

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

A lawsuit is currently pending in the Superior Court of California for the County of Los Angeles, entitled *Charlotte Edwards, et al. v. Angeles Abbey Memorial Park, Inc., et al.*, case number BC 252904. In that lawsuit, Carl Bradley, Alma Gant, Marvin Green, Cloteal Jones, Phyllis McNulty and Wanda Pearson, on behalf of themselves and all others similarly situated, claim that Angeles Abbey Memorial Park, Inc. (“Angeles Abbey”) engaged in wrongful acts including, but not limited to, improper burial practices, improper handling of human remains, and various statutory violations including, but not limited to, the following: California Business & Professions Code § 17200 *et seq.* and California Health & Safety Code §§ 8277 and 8550. **ANGELES ABBEY ADAMANTLY DENIES ALL SUCH ALLEGATIONS.** However, because of the expense and uncertainty of litigation, the parties have mutually proposed to settle this matter.

BECAUSE THE LAWSUIT IS A CLASS ACTION, THE PROPOSED SETTLEMENT MAY AFFECT YOUR RIGHTS. PLEASE READ THIS NOTICE CAREFULLY.

YOUR RIGHTS AND CHOICES:

YOU MAY:	DUE DATE:
Submit a Claim Form	Postmarked by: April 29, 2010
Exclude Yourself From The Settlement	Postmarked by: April 29, 2010
Object To The Settlement	Received by: April 29 2010
Appear in the Lawsuit	Received by: April 29, 2010
Do Nothing	

1. Who Is Included In This Lawsuit:

As determined by the Court, members of the class include:

All persons: (a) who are the spouse, parent, child, sibling, grandchild, contracting party, or person who comes within the “exceptional circumstances” test of *Thing vs. Lachusa*, i.e., is a blood relative or a significant other who lived with the decedent at the time of death, and whose decedent’s remains are interred at Angeles Abbey Memorial Park’s Garden of Remembrance, Garden of Rest, Garden of Rest II, and Garden of Rest III beginning on or about January 1, 1999, and continuing through December 31, 2002; and (b) who must have been aware of the decedent’s death and aware of the alleged mishandling of the decedent’s burial services by Angeles Abbey Memorial Park.

NOTE THAT IF THIS NOTICE IS ADDRESSED TO YOU, A PRELIMINARY DETERMINATION HAS ALREADY BEEN MADE THAT YOU MAY BE INCLUDED IN THIS LAWSUIT.

PROPOSED SETTLEMENT TERMS

2. What Are The Terms Of The Settlement?

If the settlement is approved by the Court, monetary relief will be made available to members of the class on a “claims made” basis. To be eligible for monetary relief, class members must submit a timely and complete claim form. Class members who submit a timely and complete claim form will receive monetary relief in an amount determined by dividing the net amount of the settlement funds, *i.e.*, the remaining amount after payment of attorney’s fees and costs, incentive payments, and claims administration fees, by the total number of approved claims.

If the settlement is approved by the Court, counsel for the settlement class will be requesting an award from the Court of attorney's fees, and an award for reimbursement of all necessary and reasonable costs and other expenses incurred by counsel for the settlement class. In addition, and if approved by the Court, class representatives Carl Bradley, Alma Gant, Marvin Green, Cloteal Jones, Phyllis McNulty and Wanda Pearson will each receive an Incentive Award of up to \$10,000 in recognition of their time and participation as representatives of the Class in this lawsuit. Any award of attorney's fees or costs to counsel for the settlement class, and any Incentive Award provided to the class representatives, if approved by the Court, shall come from the settlement funds and no other source.

**PLEASE TAKE PARTICULAR NOTE OF THE FOLLOWING
TERMS OF THE SETTLEMENT AGREEMENT**

3. What Rights Am I Giving Up If I Remain In The Class?

IF YOU ARE A MEMBER OF THE CLASS, AND THE SETTLEMENT IS APPROVED BY THE COURT, YOU WILL BE BOUND BY THE SETTLEMENT AND YOU WILL BE BARRED FROM PURSUING AN INDIVIDUAL CLAIM FOR ANY INJURIES, LOSSES, PENALTIES, OR DAMAGES ARISING OUT OF OR IN ANY WAY RELATED TO THE ALLEGED IMPROPER BURIAL PRACTICES, IMPROPER HANDLING OF HUMAN REMAINS, OR VARIOUS STATUTORY VIOLATIONS DURING THE TIME PERIODS SET FORTH ABOVE UNLESS YOU TIMELY OPT OUT PURSUANT TO THE PROCEDURES SET FORTH BELOW.

HOW TO SUBMIT A CLAIM FORM

4. How Do I Submit A Claim Under The Settlement?

If you approve of the settlement, and you wish to make a claim, you are required to submit a completed Claim Form. The Claim Form must be postmarked no later than April 29, 2010, and should be submitted by first class mail to the following address: Angeles Abbey Claims Administrator, c/o Desmond, Marcello & Amster, P.O. Box 451999, Los Angeles, CA 90045. A copy of the Claim Form is enclosed. Each Settlement Class member who submits a timely and complete claim form will receive monetary relief in an amount determined by dividing the net amount of the settlement funds, *i.e.*, the remaining amount after payment of attorney's fees and costs, incentive payments, and claims administration fees, by the total number of approved claims.

To the extent there is a dispute regarding whether a particular member of the Settlement Class is entitled to monetary relief as set forth herein, the parties will make a reasonable and good faith effort to resolve the dispute informally. If the parties are unable to resolve the dispute to the satisfaction of each, the matter will be submitted for binding arbitration before an arbitrator mutually agreeable to the parties, and as governed by the JAMS rules for binding arbitration. The expense of said arbitration shall be shared equally by the parties.

5. If I Qualify For A Refund, When Will I Get Paid?

The process by which Claim Forms are processed and settlement benefits are paid will commence upon final approval of this settlement by the Court. "Final approval" means the date on which the time for filing a notice of appeal has expired or any and all appeals which have been filed have become final. The claims administrator will complete the processing of all Claim Forms and the payment of any refund within 12 (twelve) months of the final approval of the settlement. In the event a refund payment is returned to the claims administrator as undeliverable, Angeles Abbey and/or the settlement claims administrator shall make reasonable efforts to obtain a current address for forwarding of the settlement payment. In the event such efforts are unsuccessful, the undeliverable refund payment shall be donated to a mutually-agreeable charity.

YOUR RIGHTS – EXCLUDING YOURSELF FROM THE SETTLEMENT

6. How Do I Exclude Myself From The Settlement?

If you do not wish to be bound by the settlement, and you want to preserve your right to pursue an individual claim, you must submit a timely and complete opt-out notice. An opt-out notice is enclosed. Completed opt-out notices must be postmarked no later than April 29, 2010, and should be sent by first class mail to the following address: Angeles Abbey Claims Administrator, c/o Desmond, Marcello & Amster, P.O. Box 451999, Los Angeles, CA 90045. **Please note that if you do not submit a timely and complete opt-out notice, you will be bound by the settlement and will be barred from pursuing an individual claim, even if you do not make a claim for monetary relief under this settlement.**

YOUR RIGHTS – OBJECTING TO THE SETTLEMENT

7. How Do I Tell The Court If I Do Not Like The Settlement?

If you wish to remain a part of the class, but you object to any aspect of the proposed settlement, you may appear personally or through a lawyer of your own choice at the Fairness Hearing and have your objections heard by the Court. The date, time, and place of the hearing are listed below.

To be heard or to have papers or briefs considered by the Court, you or your lawyer must file with the Court a notice of intention to appear along with any papers or documents showing the basis for your objection. Submit your written objections, along with any other supporting materials, to the Los Angeles County Superior Court, Attn. Clerk, 600 S. Commonwealth Ave., Los Angeles, California 90005. Be sure to put the name of the case and case number (BC 252904) on the front of your papers. Your papers must be received by the Court no later than April 29, 2010. In addition, you must also send copies of all documents you file with the Court to:

Scott E. Schutzman, Esq.
Law Offices of Scott E. Schutzman
3700 South Susan Street, Suite 120
Santa Ana, California 92704

Gary J. Lorch, Esq.
Craig J. Mariam, Esq.
Gordon & Rees LLP
633 West Fifth Street, Suite 4900
Los Angeles, California 90071

Any class member who does not timely file and serve a written objection and a notice of intention to appear shall not be permitted to object or appear at the Fairness Hearing, except on good cause shown.

YOUR RIGHTS – APPEARING IN THE LAWSUIT

8. Can I Appear Or Speak In This Lawsuit and Settlement?

As long as you do not exclude yourself, you can (but do not have to) participate and speak for yourself in this lawsuit and Settlement. If you want you or your lawyer instead of Class Counsel to participate or speak for you in this lawsuit, you must give the Court a paper entitled “Notice of Appearance.” If you wish, your Notice of Appearance can also say you or your lawyer would like to speak at the Court’s Fairness Hearing on the Settlement. The Notice of Appearance must be filed with the Court by April 29, 2010. The address of the Court for filing the Notice of Appearance is Los Angeles County Superior Court, Central Civil West Courthouse, Attn. Clerk, 600 S. Commonwealth Ave., Los Angeles, California 90005.

YOUR RIGHTS – IF YOU DO NOTHING

9. What Happens if I Do Not Do Anything At All?

If you do nothing, you will not be able to receive any cash benefit or monetary payment under the Settlement, assuming you otherwise qualify to do so. You must file a Claim Form in order to determine whether you are entitled to receive a monetary payment. And if you do not exclude yourself from the Settlement, you will be bound by its terms and will not be able to pursue any relief against the defendant for the alleged conduct in this case.

THE COURT’S FAIRNESS HEARING

10. When and Where Will The Court Decide Whether To Approve The Settlement?

A fairness hearing will be held on June 9, 2010, at 10:00 a.m. in Dept. 324 of the Los Angeles County Superior Court, which is located in the Central Civil West Courthouse at 600 S. Commonwealth Ave., Los Angeles, California 90005. At that hearing, the Court will consider whether the settlement should be granted final approval as fair, adequate and reasonable and in the best interests of the class. The Court will also decide how much to pay Class Counsel for their time and expenses, and how much of an incentive award should be allocated to the class representatives. Although you may attend this hearing, you are not required to do so in order to participate in the settlement.

CHANGE OF ADDRESS

11. What If I Move Before The Settlement Is Completed?

If you move after receiving this notice, or if this notice was mis-addressed, you should supply your name and correct address to: Angeles Abbey Claims Administrator, c/o Desmond, Marcello & Amster, P.O. Box 451999, Los Angeles, CA 90045. This is important to ensure that any future notices, as well as your share of the settlement, reaches you.

IF YOU HAVE FURTHER QUESTIONS

12. How Do I Get More Information?

If you have further questions, you may write to class counsel Scott E. Schutzman, Esq., at the Law Offices of Scott E. Schutzman, 3700 South Susan Street, Suite 120, Santa Ana, California 92704, call (714) 543-3638, or consult with your own personal attorney. **PLEASE DO NOT CALL OR WRITE THE COURT WITH ANY QUESTIONS.** Court personnel are prohibited from giving legal advice.

Dated: January 28, 2010

HON. EMILIE H. ELIAS
Los Angeles County Superior Court Judge

Charlotte Edwards, et al., v. Angeles Abbey Memorial Park, Inc., et al., Los Angeles County Superior Court Case No. BC 252904

OPT-OUT FORM

I, _____, hereby elect to exclude myself from the above-referenced action. I understand that, by doing so, I will not be eligible to participate in any of the potential benefits of any settlement or other resolution of the case, and that I will not be bound by any rulings or other resolution thereof.

(Optional) Please state the reason(s) you wish to exclude yourself from this action:

Date: _____

Print Name: _____

Signature: _____

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

**CHARLOTTE EDWARDS, ET AL. V. ANGELES ABBEY MEMORIAL PARK, INC.
CASE NO. BC 252904**

CLAIM FORM AND INSTRUCTIONS

IT IS IMPORTANT THAT YOU READ AND FOLLOW THESE INSTRUCTIONS CAREFULLY.

YOU MUST SUBMIT A SEPARATE CLAIM FORM FOR EACH DECEDENT. YOU MAY COPY THIS FORM OR OBTAIN ADDITIONAL COPIES BY WRITING TO:

Angeles Abbey Claims Administrator
c/o Desmond, Marcello & Amster
P.O. Box 451999
Los Angeles, CA 90045

OR BY PRINTING THEM FROM THE SETTLEMENT WEBSITE AT www.dmaaction.com

YOU MUST MAIL ALL COMPLETED FORMS TO THE CLAIMS ADMINISTRATOR BY APRIL 29, 2010

PLEASE COMPLETE THE ENTIRE CLAIM FORM.

PLEASE USE BLUE OR BLACK INK AND PRINT NEATLY USING ONLY ONE BOX FOR EACH LETTER.

CLAIMANT INFORMATION

ID Number:	(If you received notice of the settlement in the mail, please copy your ID number from the mailing label. Otherwise, leave blank.)		
Your Name:	First Name	Middle Initial	
	Last Name	Suffix (e.g. Jr, Sr, III)	
Your Home Address:	Street	Apt. / Unit / Space #	
	City	State	Zip Code
Your Mailing Address (If Different)	Street	Apt. / Unit / Space #	
	City	State	Zip Code
Your Telephone Numbers:	() -	Home	
	() -	Cell or Pager	
Your Social Security Number		Your Birth Date:	/ /
Your Passport	Number:		
Your Driver's License	Number:		
	State:		
Name(s) and Contact of Any Businesses Owned by You	Name(s):		
	Business Phone:		

I REFUSE TO PROVIDE SOME OR ALL OF THE ABOVE INFORMATION:

Check here and Sign Below

_____ Signature

_____ Printed Name

DECEDENT INFORMATION

Decedent's Name	First Last Name	Middle Initial Suffix (e.g. Jr, Sr, III)
Decedent's Date of Death	/ /	Decedent's Date of Burial: / /
For the purposes of this form, the term "Defendant" refers to Angeles Abbey Memorial Park, Inc.		
Did you contract with Defendant for present or pre-need, future, funeral, or burial services for the decedent? <input type="checkbox"/> Yes <input type="checkbox"/> No		
If you answered "No" to the preceding question, please list the name of the Person who contracted with Defendant for present or pre-need, future, funeral, or burial services for the decedent, if known. If you answered "Yes" to the preceding question, please provide all corresponding contracts and documentary proof of payment in full of the contract, or a sworn statement under penalty of perjury as to the existence, parties, and full payment of the operative contract(s).		
First Name		Last Name
Were you aware of the death of the decedent?		<input type="checkbox"/> Yes <input type="checkbox"/> No
Were you aware that funeral or burial services were being performed for the decedent at the time the services occurred?		<input type="checkbox"/> Yes <input type="checkbox"/> No
Were you a person for whose benefit such funeral or burial services were performed?		<input type="checkbox"/> Yes <input type="checkbox"/> No
Did you live with the decedent at the time of the decedent's death?		<input type="checkbox"/> Yes <input type="checkbox"/> No
The decedent was your: (Select only 1 choice)	<input type="checkbox"/> SPOUSE	<input type="checkbox"/> CHILD
	<input type="checkbox"/> BROTHER or SISTER	<input type="checkbox"/> GRANDPARENT
<input type="checkbox"/> OTHER	<input type="checkbox"/> PARENT	
	<input type="checkbox"/> GRANDCHILD	
(Please specify relationship if "OTHER" is selected)		

THE SETTLEMENT REQUIRES THAT YOU PROVIDE DOCUMENTARY PROOF OF YOUR RELATIONSHIP TO THE DECEDENT. ACCEPTABLE PROOF SHALL CONSIST OF BIRTH CERTIFICATE(S), DEATH CERTIFICATE(S), MARRIAGE LICENSE(S), OR, IN SOME CASES, OTHER STATE ISSUED DOCUMENTATION. YOU MUST SUBMIT A COPY OF THE DOCUMENT(S) WITH YOUR CLAIM FORM. FAILURE TO PROVIDE ADEQUATE PROOF OF YOUR RELATIONSHIP MAY RESULT IN THE DENIAL OF YOUR CLAIM. IF YOU ARE UNABLE TO OBTAIN THE NECESSARY DOCUMENTATION, PLEASE EXPLAIN YOUR REASONS IN WRITING ON A SEPARATE PIECE OF PAPER.

RELEASE AND CERTIFICATION

By submitting this Claim Form, I state that I believe in good faith that I am a member of the settlement class as defined in the Notice; that I have read and understood the contents of the Notice; that I did not file a request to exclude myself from (or "opt out" of) the settlement class; and that I believe that I am entitled to participate in the proposed settlement described in the Notice. I agree and understand that, if the proposed settlement is approved by the Court and becomes effective, all claims, demands, and causes of action against Defendant Angeles Abbey Memorial Park, Inc. will be released as set forth in the settlement agreement.

I certify under penalty of perjury under the laws of the State of California and the United States that I am authorized to make this claim and that the information on the front and back of this form (and in any attached documents) is true, correct and complete. I understand that, if I submit, or cause to be submitted, a false claim, I will waive any and all rights I have under the settlement (including but not limited to the right to receive money), and I will be required to reimburse the settlement fund for any and all money paid in connection with the false claim.

Dated: ___ / ___ / ___

Your Signature

**THIS CLAIM FORM MUST BE MAILED TO THE CLAIMS ADMINISTRATOR AND
POSTMARKED ON OR BEFORE APRIL 29, 2010**

For Admin Use Only <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> Other
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