

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
No. 1:24-CV-00238**

REESE BRANTMEIER and MAYA  
JOINT, on behalf of themselves and  
all others similarly situated,

*Plaintiffs,*

*v.*

NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION,

*Defendant.*

**Declaration of  
William W. Wickersham In  
Support of Plaintiffs' Motion for  
Preliminary Approval**

I, William W. Wickersham, Esq. first being duly sworn, declare as follows:

1. My name is William W. Wickersham. I have personal knowledge of the matters set forth herein and if called as a witness I could and would testify competently to them.

2. I am Senior Vice President, Business Development and Client Relations for RG/2 Claims Administration LLC (“RG/2 Claims”), a class action claims administration firm with a nationwide presence.

3. The purpose of this declaration is to provide information related to the results of the class notice administration previously detailed in my August

18, 2025 declaration, as well as to detail the proposed notice plan (the “Notice Plan”) designed to provide settlement notice to potential class members of this class action litigation. A copy of RG/2’s Claims brochure detailing our experience as administrating class action settlements was attached to my August 18, 2025 Declaration. *See* Doc. 101.1, Ex. A.

4. On October 29, 2025 we received an NCAA data file with 17,346 lines of student-athlete data. On November 3, 2025 we received an additional NCAA data file with 1,195 lines of student-athlete data. After deduplicating the data, the final list had contact information for 18,492 potential class members.

5. On November 11, 2025, we sent out 17,730 email notices to potential class members for whom we had email addresses. After 3 attempts to transmit the email notices, only 48 email addresses were undeliverable.

6. On November 21, 2025, RG/2 completed its initial distribution of class notices when it mailed a postcard notice to 834 potential class members, including the 48 potential class members whose emails were returned as undeliverable.

7. Of the 834 mailed notices, only 25 were returned as undeliverable, and after a record locator search, 7 notices were remailed successfully. In total, 18,474 potential class members were successfully sent notice of the class

certification. Ultimately only 18 out of 18,492 potential class members did not receive a notice, representing a success rate of 99.09%.

8. In addition to the email notices, RG/2 created the case website, which remains active at [www.ncaatennisprizemoneyclassaction.com](http://www.ncaatennisprizemoneyclassaction.com) which included relevant court documents and pleadings related to this case as well as instruction for potential class members on how to opt-out of the case. To date, RG/2 has only received one (1) request for exclusion.

9. RG/2 also initiated a social media and internet banner ad campaign on Instagram and the Google Display Network targeting the class demographic with a total of 3.5 million impressions across the two platforms. The Meta campaign ultimately reached 166,388 unique individuals matching the demographic of the class and the GDN campaign reached 777,386

## **SETTLEMENT NOTICE PLAN**

10. The Settlement Notice Plan matches the notice plan for the class notice in almost all respects and is designed to provide settlement notice to members of both the Injunctive Relief and the Damages Class.

11. RG/2 will send an email notice to all potential class members for which a viable email address is available from the class data. Email notice is well suited to the demographics of the Class, is a preferred communication

method of class members, and the primary method of communication between students and universities/colleges.

12. Prior to distributing the email notice, all email addresses will be subject to a cleansing and validation process to, among other things, remove extra spaces and fix common domain name errors, as well as compare addresses against known bad email addresses and verify email existence with Internet Service Providers (“ISPs”). RG/2 conducted this process on the two data sets previously, and therefore we will be able to efficiently update any new information during this process.

13. The email notice will be designed to avoid common “red flags” that could cause the email to be blocked by spam filters. For example, the content of the notice will be placed in the body of the email rather than as an attachment, to avoid spam filters and improve deliverability. The email notice will contain a link to the case website.

14. The email delivery will be attempted three times. The email campaign will return data regarding the number of emails successfully delivered and email bouncebacks. Many of the initial bouncebacks are temporary in nature and consist primarily of those that are blocked by ISPs, result from filled inboxes on the targets’ computers, or result from some temporary technical difficulties. These three categories of bouncebacks

account for about 10-15% of all emails that are sent, and in other cases and tests we have found that about 85% of these emails could be deliverable if they were re-sent. Upon the third email bounceback for an individual potential class member, RG/2 will send a single postcard summary notice to the potential class member's corresponding postal address on the Class List, where applicable.

15. Prior to mailing, the postal addresses will be checked against the National Change of Address (NCOA) database maintained by the USPS.

16. Notices returned by the USPS as undeliverable will be re-mailed to any address available through postal service forwarding order information.

17. In addition, we will initiate a social and digital advertising campaign, to the target audience of current and recent college and professional tennis players. A copy of the Publication Notice Plan is attached hereto as Exhibit A

18. We will also issue a press release through PRNewswire. PR Newswire reaches a potential audience of roughly 80 million with 997 total AP news outlets. With a case with such a public interest, we anticipate high engagement, with many news outlets picking up and running with the Press Release.

19. We will maintain the case website which will include additional information and copies of the Long Form Notice as well as the Claim Form.

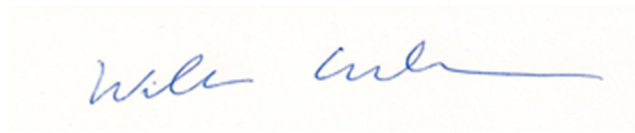
Attached as Exhibit B is a true and correct copy of the Proposed Notices of Settlement, both Long Form notice (email notice) and postcard notice (USPS mail). Attached as Exhibit C is the Claim Form that pursuant to this Court's order will be available for each potential class member to complete online and send in their claim with the required documentation electronically. Potential class members may also download a claim form from the case website and submit their claim with supporting documentation by mail as well.

20. If approved by the Court, RG/2 will maintain a telephone call-in line where anyone can call for assistance in filling out the claim form. This call-in line will be staffed by live persons from the business hours of 9 AM to 5 PM Eastern time from Monday to Friday and will provide a recorded message at all other times for a caller to leave a message. RG/2 will monitor these messages on a daily basis and return all calls for which a message was recorded.

21. RG/2 will be available during the times listed previously to provide to any potential class member who may need assistance in completing the online form and uploading any documentation with the form.

22. I declare under penalty of perjury that the foregoing statements are true and accurate to the best of my personal knowledge.

This the 28th day of April 2026.



---

William W. Wickersham

# EXHIBIT A

**Class Action Settlement Publication Notice Plan for**  
***BRANTMEIER v. NATIONAL COLLEGIATE ATHLETIC ASSOCIATION***



**Claims Administration LLC**

April 28, 2026

## Strategy overview

- 30-day social media campaign
  - **Digital platform**
    - Meta – Instagram
    - Google Display Network
  - **Geographic footprint**
    - USA
- All online media, where possible, may be tested and start with the allocation of funds and targeting as specified in this settlement plan. As the campaign progresses, optimization will occur, based on such factors as reach, impressions and clicks to the website will be evaluated so modifications to variables can be made as appropriate. Modifications to variables may include creative (messaging, visuals), targeting, frequency caps, reallocation of budgeted dollars among the media. Elimination of a particular platform is possible if performance is lagging behind expectations.
- Call-to-action – Visit [www.ncaatennisprizemoneyclassaction.com](http://www.ncaatennisprizemoneyclassaction.com), the case website for more information on how to participate in the pending settlement

## Target audience/members of the class

The class size is roughly 18,492 and is comprised of current college & graduated student athletes, specifically tennis players, and professional tennis players from 2020-present.

## Digital – Social Media

The objective of this campaign is mainly for awareness. For all social media, the target audiences are current college & graduated student athletes, specifically tennis players, and professional tennis players from 2020-present. Impressions are expressed as estimates. Ads will run across networks that have an affinity to the above-described audiences.

	<b>EST. IMPRESSIONS</b>	<b>EST. REACH</b>
Meta – Instagram	150,000 – 190,000	80,000 – 110,000
Google Display Network	28,500,000	TBD*

*All media numbers are estimated. \*Google Display Network reach is determined once campaign goes live*

For Meta/Instagram, targeting options are as follows:

- Demographics: Age (18–32), gender (male/female)
- Affinity / In-Market Audiences: e.g., sports enthusiasts, tennis lovers, college sports followers
- Contextual (Topics/Placements): Sites with tennis content, NCAA news, sports blogs

For Google Display Networking, targeting options are as follows:

- Demographics: Age (18–32), gender (male/female)
- Affinity / In-Market Audiences: e.g., sports enthusiasts, tennis lovers, college sports followers
- Contextual (Topics/Placements): Sites with tennis content, NCAA news, sports blogs
- Custom Audiences: Remarketing (if available) or similar audiences

## Campaign timing

Once a start date is determined, the agency will develop a timeline for the campaign. All ads must be approved by the media prior to going live. All media reserve the right to refuse an ad.

## Tracking

Given the multi-platform nature of this notice campaign, digital traffic to the website will be tracked using UTM (urchin tracking module) or other tracking methods to determine from where the traffic is being generated. Google Analytics will capture this information that will serve as vital decision support data from which to reallocate budget as may be necessary.

## General notes

All digital and social campaigns are subject to fine-tuning once the campaigns start. Near real-time data allows us to monitor and manage the campaigns as they are in progress.

The numbers stated in this proposal are estimates and in no way should they be construed as guarantees of performance. Impressions and reach are estimates for each respective media. Data ranges are calculated based on the mid-point.

## Media Summary

PLATFORM	EST. IMPRESSIONS	EST. REACH
Google Display Network	28,500,000	TBD
Meta - Instagram	150,000 – 190,000	80,000 – 110,000
<b>TOTAL</b>	<b>28,650,000 – 28,690,000</b>	<b>80,000 – 110,000</b>

All media numbers are estimated. \*Google Display Network reach is determined once campaign goes live

Reach figures are calculated *within* the medium used and not across all media.  
All representations of impressions and reach are estimates.

# EXHIBIT B

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF  
NORTH CAROLINA

**Student-Athletes that have forfeited Prize Money:  
You could get a payment from a class action  
settlement.**

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

- The NCAA has agreed to pay \$2.02 million in damages (including a \$10,000 service award to each Named Plaintiff) and to provide injunctive relief to resolve claims of a class of student-athletes who forfeited prize money in a tennis tournament from March 19, 2020 and November 21, 2025 and either (i) competed in NCAA Division I Tennis, or (ii) submitted information to the NCAA Eligibility Center.
- The settlement resolves a class action lawsuit alleging that the NCAA's rules limiting the prize money tennis players may accept from non-NCAA competitions are an unlawful restraint of trade in violation of federal antitrust laws. The NCAA denies any and all alleged wrongdoing.
- For class members, the settlement avoids the costs and risks of continuing the lawsuit (such as going to trial, losing, and getting nothing), pays money to student-athletes, and releases claims against the NCAA.
- The NCAA has agreed to pay Class Counsel \$1.875 million in attorneys' fees, and \$425,000 for expenses Class Counsel incurred in prosecuting this case. These amounts are subject to Court approval, and the Court may award less. The fees and expenses were negotiated separately from the Settlement Fund and will be paid separately by the NCAA, so they will not reduce the amount available to the Class.
- **Your legal rights are affected whether you act or do not act. Please read this notice carefully.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
<b>SUBMIT A CLAIM</b>	To receive payment, you must submit a claim form by the deadline. If you do and your claim is approved, you will be entitled to receive a pro-rata portion of the settlement fund based

	on the amount of prize money forfeited and a Court-approved allocation plan.
<b>DO NOTHING</b>	You will remain a part of the Settlement Class, release your claims against the NCAA, and you will not receive payment from the settlement fund.
<b>EXCLUDE YOURSELF</b>	You will get no payment from the settlement fund, will be excluded from the class, and will preserve your ability to sue the NCAA on your own over the claims at issue in this lawsuit.
<b>OBJECT</b>	You have the right to remain in the Class and argue to the Court that the settlement should not be approved.
<b>GO TO A HEARING</b>	You have the right to attend the Fairness Hearing. You may also ask the Court for permission to speak at the hearing about whether the settlement should be approved, but you are not required to speak.

## WHAT THIS NOTICE CONTAINS

<b>BASIC INFORMATION</b> .....	<b>4</b>
1. WHY DID I GET THIS NOTICE? .....	4
2. WHAT IS THIS LAWSUIT ABOUT? .....	4
3. WHY IS THIS A CLASS ACTION, AND WHO IS INVOLVED? .....	4
4. WHY IS THERE A SETTLEMENT? .....	5
<b>WHO IS IN THE CLASS ACTION LAWSUIT?</b> .....	<b>5</b>
5. HOW DO I KNOW IF I AM PART OF THE SETTLEMENT? .....	5
6. I'M STILL NOT SURE IF I AM INCLUDED. ....	6
7. WHAT DOES THE SETTLEMENT PROVIDE? .....	6
8. HOW MUCH WILL MY PAYMENT BE? .....	7
<b>HOW YOU GET A PAYMENT</b> .....	<b>8</b>
9. HOW CAN I GET A PAYMENT? .....	8
10. WHEN WILL I GET MY PAYMENT? .....	9
<b>EXCLUDING YOURSELF FROM THE ONGOING LAWSUIT</b> .....	<b>9</b>
11. WHAT AM I GIVING UP AS PART OF THE SETTLEMENT? .....	9
12. HOW DO I EXCLUDE MYSELF FROM THE CLASS AND THE SETTLEMENT? .....	9
13. IF I DON'T EXCLUDE MYSELF, CAN I SUE THE NCAA FOR THE SAME THING LATER? .....	10
14. IF I EXCLUDE MYSELF, CAN I GET MONEY FROM THIS CASE? .....	10
15. WHO REPRESENTS ME IN THIS CASE? .....	10
16. SHOULD I GET MY OWN LAWYER? .....	11
17. HOW WILL THE LAWYERS BE PAID? .....	11
<b>OBJECTING TO THE SETTLEMENT</b> .....	<b>12</b>
18. CAN I OBJECT TO THE SETTLEMENT? .....	12
19. WHAT'S THE DIFFERENCE BETWEEN OBJECTING AND EXCLUDING? .....	12
<b>THE COURT'S FAIRNESS HEARING</b> .....	<b>12</b>
20. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT? .....	13
21. DO I HAVE TO COME TO THE HEARING? .....	13
22. MAY I SPEAK AT THE HEARING? .....	13
<b>IF YOU DO NOTHING</b> .....	<b>13</b>
23. WHAT HAPPENS IF I DO NOTHING AT ALL? .....	13
<b>GETTING MORE INFORMATION</b> .....	<b>14</b>
24. ARE MORE DETAILS ABOUT THE SETTLEMENT AVAILABLE? .....	14
25. HOW DO I GET MORE INFORMATION? .....	14

## BASIC INFORMATION

### **1. Why Did I Receive This Notice?**

You are receiving this Notice because records indicate that you may be a member of one or both classes certified in this lawsuit involving NCAA Division I tennis players and NCAA rules restricting prize money.

**The Court ordered that this Notice be sent to you because you have a right to know about a proposed settlement of a class action lawsuit, and about all of your options, before the Court decides whether to approve the settlement. If the Court approves it, and after objections and appeals are resolved, an administrator appointed by the Court will make the payments that the settlement allows.**

This package explains 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 of the case is the United States District Court for the Middle District of North Carolina, and the case is known as *Brantmeier v. National Collegiate Athletic Association* (“NCAA”), Case No. 1:24-cv-00238. The individuals who sued are called the Plaintiffs, and the entity they sued, the NCAA, is called the Defendant.

### **2. What Is This Lawsuit About?**

Plaintiffs allege that certain NCAA rules restricting student-athletes from accepting prize money in non-NCAA tennis competitions violate federal antitrust laws by limiting compensation for athletic performance. The NCAA denies these allegations.

To obtain more information about the claims in this lawsuit, you can view the complaint and other court documents in this case at:

<https://www.ncaatennisprizemoneyclassaction.com/>

### **3. Why is this a class action, and who is involved?**

In a class action lawsuit, one or more people called “Named Plaintiffs” or “Class Representatives” (in this case, Reese Brantmeier and Maya Joint) sue on behalf of other people who have similar claims. All of these people are called a “Class” or individually “Class Members.” A court resolves the issues for all

Class Members, except for those who exclude themselves from the Class. U.S. District Judge Catherine C. Eagles is in presiding over this class action.

#### **4. Why is there a settlement?**

Plaintiffs' expert, Andrew Schwarz, estimated that the Class's damages were estimated at \$2,860,884. The NCAA argued that the Class's damages were \$0 because no antitrust injury occurred, and in the alternative, that the damages estimated by Mr. Schwarz are both unreliable, and overstate damages (to the extent injury occurred at all). The Court has not yet decided in favor of Plaintiffs or the Defendant. Instead of going to trial, both sides agreed to a settlement. That way, each side avoids the cost of a trial and further litigation, and the uncertainty and risk associated. Plaintiffs have elected for guaranteed compensation to the Damages Class and Injunctive Relief for all pre-college enrollment students. The Class Representatives and their attorneys think the settlement is preferable to the risks and further costs of trial and continued litigation.

### **WHO IS IN THE CLASS ACTION LAWSUIT?**

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

Judge Eagles decided that everyone who fits these descriptions is a Class Member.

- Injunctive Class: All persons who, at any time between March 19, 2020, and the date of judgment in this action, (i) competed in NCAA Division I Tennis, or (ii) were ineligible to compete in NCAA Division I Tennis due to the Prize Money Rules (the "Injunctive Relief Class").
- Damages Class: All persons who, at any time between March 19, 2020 and November 21, 2025 (the date of initial distribution of Class Notice in this matter), have voluntarily forfeited Prize Money earned in a tennis tournament, and (i) have competed in NCAA Division I Tennis, or (ii) have submitted information to the NCAA Eligibility Center (the "Damages Class").

You are a Class Member of the Injunctive Class if you fall under the definition above and cannot request exclusion.

You are a Class Member of the Damages Class if you fall under the definition above, did not previously request to exclude yourself from the Class, and do not request an exclusion pursuant to the instructions below.

You are a Class Member to both classes if you fall under the definition of both, did not previously request to exclude yourself from the Damages Class, and do not request an exclusion from the Damages Class pursuant to the instructions below.

## **6. I am still not sure if I am included.**

If you received this Notice mailed to you, it is because you were listed as a potential Class Member. If you are still not sure whether you are included, you can ask for free help. You can call 1-888-742-4955, email [info@rg2claims.com](mailto:info@rg2claims.com), or visit <https://www.ncaatennisprizemoneyclassaction.com/index.html> for more information.

## **7. What Does the Settlement Provide?**

The NCAA has agreed to pay \$2 million into a Settlement Fund to be divided on a pro rata basis amongst all Damages Class Members, who submit a valid claim form and supporting documentation, and are approved for payment by the Settlement Administrator. Payments will be determined based on the amount of prize money forfeited (“Forfeited Prize Money”) and a Court-approved allocation plan. The NCAA has also agreed to Injunctive Relief that will eliminate certain restrictions on pre-college enrollment student-athletes’ acceptance of prize money. Specifically, the NCAA will revise the Prize Money Rules to state as follows:

12.1.2.2.3 Expenses Before Full-Time Collegiate Enrollment -- Professional Sports Organization. Before full-time collegiate enrollment, an individual may accept up to actual and necessary expenses for competition and practice held in preparation for such competition from a professional sports organization that sponsors the event. (See Bylaw 12.1.2.4.1.)

12.1.2.4 Prize Money or Payment Based on Performance.

12.1.2.4.1 Before Initial, Full-Time Collegiate Enrollment. Before initial, full-time collegiate enrollment, an individual may accept

prize money based on place finish or performance in an athletics event. Such prize money may be provided only by the sponsor of the event. For purposes of this bylaw, “sponsor” includes any governing body or other entity that provides prize money based on place finish or performance but does not include an “associated entity or individual” as defined in Bylaws 22.02.1 and 22.02.2. Bylaw 12.1.2.2.3 does not prohibit an individual from accepting prize money based on place finish or performance from a professional sports organization before initial, full-time enrollment.

The rule changes will be deemed effective for pre-enrollment tennis student-athletes as of February 25, 2026, when the Parties executed an initial Term Sheet.

## **8. How much will my payment be?**

Damages Class Members with a valid NCAA Identification number, who file a validated claim form with supporting documentation, will be eligible to receive a pro-rata share of the Settlement Fund (\$2,000,000) based on a formula using a Damages Class Member’s Forfeited Prize Money.<sup>1</sup> In other words, each individual Damages Class Member’s share of the Settlement Fund is a fraction, with a validated claim of a Damages Class Member’s total Forfeited Prize Money as the numerator and the total Forfeited Prize Money by all validated claims of Damages Class Members during the Class Period as the denominator:

(Individual Damages Class Member’s approved and validated total Forfeited Prize Money during the Class Period) ÷ (Total Forfeited Prize Money of all approved and validated claims of Damages Class Members during the Class Period).

---

<sup>1</sup> “Forfeited Prize Money” is defined as the amount of tournament prize money forfeited by the Class Member in a non-NCAA tennis tournament during the Class Period, and does not include any expenses reimbursed by tournament organizers. Any taxes, stipends, grants or per diems will not be considered in calculating Forfeited Prize Money Amounts.

Each Damages Class Member's fractional amount will then be multiplied against the Settlement Fund of \$2,000,000.

The total Forfeited Prize Money of a potential Damages Class Member will be derived from documentation produced by each potential Damages Class Member, NCAA data and documents previously produced by the NCAA, and publicly available information from recognized professional tennis organizations including but not limited to the Women's Tennis Association, Association of Tennis Professionals, and the Grand Slam tournaments.<sup>2</sup> Determination, validation and approval of the amount to be paid to each approved and validated Damages Class Member will be made by the Settlement Administrator based upon the Allocation Plan. To the extent that such calculations of Forfeited Prize Money require additional information based upon claim deficiencies, the potential class member will be notified of deficiencies and given 30 days from date the notification is sent to provide additional information.

Payments to Damages Class Members shall not be made until a final judgment is entered and all objections, collateral challenges, or appeals relating to the Settlement have been fully and finally resolved.

### **HOW YOU GET A PAYMENT**

#### **9. How can I get a payment?**

For Damages Class Members eligible to receive payment, you must submit a Claim Form. The Claim Form will be available on the settlement website located at <https://www.ncaatennisprizemoneyclassaction.com/index.html>. Each claim submitted by a potential Damages Class Member must contain a valid NCAA ID number and adequate documentation for each tournament where prize money was forfeited.

**YOU DO NOT NEED A THIRD-PARTY CLAIMS SETTLEMENT SERVICE TO SUBMIT YOUR CLAIM. FREE ASSISTANCE IS AVAILABLE FROM CLASS COUNSEL AS WELL AS THE SETTLEMENT ADMINISTRATOR.**

---

<sup>2</sup> The Grand Slam tournaments are the Australian Open, the French Open, Wimbledon, and the US Open.

## **10. When will I get my payment?**

The Court will hold a hearing on [DATE] to decide whether to approve the settlement. If Judge Eagles approves the settlement, that approval becomes final, and all appeals or objections are resolved, then the Settlement Administrator will be directed to send payments promptly. You may check the website (<https://www.ncaatennisprizemoneyclassaction.com/index.html>) or call for updates or questions [PHONE].

## **11. What am I giving up as part of the settlement?**

Class Members that do not opt-out of the Damages Class will release the NCAA, all Division I Conferences, all Division I Member Institutions, and all of their respective past or present officers, directors, trustees, employees, insurers, agents, managers, partners, committee members, direct or indirect parents, subsidiaries, affiliates, and the predecessors, heirs, executors, administrators, successors, and assigns of any of the foregoing persons or entities (the “Released Defendant Parties”) from damages claims that accrued before or during the Damages Class Period (March 19, 2020 and November 21, 2025), that were asserted or could have been asserted in this lawsuit (the “Release”). Any damages claims that accrued after the date of the initial distribution of Class Notice in this matter will not be released. The Settlement will also release the Released Defendant Parties from injunctive claims that were or could have been raised in this lawsuit prior to final approval by the Court.

### **EXCLUDING YOURSELF FROM THE ONGOING LAWSUIT**

If you do not want a payment from this settlement, but you want to keep the right to sue or continue to sue the NCAA, on your own and at your own expense, about the legal issues in this case, then you must take the steps to exclude yourself, see below.

## **12. How do I exclude myself from the Damages Class and the settlement?**

To exclude yourself from the Damages Class and the settlement, you must send a letter by physical mail or email saying that you want to be excluded from the *Brantmeier v. NCAA* settlement. Be sure to include your name, address, telephone number, signature, and the amount of Prize Money

you forfeited during the Class Period, as well as a statement that you wish to be excluded from the settlement. You must mail or e-mail your exclusion request postmarked no later than [DATE] to:

**Brantmeier-NCAA Settlement Exclusions**

**P.O. Box 0000**

**City, St 00000-0000**

**Email Address**

You cannot exclude yourself (opt out) by telephone. If you ask to be excluded, you will not get any settlement payment, and you cannot object to the settlement. You will not be bound by anything that happens in this lawsuit. You may be able to sue (or continue to sue) the NCAA based on allegations and claims set forth in this case in the future.

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

No. If you are a Damages Class Member, unless you exclude yourself, you give up the right to sue the NCAA for the Claims that 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 [DATE].

**14. If I exclude myself, can I get money from this case?**

No. If you exclude yourself, you will not receive money from this Settlement. But, you may sue or continue to sue the NCAA based on allegations and claims set forth in this case in the future, or be part of a different lawsuit against the NCAA.

**THE LAWYERS REPRESENTING YOU**

**15. Who represents me in this case?**

The following attorneys and law firms have been approved as Class Counsel to represent the Class:

**MILBERG, PLLC**  
PEGGY J. WEDGWORTH  
New York State Bar No. 2126159

**BRYSON HARRIS SUCIU  
& DEMAY, PLLC**  
DANIEL K. BRYSON

405 East 50th Street  
New York, NY 10022  
(212) 594-5300  
pwedgworth@milberg.com

North Carolina State Bar No. 15781  
LUCY N. INMAN  
North Carolina State Bar No. 17462  
900 W. Morgan Street  
Raleigh, NC 27603  
(919) 600-5000  
dbryson@milberg.com  
linman@milberg.com

**MILLER MONROE HOLTON  
& PLYLER PLLC**

JASON A. MILLER  
North Carolina State Bar No. 39923  
ROBERT B. RADER III  
North Carolina State Bar No. 55184  
JOEL LULLA, *Of Counsel*  
New York State Bar No. 1865823  
1520 Glenwood Avenue  
Raleigh, NC 27608  
(919) 809-7346  
jmiller@milleronroeh.com  
rrader@milleronroeh.com  
joel\_lulla@yahoo.com

These law firms are called “Class Counsel.” If you want to be represented by your own lawyer, you may hire one at your own expense.

**16. Should I get my own lawyer?**

You do not need to hire your own lawyer because Class Counsel are working on your behalf. If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer’s services. For example, you may ask your lawyer to appear in Court for you. You may also appear for yourself without a lawyer.

**17. How will the lawyers be paid?**

The NCAA has agreed to pay Class Counsel \$1.875 million in attorneys’ fees, and reimburse Class Counsel \$425,000 in expenses incurred litigating your claims. Class Counsel will present a motion describing all attorneys’ fees and costs at a later date. The fees would include payment to Class Counsel for

investigating the facts and litigating the case. The attorneys' fees and costs were negotiated separately and shall be paid separately from the Settlement Fund. The attorneys' fees and costs will not be paid out of the Settlement Fund. The NCAA has agreed to pay these fees and expenses.

### **OBJECTING TO THE SETTLEMENT**

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

#### **18. Can I object to the settlement?**

Yes. If you are a Class Member, you can object to the settlement if you do not like it and do not think it should be approved. You can give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must send a letter or email saying so. Be sure to include your name, address, telephone number, your signature, and the detailed reasons why you object to the settlement. You must also include a list of any objections you (or your attorney) have made to any class action settlements submitted to any court in the United States in the previous five years. Mail the objection to the following address, postmarked no later than [DATE]:

**Brantmeier-NCAA Settlement Exclusions**  
**P.O. Box 0000**  
**City, St 00000-0000**  
**Email Address**

#### **19. What's the difference between objecting and excluding?**

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

### **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 if you submit a written objection, but you don't have to.

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

The Court will hold a Fairness Hearing at [TIME] on [DATE] at the United States District Court for the Middle District of North Carolina, 324 W. Market Street, Greensboro, NC 27401-2544. 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 Eagles will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay to Class Counsel. After the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

**21. Do I have to come to the hearing?**

No. Class Counsel will answer questions Judge Eagles may have. But, you are welcome to come. If you send an objection, you do not have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also hire your own lawyer to attend, but it is not necessary.

**22. May I speak at the hearing?**

You may ask the Court for permission to speak at the Fairness Hearing if you submitted a written objection before the hearing starts and included with your objection a written statement of your intent to appear at the hearing.

**IF YOU DO NOTHING**

**23. What happens if I do nothing at all?**

If you are in the Injunctive Class, you will be bound by the settlement. If you are in the Damages Class, you will not receive payment unless you submit a claim, but you will still be bound by the settlement unless you opt out. In order to receive payment you must submit a Claim Form. These forms can be accessed by all class members at the publicly available settlement website (<https://www.ncaatennisprizemoneyclassaction.com/index.html>). If you have any further questions on this process, please call or email the Administrator at [PHONE] or [EMAIL].

**GETTING MORE INFORMATION**

**24. Are more details about the settlement available?**

Yes. This notice summarizes key aspects of the proposed settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement by visiting: <https://www.ncaatennisprizemoneyclassaction.com/index.html>.

**25. How do I get more information?**

You can call [PHONE], write to the notice administrator at [EMAIL] or visit <https://www.ncaatennisprizemoneyclassaction.com/index.html>, where you will find answers to common questions about the settlement and other information to help you determine whether you are a Class Member and whether you are eligible for a payment. You may also contact Class Counsel with questions (see contact information in Question 16, above). You may also see the advice and counsel of your own attorney at your own expense, if you desire.

**PLEASE DO NOT CONTACT THE COURT. YOU SHOULD DIRECT ANY QUESTIONS YOU MAY HAVE ABOUT THIS NOTICE OR THE SETTLEMENT OF THE NOTICE ADMINISTRATOR AND/OR TO CLASS COUNSEL.**

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
Case No. 1:24-cv-00238-CCE-JEP

REESE BRANTMEIER and MAYA  
JOINT, on behalf of themselves and  
all others similarly situated,  
Plaintiffs,

v.

NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION,  
Defendant.

POSTCARD  
NOTICE OF  
PENDENCY OF  
CLASS ACTION

*A federal court authorized this notice. It is not a solicitation from a lawyer.*

A settlement with the the National Collegiate Athletic Association (“NCAA”) has been reached in the *Brantmeier v. NCAA* case, an antitrust class action challenging the NCAA’s restrictions on the eligibility of tennis players who have accepted Prize Money to compete in Division I men’s and women’s tennis.

**If you forfeited prize money in a tennis tournament from March 19, 2020 and November 21, 2025, competed in NCAA Division I Tennis, were ineligible to compete in NCAA Division I Tennis due to the Prize Money Rules, or submitted information to the NCAA Eligibility Center, then your rights may be affected by this class action lawsuit.**

<https://www.ncaatennisprizemoneyclassaction.com/>

**What Is The Purpose of This Notice?** The purpose of this notice is to inform you of (1) your rights related to the proposed class action settlement with the National Collegiate Athletic Association ("NCAA"), and (2) the proposed plan for distributing the settlement fund.

**What Is This Lawsuit About?** Plaintiffs allege that certain NCAA rules restricting student-athletes from accepting prize money in non-NCAA tennis competitions violate federal antitrust laws by limiting compensation for athletic performance. The NCAA denies these allegations.

**Who Is Included In The Settlement?** The Court has certified two Classes:

**Injunctive Relief Class:** all persons who, at any time between March 19, 2020 and the date of judgment in this action:

- (i) competed in NCAA Division 1 Tennis, or
- (ii) were ineligible to compete in NCAA Division I Tennis due to the Prize Money Rules

**Damages Class:** all persons who, at any time between March 19, 2020 and November 21, 2025, voluntarily forfeited Prize Money earned in a tennis tournament, and:

- (i) competed in NCAA Division I Tennis or
- (ii) submitted information to the NCAA Eligibility Center.

**What Does The Settlement Provide?** The NCAA has agreed to pay \$2 million into a Settlement Fund for the Damages Class and to eliminate certain restrictions on pre-college enrollment student-athletes' acceptance of prize money.

**How Do You Get a Payment?** For Damages Class Members, you must submit a Claim Form by [DATE], which will be available at <https://www.ncaatennisprizemoneyclassaction.com/index.html>. Each claim submitted must contain a valid NCAA ID number and adequate documentation for each tournament where prize money was forfeited.

**How Will The Lawyers Be Paid?** The NCAA has agreed to pay Class Counsel \$1.875 million in attorneys' fees and reimburse Class Counsel \$425,000 in expenses incurred litigating your claims. The attorneys' fees and costs were negotiated separately and will be paid separately from the Settlement Fund. The NCAA has agreed to pay these fees and expenses.

**What Are Your Other Options?** Members of the Damages Class may exclude themselves by [DATE] to keep any rights to sue the NCAA over the damages claims in this case. Members of either Class may also object to the Settlement, Attorneys' Fee and Expense Award, or the Allocation Plan by [DATE]. The Court will hold a Fairness Hearing at [TIME] on [DATE].

**Where Can You Get More Information?** Visit <https://www.ncaatennisprizemoneyclassaction.com/index.html>, call [PHONE], write to the Settlement Administrator at [ADDRESS], or [EMAIL], or contact Class Counsel [NAME], [FIRM] at [EMAIL] or [PHONE]. Claims assistance is available from Class Counsel and the Settlement Administrator **AT NO COST**.

# EXHIBIT C

Brantmeier v. National Collegiate Athletic Association  
No. 1:24-cv-00238 (M.D.N.C.)

CLASS MEMBER CLAIM FORM  
Tennis Prize Money Forfeiture Settlement

**YOU DO NOT NEED A THIRD-PARTY CLAIMS SETTLEMENT SERVICE TO SUBMIT YOUR CLAIM. FREE ASSISTANCE IS AVAILABLE FROM CLASS COUNSEL AND RG/2 CLAIMS ADMINISTRATION LLC**

SECTION 1 – CLAIMANT INFORMATION

Full Legal Name (Required)

--	--	--

First

M.I.

Last

Current Mailing Address (Required)

--

Address

--	--	--

City

State

Zip

--

Country

Email Address: (Required):

--

Phone Number:

--

U.S. Tax Id Number:

--	--	--	--	--	--	--	--	--

NCAA ID Number (Required):

--	--	--	--	--	--	--	--	--	--	--

Your NCAA ID number is required to verify eligibility. Claims submitted without a valid NCAA ID number will be rejected.

SECTION 2 – CLASS MEMBERSHIP CONFIRMATION

Eligibility Confirmation (Required) - (Must select first box and at least one sub-box to proceed.)

I state under penalty of perjury that between March 19, 2020 and November 21, 2025:

I voluntarily forfeited prize money earned in a tennis tournament.

AND

Either:

- Competed in NCAA Division I Tennis; **OR**
- Submitted information to the NCAA Eligibility Center.

### SECTION 3 – TOURNAMENT PRIZE MONEY FORFEITURES

Please list each tennis tournament or event in which you forfeited prize money during the time period of March 19, 2020 to November 21, 2025 (the “Class Period”).

- **One event per row**
- Forfeited Prize Money is defined as the amount of tournament prize money forfeited by the Class Member during the Class Period and does not include any expenses reimbursed by tournament organizers. Any taxes, stipends, grants or per diems will not be considered in calculating Forfeited Prize Money.

				Prize Money	
#	Tournament Date	Tournament Name	Singles or Doubles	Type of Currency Awarded	Forfeited Prize Money
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					

\*If you have more than 10 tournaments to claim, please click [here](#) for a template to complete and upload. **(This option will be provided for online claim submissions – paper-filing claimants may print out and submit additional copies of this page)**

### SECTION 4 – SUPPORTING DOCUMENTATION (Required)

For each tournament listed above, you must upload documentation supporting your claim detailing the Forfeited Prize Money claimed. Some sample documents may include but are not limited to:

- Tournament prize statements
- Correspondence regarding forfeiture
- Bank records showing prize amount received or forfeited
- Printouts from web showing prize amount awarded

[File Upload Field – Allow multiple uploads, PDF/JPG/PNG]

**SECTION 5 – TOTAL AMOUNT CLAIMED (For online claims only – if filing by paper, they will need to complete this themselves)**

Based on the information you have provided, your total Forfeited Prize Money is:

Forfeited Prize Money (total)

---

**SECTION 6 – ATTESTATION & SIGNATURE**

**Certification Under Penalty of Perjury**

By submitting this Claim Form, I declare under penalty of perjury under the laws of the United States of America that:

1. I meet the definition of a Class Member as stated above in Section 2.
2. The Forfeited Prize Money listed in Section 3 and 5 were voluntarily forfeited during the Class Period.
3. The Forfeited Prize Money listed in Sections 3 and 5 are accurate to the best of my knowledge.
4. I understand that false or incomplete statements may result in rejection of my claim and potential legal consequences.
5. I am NOT subject to backup withholding under the provisions of Section 3406 (a)(1)(c) of the Internal Revenue Code.

**Signature (Required)** *(for online claims, signature box will appear)*

**Capacity of person signing** (If other than Class Member)

**\*\*If person signing the claim is not the class member, proof of authority documents may be requested.**

**Date Submitted:**

**[Auto-generated for online claims]**