



United States District Court  
for the Central District of California

*Hernandez v. Radio Systems Corporation*

Case No. 5:22-cv-01861-JGB-DTB

# Class Action Notice

*Authorized by the U.S. District Court*

---

**Did you buy a  
PetSafe e-collar  
in California  
between  
October 2018  
and October  
2022?**

**There is a  
\$1,900,000  
settlement of  
a class action  
lawsuit.**

**You may be  
entitled to  
money.**

**To be part of this  
settlement, you  
should:**

**Read this notice.**

**Respond by  
December 29,  
2025.**

---

Important things to know:

- If you take no action, you will still be bound by the settlement, and your rights will be affected.
- You can learn more at: [petsafesettlement.com](https://petsafesettlement.com)

# Table of Contents

|                                                           |           |
|-----------------------------------------------------------|-----------|
| <b>Table of Contents.....</b>                             | <b>2</b>  |
| <b>About This Notice .....</b>                            | <b>3</b>  |
| Why did I get this notice? .....                          | 3         |
| What do I do next? .....                                  | 3         |
| What are the most important dates? .....                  | 3         |
| <b>Learning About the Lawsuit .....</b>                   | <b>4</b>  |
| What is this lawsuit about? .....                         | 4         |
| Why is there a settlement in this lawsuit? .....          | 4         |
| What happens next in this lawsuit? .....                  | 4         |
| <b>Learning About the Settlement.....</b>                 | <b>5</b>  |
| What does the settlement provide? .....                   | 5         |
| How do I know if I am part of this settlement? .....      | 6         |
| How much will my payment be? .....                        | 6         |
| <b>Deciding What to Do.....</b>                           | <b>7</b>  |
| How do I weigh my options? .....                          | 7         |
| What is the best path for me? .....                       | 8         |
| <b>Submitting a Claim .....</b>                           | <b>8</b>  |
| How do I get a payment if I am a class member? .....      | 9         |
| Do I have a lawyer in this lawsuit? .....                 | 9         |
| Do I have to pay the lawyers in this lawsuit? .....       | 9         |
| <b>Opting Out.....</b>                                    | <b>10</b> |
| What if I don't want to be part of this settlement? ..... | 10        |
| How do I opt out? .....                                   | 10        |
| <b>Objecting .....</b>                                    | <b>11</b> |
| What if I disagree with the settlement? .....             | 11        |
| <b>Doing Nothing.....</b>                                 | <b>12</b> |
| What are the consequences of doing nothing? .....         | 12        |
| <b>Key Resources .....</b>                                | <b>12</b> |
| How do I get more information? .....                      | 12        |

# About This Notice

## Why did I get this notice?

This notice is to tell you about the settlement of a class action lawsuit, *Hernandez v. Radio Systems Corporation*, brought on behalf of people in California who bought certain PetSafe electronic collar products for pets made by Radio Systems. **You received this notice because you may be a member of the group of people affected, called the “class.”** This notice gives you a summary of the terms of the proposed settlement agreement, explains what rights class members have, and helps class members make informed decisions about what action to take.

## What do I do next?

Read this notice to understand the settlement and to determine if you are a class member. Then, decide if you want to:

| Your Options               |                                                                                                  |
|----------------------------|--------------------------------------------------------------------------------------------------|
| <b>Submit a Claim Form</b> | You must submit a claim to receive payment. You will be bound by the settlement.                 |
| <b>Do Nothing</b>          | Get no payment. Give up rights resolved by settlement.                                           |
| <b>Opt Out</b>             | Get no payment. Allows you to bring another lawsuit against Radio Systems about the same issues. |
| <b>Object</b>              | Tell the Court why you don't like the settlement.                                                |

Read on to understand the specifics of the settlement and what each choice would mean for you.

## What are the most important dates?

Your deadline to object or opt out: **December 29, 2025**

Settlement approval hearing: **January 26, 2026**

Your deadline to submit a claim form: **December 29, 2025**

# Learning About the Lawsuit

## What is this lawsuit about?

On October 21, 2022, a class action lawsuit was filed against Radio Systems. The lawsuit was brought on behalf of consumers who bought PetSafe e-collar products in California. This lawsuit claims that Radio Systems made misleading statements and left out important information about the products' safety.

Radio Systems denies that it made misleading statements or did anything wrong.

### Where can I learn more?

You can get a complete copy of the proposed settlement and other key documents in this lawsuit at [petsafesettlement.com](https://petsafesettlement.com)

## Why is there a settlement in this lawsuit?

In 2025, the parties agreed to settle, which means they have reached an agreement to resolve the lawsuit. Both sides want to avoid the risk and expense of further litigation.

The settlement is on behalf of the consumer who brought the case and all members of the California settlement class, which includes consumers who bought certain PetSafe e-collars. The Court has not decided this case in favor of either side.

### What is a class action settlement?

A class action settlement is an agreement between the parties to resolve and end the case. Settlements can provide money to class members.

## What happens next in this lawsuit?

The Court will hold a Fairness hearing to decide whether to approve the settlement. The hearing will be held at:

**Where:** George E. Brown, Jr. Federal Building and U.S. Courthouse  
Courtroom 1  
3470 Twelfth Street  
Riverside, CA 92501-3801

**When:** January 26, 2026 at 9:00 a.m. PT

The Court has directed the parties to send you this notice about the proposed settlement. Because the settlement of a class action decides the rights of all members of the proposed class, the Court must give final approval to the settlement before it can take effect. Payments will only be made if the Court approves the settlement.

You don't have to attend, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the settlement. If the Court does not approve the settlement or the parties decide to end it, it will be void and the lawsuit will continue. The date of the hearing may change without further notice to members of the class. To learn more and confirm the hearing date, go to [petsafesettlement.com](https://petsafesettlement.com).

## Learning About the Settlement

### What does the settlement provide?

The settlement pays money to consumers who purchased certain Radio Systems' e-collar products.

Radio Systems, with no admission of guilt, has agreed to pay \$1,900,000 into a settlement fund. This money will be divided among the class members who submit a timely and valid claim form and will also be used to pay for costs and fees approved by the Court, including the cost of administering this settlement. Members of the settlement class will "release" their claims as part of the settlement, which means they cannot sue Radio Systems for the same issues in this lawsuit. The full terms of the release can be found in the settlement agreement located at [petsafesettlement.com](https://petsafesettlement.com).

## How do I know if I am part of this settlement?

If you bought a PetSafe e-collar product in California between October 1, 2018 and October 31, 2022, you may be a member of the class and entitled to money. The settlement includes the following products:

|                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Bark Collar Products</b><br>Classic Bark Collar<br>Basic Bark Control Collar<br>Lite Rechargeable Bark Collar<br>Rechargeable Bark Control Collar<br><br><b>Barrier Products</b><br>Pawz Away Mini Pet Barrier<br>Pawz Away Indoor Pet Barrier<br>Pawz Away Outdoor Pet Barrier | <b>In- Ground Fence Products</b><br>PetSafe In-Ground Fence<br>Basic In-Ground Fence<br>Classic In-Ground Fence<br>Rechargeable In-Ground Fence<br>Stubborn Dog In-Ground Fence<br>Elite Little Dog Deluxe In-Ground Fence<br>Deluxe In-Ground Cat Fence<br>YardMax Rechargeable In-Ground Fence<br>YardMax Cordless In-Ground Fence<br><br><b>Wireless Fence Products</b><br>Wireless Pet Containment System<br>Stay & Play Compact Wireless Fence<br>Stay & Play Wireless Fence for Stubborn Dogs<br>Stay & Play Wireless Fence with Replaceable Battery |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## How much will my payment be?

Your payment depends on which and how many PetSafe e-collar products you purchased.

Each settlement class member who submits a valid claim form on time will get a cash award of \$30 for each Bark Collar Product, \$35 for each Barrier Product, \$90 for each In-Ground Fence Product, and \$140 for each Wireless Fence Product.

You may submit a claim for up to 3 products with no proof of purchase. If you submit a claim for more than 3 products, you will need to provide proof of purchase. You must certify under oath which products PetSafe e-collar products you purchased.

| Product                  | Cash Award   |
|--------------------------|--------------|
| Bark Collar Products     | \$30.00 each |
| Barrier Products         | \$35.00 each |
| In-Ground Fence Products | \$90.00 each |

|                         |               |
|-------------------------|---------------|
| Wireless Fence Products | \$140.00 each |
|-------------------------|---------------|

If claims exceed the total amount of funds available, payments will be reduced *pro rata* so that all claims equal the total funds available.

## Deciding What to Do

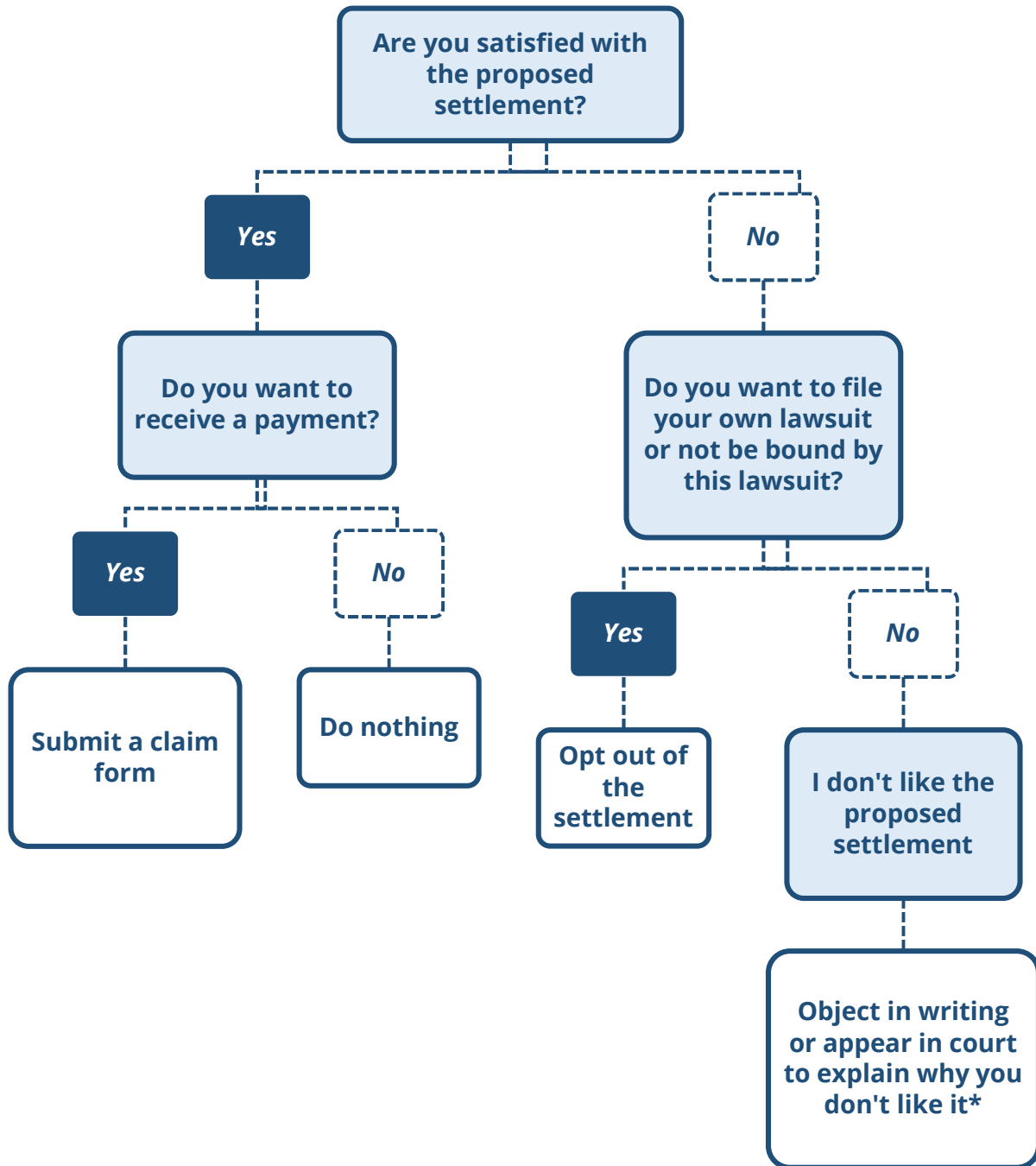
### How do I weigh my options?

You have four options. You can stay in the settlement and submit a claim, you can opt out of the settlement, you can object to the settlement, or you can do nothing. If you object to the settlement, but still want to receive a payment from settlement, you must submit a claim.

This chart shows the effects of each option:

|                                                         | <b>Submit<br/>a Claim</b> | <b>Opt out</b> | <b>Object</b> | <b>Do<br/>Nothing</b> |
|---------------------------------------------------------|---------------------------|----------------|---------------|-----------------------|
| <b>Can I receive settlement money if I ...</b>          | YES                       | NO             | YES           | NO                    |
| <b>Am I bound by the terms of this lawsuit if I ...</b> | YES                       | NO             | YES           | YES                   |
| <b>Can I pursue my own case if I ...</b>                | NO                        | YES            | NO            | NO                    |
| <b>Will the class lawyers represent me if I ...</b>     | YES                       | NO             | NO            | YES                   |

## What is the best path for me?



*\*You can object to the settlement AND submit a claim form to receive payment.*

# Submitting a Claim

## How do I get a payment if I am a class member?

If you wish to receive money, you must submit a verified claim form to the Settlement Administrator online or download a claim form at [petsafesettlement.com](https://petsafesettlement.com) and mail to the Settlement Administrator at:

PetSafe Settlement Administrator  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103

The deadline is December 29, 2025.

## Do I have a lawyer in this lawsuit?

In a class action, the court appoints class representatives and lawyers to work on the case and represent the interests of all the class members. For this settlement, the Court has appointed the following individuals and lawyers.

**Class Counsel:** Amber L. Schubert of Schubert Jonckheer & Kolbe LLP.

This is the lawyer who negotiated this settlement on your behalf. You may contact your lawyer at [petsafe.settlement@sjk.law](mailto:petsafe.settlement@sjk.law).

If you want to be represented by your own lawyer, you may hire one at your own expense.

## Do I have to pay the lawyers in this lawsuit?

Lawyers' fees and costs will be paid from the Settlement Fund. **You will not have to pay the lawyers directly.**

To date, Class Counsel have not been paid any money for their work or the expenses that they have paid for the case. To pay for some of their time and risk in bringing this case without any guarantee of payment unless they were successful, your lawyers will request, as part of the final approval of this Settlement, that the Court approve a payment of

up to \$633,270 total in attorneys' fees plus the reimbursement of out-of-pocket expenses.

Lawyers' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the lawyers' fees even if you think the settlement terms are fair.

Class Counsel will also ask the Court to approve a payment of up to \$10,000 to the Class Representative for the time and effort he contributed to the case. If approved by the Court, this will be paid from the Settlement Fund.

## Opting Out

### What if I don't want to be part of this settlement?

You can opt out. If you do, you will not receive payment and cannot object to the settlement. However, you will not be bound or affected by anything that happens in this lawsuit and may be able to file your own case.

### How do I opt out?

To opt out of the settlement, you must complete the opt out form online at [petsafesettlement.com](https://petsafesettlement.com) or download the opt out form and submit it to the Settlement Administrator by mail:

PetSafe Settlement Administrator  
Attn: Opt Outs  
P.O. Box 58220  
Philadelphia, PA 19102

Be sure to include your name, address, telephone number, email address, case name and number, and signature.

The deadline to submit an opt out form online is **December 29, 2025**. Opt out forms submitted by mail must be postmarked no later than **December 29, 2025**.

# Objecting

## What if I disagree with the settlement?

If you disagree with any part of the settlement (including the lawyers' fees) but don't want to opt out, you may object. You must give reasons why you think the Court should not approve it and say whether your objection applies to just you, a part of the class, or the entire class. The Court will consider your views. The Court can only approve or deny the settlement—it cannot change the terms of the settlement. You may, but don't need to, hire your own lawyer to help you.

To object, you must send a letter to the Court that:

- (1) is postmarked by December 29, 2025;
- (2) includes the case name and number (*Hernandez v. Radio Systems Corporation*, No. 5:22-cv-01861-JGB-DTB)
- (3) includes your full name, address, telephone number, and email address (if you have one);
- (4) states the reasons for your objection;
- (5) says whether either you or your lawyer intend to appear at the final approval hearing and your lawyer's name;
- (6) your signature.

Mail the letter to:

Clerk of the Court  
U.S. District Court for Central District of CA  
George E. Brown, Jr. Federal Building and U.S.  
Courthouse  
3470 Twelfth Street  
Riverside, CA 92501-3801

# Doing Nothing

## What are the consequences of doing nothing?

If you do nothing, you will not get any money, but you will still be bound by the settlement and its “release” provisions. That means you won’t be able to start, continue, or be part of any other lawsuit against Radio Systems about the issues in this case. A full description of the claims and persons who will be released if this settlement is approved can be found at [petsafesettlement.com](https://petsafesettlement.com).

## Key Resources

### How do I get more information?

This notice is a summary of the proposed settlement. The complete settlement with all its terms can be found here. To get a copy of the settlement agreement or get answers to your questions:

- contact Class Counsel (information below)
- visit the case website at [petsafesettlement.com](https://petsafesettlement.com)
- access the Court’s docket online at [cacd.uscourts.gov](https://cacd.uscourts.gov) or by visiting the Clerk’s office of the Court (address below).

| Resource                        | Contact Information                                                                                                                                                                        |
|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Case website</b>             | <a href="https://petsafesettlement.com">petsafesettlement.com</a>                                                                                                                          |
| <b>Settlement Administrator</b> | PetSafe Settlement Administrator<br>1650 Arch Street, Suite 2210<br>Philadelphia, PA 19103<br>(877) 766-4150<br><a href="mailto:info@petsafesettlement.com">info@petsafesettlement.com</a> |
| <b>Class Counsel</b>            | Amber L. Schubert<br>Schubert Jonckheer & Kolbe LLP<br>2001 Union St., Ste. 200<br>San Francisco, CA 94123                                                                                 |

|  |                                                                            |
|--|----------------------------------------------------------------------------|
|  | <a href="mailto:petsafe.settlement@sjk.law">petsafe.settlement@sjk.law</a> |
|--|----------------------------------------------------------------------------|

- Please **do not contact** the Court with any questions related to the settlement.

|              |                                                                                                                                                                   |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Court</b> | U.S. District Court for Central District of CA<br>George E. Brown, Jr. Federal Building<br>and U.S. Courthouse<br>3470 Twelfth Street<br>Riverside, CA 92501-3801 |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|