Superior Court of the District of Columbia

Travelers United, Inc. v. Sonesta International Hotels Corp.

Case No. 2023 CAB 5254

Class Action Notice

Authorized by the Superior Court of the District of Columbia

Did you pay a resort, destination, or other similar fee to Sonesta International Hotels Corp. between August 24, 2020, and June 28, 2024?

There is an $8.2 million settlement of a lawsuit.

You may be entitled to money.

Read this notice. To be part of this settlement, you may:

Respond by January 4, 2027, or do nothing and be bound by the terms of the Settlement.

Important things to know:

- If you are a Settlement Class Member and take no action, you will still be bound by the settlement, and your rights will be affected. You will also automatically receive your Settlement Award after the Settlement becomes final.
- Visit www.TravelersSonestaLawsuit.com to learn more about the Settlement and to select your preferred payment method.

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About This Notice

Why did I get this notice?

This notice is to tell you about the settlement of a class action lawsuit, *Travelers United, Inc. v. Sonesta International Hotels Corp.,* No. 2023-CAB-005254, pending in the Superior Court of the District of Columbia. **You received this notice because records show that you are a member of the group of people affected, called the "class."** This notice provides 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:

Options	More information about each option
Do Nothing	You do not need to do anything. Your settlement award will be sent to you automatically, and you will be bound by the settlement's release of claims.
Opt Out	Get no award. Allows you to bring another lawsuit against Sonesta about the same issues.
Object	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: **January 4, 2027**

Settlement approval hearing: **February 4, 2027**

Learning About the Lawsuit

What is this lawsuit about?

In 2023, a class action lawsuit was filed against Sonesta International Hotels Corp. ("Sonesta"). The lawsuit was brought on behalf of consumers who booked through Sonesta's website or mobile app and (1) paid a resort, destination, or other similar fee to Sonesta to stay at a hotel in Washington D.C., and (2) D.C. residents who paid a resort, destination, and/or other similar fee to Sonesta to stay at any hotel in the U.S. The lawsuit claims that by failing to include such fees in the advertised price of its hotel rooms, Sonesta made misleading statements and left out important pricing information.

Where can I learn more?
You can get a complete copy of the settlement agreement and other key documents in this lawsuit at: www.TravelersSonestaLawsuit.com

Sonesta denies these allegations and maintains that its pricing practices were lawful, transparent, and consistent with industry standards.

Why is there a settlement in this lawsuit?

The Plaintiff and Defendants disagree about the legal claims in this Action. The Action has not gone to trial, and the Court has not decided in favor of either the Plaintiff or the Defendants. Instead, the Plaintiff and Defendants (collectively, the "Parties") agreed to settle the Action after considering the risks, costs, and uncertainties of continued litigation.

What is a class action settlement?
A class action settlement is an agreement that resolves claims brought on behalf of a group of people or entities who share similar legal claims against one or more defendants.

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: Superior Court of the District of Columbia, Moultrie Courthouse, 500

Indiana Ave NW, Washington, DC 20001

When: 9:30 a.m. on February 4, 2027.

The Court has authorized this notice about the proposed settlement. Before the Court decides whether to grant final approval to the Settlement, you have the right to understand the Settlement and your rights and options.

This Notice explains the nature of the lawsuit, the terms of the proposed Settlement, who is eligible to receive benefits from this Settlement, a description of the benefits, and how to obtain those benefits.

Learning About the Settlement

What does the settlement provide?

The settlement provides payments or Stay Credit vouchers to class members who paid a resort, destination, or similar fees by Sonesta. There are three separate classes which make up the Settlement Class. The ***Travelers*** **National Class**, the ***Travelers*** **District Class**, and the ***Isaacson*** **or Travel Pass Class**.

Sonesta has agreed to pay $5,025,237.00 into a settlement fund to pay class members. In addition, Sonesta has agreed to provide additional compensation to Settlement Class members in the form of stay credits (each, a "Stay Credit") to each of the below Classes, totaling $3,216,275.00 in value.

You do <u>not</u> need to file a claim to receive the settlement benefits. However, if you would like to select a payment method, visit www.TravelersSonestaLawsuit.com.

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

If you fall within the definition of the ***Travelers National Class***, ***Travelers District Class***, or, ***Isaacson or Travel Pass Class***, defined below, you are part of this settlement.

Travelers National Class - All individuals in the United States who, between August 24, 2020, and June 28, 2024, booked a room at a Sonesta hotel within the District of Columbia through the Sonesta website and/or Sonesta App for personal use and paid a resort, destination, and/or other similar fee to Sonesta.

***Travelers* District Class -** All residents of the District of Columbia who, between August 24, 2020, and June 28, 2024, booked a room at a Sonesta hotel within the United States through the Sonesta website and/or Sonesta App for personal use and paid a resort, destination, and/or other similar fee to Sonesta.

***Isaacson* or Travel Pass Class:** All Sonesta Travel Pass rewards members who, between October 24, 2021, and June 28, 2024, paid a Destination Fee, Resort Fee, or other similar fee to Sonesta through the desktop or mobile versions of https://www.sonesta.com or through the Sonesta mobile application where the price initially displayed to the consumer did not include the amount of such fee. Individuals who are members of either *Travelers* class are excluded from the *Isaacson* class.

How much will my settlement award be?

Your settlement award depends on which Class you are in and the total fees paid to Sonesta during the relevant time periods.

Members of the ***Travelers National Class*** and ***Travelers District Class*** will receive a proportional share of $2,793,000.00 (less attorneys' fees, service awards, administration costs, and any other costs, expenses, fees, or awards permitted by the Court) as well as a $50.00 Stay Credit.

Members of the ***Isaacson or Travel Pass Class*** will receive a proportional share of proportional share of $2,232,237.00 (less attorneys' fees, service awards, administration costs, and any other costs, expenses, fees, or awards permitted by the Court) as well as a $25.00 Stay Credit.

Settlement Class Members shall be entitled to only one award: either the ***Travelers (National/District) Class*** award or the ***Isaacson or Travel Pass Class*** award, but not both.

The Settlement Administrator will automatically issue settlement awards and Stay Credits to eligible Settlement Class Members who do not opt-out of the Settlement; however, you are encouraged to visit www.TravelersSonestaLawsuit.com to update your contact information and select a preferred payment method.

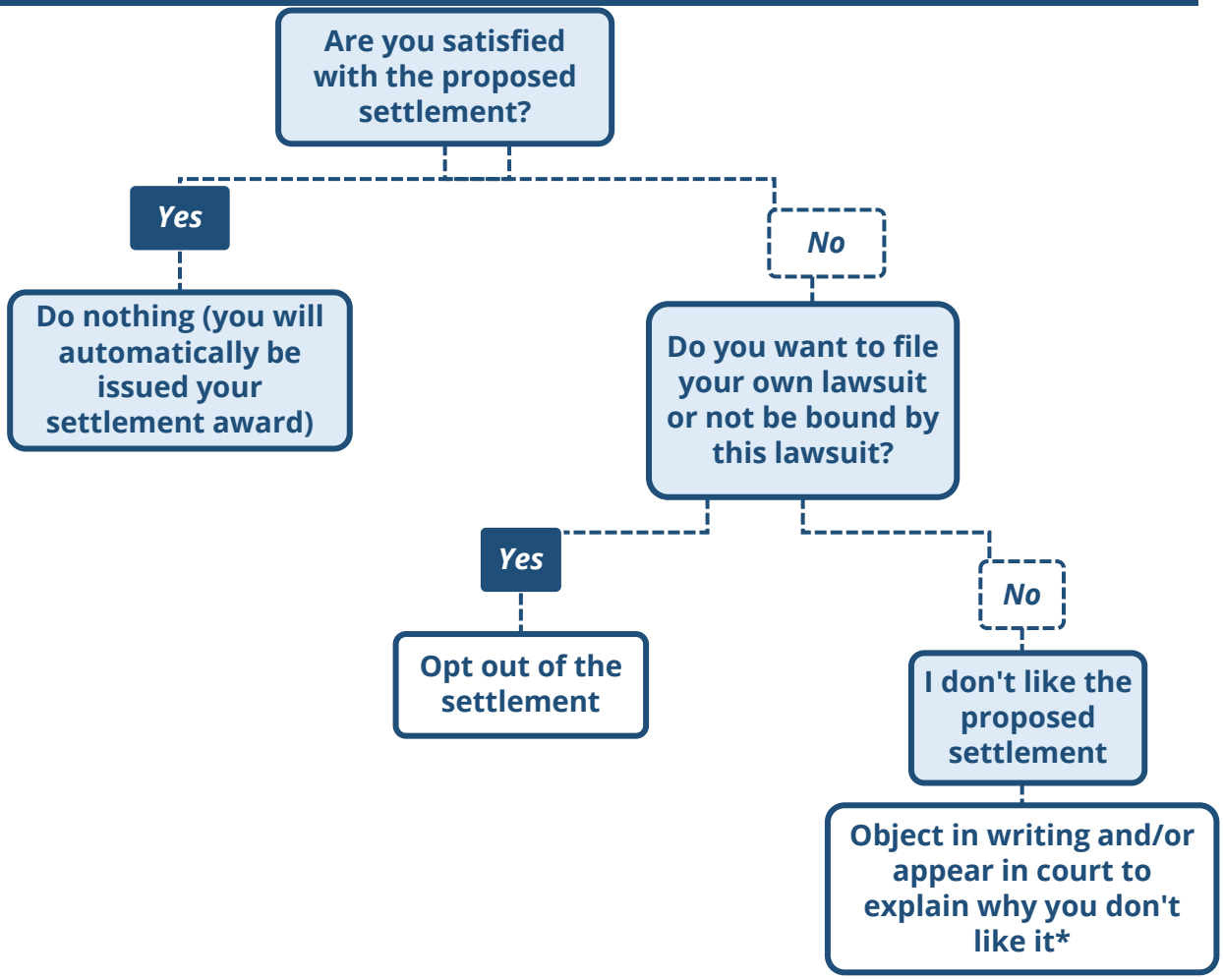
Deciding What to Do

How do I weigh my options?

You have three options. You can do nothing to stay in the settlement, you can opt out of the settlement, or you can object to the settlement. This chart shows the effects of each option:

	Do Nothing	Opt out	Object
Can I receive a settlement award if I . . .	YES	NO	YES
Am I bound by the terms of this settlement if I . . .	YES	NO	YES
Can I pursue my own case if I . . .	NO	YES	NO
Will the class lawyers represent me if I . . .	YES	NO	NO

What is the best path for me?



**You can object to the settlement and still receive your settlement award.*

Selecting a Payment Method

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

You do not need to submit a claim or take any action to receive a payment. If you are a settlement class member and do not exclude yourself, the Settlement Administrator will automatically send you a settlement award. To make sure your settlement award is sent correctly, you are encouraged to visit www.TravelersSonestaLawsuit.com to update your contact information and provide the Settlement Administrator with your preferred payment method.

Stay Credit vouchers will be issued along with all class member monetary payments pursuant to the plan of distribution, redeemable solely for hotel stays at Sonesta properties, and not for gift cards, merchandise, or any other non-stay redemption, and shall expire one (1) year after the date of receipt by the Settlement Class member if not redeemed. If you opt to receive your settlement award via digital payment, your Stay Credit voucher will be emailed to you in the form of a redeemable unique ID number. If you opt to receive payment via physical check, your Stay Credit voucher with a redeemable unique ID number will be mailed to you along with your settlement award check. Stay Credits cannot be redeemed for cash.

The Lawyers Representing You

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.

Your lawyers: F. Peter Silva II, Hassan A. Zavareei, and Robert Devling of Tycko & Zavareei LLP. These are the lawyers who negotiated this settlement on your behalf.

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, your lawyers 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 one-third of common fund 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.

Your lawyers will also ask the Court to approve a service award payment of up to $10,000.00 to the Class Representatives, Jackson Isaacson and Travelers United, Inc., for their time and effort they put forth to serve as class representatives and achieve this settlement.

Opting Out

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

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

How do I opt out?

To opt out of the settlement, you must submit an opt-out request by mail to the Settlement Administrator at the address below, so it is postmarked no later than **January 4, 2027**.

Sonesta Hotel Corporation Litigation
Settlement Administrator
Attn: Opt Outs
PO Box 58220

Philadelphia, PA 19102

Be sure to identify the case name, include your name, address, telephone number, include a statement that indicates your desire to be excluded from the Settlement Class, and your signature.

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 **January 4, 2027**;
(2) includes the case name and number (*Travelers United, Inc. v. Sonesta International Hotels Corp.,* No. 2023-CAB-005254)
(3) includes your full name, address and 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:

Sonesta Hotel Corporation Litigation Settlement Administrator Attn: Objection	Superior Court of the District of Columbia Moultrie Courthouse 500 Indiana Ave., N.W., Suite

PO Box 58220 Philadelphia, PA 19102	2500 Washington, D.C. 20001

Doing Nothing

What are the consequences of doing nothing?

If you do nothing, you will receive your settlement award at your current mailing address and you will also receive the Stay Credit. You will 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 Sonesta 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 in the Settlement Agreement, available at www.TravelersSonestaLawsuit.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 your lawyer (information below)
- visit the case website at www.TravelersSonestaLawsuit.com

Resource	Contact Information
Case website	www.TravelersSonestaLawsuit.com
Settlement Administrator	Sonesta Hotel Corporation Litigation Settlement Administrator 1650 Arch Street, Suite 2210 Philadelphia, PA 19103

	(844) 743-4352
Your Lawyers	Tycko & Zavareei LLP TravelersSonestaLawsuit@tzlegal.com 2000 Pennsylvania Ave. NW, Suite 1010 Washington, D.C. 20006