

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

If you live in the United States or its territories and purchased MacKeeper Software on or before July 8, 2015, a class action settlement may affect your rights.

A Federal Court authorized this notice. You are not being sued. This is not a solicitation from a lawyer.

- A settlement has been reached in a class action lawsuit against software developer ZeoBIT LLC. The class action lawsuit involves whether or not ZeoBIT's MacKeeper software performed certain functions as advertised.
- You are included if you live in the United States or its territories and purchased MacKeeper software on or before July 8, 2015.
- If you are included in the settlement, you are eligible to submit a claim to receive a payment of up to \$39.95 from a \$2,000,000 settlement fund, after the payment of the costs of administering the settlement, the attorneys' fee award, and any incentive award to the plaintiff. The amount of the payment will depend on the number of claims received.
- Please read this notice carefully. Your legal rights are affected whether you act or don't act.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM BY NOVEMBER 30, 2015	The only way to receive a payment.
EXCLUDE YOURSELF BY SEPTEMBER 21, 2015	You will receive no payment, but you will retain any rights you currently have to sue ZeoBIT about the claims in this case.
OBJECT BY SEPTEMBER 21, 2015	Write to the Court explaining why you don't like the Settlement.
ATTEND A HEARING	Ask to speak in Court about the fairness of the settlement.
DO NOTHING	You won't get a share of the settlement benefits and will give up your rights to sue ZeoBIT about the claims in this case.

These rights and options—and the deadlines to exercise them—are explained in this notice.

The Court in charge of this case still has to decide whether to approve the settlement. Payments will be provided only after any issues with the settlement are resolved. Please be patient.

BASIC INFORMATION

1. What is this notice?

A court authorized this notice to let you know about a proposed settlement of a class action lawsuit with ZeoBIT LLC. You have legal rights and options that you may act on before the Court decides whether to approve the proposed settlement. This notice explains the lawsuit, the settlement, and your legal rights.

Judge Joy Flowers Conti of the U.S. District Court for the Western District of Pennsylvania is overseeing this class action. The case is known as *Yencha v. ZeoBIT LLC*, No. 14-cv-00578 (the "Action"). The person who sued is called the "Plaintiff." The company she sued, ZeoBIT LLC, is called the "Defendant." You need not live in Pennsylvania to participate.

2. What is a class action lawsuit?

In a class action, one or more people called "Class Representatives" sue on behalf of a group of people who have similar claims. Together, these people are called a "Class" or "Class Members." In a class action, the court resolves the issues for all Class Members, except for those who exclude themselves from the Class. After the parties reached an agreement to settle this case, the Court recognized it as a case that should be treated as a class action for settlement purposes.

THE CLAIMS IN THE LAWSUIT AND THE SETTLEMENT

3. What is this lawsuit about?

The lawsuit alleges that ZeoBIT deceptively advertised and sold MacKeeper software as capable of enhancing an Apple Macintosh computer's speed, performance, and security by detecting and eliminating harmful errors and threats, but that it does not and cannot perform all of the functions advertised. The lawsuit seeks damages for breach of contract and unjust enrichment. ZeoBIT denies Plaintiff's claims of wrongdoing or liability against it and asserts that its conduct was lawful.

More information about Plaintiff's complaint and Defendant's answer to the claims are available in the "Court Documents" section of the settlement website at www.YenchaSoftwareSettlement.com.

4. Why is there a Settlement?

The Court has not decided whether the Plaintiff or the Defendant should win this case. Instead, the parties have agreed to settle the claims against Defendant—that is, reach a compromise—by entering into a written settlement agreement. That way, they avoid the uncertainties and expenses associated with ongoing litigation, and Class Members will get compensation now rather than, if at all, years from now.

The Class Representative and her attorneys ("Class Counsel") believe that the settlement is in the best interest of the Class Members.

WHO'S INCLUDED IN THE SETTLEMENT?

5. How do I know if I am in the Settlement Class?

The Court decided that everyone who fits this description is a member of the **Settlement Class**:

All Persons in the United States and its territories who purchased MacKeeper on or before July 8, 2015.

If you meet that definition, you are a member of the Settlement Class.

THE SETTLEMENT BENEFITS

6. What does the Settlement provide?

Defendant has agreed to create a \$2,000,000 Settlement Fund. Settlement Class Members can submit a claim for up to \$39.95 for their purchase of MacKeeper. In addition to paying for valid claims of Class Members, the Settlement Fund will be used to pay the costs to administer the settlement, any Court-ordered award to Class Counsel for reasonable fees and expenses, and any incentive award to the Class Representative. The amount each claimant will be paid depends upon the number of valid claims submitted. There are approximately 513,000 individuals in the Settlement Class. Based upon class member participation in other similar settlements, the Parties anticipate that each Settlement Class Member that submits an approved claim in this case will receive a payment of \$39.95. If the amount required to pay each class member with a valid claim exceeds the amount of the Settlement Fund (after paying fees and expenses), then each Settlement Class Member who filed a valid claim will receive a proportionally reduced share of the Settlement Fund.

On the other hand, if there is still money left in the Settlement Fund after providing payments to every Settlement Class Member with a valid claim, paying the costs to administer the Settlement, the award of attorneys' fees and expenses, and any incentive award to the Class Representative, the remaining money will be donated to the following nonprofit organizations:

- Carnegie Mellon CyLab: Carnegie Mellon University's CyLab establishes public-private partnerships to develop new technologies for measurable, available, secure, trustworthy, and sustainable computing and communications systems, as well as to educate individuals at all levels equipping them to meet the demands and challenges of being responsible computer users and cybercitizens. For more information visit www.cylab.cmu.edu.
- National Consumer Law Center: The NCLC has dedicated itself to consumer justice issues since its founding in 1969 and has taken a leadership role in the development of laws aimed at protecting consumers, such as the Credit CARD Act of 2009. The NCLC also works closely with nonprofit organizations, legal service organizations, attorneys, policymakers, and state and federal governments to stop exploitive consumer practices, help consumers build and retain wealth, and advance economic fairness. The NCLC's expertise has focused on a broad range of consumer issues, including deceptive acts and practices, and privacy rights. For more information visit www.nclc.org.

HOW TO GET BENEFITS

7. How do I get benefits?

If you are a Class Member and you want to participate in the settlement, you must complete and submit a Claim Form **online or by mail postmarked by November 30, 2015**.

You can submit an electronic Claim Form online at, or obtain a copy of the Claim Form by downloading it from, www.YenchaSoftwareSettlement.com, by writing to the Settlement Administrator at MacKeeper Settlement Administrator, c/o Rust Consulting, Inc., PO Box 2242, Faribault, MN 55021-1642, or by calling toll-free 1-877-315-1149. You cannot submit a claim if you already received a refund for the MacKeeper software you purchased.

If you submit a Claim Form, you won't be able to sue ZeoBIT in a future lawsuit about the claims addressed in the Settlement. For a more detailed description of the claims that you will be releasing if you do not request to be excluded from the Settlement, see **provision 1.24 on pages 7-8** of the Settlement Agreement.

8. When will I get my payment?

If you submitted a valid and approved claim, you should receive a check from the Settlement Administrator within approximately 60-90 days after the Settlement has been finally approved and/or after any appeals have been resolved in favor of the Settlement. The hearing to consider the final fairness of the Settlement is scheduled for October 16, 2015 at 1:30 P.M. All checks will expire and become void 90 days after they are issued.

Please also note that if, prior to the fairness hearing, more than 1,000 Class Members exclude themselves from the settlement, ZeoBIT shall have the option to terminate the settlement. If ZeoBIT terminates the settlement, you will not receive a payment.

THE LAWYERS REPRESENTING YOU

9. Do I have a lawyer in this case?

Yes, the Court has appointed lawyers Rafey S. Balabanian, Benjamin H. Richman, and Courtney C. Booth of Edelson PC as Class Counsel. You will not be separately charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

10. How will the lawyers be paid?

Class Counsel will ask the Court for attorneys' fees and expenses of up to one-third (1/3) of the Settlement Fund. The Court will determine the proper amount of any attorneys' fees and expenses to award Class Counsel. The Court may award less than the amount requested.

Class Counsel will also request a service award (also known as an "incentive" award) for the Class Representative of up to \$1,000 from the Settlement Fund for her services as Class Representative and her efforts in bringing this case. The Court will determine what amount will be paid to the Class Representative. The Court may award less than the amount requested.

Class Counsel will file with the Court and post on the settlement website their request for attorneys' fees and expenses and request for an incentive award to the Class Representative two weeks before the objection deadline of September 21, 2015.

YOUR RIGHTS AND OPTIONS

11. What happens if I do nothing at all?

If you do nothing, you will receive no payment under the Settlement, you will be in the Settlement Class, and if the Court approves the Settlement, you will also be bound by all orders and judgments of the Court. Also, unless you exclude yourself, you won't be able to start a lawsuit or be part of any other lawsuit against the Defendant for the claims being resolved by this Settlement, unless otherwise ordered by the Court.

12. What happens if I ask to be excluded?

If you exclude yourself from the Settlement, you can't claim any money or receive any benefits as a result of the Settlement, unless otherwise ordered by the Court. You will keep your right to start your own lawsuit against Defendant for the same legal claims made in this lawsuit. You will not be legally bound by the Court's judgments related to the Settlement Class and Defendant in this class action.

13. How do I ask to be excluded?

To exclude yourself from the Settlement Class, you must send a letter or email saying that you want to be excluded from the Settlement Class in *Yencha v. ZeoBIT LLC*, Case No. 14-cv-00578. Your letter or email must also include your name, address, the e-mail address you used in connection with your purchase of MacKeeper, your phone number, and your signature. If you choose to exclude yourself by mail, your request for exclusion must be postmarked no later than **September 21, 2015**, and sent to:

MacKeeper Settlement Administrator
c/o Rust Consulting, Inc.
PO Box 2242
Faribault, MN 55021-1642

If you choose to exclude yourself by email, your request for exclusion must be sent to info@yenchasoftwaresettlement.com no later than **September 21, 2015**.

You cannot exclude yourself by phone.

14. If I don't exclude myself, can I sue the Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the Defendant for the claims being resolved by this Settlement, unless otherwise ordered by the Court. For a more detailed description of the claims that you will be releasing if you do not request to be excluded from the Settlement, see **paragraph 1.24 on pages 7-8** of the Settlement Agreement.

15. If I exclude myself, can I get anything from this Settlement?

No, if you exclude yourself, do not submit a Claim Form to ask for a payment.

16. How do I object to the Settlement?

If you do not exclude yourself from the Settlement Class, you can object to the Settlement if you like or don't like any part of it. You can give reasons why you think the Court should not approve it by filing an objection. The Court will consider your views. Your objection must be filed with the Court or postmarked to the Court's address below no later than **September 21, 2015**. You must also send a copy to attorneys for the Parties at the addresses below. If you are represented by an attorney, your objection must be filed through the Court's Case Management/Electronic Case Filing (CM/ECF) system.

Court	Class Counsel	Defendant's Counsel
Clerk of the Court United States Courthouse W.D. of Pennsylvania, Pittsburgh Division 700 Grant Street Pittsburgh, Pennsylvania 15219	Benjamin H. Richman EDELSON PC 350 North LaSalle, Suite 1300 Chicago, Illinois 60654	Matthew D. Brown Cooley LLP 101 California Street, 5th Floor San Francisco, California 94111

The objection must be in writing and include the case name *Yencha v. ZeoBIT LLC*, Case No. 14-cv-00578. It must also include (a) your name, (b) your address, (c) the e-mail address that you used in connection with your purchase of MacKeeper, (d) your phone number, (e) an explanation of the basis upon which you claim to be a Settlement Class Member, (f) the specific grounds for the objection (including all arguments, citations, and evidence supporting the objection, if you have any), (g) the name and contact information of any and all attorneys representing, advising, or in any way assisting you in connection with the preparation or submission of your objection or who may profit from the pursuit of your objection, and (h) your physical signature. The Court will consider all properly filed objections from Settlement Class Members.

17. What's the difference between objecting and excluding myself from the Settlement?

Objecting simply means telling the Court that you don't like something about the settlement. You can object only if you stay in the Settlement Class. Excluding yourself from the Settlement Class is telling the Court that you don't want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT'S FAIRNESS HEARING

18. When and where will the Court hold a hearing on the fairness of the Settlement?

A hearing has been set for October 16, 2015 at 1:30 P.M., before The Honorable Joy Flowers Conti at the United States Courthouse, Pittsburgh Division, 700 Grant Street, Pittsburgh, Pennsylvania 15219 in Courtroom 5A. At the hearing, the Court will hear any objections and arguments concerning the fairness of the proposed settlement, including the amount requested by Class Counsel for attorneys' fees and expenses and the incentive award to the Class Representative. You do not need to attend this hearing. You also do not need to attend to have an objection considered by the Court.

Note: The date and time of the fairness hearing are subject to change by Court Order, but any changes will be posted at www.YenchaSoftwareSettlement.com or through the Court's Public Access to Court Electronic Records (PACER) system.

19. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have, but you are welcome to come at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as your written objection was filed and mailed on time and meets the other criteria described in the Settlement, the Court will consider it. You may also pay another lawyer to attend, but you don't have to.

20. May I speak at the hearing?

If you do not exclude yourself from the Settlement Class, you may speak at the hearing.

GETTING MORE INFORMATION

21. Where can I get additional information?

This notice summarizes the proposed Settlement. For the precise terms and conditions of the Settlement, please see the Settlement Agreement available at www.YenchaSoftwareSettlement.com, by contacting Class Counsel at 1-866-354-3015, by accessing the Court docket in this case through the Court's PACER system, or by writing to the Settlement Administrator at MacKeeper Settlement Administrator, c/o Rust Consulting, Inc., PO Box 2242, Faribault, MN 55021-1642 or calling toll-free 1-877-315-1149. The Settlement Agreement and all other pleadings and papers filed in the case are available for inspection and copying during regular business hours at the office of the Clerk of the U.S. District Court of the Western District of Pennsylvania, Pittsburgh Division, located at the United States Courthouse, 700 Grant Street, Pittsburgh, Pennsylvania 15219.

PLEASE DO NOT CONTACT THE COURT, THE JUDGE, OR THE DEFENDANT WITH QUESTIONS ABOUT THE SETTLEMENT OR CLAIMS PROCESS.

