not be legally bound by anything that happens in this lawsuit. Mass requests for exclusion are not allowed; your exclusion request or opt out must be made individually.

## **THE LAWYERS REPRESENTING YOU**

The Court has appointed Ari Marcus of Marcus & Zelman, LLC, Andrew Shamis of Shamis & Gentile, P.A., and Joseph Kanee of The Kanee Law Firm, PLLC to represent you and other Settlement Class Members. These lawyers are called Class Counsel. You will not be personally charged by these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense. Class Counsel will ask the Court to approve payment of attorneys' fees of \$345,469.60 and reimbursement of costs not to exceed \$3,333.75, for a total of \$348,803.35. This payment will compensate Class Counsel for investigating the facts, litigating the lawsuit, and negotiating the settlement. Class Counsel also will request a service award of up to \$2,500 for the named Plaintiff to compensate for their time and effort in pursuing this lawsuit on behalf of the Settlement Class. The Court may award less than these amounts.

## **OBJECTING TO THE SETTLEMENT**

If you are a Settlement Class Member and you do not exclude yourself from the Settlement Class, you can object to the Class Action Settlement if you do not like any part of it. You may give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must make your objection in writing and file it with the Court in the case of *Farst v. AutoZone, Inc. et al*, Case No. 2024-00002. The written objection must contain information sufficient to allow the parties to confirm that you are a member of the Settlement Class, including: (i) the name of the proceedings; (ii) the Settlement Class Member's full name and current mailing address; (iii) a statement that states with specificity the grounds for the objection, as well as any documents supporting the objection; (iv) the identity of any attorneys representing the objector; (v) a statement regarding whether the Settlement Class Member (or his/her attorney) intends to appear at the Final Approval Hearing; and (vi) the signature of the Settlement Class Member or the Settlement Class Member's attorney.

You must file the objection with the Court no later than **October 14, 2025**.

Prothonotary, Cumberland County Court of Common Pleas  
1 Courthouse Square, Suite 100  
Carlisle, PA 17103

Also, you must send your objection to the Settlement Administrator **postmarked** no later than **October 14, 2025** at:

AutoZone WESCA Settlement  
Attn: Objections  
P.O. Box 58220  
Philadelphia, PA 19102

Objecting simply means telling the Court that you do not like something about the Class Action Settlement. You can object only if you stay in the Settlement Class. Excluding yourself from the Settlement Class is telling the Court that you do not want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the lawsuit no longer affects you.

## **THE COURT'S FAIRNESS HEARING**

The Court is scheduled to hold a final approval hearing on **November 25, 2025 at 9:00 a.m. E.T.**, Courtroom Number 1, Cumberland County Courthouse, Carlisle, Pennsylvania 17013 to decide whether to approve the Settlement, how much attorneys' fees and costs to award to Settlement Class Counsel for representing the Settlement Class, and whether to award a service award payment to the Class

Representative who brought this Action on behalf of the Settlement Class. If you are a Settlement Class Member, you or your attorney may ask permission to speak at the hearing at your own cost. If you do not like the Settlement, remember you may object to it but you have to follow certain requirements. After the Final Approval Hearing, the Court will decide whether to approve the Class Action Settlement. It is unknown how long these decisions will take.

**Note:** The date and time of the Final Approval Hearing is subject to change by Court Order. Any changes will be posted on the Settlement Website, [www.AZ-Settlement.com](http://www.AZ-Settlement.com).

## **DO I HAVE TO ATTEND THE HEARING?**

No. Class Counsel will answer any questions the Court may have. But you are welcome to attend the Final Approval Hearing at your own expense. If you send an objection, you do not have to attend the Final Approval Hearing to talk about it. As long as your written objection was filed by the deadline, and meets the other criteria described above and in the Settlement Agreement, the Court will consider it. You may also pay a lawyer to attend, but you do not have to. If you do not exclude yourself from the Settlement Class, you may ask the Court for permission to speak at the Final Approval Hearing concerning any part of the proposed Settlement Agreement. If you filed an objection and intend to appear at the Final Approval Hearing, you must follow the procedure explained in the Settlement Agreement and noted above. You cannot speak at the Final Approval Hearing if you exclude yourself from the Settlement Class.

## **IF YOU DO NOTHING**

If you do nothing, you will get no money from this settlement. You must file a Claim Form to be eligible for payment. You will also not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against AutoZone about the legal issues released in this Settlement.

## **GETTING MORE INFORMATION**

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement. You may review the Settlement Agreement on the Settlement Website at [www.AZ-Settlement.com](http://www.AZ-Settlement.com). You can also get a copy of the Settlement Agreement by writing to the Settlement Administrator. You can call 1-833-749-4176 toll free; write to AutoZone WESCA Settlement, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103; or visit the website at [www.AZ-Settlement.com](http://www.AZ-Settlement.com), where you will find answers to common questions about the settlement, a Claim Form, plus other information to help you determine whether you are a member of the Settlement Class.

Publicly filed documents can also be obtained by visiting the office of the Common Pleas of County of Cumberland, 9th Judicial District, Commonwealth of Pennsylvania or by reviewing the Court's online docket. For those planning to visit the Court for more information, please contact the Court for its regular business hours and for any costs associated with obtaining documents maintained by the Court.

You may also contact your counsel in this matter, the Settlement Class Counsel, as follows:

Ari Marcus  
**MARCUS & ZELMAN, LLC**  
[ari@marcuszelman.com](mailto:ari@marcuszelman.com)

Andrew Shamis  
**SHAMIS & GENTILE, P.A.**

[ashamis@shamisgentile.com](mailto:ashamis@shamisgentile.com)

Joseph Kanee  
**THE KANEE LAW FIRM, PLLC**  
[joseph@kaneelaw.com](mailto:joseph@kaneelaw.com)

**PLEASE DO NOT CONTACT THE COURT, THE JUDGE, OR AUTOZONE WITH  
QUESTIONS ABOUT THE SETTLEMENT OR CLAIMS PROCESS.**