

BASIC INFORMATION

Why did I receive a notice about this lawsuit?

If you received a notice about this lawsuit, it means that ExpressVPN's records show that you may be a member of the Settlement Class (defined below).

You were sent notice because you have the right to know about the proposed settlement of this lawsuit and about your options before the Court decides whether to approve the settlement. This website explains the lawsuit and your legal rights.

What is this lawsuit about?

The case challenges ExpressVPN's autorenewal practices. In particular, the lawsuit claims that ExpressVPN violated California consumer protection statutes by not adequately disclosing the automatic renewal terms of ExpressVPN subscriptions in a clear and conspicuous manner.

ExpressVPN denies these allegations and any wrongdoing and maintains that its autorenewal practices are and were at all times lawful.

More information about the lawsuit can be found in the "Documents" section of the Settlement Website at [\[WEBSITE\]](#).

Why is this a class action?

In this class action, the Class Representatives sued on behalf of people who they believe have similar claims (the "Class Members"). The case is brought as a class action because the Class Representatives believe it is more efficient to pursue all Class Members' claims in one lawsuit. More information about why this is a class action can be found in the Court's Preliminary Approval Order, which is available at [\[URL TO DOCUMENTS SECTION OF WEBSITE\]](#).

WHO IS INCLUDED IN THE LAWSUIT?

Who is part of the Class?

The Class includes individuals who purchased an automatically renewing ExpressVPN subscription and paid at least one autorenewal charge in the period from September 15, 2022 to June 13, 2025 while living in California.

The full Class definition is included in the Settlement Agreement, available on the Documents page of this website.

How can I be sure if I am included?

If you are not sure whether you are included in the lawsuit, you may call [\[Admin phone number\]](#) and leave a voicemail with questions. You may also send questions to the Settlement Administrator at [\[ADDRESS\]](#) or at [\[EMAIL ADDRESS\]](#). Do not contact ExpressVPN, its lawyers, or the Court.

When will I get my payment?

We can't give you a date yet. We estimate that payments will be made about two months after the judge approves the settlement or after any appeals are resolved in favor of the settlement. The judge will consider whether to approve the settlement on February 19, 2027. Even if the judge approves the settlement, there may be appeals. It is always uncertain whether and when appeals will be resolved and resolving them can take more than a year. Please be patient.

All checks will expire and become void 90 days after they are issued.

The Settlement Website will be updated to inform Class Members of the progress of the settlement.

YOUR RIGHTS AND OPTIONS

How can I get a payment?

To get a cash payment, you must complete and submit a valid Claim Form **no later than [CLAIMS DEADLINE]**. Please file your claim electronically on **[SETTLEMENT WEBSITE]**. Not only is submitting online easier and more secure, but it is completely free and takes only minutes. You can get a payment by check or electronically through an ACH transfer, prepaid Mastercard (virtual or physical), PayPal, Zelle, or Venmo.

If you want a paper copy of the Claim Form, you can download it **here [LINK TO CLAIM FORM]**, or call toll free to request that one be mailed to you, **[XXX-XXX-XXXX]**. If you want to submit your Claim Form by mail please send it to the Settlement Administrator at the address below:

SETTLEMENT ADMINISTRATOR
P.O. BOX XXX
ANYTOWN, ANY XXXXX

If you timely submit a valid Claim Form and your claim is approved, you will receive a cash payment after the settlement is approved.

Please read the Claim Form carefully and provide all the information required. All Claim Forms **must be received (or postmarked if mailed) and properly completed by [CLAIMS DEADLINE]**.

What are my other choices?

As a Class Member, you have a choice whether to remain in the Class and be represented by the Class Representatives and Class Counsel, or to exclude yourself. Either choice will have legal consequences, which you should understand before making your decision.

What happens if I do nothing?

If you are a Class Member and you do nothing (meaning you don't submit a Claim Form and don't exclude yourself), you will **not** receive money from this settlement and you will release your claims. Releasing your claims means that, if the judge approves the settlement, you are giving up the right to file your own lawsuit against, or seek further money from, ExpressVPN for any of the issues or claims in the case—whether or not you are currently aware of those claims. The specific scope of the claims you are releasing is in paragraph 77 of the Settlement Agreement, which is available through the "Documents" link on the Settlement Website.

If you are a Class Member who is a former ExpressVPN subscriber as of September 9, 2026, you will still receive a Credit Voucher that may be redeemed for a 3-month “Advanced”-tier subscription for ExpressVPN even if you do nothing at all.

What if I don’t want to be part of the Class?

If you do not want a settlement benefit and you want to keep the right to sue or continue to sue ExpressVPN regarding the claims released by the Settlement Agreement, you must exclude yourself from the Class. If you exclude yourself, you will not receive any money or other settlement benefits that may result from this lawsuit. You will not be bound by any Court orders regarding this lawsuit and you will keep any rights to sue ExpressVPN on your own regarding the legal claims in this case.

To exclude yourself from the Class, you must mail a letter stating that you want to exclude yourself from the Class to the Notice Administrator at the address below:

ADDRESS

Your letter must include:

- The following statement: “I request to be excluded from the Class and Settlement in *Marin v. Express Technologies, Ltd.*, No. 26CU028651N.”
- Your full name
- Your mailing address
- Your email address
- Your phone number, and
- Your signature (a typed signature or an attorney’s signature will not satisfy this requirement)

You **must** mail your letter postmarked by **[DATE]**. This will be the only opportunity you will have to exclude yourself from the Class.

If I don’t exclude myself, can I sue later?

No. Unless you exclude yourself by the deadline, you give up any right to sue (or continue to sue) ExpressVPN for the claims released in the Settlement Agreement.

How do I tell the Court that I do not agree with the settlement?

If you are a member of the Class and you do not exclude yourself, you can ask the judge to deny approval of the settlement by filing an objection. You cannot ask the judge to order a different settlement—the judge can only approve or reject the settlement. If the Court denies approval, no settlement payments will be made and the lawsuit will continue. A Class Member who objects still remains in the Class and, if the Court approves the settlement, will receive the benefits afforded by the settlement.

Any objection to the proposed settlement must be in writing. If you submit a written objection before the deadline, you may, but don’t have to, appear at the Final Approval Hearing. If you want to appear, you can do so yourself or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

All written objections and supporting papers must (a) clearly identify the case name and number (“*Marin v. Express Technologies, Ltd.*, Case No. 26CU028651N (San Diego Cnty.)”), and (b) be mailed to the Settlement Administrator postmarked on or before [Objection/Exclusion Deadline].

ExpressVPN Settlement Administrator

ATTN: Objection

Address

Written objections must also contain: (1) your full name, mailing address, email address, and telephone number, and the same information for any counsel who represents you or who assisted in preparing your objection (whether or not such counsel represents the objector); (2) a written statement of all grounds for the objection accompanied by any legal support for the objection (if any); (3) copies of any papers, briefs, or other documents upon which the objection is based; (4) a list of all persons who will be called to testify in support of the objection (if any); (5) a statement of whether you or an attorney you hire intend to appear at the Final Approval Hearing; (6) a signed statement attesting, under penalty of perjury, that you are a Class Member; (7) a list of all objections filed by you or your counsel to class action settlements in the last five years (if any); and (8) your signature and your attorney’s signature (if any).

THE LAWYERS REPRESENTING YOU

Who is Class Counsel?

The Court has appointed Dovel & Luner, LLP and Wittels McInturff Palikovic as Class Counsel to represent you and the other Class Members. Their contact information is below:

Dovel & Luner, LLP
201 Santa Monica Blvd., Suite 600
Santa Monica, California 90401
Telephone: 310-656-7066
jonas@dovel.com
martin@dovel.com

Wittels McInturff Palikovic
305 Broadway, 7th Floor
New York, NY 10007
Telephone: 914-775-8862
case@wittelslaw.com

If you want to be represented by another lawyer, you may hire one at your own expense.

How will Class Counsel be paid?

Class Counsel will file a request for attorneys’ fees and reimbursement of the costs they sustained in litigating this case. Class Counsel will request no more than one-third of the value of the Settlement Fund to them for attorneys’ fees and reimbursement of out-of-pocket expenses incurred in the lawsuit. Class Counsel may also ask the Court to approve a Service Award of up to \$5,000 to each Class Representative for their efforts in litigating the case. The Court may award less than the amounts requested. Any court-approved attorneys’ fees and cost reimbursements or Service Awards will be paid from the Cash Fund.

GETTING MORE INFORMATION

How do I get more information about the Lawsuit?

This page summarizes the lawsuit. You can access a copy of the complaint, the Long Form Notice, and other important information about the lawsuit on the Documents page of this website. You may also contact the Settlement Administrator directly if you have any questions. Before doing so, however, please review this page carefully.

[ADDRESS]
Tel: [XXX-XXX-XXXX] | Fax: [XXX-XXX-XXXX]
Email: [EMAIL ADDRESS]

PLEASE DO NOT CONTACT THE CLERK OF THE COURT, THE JUDGE, OR EXPRESSVPN WITH INQUIRIES ABOUT THE CASE. INSTEAD, PLEASE DIRECT ANY INQUIRIES TO THE CONTACTS LISTED ABOVE.