

## LEGAL NOTICE

# If you purchased advertising space in the Chicago Sun-Times, Daily Southtown or Star newspapers, you could get a payment from a class action settlement.

### Para una notificación en Español, llamar o visitar nuestro website.

A settlement has been proposed in a class action lawsuit over whether the *Chicago Sun-Times*, *Daily Southtown* and *Star* newspapers misled advertisers about the newspapers' circulation. The settlement will provide \$15 million in cash and other benefits to pay claims from advertisers who purchased advertising space in those newspapers. If you qualify, you may send a benefit or claim form to get benefits, or you can exclude yourself from the settlement, or object to it.

The Circuit Court of Cook County, Illinois authorized this Notice. Before any compensation is paid, the Court will have a hearing to decide whether to approve the settlement.

### WHO'S INCLUDED?

You are a Class Member and could get benefits if you purchased advertising in (i) the *Chicago Sun-Times* from April 1, 1997 through September 30, 2004, or (ii) the *Daily Southtown* or *Star* newspapers from April 1, 2004 through September 30, 2004. Excluded from the Class are employees of the Defendants and their immediate family members. You are also excluded from the Class if you signed a settlement agreement covering your claims against the Defendants or filed your own lawsuit against them prior to September 16, 2005.

You can obtain more information, including a detailed Notice, at [www.SunTimesCirculationSettlement.com](http://www.SunTimesCirculationSettlement.com) or by calling toll-free 1-800-465-9507.

### WHAT'S THIS ABOUT?

The lawsuit claims that the Defendants used a variety of methods to overstate the circulation figures of the *Chicago Sun-Times*, *Daily Southtown* and *Star* newspapers over different periods of time. The lawsuit also claims that the Defendants' overstatement of circulation caused Class Members to pay more for advertising than they would have paid had the circulation totals been accurately reported. The Defendants deny all liability and deny that the overstatements damaged any Class Member. Both sides agreed to the settlement to resolve the case and get benefits to advertisers.

### WHAT DOES THE SETTLEMENT PROVIDE

The Defendants have agreed to provide cash and other benefits to Class Members who comply with the terms of the settlement agreement, which requires among other things that they send in valid benefit or claim forms. The amount of compensation to which each Class Member would be entitled depends on which newspapers they advertised in, when they placed the ad, and what type of ad they placed. The Stipulation of Settlement, available at the website below, describes all of the details about the proposed settlement. You may also obtain a more detailed notice at that website.

### HOW TO OBTAIN BENEFITS

#### Private Classified Advertisers

Classified Advertisers fall into two groupings: those who are assigned an account representative and those who simply place a classified ad without assignment of an account representative. If you placed a classified ad without being assigned an account representative, you will not receive any mailed documents and must complete a claim form, a copy of which accompanies this notice. A claim form can also be obtained at [www.SunTimesCirculationSettlement.com](http://www.SunTimesCirculationSettlement.com) or by calling toll-free 1-800-465-9507. In order to receive the benefits of the settlement, you must send in a completed claim form by **March 18, 2006**.

#### Non-Private Classified Advertisers

Non-Classified Advertisers (including classified advertisers who are assigned an account representative) should receive in the mail a detailed notice and claim form package containing everything you need. If you fall into this classification and do not receive a detailed notice, call 1-800-465-9507 or visit the website [www.SunTimesCirculationSettlement.com](http://www.SunTimesCirculationSettlement.com). To obtain benefits, you will need to send in a benefit form by **March 18, 2006**.

### OTHER OPTIONS

If you don't want to be legally bound by the settlement, you must exclude yourself by **December 2, 2005**. Otherwise, you won't be able to sue the Defendants about the legal claims in this case. If you exclude yourself, you can't get compensation from this settlement.

If you stay in the settlement, you may object to it by **December 2, 2005**.

The detailed Notice explains how to exclude yourself or object.

### **FAIRNESS HEARING**

The Court will hold a hearing in this case (*In re Chicago Sun-Times Circulation Litigation*, Case No. 04 CH 9757) on **January 17, 2006**, to consider whether to approve the settlement and any request by the lawyers representing all Class Members for attorneys' fees and costs, for investigating the facts, litigating the case, and negotiating the settlement.

The fees and costs won't reduce the benefits available for Class Members. You may ask to appear at the hearing, but you don't have to. For more information, call toll-free 800-465-9507, visit the website [www.SunTimesCirculationSettlement.com](http://www.SunTimesCirculationSettlement.com), or write to Chicago Sun-Times Circulation Litigation, Claims Administrator, P.O. Box 1793, Faribault, MN 55021-1793.

**DO NOT CONTACT THE JUDGE, CLERK OF THE COURT, OR ANY REPRESENTATIVES OF THE CHICAGO SUN-TIMES, DAILY SOUTHTOWN OR STAR NEWSPAPERS CONCERNING THIS SETTLEMENT.**

1-800-465-9507

[www.SunTimesCirculationSettlement.com](http://www.SunTimesCirculationSettlement.com)

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