

NOTICE OF PENDENCY OF CLASS ACTION**If You Purchased a New Passport Brand Western Edition Trailer from a Keystone Authorized Dealership in California before December 1, 2019, a Class Action Lawsuit May Affect your Rights.**

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

Please read this Notice carefully and in its entirety.

- A class action lawsuit known as *Guisinger v. Keystone RV Company*, Case No. 23-cv-01393-MWC-RAO (“lawsuit”) is pending in the United States District Court for the Central District of California (the “Court”) against Defendant Keystone RV Company (“Keystone”).
- The lawsuit alleges that Keystone began manufacturing its Western Edition Passport Travel Trailers with wood roof trusses after September 2016 while representing the trailers were manufactured with “5 [inch] Crowned / Stamped Galvanized Steel Roof Trusses” until December 2019. Keystone denies Plaintiff’s legal claims.
- You are a Class member if you are a consumer who purchased a new Passport Brand Western Edition Trailer from a Keystone authorized dealership in California prior to December 1, 2019, with a Serial Number that sequentially ends after HX414101.
- The Court has not decided who is right or wrong. There is no money available now, and no guarantee there will be. The lawsuit is scheduled for trial on June 29, 2026. However, if you are a member of the Class described above, your legal rights are affected, and you have a choice to make now. Please read this notice carefully.

Your Legal Rights and Options		Deadline
Do Nothing	By doing nothing, you keep the possibility of getting money or benefits that may come from a trial or settlement at a later date. But, you give up any rights to sue Keystone separately about the same legal claims in this lawsuit.	
Exclude Yourself	If you ask to be excluded from this lawsuit and money or benefits are later awarded, you will not receive any money or benefits. But, you keep any rights to sue Keystone separately about the same legal claims in this lawsuit.	Postmarked by: JUNE 22, 2026

The Plaintiff must prove their legal claims against Keystone at trial. If you do not ask to be excluded from the lawsuit and money or benefits are obtained from Keystone, you will be notified about how to receive your benefits.

Questions? Go to www.KeystonePassportClassAction.com or call 1-877-239-7718

BASIC INFORMATION

1. Why should I read this notice?

You may be part of a class action lawsuit that is now pending against Keystone RV Company in the United States District Court for the Central District of California, entitled *Guisinger v. Keystone RV Company*, Case No. 23-cv-01393-MWC-RAO (the “lawsuit”). The lawsuit has been certified by the Court to proceed as a class action on behalf of all consumers who purchased a new Passport Brand Western Edition Trailer from a Keystone authorized dealership in California prior to December 1, 2019, with a Serial Number that sequentially ends after HX414101.

The Honorable Michelle Williams Court of the United States District Court for the Central District of California is overseeing this class action. The person who sued is called the “Plaintiff” and the company sued, Keystone RV Company, is called the “Defendant” or “Keystone.” The Plaintiff brought this lawsuit on behalf of a Class of other consumers in California who similarly purchased Passport Brand Western Edition Trailers manufactured by Keystone.

2. Why is the lawsuit a class action?

In a class action, one or more people (called class representatives) sue on behalf of all people who have similar legal claims. Together, all these people are called a class or class members. One court resolves the issues for all class members, except for those class members who timely exclude themselves (opt out) from the class.

THE LEGAL CLAIMS IN THE LAWSUIT

3. What is this lawsuit about?

The lawsuit alleges that Keystone manufactured its Passport Brand Western Edition Trailers with a Serial Number that ends after HX414101 with wood roof trusses while representing the trailers were manufactured with “5 [inch] Crowned / Stamped Galvanized Steel Roof Trusses” until December 1, 2019. Because Keystone’s representation is alleged to be false, Plaintiff asserts legal claims against Keystone under: (1) the California Consumers Legal Remedies Act, (2) California Unfair Competition Law, (3) California False Advertising Law, and (4) common law unjust enrichment.

Keystone denies Plaintiff’s legal claims and denies any wrongdoing. No court or other judicial entity has made any judgment or other determination of any wrongdoing by the Defendant, or that any law has been violated.

4. Has the Court decided who is right?

The Court has not decided whether Plaintiff or Keystone is right. By establishing the Class and providing this Notice, the Court has not decided and is not suggesting that Plaintiff will win or lose this lawsuit. The Plaintiff must prove their legal claims at a trial.

A trial is scheduled to start on June 29, 2026.

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5. What is the Plaintiff asking for?

The Plaintiff is asking for money for the Class members for Keystone’s alleged false representation that the Passport Brand Western Edition Trailers purchased by the Class were constructed from wood rather than steel. The Plaintiff is also asking for attorneys’ fees and costs for Class Counsel.

6. Is there any money or benefits available now?

No money or benefits are available now. The Court or jury has not decided whether Keystone did anything wrong, and Plaintiff and Keystone have not settled the lawsuit. There is no guarantee that money or benefits will be obtained in the future. You will be notified if money or benefits become available.

WHO IS INCLUDED IN THE CLASS?

7. Am I part of the Class?

The Class includes: All consumers who purchased a new Passport Brand Western Edition Trailer from a Keystone authorized dealership in California prior to December 1, 2019, with a Serial Number that sequentially ends after HX414101.

Excluded from the Class are: Defendant and any entities in which Defendant has a controlling interest, any of Defendant’s parents, subsidiaries, affiliates, officers, directors, employees, and members of such person’s immediate families, the presiding judge and the judge’s immediate family.

8. What trailers are included in the lawsuit?

The lawsuit includes Passport Brand Western Edition towable trailers manufactured by Keystone that contain a Serial Number that ends after HX414101 purchased from a Keystone authorized dealership in California prior to December 1, 2019.

A towable trailer, also called a “towable RV” or “travel trailer,” is a non-motorized RV that includes living quarters (i.e., a kitchen, beds, and a bathroom) and is towed behind a separate vehicle.

More information on how to determine whether your trailer is included in the lawsuit can be found at www.KeystonePassportClassAction.com.

9. What if I am still not sure if I am included in the Class?

If you are still not sure whether you are a Class member, you can get free help at www.KeystonePassportClassAction.com or by calling or writing to the lawyers in this lawsuit at the telephone number or address listed below.

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YOUR RIGHTS AND OPTIONS

Class members may: (1) do nothing or (2) ask to be excluded (“Opt-Out”) from the Class.

10. What happens if I do nothing at all?

You do not have to do anything now if you want to keep the possibility of getting money or benefits from this lawsuit in the future. If you do nothing, then you will remain in the Class, and you will be bound by all past, present, and future orders, findings, and judgments in this lawsuit, whether favorable or unfavorable. If you stay in the Class and money or benefits are awarded to the Class, either through settlement or judgment after trial, you will be notified about how to get your share. If Keystone wins in whole or in part on any issues or legal claims in the lawsuit, you will be bound by that outcome. By staying in the Class, you will give up your right to sue Keystone for the legal claims in this lawsuit.

11. Why would I ask to be excluded?

If you want to sue Keystone on your own regarding the same legal claims in this lawsuit, or already have your own lawsuit against Keystone regarding the same legal claims in this lawsuit and you want to continue with it, you need to ask to be excluded from the Class. If you exclude or remove yourself from the Class—sometimes called “opting-out” of the Class—you will not get any money or benefits from this lawsuit even if Plaintiff wins at trial or there is a settlement. However, you may be able to sue or continue to sue Keystone on your own. If you exclude yourself, you will not be legally bound by the Court’s judgments in this class action lawsuit.

If you start your own lawsuit or continue with an existing lawsuit against Keystone regarding the same legal claims in this lawsuit after you exclude yourself, you will have to hire your own lawyer(s) for that lawsuit, and you will have to prove your legal claims. If you do exclude yourself so you can start or continue your own lawsuit against Keystone, you should talk to your own lawyer soon, because *your legal claims may be subject to a statute of limitations*, meaning that you may face a deadline after which you cannot sue.

12. How do I exclude myself from the Class?

To exclude yourself from the Class, you must send a written request for exclusion, which includes the following:

- 1) A statement that you want to be excluded from the Class, such as “I wish to opt-out of the Class in *Guisinger v. Keystone RV Company*;”
- 2) Your name, email address (if any), telephone number, and mailing address; and
- 3) Your personal signature and the date.

Your exclusion request must be mailed to the Class Administrator at the following address and **postmarked by JUNE 22, 2026**:

Keystone Passport Class Action
Class Administrator
PO Box 3219
Portland, OR 97208-3219

Please note per the United States Postal Service, mail may *not* be postmarked the day it is deposited in a mailbox or at a local post office. Postmarks occur when mail reaches a processing facility. To

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meet a postmark deadline, **mail at least a week prior to a postmark deadline**, get a manual postmark in-person at any post office, or send via Certified Mail.

You cannot opt out (exclude yourself) by telephone or by email.

“Mass” or “class” requests for exclusion filed by third parties on behalf of a “mass” or “class” of Class members or multiple Class members where the opt out has not been signed by each and every individual Class member will not be allowed.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in this lawsuit?

Yes. The Court appointed Saltz Mongeluzzi & Bendesky, P.C. to represent you and all Class members as “Class Counsel” for the purposes of this lawsuit. Class Counsel is experienced in handling similar lawsuits. Class Counsel’s contact information is below:

Simon Paris
Saltz Mongeluzzi & Bendesky, P.C.
120 Gibraltar Road, Suite 218
Horsham, PA 19044
Email: KeystoneClassAction@smbb.com

14. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you can hire one at your own expense. For example, you can ask your own lawyer to appear in Court for you if you want someone other than Class Counsel to speak for you.

15. How will Class Counsel be paid?

If Class Counsel gets money or benefits for the Class, they may ask the court for fees and expenses. You will not have to personally pay these attorneys’ fees or costs. If the Court grants Class Counsel’s request, the attorneys’ fees and expenses will either be deducted from any money obtained for the Class or paid separately by Keystone.

THE TRIAL

16. Where and when will the Court decide who is right?

Class Counsel will have to prove Plaintiff’s legal claims at a trial. The trial is currently set to start on **Monday, June 29, 2026, at 9:00 a.m.**, in the United States District Court for the Central District of California, located at 350 W. 1st Street, Los Angeles, CA 90012, in Courtroom 6A. During the trial, a Jury and the Judge will hear all of the evidence to help them reach a decision about whether the Plaintiff or Keystone is right about the legal claims in the lawsuit. There is no guarantee that Plaintiff will win, or that they will get any money for the Class.

Note: The date and time of the trial are subject to change without further notice to the Class. You should check the website www.KeystonePassportClassAction.com to confirm the date and time of the trial have not changed.

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17. Do I need to come to the trial?

You do not need to attend the trial. Class Counsel will present the case for the Plaintiff, and Keystone will present the defenses. You or your own lawyer are welcome to come at your own expense.

18. Will I get money after the trial?

If the Plaintiff obtains money or benefits for the Class as a result of the trial or a settlement, and you remain in the Class, you will be notified about how to participate to receive money or benefits. It is not known how long this will take.

GETTING MORE INFORMATION

19. Are more details available?

This Notice summarizes the lawsuit. For more information, you can contact Class Counsel at the information listed above, or access the Court docket in this lawsuit, through the Court's Public Access to Court Electronic Records (PACER) system. You can also visit the website www.KeystonePassportClassAction.com or call the Class Administrator at 1-877-239-7718.

PLEASE DO NOT CONTACT THE COURT TO INQUIRE ABOUT THE ACTION

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