

**Wells Fargo Settlement Administrator  
P.O. Box 9349  
Dublin, OH 43017-4249**

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**Forwarding Service Requested**

A COURT AUTHORIZED  
THIS LEGAL NOTICE

**If you own or owned real property in Washington State at any time since December 12, 2012 that was subject to a deed of trust or mortgage securing a mortgage loan serviced by Wells Fargo Bank, N.A., a class action settlement may affect your rights.**

The parties have reached a Settlement in *Valerie Rhodes v. Wells Fargo Bank, N.A.*, Civil Action No. 2:17-cv-0093-SMJ (United States District Court, Eastern District of Washington). The Plaintiff claims that Wells Fargo violated Washington law by trespassing, changing locks, and removing property prior to completing foreclosure. Wells Fargo denies that it did anything wrong.

Questions? Call toll-free 1-888-730-7196 or visit the Settlement Website at [www.wellsfargopreforeclosureclassaction.com](http://www.wellsfargopreforeclosureclassaction.com)

### **WHO IS A CLASS MEMBER?**

You are in the Settlement Class if at some time since December 12, 2012 you owned real property in the state of Washington subject to a deed of trust or mortgage securing a loan serviced by Wells Fargo Bank, N.A., and, before completing a foreclosure, Wells Fargo, or a person or company working for Wells Fargo, entered your property and (1) changed the locks on your property; or (2) performed a winterization of your property; or (3) removed items from your property. You may be eligible to receive a payment from the Settlement.

### **THE SETTLEMENT**

Wells Fargo denies the allegations in this case, but in order to settle this lawsuit, Wells Fargo has agreed to pay \$26,305,000 into a Settlement Fund which will provide individual payments to all Settlement Class Members, an incentive award payment to the Class Representative, attorneys' fees and reimbursement of out-of-pocket litigation costs, and costs related to settlement administration.

The Court decided that the law firm of Jeffers, Danielson, Sonn & Aylward, P.S. of Wenatchee, WA is qualified to represent you and all Class Members. Class Counsel will ask the Court to approve payment of up to \$6,576,250.00 to them for attorneys' fees and up to \$35,000.00 to reimburse their out-of-pocket expenses. Class Counsel will also request a service award of \$10,000 for named Plaintiff, Ms. Rhodes, to compensate her for her time and effort during the litigation. Class Counsel's complete request for fees, costs, and the incentive award to the named Plaintiff will be posted on the Settlement Website [www.wellsfargopreforeclosureclassaction.com](http://www.wellsfargopreforeclosureclassaction.com) by October 1, 2018. The Court may award less than these amounts.

The Court will hold the Final Fairness Hearing to determine whether the Settlement should be approved on December 18, 2018 at 10:30 a.m., before the Honorable Salvador Mendoza, Jr. at the United States District Court for the Eastern District of Washington, 920 West Riverside Ave., Spokane, WA, Room 755.

### **YOUR RIGHTS AND OPTIONS**

**Do Nothing.** Stay in this lawsuit. Receive a payment. Give up certain rights. By doing nothing, you keep the possibility of getting money from the Settlement if it is approved by the Court. But, you give up any rights to sue Wells Fargo separately about the same or similar legal claims in this lawsuit. Listed below is the estimated gross amount of your share of the Class Action Settlement. (The final amount may be different.)

Your Estimated Gross Recovery from Settlement

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**Opt Out.** Get out of this lawsuit. Get no benefits from it. Keep rights. If you ask to be excluded you will not receive a payment but, you keep any rights to assert the same or similar legal claims against Wells Fargo as the ones alleged in this lawsuit. To opt-out of the Settlement you must send the request in writing to the Settlement Administrator at P.O. Box 9349, Dublin, OH 43017-4249 saying that you want to be excluded from the *Rhodes v. Wells Fargo Bank, N.A.* settlement. Your exclusion form must be postmarked by October 30, 2018. You may also submit your exclusion request via the Settlement Website, [www.wellsfargopreforeclosureclassaction.com](http://www.wellsfargopreforeclosureclassaction.com). Additional details regarding how to opt out of the Settlement can be found on the Settlement Website.

**Object.** Stay in the lawsuit. File a written objection to the Settlement with the Court. If you disagree with any portion of the Settlement Agreement, you may file a written Objection with the Court, which will be considered at the Final Fairness Hearing. You may also ask to speak at the hearing. Your written Objection must be mailed to *Valerie Rhodes v. Wells Fargo Bank, N.A.*, No. 2:17-cv-0093-SMJ, Clerk's Office, U.S. District Court, P.O. Box 1493, Spokane, WA 99210-1493 and postmarked no later than October 30, 2018. Additional details regarding objections can be found on the Settlement Website.

**This Notice is only a summary. Details about the lawsuit can be found on the website: [www.wellsfargopreforeclosureclassaction.com](http://www.wellsfargopreforeclosureclassaction.com)**

**Questions? Call toll-free XXX-XXX-XXXX. Please do not contact the Court.**