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March 12, 2018

VIA ECF

Hon. Renee Marie Bumb  
United States District Court  
District of New Jersey  
Mitchell H. Cohen United States Courthouse  
1 John F. Gerry Plaza  
Camden, NJ 08101

Re: Cannon et al. v. Ashburn Corporation, et al., Case No. 1:16-cv- 01452 (RMB)(AMD)

Dear Judge Bumb,

We represent Plaintiffs in the above matter.

While we believed the original Settlement was fair and reasonable to the Class, following the Court's order of February 21, the Parties made certain changes to the Settlement Agreement. We have attached as Exhibit 1 the Amendment to the Settlement Agreement and Release.

The Amendment makes three noteworthy changes to the Settlement:

1. Lengthens the Redemption Period for Use of Credits from 12 months to 18 months to allow Class members even more time to redeem their Credits.
2. Provides that Class members who do not use all of their Credits during the Redemption period will receive a cash payment up to the amount of their unused Credits from a newly created \$500,000 cash payment fund.
3. Class Counsel will defer their attorneys' fee request until the end of the Redemption Period to allow the Court to consider the full benefits of the Settlement and has agreed to fund the cash fund through a reduction of any eventual request for fees.

The Parties will submit their papers in support of the Settlement later today per the Court's Order.

Respectfully,



Oren Giskan