

## Exhibit D

### Notice of Proposed Class Action Settlement

**NOTICE OF PROPOSED SETTLEMENT, HEARING, AND OPTIONS TO OBJECT TO  
PROPOSED SETTLEMENT OR OPT OUT IN CLASS ACTION LAWSUIT**

*Timothy McQueen, Carla Walters, et al. v. AutoMoney, Inc. and Auto Money  
North, LLC, Case No. 23 CVS 5934*

GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION  
GUILFORD COUNTY, NORTH CAROLINA

You are hereby notified that a hearing (the “Fairness Hearing”) has been scheduled for **March 6, 2025, at 9:30 A.M.** before North Carolina Superior Court Judge Honorable Paul C. Ridgeway, in **Raleigh, North Carolina**, for consideration of a proposed settlement of the claims that have been brought on your behalf in this lawsuit. Please note that the Fairness Hearing date may change without further notice. You should check the Settlement Website, [www.AutoMoneySettlement.com](http://www.AutoMoneySettlement.com), to confirm that the date has not been changed.

**Purposes of this Notice**

The Court has conditionally certified this case as a class action lawsuit for settlement purposes only, and your rights may be affected. This notice has three purposes. The notice:

- Tells you about the proposed Settlement and the Fairness Hearing;
- Tells you how to obtain more information; and
- Explains how you may submit a Claim Form, opt out of, or object to the proposed Settlement if you disagree with it.

**Background**

This class action lawsuit claims that AutoMoney, Inc. (“AMI”), and Auto Money North, LLC (“AMN”), (hereafter referred to as “Lenders”) violated the North Carolina Consumer Finance Act, North Carolina’s Unfair and Deceptive Trade Practices Act, and North Carolina’s Usury Code, and seeks statutory damages, treble damages, interest and attorneys’ fees, and injunctive relief in connection with loans between Lenders and Class Representatives secured by the Class Representatives’ motor vehicles. Lenders dispute the claims made in the lawsuit and have not admitted any fault in response to the lawsuit or by way of this Settlement. However, Lenders have agreed to settle the claims made in the lawsuit, and this notice will explain the basic terms of the proposed Settlement.

**Description of the Proposed Settlement Agreement**

The following description is only a summary of the key points in the proposed Settlement. Information on how to obtain a full copy of the proposed agreement is provided below.

In brief, under the proposed settlement:

1. The Settlement Class is defined as follows: “All North Carolina residents who, at any time between January 1, 2011, and the effective date of a proposed Settlement between Auto Money and the proposed Settlement Class, (i) entered into a car title loan charging interest in excess of 30.0% with either AutoMoney, Inc., or Auto Money North, LLC, and (ii) the security interest granted by the car title loan was perfected with the North Carolina Department of Motor Vehicles.
2. The relief provided to qualifying members of the Settlement Class is as follows:
  - a. Lenders will deposit the sum of \$3,000,000 into an account that will become the Settlement Fund.
  - b. From the Settlement Fund, the Court will deduct administration expenses, Class Service Awards, and attorney fees, and from the remainder of the Settlement Fund, qualifying Class Members will receive a full or *pro rata* payment equal to the interest paid by a Class Member on loans for which the Class Member affirms that he or she was a resident of North Carolina at the time the loan was made and where the principal amount of the loan was within the amount described by law at the time the applicable loan was executed, plus any sales proceeds from repossession as applicable to such Class Member, if any, with any remaining settlement proceeds divided *pro rata* between all valid claimants of the Settlement Class.
3. Effective immediately upon entry of a Final Approval Order, Lenders will forgive the debt of every Class Member to the extent such debt involves any vehicle registered in the state of North Carolina. Lenders will not collect, and will cease efforts to collect, any unpaid debt related to those vehicles.

**For more information, visit the Settlement Website at [AutoMoneySettlement.com](http://AutoMoneySettlement.com) or  
call the Claims Administrator toll-free at 877-519-6526.**

4. Within 6 months of entry of a Final Approval Order, Lenders will take steps to release their liens perfected with the NC DMV in connection with the Class Members' loans.
5. A claims administrator will mail individual notices to the last known addresses of potential Class Members. Receipt of this notice by mail is not a determination that you are a Class Member or that you qualify for any compensation.

Attorneys' fees and costs: Class Counsel will request payment of their costs and a reasonable attorney fee, which fee shall be in an amount not to exceed 33.33% of the Settlement Fund, and those amounts will be deducted from the Settlement Fund.

Release of claims: Class Members will release Lenders from all claims that were asserted on behalf of the class arising from or related to the facts and circumstances alleged in the lawsuit.

### **For Further Information**

This is a summary of the proposed agreement. To understand it fully, you should read the entire agreement. A complete copy of the Settlement Agreement is available at the following website [www.AutoMoneySettlement.com](http://www.AutoMoneySettlement.com) or by writing to Class Counsel at the address listed below.

Class Counsel:  
BROWN, FAUCHER, PERALDO & BENSON, P.L.L.C.  
822 North Elm Street, Suite 200  
Greensboro, NC 27401

If you have questions, you may contact the Claims Administrator by email at [info@AutoMoneySettlement.com](mailto:info@AutoMoneySettlement.com), calling them toll-free at 877-519-6526, or writing to them at the address below.

AutoMoney Settlement  
PO Box 2869  
Portland, OR 97208-2869

### **Your Options**

You have the following options:

1. Submit a Claim Form. You must submit a Claim Form in order to participate in the proposed Settlement and be eligible to receive compensation. The Claim Form must be submitted online or postmarked on or before **May 12, 2025**.
2. Do nothing. If you do nothing, you will receive forgiveness of debt and liens will be released, but you will not receive a direct payment. You will also give up certain rights to sue Lenders.
3. Exclude yourself from the case. This is the only option that allows you to sue Lenders on your own regarding the legal claims in the case, but you will not receive compensation under the proposed Settlement and any loan balance will not be automatically forgiven. The deadline for excluding yourself is **May 12, 2025**, and you must complete and submit the opt-out form found at the website, [www.AutoMoneySettlement.com](http://www.AutoMoneySettlement.com).
4. Object to the Settlement. You must submit any objection in writing and explain why you do not like the Settlement. If you object, you will remain a Class Member and must submit a Claim Form in order to obtain compensation. The deadline for filing an Objection is **December 16, 2024** and must be filed as set forth below.\*

You can ask the Court to reject the proposed settlement by filing an objection. You cannot ask the Court to order a different Settlement; the Court can only approve or reject the Settlement. If the Court rejects the Settlement, the lawsuit will continue but not as a class action. If that is what you want to happen, you must object.

\*Objections to proposed settlement. You may object to the proposed settlement in writing. You may also appear at the Final Hearing, either in person or through your own attorney or in whatever other manner the court permits. If you appear through your own attorney, you are responsible for paying that attorney, if required. All written Objections and supporting papers must:

- Clearly identify the case name and number (*Timothy McQueen, Carla Walters, et al. v. AutoMoney, Inc. and Auto Money North, LLC*, Guilford County, Case No. 23 CVS 5934);
- Be submitted to the Court by mailing them to: North Carolina Superior Court, P.O. Box 351, Raleigh, NC 27602; and
- Be filed or postmarked on or before **December 16, 2024**.

**For more information, visit the Settlement Website at [AutoMoneySettlement.com](http://AutoMoneySettlement.com) or call the Claims Administrator toll-free at 877-519-6526.**