

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA

**If you purchased a G.Skill DDR-4 desktop memory product  
or a G.Skill DDR-5 desktop memory product,  
you may be part of a class action settlement.**

*The United States District Court for the Central District of California authorized this Notice.  
You are not being sued. This is not a solicitation from a lawyer.*

A settlement has been reached in a class action lawsuit against G.Skill International Enterprise Co., Ltd., G.Skill USA, Inc., Neuteck, Inc., and Racerspeed, Inc. (collectively, “G.Skill” or “Defendants”), alleging they violated the law in connection with advertised speeds of some of its DDR-4 and DDR-5 DRAM (non-laptop) memory products. The plaintiffs allege they were led to believe that the advertised speeds were “out of the box” speeds requiring no adjustments to their PCs. The Court has not decided which side is right. G.Skill denies all claims of wrongdoing and denies that it violated any law. The Settlement is not an admission of wrongdoing or liability. The Parties have agreed to the Settlement to avoid the uncertainties, burdens, and expenses associated with continuing the case.

You are included if you (1) purchased any G.Skill DDR-4 (non-SODIMM/laptop) memory product with a rated speed over 2133 megahertz (MHz) or any G.Skill DDR-5 (non-SODIMM/laptop) memory product with a rated speed over 4800 megahertz, and (2) made that purchase while living in the United States, and (3) the purchase(s) occurred between January 31, 2018 and **January 7, 2026**. For the sake of clarity, “rated speed” includes and encompasses effective speed, data transfer rate, and any other terminology used to describe the advertised or specified performance speed of memory products.

Those who file claims will be eligible to receive a pro rata portion of the Settlement Fund. If you do not have proof of purchase, you may not make a claim for any more than five (5) products.

If approved by the Court, the Settlement will also require G.Skill to take commercially reasonable efforts to implement changes on the packaging, website product pages, and specifications provided to resellers for the covered products. Rated speeds for the products will be listed as “up to” speeds, with the following corresponding text: “Requires overclocking/BIOS adjustments. Maximum speed and performance depend on system components, including motherboard and CPU.”

Please read this notice carefully. Your legal rights are affected regardless of whether you act or do not act.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>	
<b>SUBMIT A CLAIM FORM</b>  <b>Deadline: April 7, 2026</b>	To receive a cash payment, you must submit a valid claim either online or by mail. This is the only way to receive a payment.
<b>EXCLUDE YOURSELF</b>  <b>Deadline: April 7, 2026</b>	To exclude yourself, you must affirmatively submit a request to be excluded. You will receive no cash payment but unless you exclude yourself, you will not be able to start a lawsuit or be part of any

	other lawsuit against Defendant about the claims being resolved by this Settlement.
<b>OBJECT</b>  <b>Deadline: April 7, 2026</b>	Write to the Court explaining why you don't like the Settlement.
<b>GO TO THE HEARING</b>  <b>Date: June 5, 2026</b>	Ask to speak in Court about your opinion of the Settlement. More information on how to ask the Court to appear at the hearing is available below.
<b>DO NOTHING</b>	You won't get a share of the cash portion of the Settlement benefits and will give up your rights to sue the Defendant about the claims in this case.

## BASIC INFORMATION

### 1. Why was this Notice issued?

A Court authorized this notice because you have a right to know about a proposed Settlement of this class action lawsuit and about all of your options, before the Court decides whether to give final approval to the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights. Judge Sunshine S. Sykes of the United States District Court for the Central District of California is overseeing this class action. The lawsuit is known as *Hurd et al. v. G.Skill International.*, Case No. 2:22-cv-00685 (C.D. Cal.). The people who sued, Tristan Hurd and Ken DiMicco, are called the "Class Representatives." The companies that got sued, G.Skill International Enterprise Co., Ltd., G.Skill USA, Inc., Neuteck, Inc., and Racerspeed, Inc., are collectively called the "Defendants" or "G.Skill."

### 2. What is a class action?

In a class action, one or more people called Class Representatives (in this case, Tristan Hurd and Ken DiMicco) sue on behalf of a group or a "class" of people who have similar claims. In a class action, the court resolves the issues for all class members, except for those who choose to exclude themselves from the class.

### 3. What is this lawsuit about?

The lawsuit claims that G.Skill deceptively advertised and labeled the speed of its DDR-4 and DDR-5 DRAM (non-laptop) memory products with rated speeds over 2133 MHz or 4800 MHz, and that G.Skill is liable for violations of consumer protection statutes and breach of express warranty. The plaintiffs in the lawsuit allege they were led to believe that the advertised speeds were "out of the box" speeds requiring no adjustments to their PCs. G.Skill denies any wrongdoing and denies that it violated any law. G.Skill maintains that its memory products were appropriately labeled and advertised at all times and that they performed as represented.

### 4. Why is there a settlement?

G.Skill denies the allegations in the lawsuit, and the Court has not decided whether the Plaintiffs or the Defendants should win this case. Instead, both sides agreed to a Settlement. That way, they avoid the uncertainties, burdens, and expenses associated with ongoing litigation, and Class Members will get compensation now rather than years from now, if at all. More information about the Settlement and the lawsuit are available in the "Court Documents" section of the settlement website, or by accessing the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Central District of California, Riverside Courthouse, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

## WHO'S INCLUDED IN THE SETTLEMENT

### 5. How do I know if I am in the Settlement Class?

The Court decided that everyone who fits this description and chooses not to request to be excluded is a member of the Settlement Class:

**All individuals in the United States who purchased one or more G.Skill DDR-4 and DDR-5 DRAM (non-laptop) memory products with rated speeds over 2133 MHz or 4800 MHz respectively from January 31, 2018 to January 7, 2026.**

Excluded from the Settlement Class are (1) any Judge or Magistrate presiding over this action and members of their families, (2) the defendant, defendant's subsidiaries, parent companies, successors, predecessors, and any entity in which the defendant or its parents have a controlling interest and their current or former officers, directors, and employees, (3) counsel of record (and their respective law firms) for the Parties; (4) persons who properly execute and file a timely request for exclusion from the class, and (5) the legal representatives, successors or assigns of any such excluded persons.

If you are still not sure whether you are included, you can call the Settlement Administrator at (877) 755-4222 or email [info@GSkillDRAMSettlement.com](mailto:info@GSkillDRAMSettlement.com).

## THE SETTLEMENT BENEFITS

### 6. What does the Settlement provide?

Defendant has created a Settlement Fund totaling \$2,400,000.00. Class Member payments, as well as the cost to administer the Settlement, the cost to inform people about the Settlement, attorneys' fees and costs, and an award to the Class Representatives will also come out of this fund.

If approved by the Court, the Settlement will also require G.Skill to take commercially reasonable efforts to implement changes on the packaging, website product pages, and specifications provided to resellers for the covered products. Rated speeds for the products will be listed as "up to" speeds, with the following corresponding text: "Requires overclocking/BIOS adjustments. Maximum speed and performance depend on system components, including motherboard and CPU."

### 7. How much will my payment be?

If you are member of the Settlement Class, you may submit a Claim Form to receive a portion of the Settlement Fund. The amount of this payment will depend on how many of the Class Members file valid claims. Each Class Member who files a valid claim will receive a proportionate share of the Settlement Fund based on the number of products purchased.

Settlement Distributions will be paid on a per-product basis, with a maximum of five (5) qualifying purchases paid per household, without proof of purchase. Households that purchased more than five (5) products must provide proof of purchase upon request.

#### **8. When will I get my payment?**

You should receive a check or electronic payment from the Settlement Administrator approximately 45 days after the Settlement has been finally approved and/or after any appeals process is complete. The hearing to consider the final fairness of the Settlement is scheduled for **June 5, 2026**. All checks will expire and become void 180 days after they are issued. If appropriate, funds remaining from uncashed checks may be donated to one or more charity(ies) agreed on by the Parties and approved by the Court.

### **HOW TO GET BENEFITS**

#### **9. How do I get a payment?**

If you are a Class Member and you want to receive a payment, you must complete and submit a valid Claim Form by **April 7, 2026**. Claim Forms can be found and submitted online or you may have received a Claim Form in the mail as a postcard attached to a summary of this notice, which can be submitted by mail. To submit a Claim Form online or to request a paper copy, go to **[www.GSkillDRAMSettlement.com](http://www.GSkillDRAMSettlement.com)**, call toll free **(877) 755-4222**, or email **[info@GSkillDRAMSettlement.com](mailto:info@GSkillDRAMSettlement.com)**.

We also encourage you to submit your claim electronically. Not only is it easier and more secure, but it is completely free and takes only minutes!

### **REMAINING IN THE SETTLEMENT**

#### **10. What am I giving up if I stay in the class?**

If the Settlement becomes final, you will give up your right to sue the Defendants for the claims being resolved by this Settlement. The specific claims you are giving up against the Defendants are described in the Settlement Agreement. You will be "releasing" the Defendants and certain related parties (collectively, the "Released Parties"), described in Sections 1.25 and 1.26 of the Settlement Agreement. Unless you exclude yourself (*see* Question 14), you are "releasing" the claims, regardless of whether you submit a claim or not. The Settlement Agreement is available through the "court documents" link on the website.

The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions you can talk to the lawyers listed in Question 12 for free by calling

(310) 656-7066, or you can, of course, talk to your own lawyer if you have questions about what this means.

#### **11. What happens if I do nothing at all?**

If you do nothing, you won't get any payments from this Settlement. But, unless you exclude yourself, you won't be able to bring or participate in any other lawsuit against the Defendant for the claims being resolved by this Settlement.

### **THE LAWYERS REPRESENTING YOU**

#### **12. Do I have a lawyer in the case?**

The Court has appointed lawyers at the firm Dovel & Luner to represent the Class. They are called "Class Counsel." They are experienced in handling similar class action cases. More information about these lawyers, their law firm, and their experience is available at [www.dovel.com](http://www.dovel.com). They believe, after conducting an extensive investigation, that the Settlement Agreement is fair, reasonable, and in the best interests of the Settlement Class. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

The Court also appointed Plaintiffs Tristan Hurd and Ken DiMicco, who each purchased G.Skill DRAM products, as the Class Representatives.

#### **13. How will the lawyers be paid?**

Class Counsel attorneys' fees and costs will be paid from the Settlement Fund in an amount to be determined and awarded by the Court. The fee petition will seek no more than one third of the Settlement Fund, as well as reimbursement of reasonable costs they sustained in litigating the case. The Court may award less than this amount. Under the Settlement, any amount awarded to Class Counsel will be paid out of the Settlement Fund. Subject to approval by the Court, each Class Representative will be paid up to \$5,000.00 from the Settlement Fund.

### **EXCLUDING YOURSELF FROM THE SETTLEMENT**

#### **14. How do I get out of the Settlement?**

To exclude yourself from the Settlement, you must mail or otherwise deliver a letter (or request for exclusion) stating that you want to be excluded from the *Hurd et al. v. G.Skill International et al.*, Case No. No. 2:22-cv-00685-SSS-MAR Settlement. Your letter or request for exclusion must include your name and address, email and telephone number, the full name and model of the DRAM that you purchased, a statement that you resided in the United States at the time of purchase, and your signature. You must mail your exclusion request no later than **April 7, 2026**, to:

**G Skill Settlement Administrator  
P.O. Box 58220  
Philadelphia, PA 19102**

**15. If I don't exclude myself, can I sue the Defendant for the same thing later?**

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

**16. If I exclude myself, can I get a settlement payment?**

No. If you exclude yourself, you should not submit a Claim Form to ask for a payment because you won't receive one.

**OBJECTING TO THE SETTLEMENT**

**17. How do I object to the Settlement?**

You can ask the Court to deny approval by filing an objection. You can't ask the Court to order a different Settlement; the Court can only approve or reject the Settlement being proposed. If the Court denies approval, no settlement payments will be sent out and the lawsuit will continue. If that is what you want to happen, you must object.

Any objection to the proposed Settlement must be in writing. If you file a timely written objection, you may, but are not required to, appear at the final approval hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney. If you want to appear and speak at the Final Approval Hearing to object to the Settlement, with or without a lawyer (explained below in answer to Question Number 21), you must say so in your letter or brief. Your objection should be submitted to the Settlement Administrator at **P.O. Box 58220, Philadelphia, PA 19102**.

All written objections and supporting papers must: (a) clearly identify the case name and number *Hurd et al. v. G.Skill International et al.*, Case No. No. 2:22-cv-00685-SSS-MAR (C.D. Cal.), (b) be submitted to the Court either by mailing them to the Class Action Clerk, United States District Court for the Central District of California, 3470 Twelfth Street, Riverside, California 92501, or by filing them in person at any location of the United States District Court for the Central District of California, (c) include your name and address, (d) include an explanation of the basis upon which you claim to be a Class Member (including the name and model of the G.Skill DRAM that you purchased and a statement that you resided in the United States at the time of purchase and purchased the DRAM during the Class Period), (e) include all grounds for the objection, including all citations to legal authority and evidence supporting the objection, (f) include the name and contact information of any and all attorneys representing, advising, or in any way assisting you in connection with your objection, and your signature, and (g) be filed or postmarked on or before **April 7, 2026**.

Class Counsel will file with the Court and post on this website its request for attorneys' fees by **April 28, 2026**.



### **18. What's the difference between objecting and excluding myself from the Settlement?**

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

## **THE COURT'S FINAL APPROVAL HEARING**

### **19. When and where will the court decide whether to approve the Settlement?**

The Court will hold the Final Approval Hearing at **2:00 PM Pacific Time on June 5, 2026 in Courtroom 2 of the United States District Court for the Central District of California, located at 3470 Twelfth Street, Riverside, California 92501**. The purpose of the hearing will be for the Court to determine whether to approve the Settlement as fair, reasonable, adequate, and in the best interests of the Class; to consider Class Counsel's request for attorneys' fees and expenses; and to consider the request for incentive awards to the Class Representatives. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the Settlement.

The hearing may be postponed to a different date or time without notice, so it is a good idea to check **[www.GSkillDRAMSettlement.com](http://www.GSkillDRAMSettlement.com)** or call **(877) 755-4222** to confirm the hearing date. If, however, you timely objected to the Settlement and advised the Court that you intend to appear and speak at the final approval hearing, you will receive notice of any change in the date of such final approval hearing.

### **20. Do I have to come to the hearing?**

No. Class Counsel will answer any questions the Court may have. But you are welcome to come at your own expense. If you send an objection or comment, you don't have to come to Court to talk about it. As long as you filed and mailed your written objection on time, the Court will consider it. You may also pay another lawyer to attend, but it's not required.

### **21. May I speak at the hearing?**

Yes. You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must include in your letter or brief objecting to the Settlement a statement saying that it is your "Notice of Intent to Appear in *Hurd et al. v. G.Skill International et al.*, Case No. No. 2:22-cv-00685-SSS-MAR (C.D. Cal.)." It must include your name, address, telephone number and signature as well as the name and address of your lawyer, if one is appearing for you. Your objection and notice of intent to appear must be filed with the Court and postmarked no later than objection deadline.

### **22. Where do I get more information?**

This Notice summarizes the Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement at **[www.GSkillDRAMSettlement.com](http://www.GSkillDRAMSettlement.com)**. You can also get information about this case by accessing the Court docket, for a fee, through the Court's Public Access to Court Electronic (PACER) system at <https://ecf.cacd.uscourts.gov>, or by visiting the office of the Clerk

of the Court for the United States District Court for the Central District of California, Riverside Courthouse, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

You may also contact Settlement Administrator by mail, email, or by calling toll-free:

**1650 Arch Street, Suite 2210, Philadelphia, PA 19103**

**[info@GSkillDRAMSettlement.com](mailto:info@GSkillDRAMSettlement.com)**

**(877) 755-4222**

You may also call Class Counsel at (310) 656-7066, if you have any questions. Before doing so, however, please read this full Notice carefully.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS. All questions regarding the Settlement or claims process should be directed to the Settlement Administrator or to Class Counsel.