

Superior Court of the State of New Jersey

**If you are an owner of a residential property contained within Shieldalloy Metallurgical Corp. Classification Exception Areas (“CEAS”) for groundwater contamination approved in September 2020**  
**YOU MAY BE ENTITLED TO A PAYMENT**  
**from a class action settlement.**

*A court authorized this notice. It is not a solicitation from a lawyer. You are not being sued. Please do not contact the Court. Your legal rights are affected whether you act or don't act. **Read this notice carefully.***

**OVERVIEW**

- Certain residential property owners were notified in or about August 2018 that one or more Classification Exception Areas (“CEAs”) were to be established for certain existing and projected groundwater contamination above groundwater quality standards. The CEAs were established by TRC Companies, Inc. (“TRC”) and approved by the New Jersey Department of Environmental Protection (“NJDEP”) in September 2020. Plaintiffs filed a class action lawsuit against Shieldalloy Metallurgical Corporation (“SMC” or “Defendant”), TRC and other defendants seeking damages for diminution of property value allegedly caused by the CEAs and the requirement to disclose the CEAs upon the sale of Plaintiffs’ property. Defendant has denied and continues to deny that it did anything wrong and that the lawsuit has any merit. Plaintiffs and Defendant have reached a proposed settlement to resolve the lawsuit on a class action basis against all defendants, as described below.
- If, as of July 15, 2026, you own a residential property located within one or both of the CEAs, you are in the Settlement Class and are eligible to file a claim for a settlement payment.
- **IMPORTANT:** You must file a claim by **December 29, 2026**, to be eligible for payment from the settlement. **Click here to file a claim.** (Read below or see Questions 6-7 for details)
- Your legal rights **are affected**, and you have a choice to make. Your options are explained here.

| YOUR LEGAL RIGHTS AND OPTIONS |                                                                                                                                                                                                                                                |
|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>FILE A CLAIM</b>           | File a claim by <b>December 29, 2026</b> , to be eligible to receive a payment. See Questions 6-7.                                                                                                                                             |
| <b>DO NOTHING</b>             | Receive no payment and give up the right to sue defendants about the issues in the lawsuit.                                                                                                                                                    |
| <b>OPT OUT</b>                | Receive no payment from the settlement and retain any right you may have to sue defendants about the issues in the lawsuit. To opt out, you must mail a signed request for exclusion by <b>October 30, 2026</b> . See Question 11 for details. |
| <b>OBJECT OR COMMENT</b>      | Object or comment on the proposed settlement by <b>November 19</b> . See Question 12 for details. If you object or comment, you can still file a claim and be eligible to receive a payment.                                                   |

- Questions? Read below or visit [www.VinelandShieldalloyLitigation.coobjem](http://www.VinelandShieldalloyLitigation.coobjem) or call 1-855-945-4350 for more information.

## **INFORMATION ABOUT THE LAWSUIT AND CLASS**

### **1. What is this lawsuit about?**

A class action lawsuit was filed in New Jersey State Court, seeking relief under New Jersey law on behalf of a class of residential property owners who own property located within one or more Classification Exception Areas (“CEAs”) that were established as an institutional control for certain existing and projected groundwater contamination. The lawsuit sought to recover damages incurred by class members for the diminution of their property value as a result of the CEAs. The complaint is available at [www.VinelandShieldalloyLitigation.com](http://www.VinelandShieldalloyLitigation.com).

Plaintiffs and Defendant have now agreed to a Settlement Agreement to resolve the lawsuit on a class basis against all defendants, as described below. The Court has not decided whether Plaintiffs’ claims and/or defendants’ defenses are valid. By agreeing to the Settlement Agreement, neither Defendant nor Plaintiffs make any admissions regarding any liability by Defendant or the merits of the allegations, claims, or defenses in this case. Defendant has denied and continues to deny that it did anything wrong and that the lawsuit has any merit.

The Superior Court of the State of New Jersey is overseeing the lawsuit. The lawsuit is known as Cavagnaro v. Shieldalloy Metallurgical Corporation, et. al., GLO-L-816-24 (N.J. Super. Ct. Gloucester County)

### **2. Why is this a class action?**

In a class action, one or more people sue on behalf of themselves and other people with similar claims. All of these people together make up the class and are class members. One court resolves the issues for all class members, except for those who exclude themselves from the class.

### **3. Who is in the Settlement Class?**

The “Settlement Class” in this case includes:

All Persons that/who, as of Execution Date, own Residential Property or Residential Properties located, partially or wholly, within the geographical boundary defined by the following classification exception areas established for groundwater contamination other than perchlorate: (a) the Shieldalloy Metallurgical Corp. OU1 CVOC Classification Exception Area proposed and established by TRC and approved on or about September 2, 2020 and/or (b) the Shieldalloy Metallurgical Corp. NW TCE PCE Plume Classification Exception Area proposed and established by TRC and approved on or about September 9, 2020 (each a “CEA” and collectively the “CEAs”). A list of all properties located within either CEA (or both CEAs) is attached as **Exhibit B** (the “Class Properties”) to the Settlement Agreement and is available for review at [www.VinelandShieldalloyLitigation.com](http://www.VinelandShieldalloyLitigation.com).

Government entities, including, without limitation, the United States, State of New Jersey, the New Jersey Department of Environmental Protection, and any other department of the State of New Jersey or municipal entity are excluded from the Settlement Class.

Also excluded from the Settlement Class are those Persons who submit a timely and valid request for exclusion in accordance with the procedures set forth in the Settlement Agreement and in this Court’s Preliminary Approval Order.

If you received this notice of settlement by mail, you were identified as being a Settlement Class Member. People in the Settlement Class are called “Settlement Class Members.”

## **Information about the Settlement and About Filing a Claim for a Payment**

### **4. What are the terms of the proposed settlement?**

The complete terms of the proposed Settlement Agreement are available at [www.VinelandShieldalloyLitigation.com](http://www.VinelandShieldalloyLitigation.com). This notice provides only a summary of the terms and benefits of the Settlement Agreement, which is set forth below.

### **5. What are the benefits of the proposed Settlement?**

If the Settlement Agreement is approved and becomes final, Defendant will pay **\$1,325,000.00** into a Settlement Fund Account. This money will be used to: (1) make settlement payments to Settlement Class Members, as described at Questions 6-9 below; (2) pay the costs of distributing notice and settlement checks and electronic payments to Settlement Class Members and other costs of administering the settlement; and (3) pay court-awarded attorneys' fees and expenses of the attorneys appointed by the Court to represent the Class ("Class Counsel") and any service awards granted to the Settlement Class Representatives. As explained below, if you file a claim by the deadline and are eligible for a payment, the amount of payment is dependent on your property's location and how many Settlement Class Members file valid claims.

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

**You must file a claim** by December 29, 2026, to be eligible for a settlement payment.

### **7. How do I file a claim for a payment?**

**File Online:** To file a claim online, visit [www.VinelandShieldalloyLitigation.com](http://www.VinelandShieldalloyLitigation.com)

**File By Mail:** If you prefer, you can also print a paper claim form, available at [www.VinelandShieldalloyLitigation.com](http://www.VinelandShieldalloyLitigation.com), fill it out, and mail it to the address listed on the form. Or, if you received notice of this Settlement Agreement by mail you can fill out the claim form that is attached to that notice and mail it to the address listed on the form.

**The deadline to file a claim online or by mail is December 29, 2026.** The Settlement Administrator will review all claim forms and determine your eligibility and final payment.

### **8. How much will the payments be?**

An Eligible Claimant that, as of July 15, 2026, owns Class Property located within the well restriction area delineated by Vineland Ordinance No. 86-67 shall be entitled to a payment of \$300. An Eligible Claimant that, as of July 15, 2026, owns a Class Property located outside of the well restriction area delineated by Vineland Ordinance No. 86-67 shall be entitled to a payment equal to no more than 7% of the 2025 tax assessed value of the Eligible Claimant's Class Property<sup>1</sup>. Depending on the number of Claims For Payment filed, the amount of this payment may be pro-rata adjusted downward.

Claim Forms may only be submitted by Class Members identified in property tax records as owning the Class Property for which the Claim Form is submitted, as of July 15, 2026. If multiple Claim Forms are submitted by Eligible Claimants for the same Residential Property, then any payment shall be divided equally between the Eligible Claimants.

**You must submit a claim by the deadline December 29, 2026, to be eligible to receive a payment.**

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<sup>1</sup> As indicated for the 2025 tax year per the online tax records available at [https://taxrecords-nj.com/pub/cgi/prc6.cgi?district=0801&ms\\_user=ctb08](https://taxrecords-nj.com/pub/cgi/prc6.cgi?district=0801&ms_user=ctb08) (Gloucester County addresses); and [https://tax1.co.monmouth.nj.us/cgi-bin/prc6.cgi?&ms\\_user=ctb06&passwd=&srch\\_type=0&adv=0&out\\_type=0&district=0610](https://tax1.co.monmouth.nj.us/cgi-bin/prc6.cgi?&ms_user=ctb06&passwd=&srch_type=0&adv=0&out_type=0&district=0610) (Cumberland County addresses).

## 9. How and when will payments be sent?

Settlement payments will be issued to Eligible Claimants by check or electronic payment after the Settlement Agreement is approved and becomes final.

For any settlement payments that are uncashed or deemed undeliverable by the Settlement Administrator, those amounts will be treated as unclaimed property of the corresponding Eligible Claimant, subject to applicable state unclaimed property procedures (the additional administrative costs of such unclaimed property process will be deducted from the unclaimed property amounts on a *pro rata* basis).

## **Your other rights and options**

## 10. What happens if I do nothing?

If you do nothing, you will not receive any settlement payment. **You must file a claim by December 29, 2026, to be eligible to receive a payment.**

If you do nothing, you will release and give up any right you may have to sue defendants about the issues in this lawsuit as set forth in the Settlement Agreement. You will also be legally bound by all of the orders that the Court issues and judgments the Court makes in this class action lawsuit.

## 11. How do I exclude myself (opt out) from the Settlement Class?

To exclude yourself from the Settlement Class, you must mail a signed request for exclusion to: Shieldalloy Settlement Administrator, Attn: Exclusions, 1650 Arch Street, Suite 2210, Philadelphia, PA, 19103.

To be effective, your request for exclusion must be postmarked no later than **October 30, 2026**, and must include the following information:

- (a) your full name, telephone number, mailing address, and email address;
- (b) a clear statement that you wish to be excluded from the Settlement Class;
- (c) the name of this lawsuit: “Cavagnaro v. Shieldalloy Metallurgical Corporation, et al.”;  
and
- (d) your original signature.

## 12. How do I object or comment?

If you have not excluded yourself from the Settlement Class, you can comment on or object to the settlement, Class Counsel’s request for attorneys’ fees and litigation expenses, and/or the request for service awards for the Settlement Class Representatives. To object or comment, you must file with the Court a signed, written objection/comment including the following:

- (a) the name of this lawsuit: “Cavagnaro v. Shieldalloy Metallurgical Corporation, et al.”;
- (b) your full name, mailing address, telephone number, and email address;
- (c) your original signature;
- (d) a description of the specific reasons for the objection;
- (e) the name, address, bar number and telephone number of your attorney if you are represented by an attorney; and
- (f) a statement about whether or not you intend to appear at the Final Approval Hearing either in person or through an attorney.

To be considered by the Court, your comment or objection must be in writing and electronically filed with the Court no later than **November 19, 2026**, or mailed to the Clerk of Court at the below address, so that

it may be received by the Clerk of Court and filed on your behalf by **November 19, 2026**.

| THE COURT                                                                                                             |
|-----------------------------------------------------------------------------------------------------------------------|
| Superior Court of New Jersey<br>Gloucester County<br>Clerk of Court<br>70 Hunter Street<br>Woodbury, New Jersey 08096 |

Note that you can ask the Court to deny approval of the Settlement by filing an objection, but you cannot ask the Court to order a different settlement; the Court can only approve or reject the settlement. If the Court denies approval of the settlement, no settlement payments will be sent out and the lawsuit will continue. If you would like to request that the Court deny approval, you must object. You have the right to consult with your own attorney, at your own expense, before deciding how best to proceed.

### 13. What claims will be released by this Settlement?

If you are in the Settlement Class and do not exclude yourself from the Settlement Class, and the settlement is approved and becomes final, the settlement will be legally binding on you and you will be bound by all judgments entered in the case. In exchange for the settlement benefits, you will release all claims against defendants and the “Released Parties” listed in the Settlement Agreement about the issues in the lawsuit, except for personal injury claims. The Settlement Agreement, available at [www.VinelandShieldalloyLitigation.com](http://www.VinelandShieldalloyLitigation.com), describes the claims you are releasing (giving up) by staying in the Settlement Class (called “Released Claims”).

### 14. Do I have a lawyer in this class action?

Yes. The Court has appointed the following attorneys and law firms to represent the Settlement Class Members. These lawyers are called “Class Counsel”:

**DeNITTIS OSEFCHEN PRINCE, P.C.**

Stephen P. DeNittis, Esq.  
James A. Barry, Esq.  
525 Route 73 North, Suite 410  
Marlton, NJ 08053  
Telephone: (856) 797-9951  
Facsimile: (856) 797-9978  
Email: [sdenittis@denittislaw.com](mailto:sdenittis@denittislaw.com)  
Email: [jbarry@denittislaw.com](mailto:jbarry@denittislaw.com)

You do not have to pay Class Counsel for their time or expenses incurred in this case out of your pocket. Instead, Class Counsel will petition the Court for an award of their fees and expenses; any amount awarded to Class Counsel will be paid from the Gross Settlement Fund.

The Court has also appointed Raymond Cavagnaro, Diane Cavagnaro, and Anthony Alimenti as Settlement Class Representatives to represent the Settlement Class.

### 15. How will the lawyers be paid?

Class Counsel (see Question 14) will file a motion on or before November 9, 2026, asking the Court to award them attorneys’ fees of up to \$441,622.50 (which is 33.33% of the \$1,325,000.00 Settlement Amount) plus reimbursement of their reasonable litigation expenses. The attorneys’ fees and expenses awarded by the Court will be the only payment to Class Counsel for their efforts in achieving the settlement and for their risk in undertaking this representation on a wholly contingent basis. In addition, Class Counsel will ask the Court on or before November 9, 2026 to award the Settlement Class Representatives representing the Settlement Class a

service award of up to \$40,000.00 total to be shared by the Settlement Class Representatives to compensate them for their efforts and commitment on behalf of the Settlement Class in this lawsuit.

The Court will determine the amount of attorneys' fees, expenses, and service awards to award. Class Counsel's application for attorneys' fees, expenses, and service awards will be available at [www.VinelandShieldalloyLitigation.com](http://www.VinelandShieldalloyLitigation.com) when it is filed.

**16. Should I hire my own lawyer for this case?**

You do not need to hire your own lawyer because Class Counsel represents you and the other members of the Settlement Class already. However, you have the right to hire your own lawyer. If you want your own lawyer, you will have to pay that lawyer.

**The Court's Final Approval Hearing**

**17. When and where will the Court decide whether to approve the settlement?**

The Court will hold a Final Approval Hearing, currently scheduled for **November 30, 2026**, in the New Jersey Superior Court, located at 70 Hunter Street, Woodbury, New Jersey 08096. The hearing may be moved to a different date or time without additional notice and/or may be held remotely or telephonically. Please check [www.VinelandShieldalloyLitigation.com](http://www.VinelandShieldalloyLitigation.com) for updates or changes.

At the Final Approval Hearing, the Court will consider whether the settlement should be approved as fair, reasonable and adequate. The Court will also consider Class Counsel's application for attorneys' fees, expenses, and service awards. If there are timely objections, the Court will consider them. After the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

**18. Do I have to come to the hearing?**

No. Class Counsel will answer questions the Court may have. But you are welcome to come at your own expense. If you submit an objection, you do not have to come to the Court to talk about it. So long as you submitted your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

**19. May I speak at the hearing?**

You may ask the Court for permission to speak at the Final Approval Hearing. You cannot speak at the hearing if you exclude yourself from the Settlement Class.

**Getting more information**

**20. Where can I get more information?**

More information can be found at [www.VinelandShieldalloyLitigation.com](http://www.VinelandShieldalloyLitigation.com). That website includes important case deadlines, links to case documents including the full Settlement Agreement, the complaint in this lawsuit, and other information about the lawsuit and the settlement. You can also get more information by calling 1-855-945-4350.

**PLEASE DO NOT CONTACT THE COURT ABOUT THE SETTLEMENT**