

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA*Vasquez v. Venetian Las Vegas Gaming, LLC, Case No. 5:25-cv-07934*

YOU MAY BE ENTITLED TO A PAYMENT FROM A CLASS ACTION SETTLEMENT, if you are a California resident who, while in California, during the period from September 18, 2024 through March 16, 2026: (1) accessed and/or navigated the Venetian Las Vegas website (VenetianLasVegas.com) and/or (2) made a reservation for a Venetian hotel stay through the Venetian Las Vegas website (VenetianLasVegas.com).

A court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

A settlement has been reached in a class action lawsuit against Venetian Las Vegas Gaming, LLC (“Venetian”). The class action lawsuit claims that Venetian disclosed its website users’ guest record information and confidential communications to third parties without permission and in violation of Cal. Penal Code §§ 631-632 (the California Invasion of Privacy Act or CIPA). Venetian denies that it violated any law but has agreed to the Settlement to avoid the uncertainties and expenses associated with continuing the case.

- You are included in the Browsing Settlement Class if you are a California resident who, while in California during the period from September 18, 2024 through March 16, 2026, accessed and/or navigated the Venetian Las Vegas website (VenetianLasVegas.com).
- You are included in the Booking Settlement Class if you are a California resident who, while in California, during the period from September 18, 2024 through March 16, 2026, made a reservation for a Venetian hotel stay through the Venetian Las Vegas website (VenetianLasVegas.com).

If approved by the Court, Venetian will establish:

- A Booking Settlement Fund of \$931,713.50 to pay valid claims submitted by the Booking Settlement Class. The Booking Settlement Class claims rate is estimated to be 20 percent. If you are entitled to relief, you may submit a claim to receive a *pro rata* (meaning equal) share of the Booking Settlement Fund, estimated at approximately \$71.39 per Booking Settlement Class Member.
- A Browsing Settlement Fund of \$668,286.50 to pay valid claims submitted by the Browsing Settlement Class. The Browsing Settlement Class claims rate is estimated to be 10 percent. If you are entitled to relief, you may submit a claim to receive a *pro rata* (meaning equal) share of the Browsing Settlement Fund, estimated at approximately \$3.60 per Browsing Settlement Class Member.
- Notice and administration expenses (the “Settlement Administration Expenses”), attorneys’ fees and costs (the “Fee Award”), and an incentive award (the “Service Award”) will be paid proportionally out of the Booking Settlement Fund and Browsing Settlement Fund.
- Read this Notice carefully. Your legal rights are affected whether you act or don’t act.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM BY NOVEMBER 24, 2026	This is the only way to receive a payment.
EXCLUDE YOURSELF BY NOVEMBER 24, 2026	You will receive no benefits, but you will retain any rights you currently have to sue the Defendant about the claims in this case.
OBJECT BY NOVEMBER 24, 2026	Write to the Court explaining why you don’t like the Settlement.
GO TO THE HEARING ON DECEMBER 3, 2026	Ask to speak in Court about your opinion of the Settlement
DO NOTHING	You won’t get a share of the settlement benefits and will give up your rights to sue the Defendant about the claims in the case.

These rights and options—and the deadlines to exercise them—are explained in this Notice.

**QUESTIONS? CALL 877-367-1772 TOLL-FREE
OR VISIT WWW.VENETIANLASVEGASSETTLEMENT.COM.**

BASIC INFORMATION

1. Why was this Notice issued?

A Court authorized this Notice because you have a right to know about a proposed settlement of this class action lawsuit and about all of your options, before the Court decides whether to give final approval to the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights.

The Honorable P. Casey Pitts of the United States District Court for the Northern District of California is overseeing this case. The case is called *Vasquez v. Venetian Las Vegas Gaming, LLC*, Case No. 5:25-cv-07934. The person who has sued is called the Plaintiff. The Defendant is Venetian Las Vegas Gaming, LLC.

2. What is a class action?

In a class action, one or more people called the class representative (in this case, Max Vasquez) sue on behalf of a group or a class of people who have similar claims. In a class action, the court resolves the issues for all class members, except for those who exclude themselves from the Class.

3. What is this lawsuit about?

This lawsuit claims that Venetian disclosed its website users' guest record information and confidential communications to third parties without permission and in violation of Cal. Penal Code §§ 631-632 (the California Invasion of Privacy Act or CIPA). Venetian denies that it violated any law. The Court has not determined who is right. Rather, the Parties have agreed to settle the lawsuit to avoid the uncertainties and expenses associated with ongoing litigation.

4. Why is there a settlement?

The Court has not decided whether the Plaintiff or the Defendant should win this case. Instead, both sides agreed to a settlement. This way, they avoid the uncertainties and expenses associated with ongoing litigation, and Settlement Class Members will get compensation sooner rather than, if at all, after the completion of a trial.

WHO IS INCLUDED IN THE SETTLEMENT

5. How do I know if I am in the Settlement Class?

The **Booking Settlement Class** is defined as:

All California residents who, while in California during the period from September 18, 2024 through March 16, 2026, made a reservation for a Venetian hotel stay through the Venetian Las Vegas website (VenetianLasVegas.com).

The **Browsing Settlement Class** is defined as:

All California residents who, while in California during the period from September 18, 2024 through March 16, 2026, accessed and/or navigated the Venetian Las Vegas website (VenetianLasVegas.com).

Together, the **Booking Settlement Class** and the **Browsing Settlement Class** are the **Settlement Classes**.

"**Settlement Class Member**" means a person who falls within the definition of the **Booking Settlement Class** or the **Browsing Settlement Class**, and who has not submitted a valid request for exclusion.

THE SETTLEMENT BENEFITS

6. What does the Settlement provide?

If approved by the Court, Venetian will establish:

- A Booking Settlement Fund of \$931,713.50 to pay valid claims submitted by the Booking Settlement Class.

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- A Browsing Settlement Fund of \$668,286.50 to pay valid claims submitted by the Browsing Settlement Class.

Settlement Administration Expenses, the Fee Award, and the Service Award will be paid proportionally out of the Booking Settlement Fund and Browsing Settlement Fund. See Question 13 for more information.

7. How much will my payment be?

- If you are a member of the Booking Settlement Class, you may submit a claim to receive a *pro rata* (meaning equal) share of the Booking Settlement Fund, estimated at approximately \$71.39 per Booking Settlement Class Member.
- If you are a member of the Browsing Settlement Class, you may submit a claim to receive a *pro rata* (meaning equal) share of the Browsing Settlement Fund, estimated at approximately \$3.60 per Browsing Settlement Class Member.

The amount of payment will depend on how many of the Booking Settlement Class Members and Browsing Settlement Class Members file valid claims. Each Booking Settlement Class Member who files a valid claim will receive a proportionate share of the Booking Settlement Fund. Each Browsing Settlement Class Member who files a valid claim will receive a proportionate share of the Browsing Settlement Fund. You can contact Class Counsel to inquire as to the number of claims filed.

8. When will I get my payment?

The hearing to consider the fairness of the Settlement is scheduled for December 3, 2026, at 10:00 a.m. If the Court approves the Settlement, eligible Settlement Class Members whose claims were approved by the Settlement Administrator will receive their payment 45 days after the Settlement has been finally approved and/or any appeals process is complete. Payments will be made in the form of a check or digital payment by PayPal or Venmo. All checks will expire and become void 180 days after they are issued.

HOW TO GET BENEFITS

9. How do I claim my payment?

If you are a Settlement Class Member and you want to receive a payment, you must complete and submit a Claim Form by November 24, 2026. Claim Forms can be found and submitted online at the Settlement Website, VenetianLasVegasSettlement.com, or by printing and mailing a paper Claim Form, copies of which are available for download at www.VenetianLasVegasSettlement.com.

We encourage you to submit your claim online. It is easier, more secure, free, and takes only minutes.

REMAINING IN THE SETTLEMENT

10. What am I giving up if I stay in the Settlement Class?

If the Settlement becomes Final, you will give up your right to sue Venetian for the claims this Settlement resolves. The Settlement Agreement describes the specific claims you are giving up against Venetian. You will be releasing Venetian and certain of its affiliates described in Section 1.31 of the Settlement Agreement. Unless you exclude yourself (see Question 14), you are releasing the claims, regardless of whether you submit a claim or not. The Settlement Agreement is available through the Documents link on the Settlement Website.

The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions, you can talk to the lawyers listed in Question 12 for free or you can, of course, talk to your own lawyer.

11. What happens if I do nothing at all?

If you do nothing, you won't get any benefits from this Settlement. However, unless you exclude yourself, you won't be able to start a lawsuit or be part of any other lawsuit against Venetian for the claims being resolved by this Settlement.

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THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in the case?

The Court has appointed Philip L. Fraietta and Stefan Bogdanovich of Bursor & Fisher, P.A., to be the attorneys representing the Settlement Classes. They are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

13. How will the lawyers be paid?

Class Counsel's attorneys' fees, costs, and expenses will be paid proportionally from the Booking Settlement Fund and Browsing Settlement Fund in an amount determined and awarded by the Court. Class Counsel is entitled to seek no more than one-third of the \$1,600,000.00 total value of the Booking Settlement Fund and Browsing Settlement Fund, but the Court may award less than this amount.

The Court will also decide whether to award the Class Representative a Service Award of \$5,000.00 paid proportionally from the Booking Settlement Fund and Browsing Settlement Fund for the Class Representative's service in helping to bring and settle this case. The Court may award less than this amount.

EXCLUDING YOURSELF FROM THE SETTLEMENT

14. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must mail or otherwise deliver a written request stating clearly that you want to be excluded from the Settlement Class for the *Vasquez v. Venetian Las Vegas Gaming, LLC* settlement, Case No. 5:25-cv-07934. Your letter or request for exclusion must also include your name and address, a signature, and a statement that you wish to be excluded from the Booking Settlement Class and/or Browsing Settlement Class for purposes of this Settlement. You must mail or deliver your exclusion request no later than November 24, 2026 to the following address:

Venetian Las Vegas Settlement
P.O. Box 3278
Portland, OR 97208-3278

15. If I don't exclude myself, can I sue the Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Venetian for the claims being resolved by this Settlement.

16. If I exclude myself, can I get anything from this Settlement?

No. If you exclude yourself, you will not be eligible for benefits.

OBJECTING TO THE SETTLEMENT

17. How do I object to the Settlement?

You can ask the Court to deny approval by filing an objection. You can't ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval, no settlement payments will be sent out, and the lawsuit will continue. If that is what you want to happen, you should object.

Any objection to the proposed Settlement must be made in writing. If you file a timely written objection, you may, but are not required to, appear at the Final Approval Hearing, either in person 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 (*Vasquez v. Venetian Las Vegas Gaming, LLC*, No. 5:25-cv-07934), (b) be submitted to the Court either by filing them electronically or in person at any location of the United States District Court for the Northern District

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of California or by mailing them to the Class Action Clerk, United States District Court for the Northern District of California, 280 South 1st Street, San Jose, CA 95113, and (c) be filed or postmarked on or before November 24, 2026.

Class Counsel will file with the Court and post on the Settlement Website its request for attorneys' fees by October 20, 2026.

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

Objecting simply means telling the Court that you don't like something about the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself from the Settlement Class is telling the Court that you don't want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case will no longer affect you.

THE COURT'S FINAL APPROVAL HEARING

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

The Court will hold the Final Approval Hearing at 10:00 a.m. on December 3, 2026 in Courtroom 8 at the Robert F. Peckham Federal Building & United States Courthouse, San Jose, California 95113. The purpose of the hearing will be for the Court to determine whether to approve the Settlement as fair, reasonable, adequate, and in the best interests of the Settlement Classes; to consider Class Counsel's request for attorneys' fees and expenses; and to consider the request for a Service Award to the Class Representative. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the Settlement.

The hearing may be postponed to a different date or time without notice, so it is a good idea to check the Settlement Website, VenetianLasVegasSettlement.com, or call 877-367-1772. If, however, you timely object to the Settlement and advise the Court that you intend to appear and speak at the Final Approval Hearing, you will receive notice of any change in the date of such Final Approval Hearing.

20. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to come at your own expense. If you send an objection or comment, you don't have to come to Court to talk about it. As long as you file and mail your written objection on time, the Court will consider it. You may also pay another lawyer to attend, but it's not required.

21. May I speak at the hearing?

Yes. You may ask the Court for permission to speak at the Final Approval Hearing.

GETTING MORE INFORMATION

22. Where do I get more information?

This Notice summarizes the Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement at www.VenetianLasVegasSettlement.com. You may also write with questions to Venetian Las Vegas Settlement, P.O. Box 3278, Portland, OR 97208-3278. You can call the Settlement Administrator at 877-367-1772 or contact Class Counsel at info@bursor.com if you have any questions. Before doing so, however, please read this full Notice carefully. You may find additional information on the Settlement Website.

You may also access the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov> or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, 280 South 1st Street, Room 2112, San Jose, CA 95113, between 9:00 a.m. and 4:00 p.m. Monday through Friday, excluding court holidays. PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

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