

**If You Were on a Roster of an NCAA Division I  
Football or Men's Basketball Team, and That Team Was Included in  
One of EA's Videogames Between May 4, 2003 and [preliminary approval date],  
You Could Be Entitled to Cash Payments.**

**This Notice is only a summary of your rights and options.  
For more detailed information, visit [www.\\_\\_\\_\\_\\_settlement.com](http://www._____settlement.com) or call 1-\_\_\_\_-\_\_\_\_-\_\_\_\_ toll-free.**

**What's This About?**

A federal court is currently reviewing two proposed class action settlements concerning the alleged use of the names, images, and likenesses of NCAA men's football and basketball players in certain NCAA-Branded Videogames that were manufactured and distributed by Electronic Arts Inc. ("EA"). The two proposed settlements are (1) the "EA Videogame Settlement" and (2) the "NCAA Videogame Settlement."

The EA Videogame Settlement involves claims by student-athletes that EA and the Collegiate Licensing Company ("CLC") violated their legal rights by allegedly licensing, using, and/or selling athletes' names, images, and likenesses in EA's NCAA-Branded Videogames. The NCAA Videogame Settlement involves claims by student-athletes that the NCAA violated their legal rights by allegedly participating in the license, use, and/or sale of athletes' names, images, and likenesses in EA's NCAA-Branded Videogames. All Defendants deny any wrongdoing. The Court has not ruled on the merits of these claims.

The proposed settlements would resolve the claims described above against all Defendants. The EA Videogame Settlement has a \$40 million Settlement Fund and would resolve the claims as to EA and CLC. The NCAA Videogame Settlement has a \$20 million Settlement Fund and would resolve the claims as to NCAA.

You may be a member of one or both settlements. The two settlements share many terms and involve many of the same Class members, but are separate settlements, so you should make sure that you understand both settlements.

The Court will have a hearing on **May 14, 2015, at 2:00 p.m.** (Pacific time) to decide whether to approve the settlements. If you want to attend the hearing, keep in mind that the date and/or time may be changed, so you should check the settlement website before making travel plans. *See below for more information.*

**Who's Included in the Settlements?**

If you were (1) on a roster of an NCAA Division I football or men's basketball team, and that team was included in an NCAA-Branded Videogame originally published from July 21, 2005 through [preliminary approval date], **or** (2) you were on such a roster from May 4, 2003, **and** your jersey number or photograph appeared in such a Videogame, you *may* be a Class Member in one or both of the settlements.

There are different class definitions for each settlement. You should consult the settlement website for more detailed class definitions and more information about whether you are entitled to a payment under either settlement.

**Are These Settlements Related to the Trial Against the NCAA I've Heard About?**

You may have heard recently about a trial involving student-athletes (led by Ed O'Bannon) against the NCAA. Although the trial involved claims that the NCAA used student-athlete likenesses without permission, those claims were against the NCAA only for violations of antitrust laws. Also, unlike the claims being resolved by this settlement, the claims in the trial involved a request for injunctive relief (a court order discontinuing certain practices). The claims in the trial did not involve claims for cash payments for past conduct.

[Alt. A:] The trial in that case ended on June 27, 2014, and on August 8, the Court granted in part and denied in part the student-athletes' requested injunction, and the decision is available for review at [Settlement Website]. The NCAA has appealed. [Alt. B:] The trial in that case ended on June 27, 2014, and the Court ruled in favor of

the student-athletes. The decision is available for review at [Settlement Website].

**What Do the Settlements Provide?**

Both proposed settlements provide for cash payments to eligible Class Members. You can make a claim under *both* settlements. More information about how payments will be calculated (the "Distribution Plan") is available at the settlement website.

In addition, Class Counsel will seek from the Court the following attorneys' fees awards: (1) EA Videogame Settlement: up to \$13.2 million in fees, \$2.5 million in expenses, and additional incentive awards to the Plaintiffs who brought the suits ranging from \$2,500–\$15,000 each; (2) NCAA Videogame Settlement: up to \$5.8 million in fees, \$500,000 in expenses, and additional incentive awards to the Plaintiffs of \$5,000 each.

Class Counsel will file petitions for these awards on \_\_\_\_\_. The Court will decide the amounts (if any) of these awards at the Fairness Hearing (see below).

**What Are Your Options?**

**(1) Get a Payment:**

You are eligible for a cash payment if you qualify and submit a Claim Form—either online or by mail—to the Settlement Administrator **by April 30, 2015**. More information about how to complete and submit the Claim Form is available at the settlement website.

**Requesting or receiving a payment under these settlements will NOT affect your eligibility to compete in NCAA athletics.**

**(2) Exclude Yourself from One or Both Settlements:**

You must submit a separate exclusion (or "opt-out") request for *each* settlement from which you wish to exclude yourself. You may exclude yourself from one or both settlements. Your exclusion request must be mailed to the Settlement Administrator's address below so that it is **postmarked by** \_\_\_\_\_. More information about how to opt out is available at the settlement website.

**(3) Object to One or Both Settlements:**

You have the right to object to any element of one or both settlements, including the Distribution Plans and Class Counsel's requests for fees, costs, and incentive awards. You cannot object in order to ask the Court for a higher payment for *yourself personally*, although you can object to the payment terms that apply generally to the Class.

More information about how to object to one or both settlements is available at the settlement website.

**When/Where Is the Fairness Hearing?**

The Court will hold a hearing on **May 14, 2015 at 2:00 p.m. (Pacific time)** to consider whether to approve the settlements, including the Distribution Plans and the attorneys' fees and incentive awards. You may ask to appear at the Hearing, but you don't have to. The courthouse address is \_\_\_\_\_. The date and/or time of the Fairness Hearing may be changed, so you should check the settlement website before making travel plans.

**How Do I Get More Information?**

The settlement website, [www.\\_\\_\\_\\_\\_settlement.com](http://www._____settlement.com), contains more detailed information. You also may call the Settlement Administrator toll-free at 1-\_\_\_\_-\_\_\_\_-, e-mail at \_\_\_\_\_, or write to the Settlement Administrator at Gilardi & Co. LLC, \_\_\_\_\_.