

**If You Purchased A Nobel Prepaid Calling Card
Or Nobel Prepaid Calling Services Sold Online
Between April 8, 2006 And May 24, 2012**

You May Get Benefits from a Class Action Settlement

A Court authorized this notice. This is not a solicitation from a lawyer.

- A class action Settlement of a lawsuit captioned *Sabaj et al. v. NobelTel, LLC et al.*, Los Angeles Superior Court Case No. BC435467 (“Lawsuit”) could affect you if you purchased prepaid calling cards that were sold, serviced or distributed in California by Nobel, Inc., Nobel, Ltd., NobelCom, LLC, and NobelTel, LLC (“Defendants”), or if you purchased any prepaid calling services sold online and submitted a California billing address through www.nobelcom.com and www.enjoyprepaid.com (“Nobel Prepaid Calling Cards”), between April 8, 2006 and May 24, 2012. If you made such a purchase, you may be a member of the Settlement Class.
- The Settlement will provide 400,000 \$5.00 calling card Settlement Personal Identification Numbers (“Settlement PINs”). These Settlement PINs can be used to make international and domestic calls, originating from California, to any place in the continental United States and to 879 foreign locations.
- Defendants deny any wrongdoing and are settling the Lawsuit to avoid the costs and burdens of continuing the case.

Read this notice carefully because your legal rights will
be affected whether you act or do not act.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT:

1. DO NOTHING AND REQUEST A SETTLEMENT PIN. Stay in the Lawsuit. Request and receive benefits. Give up certain rights.

If you do nothing, you will remain in the Settlement. However, to obtain a Settlement PIN you must do one of the following:

- If you purchased prepaid calling card(s), you must make a claim by submitting a Refund Form to receive the Settlement PIN(s). You may complete and submit a Refund Form online at <http://www.nobelcaliforniasettlement.com> or you may call 888-453-3638 and request that a Refund Form be mailed to you, which you must then complete and submit by mail to Nobel, 7040 Avenida Encinas, Suite 104-321, Carlsbad, CA 92011. Refund Forms may be submitted during the Claims Submission Period from November 20, 2012 to February 18, 2013.
- If you purchased prepaid calling services sold online through www.nobelcom.com and www.enjoyprepaid.com, you will automatically receive Settlement PIN(s) via the e-mail address you provided to Defendants without having to submit anything.

2. OBJECT TO THE SETTLEMENT. Stay in the Lawsuit. Share in the benefits. Give up certain rights. Represent yourself or be represented by your own lawyer.

If you object to the Settlement, you must write to the Court and to counsel for both Plaintiff and Defendants by August 13, 2012 (See Question 17 for details). You have the right to appear and speak in the Lawsuit yourself or through a lawyer you hire at your own expense. You or your lawyer must file a Notice of Appearance with the Court (See Question 20 for details).

3. ASK TO BE EXCLUDED. Get out of the Lawsuit. Get no benefits. Keep rights.

If you asked to be excluded, you will not receive any benefit as a result of this Settlement. But, you keep any rights to sue the Defendants on your own about the same legal claims in the Lawsuit. To ask to be excluded, you must act by August 13, 2012. (See Question 15 for details). **Do not submit both a Refund Form and ask to be excluded.** If you do both, your request for exclusion will be rejected.

These rights and options **and the deadlines**

by which you need to act are explained in this Notice.

Questions? Call 888-453-3638 toll free or visit <http://www.nobelcaliforniasettlement.com>,
<http://www.ltlcounsel.com>, and <http://www.ziaeelaw.com>

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BASIC INFORMATION

1. Why Was This Notice Issued?

The Court in charge of this case issued this Notice because you have a right to know about a proposed Settlement of a class action lawsuit. You also are entitled to know how you can make a claim for certain benefits of the Settlement and about all of your options.

2. What Is This Lawsuit About?

The people who filed this lawsuit are called the “Plaintiffs.” The Lawsuit claims that the Defendants did not inform consumers sufficiently about the applicable rates and charges for their prepaid calling cards and services, failed to deliver minutes voice prompted by the cards, and violated California consumer protection laws. The lawsuit was filed in state court in California and is called *Sabaj et al. v. NobelTel, LLC et al.*, Los Angeles Superior Court Case No. BC435467.

The Defendants deny the claims in the Lawsuit. They also deny having doing anything wrong related to the manufacturing, sale, distribution, and marketing of its pre-paid calling cards and pre-paid calling services sold online. But, the Defendants have agreed to settle the Lawsuit to avoid the burdens and costs of continuing the case.

3. Why Is This A Class Action?

In a class action, one or more people called “Class Representatives” sue on behalf of people with similar claims. All of these people together are called a “Class” and individually, are called “Class Members,” except for those who exclude themselves from the Class.

4. Why Is There A Settlement?

The Court did not decide in favor of either Plaintiffs or Defendants. Instead, both sides agreed to a Settlement. That way, they avoid the uncertainty and cost of a trial and those included in the Class and others will get an opportunity to receive the benefits being available under the Settlement. The Class Representatives and their attorneys appointed by the Court to represent the Class believe that the Settlement is in the best interests of all Class Members.

WHO IS IN THE SETTLEMENT

5. How Do I Know If I Am A Part Of The Settlement?

You are a member of the Class if you purchased a prepaid calling card issued by Nobel, Inc., Nobel, Ltd., NobelCom, LLC, and NobelTel, LLC in California between April 8, 2006 and May 24, 2012. Unless you opt out (see Question 15), you will be included in the Settlement. However, to receive a Settlement PIN you must submit a Refund Form.

You are also a member of the Class if you purchased any prepaid calling services sold online and you provided a California billing address through www.nobelcom.com and www.enjoyprepaid.com between April 8, 2006 and May 24, 2012. You will automatically receive a Settlement PIN via e-mail from Defendants without having to submit anything. Unless you opt out (see Question 15), you will be included in the Settlement.

6. What Nobel Prepaid Calling Cards Are Included?

Included are any prepaid calling cards, including non-rechargeable and rechargeable calling cards, that were sold, serviced, distributed, or in any way placed in the stream of commerce in California by any of the Defendants in California between April 8, 2006 and May 24, 2012. (*Note that many of the included Nobel Prepaid Calling Cards may not prominently have the Nobel name on them, so please check the list of eligible cards carefully.* The list of eligible cards is available at <http://www.nobelcaliforniasettlement.com>, www.ltlcounsel.com, www.ziaeelaw.com.)

Also included are any prepaid calling services sold online by any of the Defendants through www.nobelcom.com and www.enjoyprepaid.com to individuals who submitted California billing addresses between April 8, 2006 and May 24, 2012.

7. Are There Exceptions To Being Included In The Settlement?

Defendants and their officers, directors, employees, and attorneys are not included in the Class. California Judges and their families are also excluded.

8. What If I Am Not Sure Whether I am Included In The Settlement?

If you are not sure whether you are included in the Settlement Class, you may call the toll free number 888-453-3638.

THE SETTLEMENT BENEFITS

9. What Does the Settlement Provide?

The settlement provides up to 400,000 \$5.00 Settlement PINs to Class Members and others, which can be used to make free calls originating in California to certain international and domestic locations.

10. How Can I Get A Settlement PIN?

If you purchased a prepaid calling card, you must make a claim by submitting a Refund Form. You may submit a Refund Form online at <http://www.nobelcaliforniasettlement.com>. Or you may call 888-453-3638 and request that a Refund Form be mailed to you, which you must then submit via mail to Nobel, 7040 Avenida Encinas, Suite 104-321, Carlsbad, CA 92011. Refund Forms may be submitted during the Claims Submission Period from November 20, 2012 to February 18, 2013.

- On the Refund Form, you will be required to provide your name, mailing address, telephone number, electronic mail address if available, the type of Nobel Prepaid Calling Card(s) purchased, the approximate date and location of purchase, the origination and/or destination telephone numbers if available, and the approximate total amount of money spent on Nobel products. You are not required to, but may also include on the Refund Form, if known, the PIN(s) you purchased, a proof of purchase for the PIN(s), and the name of the Nobel Prepaid Calling Card associated with the PIN(s). You must indicate that the information you provide on the Refund Form is under penalty of perjury under the laws of the State of California by signature or electronic signature.
- If you make a valid claim, you will be provided with one (1) Settlement PIN for up to the first \$20 in Nobel Prepaid Calling Cards purchased, and an additional Settlement PIN for every \$20 increment thereafter, up to a maximum of six (6) Settlement PINs. If you submitted your Refund Form online, you will receive the Settlement PIN(s) electronically. If you submitted your Refund Form via mail, you must call 888-453-3638 no sooner than 21 days after submission and you will receive your Settlement PIN(s) over the phone.

Questions? Call 888-453-3638 toll free or visit <http://www.nobelcaliforniasettlement.com>, <http://www.ltlcounsel.com>, and <http://www.ziaeelaw.com>

- You must make a claim during the ninety (90) day Claims Submission Period. (If the case is appealed, the start of the Claims Submission Period may be delayed. Because the date by which a claim may be submitted is determined based upon the Court's orders, you may call 888-453-3638 or visit <http://www.nobelcaliforniasettlement.com>, www.ltlcounsel.com, and www.ziaeelaw.com to find out when the Claim Submission Period has begun.)

If you purchased prepaid calling services sold online through www.nobelcom.com and www.enjoyprepaid.com, you do not need to make a claim to receive a Settlement PIN. You will automatically receive Settlement PIN(s) via the e-mail address you provided to Defendants without having to submit anything. You will receive one (1) Settlement PIN for up to the first \$40 in Nobel Prepaid Calling Cards purchased through www.nobelcom.com or enjoyrprepaid.com, and an additional one (1) Settlement PIN for every \$40 increment thereafter, as independently verifiable from Defendants' business records.

Settlement PINs will be distributed on a first-come, first-served basis. Settlement PINs shall be freely transferable. Settlement PINs will be valid for a period of twelve (12) months starting from the end of the Claims Submission Period on February 18, 2013 until February 18, 2014.

11. How And When Can I Use The Settlement PINs?

You can use your Settlement PIN(s) the same way you used your Nobel prepaid calling cards or your prepaid calling services purchased online. You must dial the new access number you receive and use the Settlement PIN(s) the same way you used the PIN on your original purchase. You may begin to use your Settlement PIN(s) as of the date you receive your Settlement PIN(s). Settlement PINs will be valid for a period of twelve (12) months from the end of the Claims Submission Period.

12. What Claims Against Nobel Am I Releasing?

If you are a Class Member, when the Settlement becomes final – even if you do not claim a Settlement PIN – you will be releasing the Defendants from any liability for all claims associated with this case, and you will be bound by the release included in the Settlement Agreement. Copies of the Settlement Agreement containing the release are available at <http://www.nobelcaliforniasettlement.com>, www.ltlcounsel.com, and www.ziaeelaw.com, or by calling 888-453-3638. The release is on pages 18-19 of the Settlement Agreement.

THE LAWYERS REPRESENTING PLAINTIFFS

13. Do I Have A Lawyer In This Case?

Yes. The Court has appointed two law firms as Class Counsel to represent Class Members in this case. The law firms are: Lee Tran & Liang, APLC and Ziaee Law. If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How Will The Lawyers Be Paid?

Class Counsel will ask the Court for attorneys' fees and expenses of no more than \$500,000. The Court may award less than that amount, and Defendants will separately pay the fees and expenses that the Court awards. These amounts will not come out of the funds or benefits to Class Members. No Class Member will pay anything. Defendants have agreed not to oppose Plaintiffs' counsel's request for these fees and expenses. Defendants also will separately pay the costs to provide notice to the Class and to administer the Settlement.

EXCLUDING YOURSELF FROM THE SETTLEMENT

15. What Do I Have To Do If I Do Not Want To Be Included In The Settlement?

If you are a Class Member and do not wish to be included in the Settlement, you have the right to exclude yourself or "opt out" of the Settlement. To exclude yourself, you must submit a written request for exclusion by mail, postmarked by **August 13, 2012**, to the counsel listed below. The written request for exclusion must:

- be signed by you,
- include a list of all PINs of Nobel Prepaid Calling Cards, if known, that were purchased by you, the date(s) or approximate date(s) of your purchase(s) of Nobel Prepaid Calling Card(s), the country of purchase(s), the approximate total dollar amount of such purchases(s), and proof of purchase if available,
- clearly express your desire to be excluded (or to "opt out") from the Settlement Class, and
- include your name, address and, if available, telephone number; and, if represented by counsel, counsel's name, address and telephone number.

Class Members may only opt out on their own behalf, except for minors. **Do not submit both a Refund Form and ask to be excluded.** If you do both, your request for exclusion will be rejected. Any request for exclusion that does not include the required information and is not postmarked by **August 13, 2012** may also be rejected. If your request for exclusion is rejected, you are automatically included in the Settlement. Class Members who opt out will not be eligible for a Settlement PIN and cannot object to the terms of the Settlement.

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16. What Happens If I Do Not Opt Out?

If you do not opt out before **August 13, 2012** and the Settlement is approved, you are automatically included in the Class and all claims that you may have against Defendants will be *waived and released*, and *you will be prohibited from bringing any similar claims in the future on your own behalf.*

Questions? Call 888-453-3638 toll free or visit <http://www.nobelcaliforniasettlement.com>,
<http://www.ltlcounsel.com>, and <http://www.ziaeelaw.com>

OBJECTING TO THE SETTLEMENT

17. How Do I Tell The Court That I Like Or Do Not Like The Settlement?

If you are a Class Member, you have the right to tell the judge what you think about the Settlement. You can express your support or give reasons why you think the Court should not approve it. The Court will consider your views.

To object you must file a written objection, no later **August 13, 2012**, with the Clerk of the Court at: Clerk of the Court, Los Angeles Superior Court, Central Civil West Courthouse, 600 S. Commonwealth Avenue, Los Angeles, CA 90005. In addition, you must send a copy of your objection to the attorneys listed in Question 15. The written objection must:

- include a list of all available PINs of Nobel Prepaid Calling Cards that were purchased by you, the dates or approximate date(s) of the your purchase(s), the approximate total dollar amount of such purchase(s), and proof of purchase,
- attach copies of any materials that will be submitted to the Court or presented at the fairness hearing,
- be signed by you, and
- clearly state in detail
 - the legal and factual ground(s) for the objection,
 - your name, address and, if available, telephone number, and
 - if, represented by counsel, such counsel's name, address and telephone number

Any objection that does not include the required information and is not postmarked by **August 13, 2012** may be rejected and disregarded by the Court. If your objections are rejected, you are bound by all Court orders.

18. When And Where Will The Court Decide To Finally Approve The Settlement?

The Court will hold a Fairness Hearing at 8:30 a.m. on **September 13, 2012** in Judge Elihu M. Berle's courtroom, department 323 at the Los Angeles Superior Court, Central Civil West Courthouse, 600 S. Commonwealth Avenue, Los Angeles, California. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court also may decide how much to award Class Counsel. After the hearing, the Court will decide whether to grant final approval of the Settlement. We do not know how long these decisions will take.

19. Do I Have To Come To A Hearing?

No. Class Counsel will answer any questions that the judge may have. However, you are welcome to attend the hearing at your own expense. You also may pay for your own lawyer to attend the Fairness Hearing on your behalf. If you send an objection, you don't have to come to Court to discuss it. As long as your written objection is received before the deadline. And you have followed the directions in Question 17 above, the Court will consider everything that you have to say.

20. May I Speak At The Hearing?

This will be up to the judge. You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a written request to the Court, at the address in Question 17, and a copy must be sent to both Plaintiffs' counsel and Defendants' counsel, at the addresses listed in Question 15, no later than **August 13, 2012** stating that this is your "Notice of Intention to Appear in *Sabaj et al. v. NobelTel, LLC et al.*, Los Angeles Superior Court Case No. BC435467." The Notice must:

- state your name, address and, if available, telephone number, as well as the name, address and telephone number of the person who will appear on your behalf,
- include a list of all available PINs of Nobel Prepaid Calling Cards that were purchased by you, the date(s) or approximate date(s) of your purchase(s), the approximate total dollar amount of your purchase(s), and proof of purchase,
- your signature, and
- a detailed statement of the ground(s) for objection that you intend to raise at the fairness hearing.

Any request that does not include the required information and is not postmarked by **August 13, 2012** will not be considered by the Court.

IF YOU DO NOTHING

21. What Happens If I Do Nothing At All?

If you do nothing, you will release and waive any related claims you may have against the Defendants.

22. How Do I Get More Information?

This notice summarizes the proposed Settlement. More details are available in the Settlement Agreement and other documents filed with the Court. You can obtain these documents at <http://www.nobelcaliforniasettlement.com>, www.ltlcounsel.com, and www.ziaelaw.com, or from the Clerk of the Court at the address in Question 17. You may also call 888-453-3638. Please **do not** contact the Court with questions about the Settlement.