

LEGAL NOTICE

IF YOUR HOME EQUITY LINE OF CREDIT ("HELOC") WAS SUSPENDED OR REDUCED BY CITIBANK, YOU MAY BE ENTITLED TO BENEFITS FROM A

CLASS ACTION SETTLEMENT

In Re Citibank HELOC Reduction Litigation, Case No. 09-cv-0350 MMC

Visit www.inrehelocsettlement.com for more information

A proposed class action settlement has been reached in a putative nationwide class action case brought against the defendant, Citibank, N.A. ("Citibank"), in the United States District Court for the Northern District of California. The Settlement resolves litigation that challenged whether Citibank had a right to suspend or reduce borrowers' HELOCs. Your legal rights may be affected whether you act or don't act. Please read this notice carefully. Please also visit www.inrehelocsettlement.com to read the full agreement and to submit a claim.

What is the Lawsuit About?

The lawsuit alleges that Citibank suspended and reduced certain of its borrowers' HELOCs on the grounds that the borrowers' homes have significantly declined in value without a basis for doing so.

Citibank denies that it violated any law. The Court has not determined who was right. Rather, the Parties have agreed to settle the lawsuit to avoid the expenses and burdens of further litigation. This notice is not an admission of wrongdoing by any party.

How Do I Know if I Am a Class Member?

You are a member of the Class if you were a person in the United States from January 1, 2008 to January 31, 2012 whose Citibank HELOC account was suspended or reduced based on a claim by Citibank that the value of the property or dwelling securing the HELOC (*e.g.*, your home) had experienced a significant decline in value.

What Can I Get From the Settlement?

If you are a current Citibank HELOC customer, you will benefit from the Settlement's service enhancements, including the Notice of Right to Request Reinstatement of your HELOC. A full explanation of these service enhancements is set forth in the long form notice available at www.inrehelocsettlement.com.

If you have closed your Citibank HELOC account following a suspension or reduction of your HELOC, you may be entitled to a cash award of \$120. If this form was mailed to you and includes a Claim Form, then Citibank has determined that you are eligible to receive the \$120 cash award, provided you timely submit a claim in the manner explained below. If you were mailed this form but it doesn't include a Claim Form, then you are not eligible to receive the cash award and may not submit a claim for such an award.

How Can I Receive Settlement Monetary Benefits?

Former Citibank HELOC customers who are eligible for a cash award may receive a \$120 cash payment by completing and timely submitting a Claim Form. A copy of the Claim Form is

available at www.inrehelocsettlement.com. You may submit the Claim Form online or mail a completed Claim Form to the following address: *In re Citibank HELOC Litigation*, Settlement Administrator, P.O. Box 2838, Portland, OR 97208-2838.

Claims Forms must either be submitted electronically or postmarked no later than January 31, 2013, midnight Pacific Time.

What are My Other Options?

You or your lawyer has the right to appear before the Court and object to the proposed Settlement. Your written objection must be postmarked by **January 31, 2013**. If you do not wish to be a member of the Class, you may exclude yourself by writing to the Settlement Administrator and indicate that you wish to be excluded from the Class. If any co-borrower on your account requests exclusion, you cannot submit a claim form for a cash award. Specific instructions are available at www.inrehelocsettlement.com. Your request for exclusion **must** be postmarked by **January 31, 2013**.

If you object or do nothing, you will remain in the Class, and if the Court approves the Settlement, you will also be bound by all orders and judgments of the Court. If the Settlement is approved by the Court, your claims against Citibank and other Released Parties for the Released Claims, which include but are not limited to, any and all claims in conjunction with the suspension or reduction of your HELOC based upon a decline in the value of your property, will be released. For a detailed explanation of the Released Claims, please review the Settlement Agreement on the website.

Who Represents Me?

The Court has approved Jay Edelson, Steven L. Woodrow and Evan Meyers of Edelson McGuire LLC and Jim Patterson of Patterson Law Group to be the attorneys representing the Class in this case. These attorneys are referred to as Class Counsel. 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.

Class Counsel will ask the Court for attorneys' fees and expenses of up to \$1,214,000. Additionally, Citibank has agreed to pay \$36,000 collectively to the Class Representatives to be shared for their services in helping to bring and settle this case. The Court may award less than these amounts.

When Will the Court Consider the Proposed Settlement?

The Court will hold the Final Approval Hearing at 9:00 a.m. on March 15, 2013, at the United States District Court for the Northern District of California located at Courtroom 7, 19th Floor, 450 Golden Gate Avenue, San Francisco, California 94102. At that hearing, the Court will hear any objections concerning the fairness of the Settlement that have been properly raised, as set forth above. The hearing may be postponed to a different date or time without notice. You are not required to come to the Final Approval Hearing.

How Do I Get More Information?

For more information, please see www.inrehelocsettlement.com, which includes links to the long-form notice and the Claim Form. You may also contact Class Counsel, at the address or phone number below for any

reason, including requesting a copy of the Settlement Agreement. If you contact Class Counsel in writing, please include the case name and number, and your name and address on any letters, not just the envelopes.

CLASS COUNSEL

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CLAIMS ADMINISTRATOR

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