



Circuit Court for Jackson County, Missouri

Erin Foley v. Adams Auto Corp. d/b/a Adams Toyota
Case No. 2416-CV18198

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

IF YOU PURCHASED A VEHICLE FROM ADAMS TOYOTA THAT INCLUDED AN ADD-ON PURCHASE OF THE RESISTALL/ENVIROGUARD PRODUCT, YOU COULD GET VALUABLE BENEFITS FROM A CLASS-ACTION SETTLEMENT.

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

You are not being sued.

Please read this Notice carefully and completely.

- You may be eligible to participate in a settlement with monetary benefits for certain persons to whom Adamas Auto Corp. d/b/a Adams Toyota ("Adams Toyota") sold a vehicle with an add-on purchase of the ResistAll/EnviroGuard product.
- The settlement resolves a lawsuit over whether Adams Toyota improperly required customers who purchased vehicles to also purchase ResistAll/EnviroGuard add-on products. This settlement avoids costs and risks to you from the lawsuit, provides benefits to customers like you, and releases Adams Toyota from liability.
- The two sides disagree on whether the customers could have won and on how much money they would have been entitled to if they won.
- Your legal rights are affected whether you act or not. Read this notice carefully.
- Consult your tax adviser about the tax issues associated with this settlement. Relief provided under this settlement, including money and debt reduction, may be subject to tax.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	By submitting a complete and verified Claim Form with supporting documentation, you will receive the monetary benefits that come from the settlement. But, you give up rights to separately sue Adams Toyota about the same legal claims asserted.	February 11, 2027
OPT OUT OF THE SETTLEMENT	Get no money or benefits. This is the only option that allows you to ever be part of any other lawsuit against Adams Toyota about the legal claims.	October 20, 2026
OBJECT TO THE SETTLEMENT	Write to the Court about why you don't like the settlement.	October 20, 2026
GO TO A HEARING	Ask to speak in Court about the fairness of the settlement.	December 7, 2026
DO NOTHING	By doing nothing, you will not receive any benefits from the settlement and you give up your rights to separately sue Adams Toyota about the same legal claims asserted.	No Deadline

- These rights and options—and the deadlines to exercise them—are explained in this notice.
- The Court must still decide whether to approve the settlement. Settlement benefits will be available if the Court approves the settlement and after any appeals are resolved. Please be patient.

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Basic Information

1. Why did I get a Notice?

You or someone in your family may have purchased a vehicle with ResistAll/EnviroGuard from Adams Toyota between August 17, 2019, and December 7, 2026.

The Court sent you a short form notice because you should know about a proposed settlement of a class action lawsuit in which you may be a Settlement Class Member, and about all your options, before the Court decides whether to approve the settlement. If the Court approves it, and after objections and appeals, if any, are resolved, Settlement Class Members will receive payments, as described more fully in this package.

This notice explains in greater detail about the lawsuit, the settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge is the Circuit Court for Jackson County, Missouri, and the case is *Erin Foley v. Adams Auto Corp. d/b/a Adams Toyota*, Case No. 2416-CV18198.

2. What is this lawsuit about?

The lawsuit claimed Adams Toyota violated statutory and other legal requirements when it sold customers vehicles with required ResistAll/EnviroGuard add-on products. You can read the claims in more detail in Plaintiff’s Amended Petition at www.AdamsAutoSettlement.com. Adams Toyota denied all alleged liability and denied that it violated any of the statute or common law at issue.

3. What is a class action?

In a class action, one or more people called Class Representatives (in this case, Erin Foley) sue for other people with similar claims. The people with similar claims are “Settlement Class Members,” or collectively, the “Class.” One court and one lawsuit resolve the issues for all Settlement Class Members, except for those who exclude themselves from the Class. Circuit Judge Kenneth Garrett oversees this class action.

4. Why is there a Settlement?

The parties disagree over who would have won and what Foley or the potential Class would've recovered if they had won. Foley believed she could recover the cost of the ResistAll/EnviroGuard she purchased and other relief. Adams Toyota believed Foley and the Class were entitled to nothing. To resolve the dispute, and because both parties are unsure of what would've happened in a trial, they agreed to a settlement. That way, they avoid the cost of a trial, and the people affected will get settlement benefits.

Who is in the Settlement?

To see if you will get benefits from this settlement, you first must decide if you are a Settlement Class Member.

5. How do I know if I am part of the settlement?

Per the settlement agreement, everyone who fits this description is a Settlement Class Member:

Customers who received ResistAll/EnviroGuard with their vehicle purchase between August 17, 2019, and December 7, 2026.

6. I'm still not sure if I am included?

If you are still not sure whether you are included, you can ask for free help. You can call **(833) 360-6865** or visit **www.AdamsAutoSettlement.com** for more information.

The Settlement Benefits – What You Get

7. What does the Settlement provide?

Adams Toyota has agreed to provide the Class with settlement benefits valued at \$4,250,000.00, which include payment of: (a) Claims by Settlement Class Members who purchased the ResistAll/EnviroGuard product with their vehicle purchase; (b) the attorney's fees and expenses for representing the Class; (c) the costs of class administration; and (d) an incentive award to Erin Foley (Plaintiff) for her services as Class Representative. This amount is called the "Cash Fund."

8. What can I get from the settlement?

Settlement Class Members who submit valid Claims will receive settlement benefits in the forms of a settlement check and settlement gift card redeemable for goods and services at Adams Toyota. The amount of the payment you receive depends on which Recovery Group you are in, the details of your purchase, and how many Class Members submit valid claims. Your payment, if any, will be calculated using formulas outlined in the Settlement Agreement. For most eligible Class Members, any payment will be split 50% by check and 50% in a closed-loop Adams Toyota gift card. Certain qualifying Recovery Group 1 Class Members whose Net Cost for ResistAll/EnviroGuard is less than \$150 and who submit a valid claim may receive a Minimum Recovery Amount of \$150, paid as \$100 by check and a \$50 gift card, subject to the Settlement's terms and overall fund limits. The exact amount of benefits each Settlement Class Member receives may also

depend upon the total number of Settlement Class Members and the amount remaining in the Cash Fund after attorneys' fees and costs are deducted.

Settlement Class Members are strongly encouraged to consult with a tax professional about the tax effects of any money and other benefits received from this settlement. The attorneys in this case cannot provide you with any tax advice, and your receipt of benefits under this settlement might have tax consequences.

How You Get Settlement Benefits

9. How can I get my Settlement benefits?

In order to receive the benefits that come from the settlement, you must submit an actual, valid, and timely Claim Form that is processed and verified after submission. The Claim Form must be filled out with your name, address, telephone number, last four digits of your social security number, vehicle identification number, and the name of any other person on your vehicle purchase agreement paperwork with Adams Toyota (if applicable).

To permit the Settlement Administrator to determine which Recovery Group in which to include you, you must also answer the following questions that are included in the Claim Form:

1. **Employee Status:** Are you a current or former Adams Toyota employee or family member who received reduced pricing on a vehicle purchase?
2. **Warranty Status:** Have you made a ResistAll/EnviroGuard warranty claim on a vehicle you purchased from Adams Toyota?
3. **Current Ownership:** Do you still own the vehicle you purchased from Adams Toyota with ResistAll/EnviroGuard?

Finally, along with your fully completed Claim Form, you must also submit proof of your continuous and current ownership of the vehicle purchased from Adams Toyota with the ResistAll/EnviroGuard product. Proof may include a copy of the certificate of title or ownership, vehicle registration documentation, or vehicle insurance documentation.

If you do not include this information and documentation the Settlement Administrator may not be able to verify that you are a Settlement Class Member and you may not receive any settlement benefits. The Settlement Administrator shall have the sole discretion in determining whether you are entitled to any settlement benefits based on the information contained in your submitted Claim Form and supporting documentation. The Settlement Administrator's denial of a Claim based on a Class Member's failure to provide any of the items mentioned in this Section is not appealable by the Settlement Class Member.

You must submit your Claim Form and supporting documentation to the Settlement Administrator by U.S. Mail, electronic mail/email, or by facsimile at the following address:

Foley v. Adams Auto Corp.
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

If the Claim Form is mailed by U.S. Mail, it must be postmarked on or before **February 11, 2027**, or it will be rejected as untimely. If the Claim Form is submitted by electronic mail/email or by facsimile, it must be submitted to the Settlement Administrator no later than midnight on **February 11, 2027**, as determined by the Settlement Administrator's records.

If you do not submit a Claim Form and the required supporting documentation by this deadline, your claim may be denied. The Settlement Administrator is the lone judge of whether a Claim Form is submitted timely. There shall be no appeal from the Settlement Administrator's denial of payment based on an untimely or unverifiable Claim Form.

If you fail to timely submit a verifiable Claim Form and supporting documentation, and you do not exclude yourself as described below in section 12, you will not receive any settlement benefit, but you will still be bound by any judgments issued by the Court and the class settlement and its release provisions.

10. When would I get my settlement benefits?

The Court will hold a hearing on **December 7, 2026**, at **9:00 a.m.** to decide whether to approve the settlement. Even if Judge Garrett approves the settlement, there may be appeals. It's always uncertain how an appeal will be resolved and how long it will take. Some appeals take more than a year. Please be patient. You'll receive your payment if the settlement is approved and after that approval becomes a "final judgment" (i.e., after any appeals are resolved or the time for appealing has passed).

11. What am I giving up to get settlement benefits or stay in the Class?

Unless you exclude yourself by following the procedure below, you are a part of the Class, and that means you can't sue, continue to sue, or be part of any other lawsuit against Adams Toyota about the same legal issues in this lawsuit. For example, you won't be able to make any independent claim against Adams Toyota arising from your purchase of ResistAll/EnviroGuard that this lawsuit is about. Staying in the Class also means all the Court's orders in this lawsuit will apply to you and legally bind you. To see exactly the legal claims and defenses you give up if you get settlement benefits, please view the Settlement Agreement at www.AdamsAutoSettlement.com.

Excluding Yourself From The Settlement

If you don't want benefits from this settlement, but you want to keep the right to sue or continue to sue Adams Toyota on your own about these legal issues, then you must try to get out of the settlement. This is called "excluding" yourself—or is sometimes called "opting out" of the Settlement Class.

12. How do I get out of the settlement?

To exclude yourself from the settlement, you must send a letter by mail saying you want to be excluded from *Erin Foley v. Adams Auto Corp. d/b/a Adams Toyota*, Case No. 2416-CV18198. Your request must specifically

reference the name of this case. Include your name, address, telephone number, last four digits of your Social Security Number, and the name of any other person on your vehicle purchase agreement paperwork with Adams Toyota, along with your signature. The exclusion request must be signed by you **and by any coborrower on your purchase agreement**, unless the co-borrower is deceased, in which case you must include a death certificate with your request. You cannot exclude yourself by having an actual or purported agent or attorney acting for you or a group of Settlement Class Members sign the letter. You must mail your exclusion request postmarked no later than **October 20, 2026**, to:

Foley v. Adams Auto Corp.
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

If you ask to be excluded, you will get no settlement benefits, and you cannot object to the settlement. You will not be legally bound by anything that happens in this lawsuit. You may sue (or continue to sue) Adams Toyota about the claims asserted.

13. If I don't exclude myself, can I sue Adams Toyota for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Adams Toyota for the claims this settlement resolves. If you have a pending lawsuit, speak to your lawyer in that case immediately. You must exclude yourself from this Class to continue your own lawsuit. Remember, the exclusion deadline is **October 20, 2026**. Exclusion requests postmarked later than this date will not be honored.

14. If I exclude myself, can I get benefits from this settlement?

No. But you may sue, continue to sue, or be part of a different lawsuit against Adams Toyota about the same claims made.

The Lawyers Representing You

15. Do I have a lawyer in this case?

The Court appointed Paul D. Anderson and Mark Schloegel of The Popham Law Firm and Kenneth McClain and Jonathan Soper of the law firm Humphrey, Farrington, & McClain, P.C. to represent you and other Settlement Class Members. These lawyers are called Class Counsel. You will not be charged for these lawyers. They are experienced in handling similar cases against consumer lenders. More information about these lawyers and their firm is available at www.pophamlaw.com/ and www.hfmlegal.com/. You do not need to hire your own lawyer because Class Counsel is working for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

16. How will the lawyers be paid?

Class Counsel has prosecuted this litigation on a contingent basis and has incurred or advanced all costs, expenses, and attorney's fees associated with the lawsuit since their investigation of claims against Adams Toyota in 2024. Class Counsel has not been paid for their work or received reimbursement for the expenses they have incurred or advanced for the Class Representative and Settlement Class Members. Class Counsel will ask the Court to approve payment of approximately 35% of the value of the settlement benefits, not to exceed \$1,500,000.00, to them for attorneys' fees and costs and payment of \$10,000 to Erin Foley for her

services as Class Representative. The fees and expenses would pay Class Counsel for investigating the facts, litigating the case, negotiating the settlement, and to assist in the administration of the settlement and pay the costs to administer the settlement.

Objecting to The Settlement

You can tell the Court you don't agree with the settlement or some part of the settlement.

17. How do I tell the Court that I don't like the settlement?

If you're a Settlement Class Member, you can object to the settlement if you do not like any part of it. You can explain why you think the Court should not approve it. The Court will consider your views. To object, you must send a letter to the Court saying you object to *Erin Foley v. Adams Auto Corp. d/b/a Adams Toyota*, Case No. 2416-CV18198. You must specifically reference the name of this case. Your letter must be in writing and include your name, address, telephone number, facsimile number (if available), email address (if available), last four digits of your Social Security Number, a statement of your objections, and the reasons and facts you contend support each of your objections. Your objection must include any documents (including buyers orders, retail installment contracts, receipts, ResistAll/EnviroGuard registration forms, warranty forms and/or other registration forms) in your possession that you rely upon to support your objection and identify any witnesses you plan to use at the Fairness Hearing (described below). If there is other evidence (e.g., documents) that you rely upon for your objection, you must attach copies to your objection. If you plan to use expert witnesses about your objection, you must provide—with your objection—an expert report for each expert outlining the expert's opinions and the facts and reasons for the expert's opinions. You must also state whether you intend to appear at the Fairness Hearing and provide copies of any evidence you intend to use at the hearing. Finally, you must sign and date the objection and include a statement substantially in this form: "I declare (or certify, verify, or state) under penalty of perjury that all of the information in the objection is true and correct. Executed on (date). (Signature)." You must mail or hand-deliver your objection and all supporting documents to the Court, to Class Counsel, and to Adams Toyota's Counsel at the separate addresses below. Your objection must be postmarked no later than **October 20, 2026**:

Court	Class Counsel	Adams Toyota's Counsel
Eastern Jackson County Courthouse Attn: Judge Garrett, Div. 2 308 West Kansas Ave. Independence, MO 64050	Paul D. Anderson Mark Schloegel The Popham Law Firm 712 Broadway Blvd., #100 Kansas City, MO 64105 Kenneth McClain Jonathan Soper Humphrey, Farrington, & McClain, P.C. 221 W. Lexington, Suite 400 Independence, MO 64050	Timothy J. Wolf Lucas J. Ude Watters Wolf Bub & Hansmann, LLC 600 Kellwood Parkway, Suite 120 St. Louis, Missouri 63017 Brandon Mizner Christopher Napolitano Remington Smith Ensz & Jester, P.C. 1100 Main Street, Suite 2121 Kansas City, Missouri 64105

If an attorney is submitting the objection for you, besides information and materials discussed above, the objection must include the name, address, telephone number, facsimile number (if available), and email

address (if available) of your attorney and a detailed description of the legal authorities supporting each objection.

If you file an objection, Class Counsel or Adams Toyota's Counsel may notice and take your deposition, consistent with the Missouri Supreme Court Rules, at an agreed-upon location before the Fairness Hearing and seek any documentary evidence or other tangible things relevant to the objection. Failure by an objector to comply with discovery requests may cause the Court to strike the objection and otherwise deny that person the opportunity to be heard further. The Court reserves the right to tax the costs of any such discovery to the objector or objector's counsel should the Court determine the objection is frivolous or is made for an improper purpose.

18. What's the difference between objecting and excluding?

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

The Court's Fairness Hearing

The Court will hold a hearing to decide whether to approve the settlement. You may attend and you may ask to speak, but you do not have to.

19. When and where will the Court decide whether to approve the settlement?

The Court will hold a Fairness Hearing at **9:00 a.m.** on **December 7, 2026**, at the Sixteenth Judicial Circuit Court, Jackson County, Missouri, 308 West Kansas Avenue, Independence, MO 64050. At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. Judge Garrett will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay to Class Counsel and the Class Representative. After the hearing, the Court will decide whether to approve the settlement. We don't know how long these decisions will take.

20. Do I have to come to the hearing?

No. Class Counsel will answer questions that Judge Garrett may have. But you are welcome to come at your own expense. If you send an objection, you do not have to come to Court to talk about it. If you mailed your written objection on time with all the required information, the Court will consider it. You may also pay your own lawyer to attend, but that is unnecessary.

21. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. You may speak either for or against the settlement. To speak for the settlement, you must send a letter saying it is your "Notice of Intention to Appear in *Erin Foley v. Adams Auto Corp. d/b/a Adams Toyota*, Case No. 2416-CV18198." Include your name, address, telephone number, last four digits of your Social Security Number, and your signature. Your "Notice of Intention to Appear" must be postmarked no later than **October 20, 2026**, and be sent to the Eastern Jackson County Courthouse, Class Counsel, and Adams Toyota's Counsel, at the addresses provided above in section 17.

If you plan to speak at the Fairness Hearing to tell the Court you do not like something about the settlement, you must submit an objection as detailed in section 17 above and include with that objection a statement that you intend to appear at the Fairness Hearing. The identity of any witnesses or experts you plan to present at the Fairness Hearing, with evidence you intend to present at the Fairness Hearing, must also be included with your objection.

You cannot speak at the hearing if you excluded yourself or if you don't send in a request with the required information and documents.

Getting More Information

22. Are there more details about the settlement?

This notice summarizes the proposed settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement by writing to Class Counsels' addresses listed in Question 17, or by visiting **www.AdamsAutoSettlement.com**.

23. How do I get more information?

You can call **(833) 360-6865**; write to the addresses listed in Question 17; or visit the website **www.AdamsAutoSettlement.com**, where you will find information to help you determine whether you are a Settlement Class Member.