NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

The Third Judicial District Court, Salt Lake County, State of Utah, authorized this Notice.

If you purchased tickets to the Glenn Beck Cruise Thru History, you may be eligible to receive a payment from a class action settlement.

Your legal rights may be affected. Please read this notice carefully.

- A Settlement has been reached in a class action lawsuit, *Garritty v. Project Neptune, LLC, et al.*, pending in the Third Judicial District Court, Salt Lake County, State of Utah, Case No. 250907398 (the "Action"). This Notice informs you of the settlement and your rights under it.
- The Settlement includes all persons who purchased tickets for the Glenn Beck Cruise Thru History scheduled to depart March 24, 2020 (including "Insider Package," "VIP Package," and "Inner Circle Package" tickets), except those persons who received a full refund of their ticket purchase.
- If approved by the Court, the Settlement will establish a $800,000.00 Settlement Fund.[1] Members of the Settlement Class, as described herein, may submit a claim for their *pro rata* portion of the Settlement Fund.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM **DEADLINE: APRIL 1, 2027**	Submitting a timely and valid Claim Form is the only way to receive a payment from the Settlement. Any Settlement Class Member who does not request exclusion from the Settlement may submit a Claim Form.
EXCLUDE YOURSELF FROM THIS SETTLEMENT **DEADLINE: DECEMBER 2, 2026**	Excluding yourself from the Settlement (or "opting out") is the only option that allows you to sue, continue to sue, or be part of another lawsuit against the Defendants or other Released Parties for the legal claims this Settlement resolves. If you exclude yourself, you will give up the right to receive a Settlement Payment.
OBJECT TO THE SETTLEMENT **DEADLINE: DECEMBER 2, 2026**	You may object to the Settlement by writing to the Court and informing it why you do not think the Settlement should be approved. You will still be bound by the Settlement if it is approved. • *If you exclude yourself from the Settlement, you cannot object to it.* • *If you object to the Settlement, you are still eligible to submit a Claim Form.*
ATTEND THE FAIRNESS HEARING **JANUARY 11, 2027**	You may attend the Fairness Hearing where the Court will determine whether to grant final approval of the Settlement. If you wish to speak at the Fairness Hearing, you must make a request to do so in your written objection. The time and date of the hearing may change, so visit www.CruiseRefundSettlement.com for updates.
DO NOTHING	If you do nothing, you will not receive a payment and you will give up any rights you may have to sue, continue to sue, or be part of another lawsuit against Defendants and other Released Parties for the claims this Settlement resolves.

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement. Settlement payments

[1] All capitalized terms in this Notice shall have the same meaning provided for as in the Settlement Agreements, unless stated otherwise.

will not be provided unless the Court grants final approval of the Settlement and the Settlement becomes effective.

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BASIC INFORMATION

1. Why is there a Notice?

This Notice explains the proposed Settlement in a class action lawsuit called *Garritty v. Project Neptune, LLC, et al., Third Judicial District Court for the County of Salt Lake, State of Utah, Case No. 250907398*, and the legal rights and options that you might have as a potential member of the Settlement Class.

This case is pending in the Third Judicial District Court for the County of Salt Lake in the State of Utah, before the Honorable Todd M. Shaughnessy. The Court has not ruled in favor of Plaintiffs or Defendants and must still decide whether to finally approve the Settlement.

To find out if you are a member of the Settlement Class, see **Question 5**, below.

2. What is this lawsuit about?

The Action alleged that Project Neptune, LLC ("Defendant") violated the rights of persons who purchased tickets for the Glenn Beck Cruise Thru History (the "Cruise"). The Cruise was scheduled to depart March 24, 2020, but was postponed and eventually canceled. Plaintiffs claimed that Defendants failed to refund ticket purchase prices as originally promised.

Defendants deny all allegations and liability. By settling, neither side admits any wrongdoing.

3. Why is this lawsuit a class action?

In a class action lawsuit, one or more individuals (called the "Plaintiffs" or "Class Representatives") bring claims on behalf of a larger group of people who have similar claims (the "Settlement Class" or "Settlement Class Members"). The Court resolves the claims for all Settlement Class Members, except for those who choose to exclude themselves from (or "opt-out" of) the Settlement Class.

4. Why is there a Settlement?

Plaintiffs and Defendants have agreed to settle the case to avoid the delays, costs, and the risk of trial, and any appeals that could follow a trial. The Settlement allows Settlement Class Members to potentially receive compensation, subject to Court approval, rather than risk receiving nothing. Plaintiffs and Class Counsel (see **Question 15**, below) believe the Settlement is in the best interests of all members of the Settlement Class.

WHO IS INCLUDED IN THE SETTLEMENT?

5. How do I know if I am part of the Settlement Class?

You are a Settlement Class Member if you purchased one or more tickets for the Glenn Beck Cruise Thru History scheduled to depart March 24, 2020 (including Insider Package, VIP Package, or Inner Circle Package tickets), and you did not receive a full cash refund.

Excluded from the Class are the following:

(a) Any class member that received a full refund for their reservation.
(b) Any of the named defendants, their directors, officers, employees, and/or agents.
(c) The judge presiding over this action and his/her immediate family members.
(d) Any person that timely and properly excludes himself/herself/itself pursuant to the orders of the Court.

For more information, you can contact the Settlement Administrator by phone, email, or mail:

- Toll-Free: 1-833-657-4328
- Email: info@CruiseRefundSettlement.com
- Mail: Garritty v. Project Neptune Settlement Administrator, PO Box 429, East Brunswick, NJ 08816-9998.

THE SETTLEMENT BENEFITS

6. What does this Settlement provide?

Defendants have agreed to pay $800,000.00 to settle the Action. This money will be distributed to eligible Settlement Class Member who submit valid Claim Forms. Settlement payments will be calculated based on the amount paid for tickets (supported by proof of purchase documentation), minus any credits or compensation received from CruiseBuilder in connection with the Cruise cancellation.

If the total claims exceed the available funds, each Settlement Class Member will receive a *pro rata* share.

The Settlement Fund shall be used to pay: (i) Settlement Administrator fees and expenses; (ii) attorneys' fees and expenses as approved by the Court; (iii) incentive award to the Class Representative as approved by the Court; and (iv) Settlement Class Members who submit valid and timely claims.

7. How do I ask for money from this Settlement?

Settlement Class Members must submit a Claim Form in order to receive a payment from the Settlement. Visit www.CruiseRefundSettlement.com to submit a claim online or to download a full Claim Form to complete and return by mail.

Claim Forms must be submitted online by **April 1, 2027.** Claim Forms submitted by mail must be received or postmarked no later than **April 1, 2027**.

To be eligible to receive a Settlement benefit, your Claim Form must be accompanied by the following documentation:

- Proof of Purchase of one or more tickets for the Glenn Beck Cruise Thru History
    - Documentation must show the number of tickets purchased, date of purchase, and amount paid.
- Proof of any credit or refund received (if applicable)
    - Documentation must show the amount of the refund or credit and date issued.
- Authorized Representatives – If you are completing and submitting this Claim Form on behalf of a Class Member, you must submit documentation that demonstrates your authority to act on behalf of the Class Member.

Completed Claim Forms along with supporting documentation must be mailed to the Settlement Administrator at the following address:

Garritty v. Project Neptune Settlement Administrator
Attn: Claim Forms
P.O. Box 429
East Brunswick, NJ 08816-9998

You can request to have a Claim Form mailed or emailed to you by contacting the Settlement Administrator at info@CruiseRefundSettlement.com or toll free at 1-833-657-4328.

8. How much money will I get?

Payments will be calculated as follows: The amount paid for tickets by the Settlement Class Member, demonstrated by proof of purchase documentation submitted, less the dollar value of any credit or other compensation received from CruiseBuilder due to the cancellation of the Cruise. If the amount claimed by all Settlement Class Members exceeds the amount available for distribution, then the approved claimants shall receive their *pro rata* share of the funds available.

EXCLUDING YOURSELF FROM THE SETTLEMENT

9. How do I exclude myself from the Settlement Class?

If you are a member of the Settlement Class and do not want to remain in the Settlement Class and release your claims against the Defendants, and do not want money from the Settlement, then you must take steps to exclude yourself from the Settlement. This is sometimes referred to as "opting out" of a class. The Court will exclude from the Settlement all members of the Settlement Class who submit valid and timely requests for exclusion.

If you exclude yourself, you will *not* be able to receive any money from these Settlement. However, this is the only way you will retain your rights to sue any of the Defendants and the Released Parties on your own, based on the Released Claims as defined in the Settlement Agreement. Information about the Released Claims is available in the Settlement Agreement, accessible on the Settlement Website: www.CruiseRefundSettlement.com.

To exclude yourself from the Settlement, you must send a written "Request for Exclusion" to the Settlement Administrator at the address below. To be valid, your Request for Exclusion must be received by or received with a postmark date no later than **December 2, 2026**.

Garritty v. Project Neptune Settlement Administrator
Attn: Exclusion Request
P.O. Box 429
East Brunswick, NJ 08816-9998

To be valid, a Request for Exclusion must include: (a) the Settlement Class Member's name, current address and telephone number; (b) include a clear statement that the Settlement Class Member wants to be excluded from the Settlement -- *Garritty v. Project Neptune, LLC, et al.*, Third Judicial District Court for the County of Salt Lake, State of Utah, Case No. 250907398; and (c) must be personally signed by the Settlement Class Member requesting exclusion. Mass or group exclusion requests will not be accepted.

10. If I do not exclude myself, can I sue Defendants and the Released Parties for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the Defendants and Released Parties for the legal claims resolved by this Settlement.

11. If I exclude myself from the Settlement Class, can I get money from the Settlement?

No. You will not get any money from these Settlement if you exclude yourself. Only Settlement Class Members who do not exclude themselves and who submit a valid and timely Claim Form will be eligible to receive a payment from the Settlement.

12. If I exclude myself from the Settlement, can I still object?

No. If you exclude yourself, you are no longer a member of the Settlement Class and may not object to any aspect of the Settlement.

OBJECTING TO THE SETTLEMENT

13. How do I tell the Court if I do not like the Settlement?

If you are a member of the Settlement Class and do not exclude yourself, you can object to the Settlement or Class Counsel's attorneys' fees and expenses by writing to the Court. For an objection to be considered by the Court, it must be filed with the Court no later than **December 2, 2026** (with copies sent to Class Counsel and Defendants' Counsel), and must include the following information:

- The name of the Action - *Garritty v. Project Neptune, LLC, et al.*, Third Judicial District Court for the County of Salt Lake, State of Utah, Case No. 250907398;
- The full name, address, telephone number, and email address of the objector;
- A detailed statement of the grounds and evidence upon which the objection is based, accompanied by any legal support or documentation to support the objection;
- The number of times the objector has objected to a class action settlement within the 5 years preceding the date that the objector files the objection, the caption of each case in which the objector has made such objection, and a copy of any orders related to or ruling upon the objector's prior objections that were issued by the trial and appellate courts in each listed case;
- The identity of all counsel who represent the objector, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement and/or Class Counsel's award of Attorneys' fees, expenses and/or Service Awards;
- The number of times in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the five years preceding the date of the filed objection, the caption of each case in which counsel or the firm has made such objection and a copy of any orders related to or ruling upon counsel's or the counsel's law firm's prior objections that were issued by the trial and appellate courts in each listed case in which the objector's counsel and/or counsel's law firm have objected to a class action settlement within the preceding five years;
- A statement confirming whether the objector and/or objector's counsel will appear personally and/or wish to testify at the Fairness Hearing;

- A list of all persons who will be called to testify at the Fairness Hearing in support of the objection (if any);
- Whether the objector used the assistance of AI to draft the objection; and
- The objector's signature (an attorney's signature is not sufficient).

COURT	CLASS COUNSEL	DEFENDANTS' COUNSEL
Third Judicial District Court for the County of Salt Lake, 450 South State Street Salt Lake City, UT 84111	Scott Poynter. Esq. Poynter Law Group, PLLC 4924 Kavanaugh Blvd. Little Rock, AR 72207	Mark Nickel, Esq. Gordon Rees Scully Mansukhani, LLP 15 West South Temple, Suite 1600 Salt Lake City, UT 84101

Objections that are not timely submitted or do not contain the required information will not be considered by the Court or any court on appeal. Any Settlement Class Member who fails to object to the Settlement in the manner described above shall be deemed to have waived any such objection, shall not be permitted to object to any terms or approval of the Settlement at the Fairness Hearing, and shall be foreclosed from seeking any review of the Settlement or the terms of the Settlement Agreement by appeal or other means.

14. What is the difference between objecting and excluding?

Objecting is telling the Court that you don't like something about the Settlement. You can object only if you don't exclude yourself from the Settlement Class. If you exclude yourself, you have no basis to object to the Settlement because it no longer affects you, and you are ineligible to receive a payment from the Settlement Fund.

Objecting does not change your ability to receive a payment from the Settlement (if the Court approves the Settlement), as you are still a Settlement Class Member. If you object, you still must complete and submit a timely and valid Claim Form to be eligible to receive a Settlement payment.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this lawsuit?

The Court has appointed Scott Poynter of Poynter Law Group, PLLC as Class Counsel to represent Plaintiffs and Settlement Class Members. You will not be personally charged for fees or costs by Class Counsel. If you have any questions about the Notice or the Action, you can contact Class Counsel or the Settlement Administrator. Their contact information is provided in **Question 13**, above.

You do not need to hire a lawyer because Class Counsel is working on your behalf.

If you exclude yourself from the Settlement Class, Class Counsel will no longer represent you. If you wish to object to the Settlement, or any motion for attorneys' fees and expenses, and Service Awards, you will need to proceed on your own or obtain your own lawyer at your own cost for that purpose.

16. How will Class Counsel be paid?

To date, Class Counsel has not been paid any attorneys' fees or reimbursed for any costs or expenses that Class Counsel expended to litigate this case. Class Counsel may ask the Court for attorneys' fees (up to 35% of the

Settlement Fund) and litigation expenses (up to $25,000). The Class Representative may seek an incentive award (up to $7,500) for service as class representative. These amounts are paid from the Settlement Fund. The Court may award less than these amounts.

The deadline for Class Counsel to submit their application for Attorneys' Fees and Expenses, and a Class Representative Service Award is **January 4, 2027.**

THE COURT'S FAIRNESS HEARING

17. When and where will the Court decide whether to approve these Settlement?

The Court will hold a Fairness Hearing on **January 11, 2027 at 1:30 PM** at **THIRD DISTRICT COURT, 450 South State Street, Salt Lake City, UT 84114,** to consider whether the Settlement is fair, reasonable, and adequate and should be finally approved. The Court will also consider Class Counsel's request for attorneys' fees and expenses, and a Service Award for the Class Representative. The Court will consider any timely and complete objections and listen to Settlement Class Members who have asked to speak at the Fairness Hearing.

Important! The time and date of the Fairness Hearing may change without additional notice to the Settlement Class. Please visit www.CruiseRefundSettlement.com to check if there are any updates to the date or time of the Fairness Hearing.

18. Do I have to come to the Fairness Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you submit a timely and complete objection (*See* **Question 13**), the Court will consider it, and you do not have to come to Court to talk about it.

19. What if I want to speak at the Fairness Hearing?

If you wish to attend and speak at the Fairness Hearing, you must indicate your intent to do so in your written objection (*See* **Question 13**). Your objection must state that it is your intention to appear at the Fairness Hearing and must indicate if your attorney intends to appear and speak on your behalf at the hearing.

IF YOU DO NOTHING

20. What happens if I do nothing?

If you are a Settlement Class Member and you do nothing, you will not receive a payment from the Settlement. You will also give up certain rights, including your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Defendants or any of the other Released Parties about the legal issues in this Action and released by the Settlement.

GETTING MORE INFORMATION

21. How do I get more information?

This Notice summarizes the proposed Settlement. For the precise terms and conditions of the Settlement, please see the Settlement Agreement available at www.CruiseRefundSettlement.com. You may also contact the Settlement Administrator by phone, email, or mail:

- Toll-Free: 1-833-657-4328
- Email: info@CruiseRefundSettlement.com
- Mail: Garritty v. Project Neptune, LLC et al., Settlement Administrator, P.O. Box 429, East Brunswick, NJ 08816-9998.

Questions? Visit WWW.CRUISEREFUNDSETTLEMENT.COM or call toll-free 1-833-657-4328.