

Notice Plan

Treon, et al. v. Dryvit Systems, Inc.,
Beaufort County Court of Common Pleas
Civil Action No. 2002-CP-07-1377

Class Counsel proposes providing notice of the Settlement Agreement in this matter to Class Members as set forth below.

- 1) **Direct Mailings to Known and Possible Class Members.** Within thirty (30) days of the Notice Date, Class Counsel will provide a copy of the Class Notice with an appropriate cover letter to each potential Class Member identified by the Parties by First Class United States Mail. Copies of the Class Notice may also be provided to groups whose membership may contain or have professional contact with Class Members. Those groups include, but are not limited to the Homeowners Association of South Carolina (HOA-SC), the South Carolina Chapter of the Community Association Institute (SC-CAI), the South Carolina Association of Realtors, the Chairs of the Construction Law and the Real Estate Practices Sections of the South Carolina Bar, etc.
- 2) **Print Advertising.** Beginning on the Notice Date (currently scheduled for January 4, 2010) and during a period of sixty (60) days thereafter, Class Counsel will place advertisements based on the content of, or otherwise submit for publication, the Summary Class Notice in at least the following South Carolina publications: The State (Columbia), The Post & Courier (Charleston), The Morning News (Florence), The Greenville News, The Sun News (Myrtle Beach), Spartanburg Herald Journal, Beaufort Gazette/Island Packet (Lowcountry), the South Carolina Bar magazine. The advertisements in the newspapers specified above will run once a week for at least two consecutive weeks.
- 3) **On-Line Advertising.** Beginning on the Notice Date (currently scheduled for January 4, 2010) and during a period of sixty (60) days thereafter, Class Counsel will place on-line advertisements known as “leaderboards” or “skyscrapers” on the following South Carolina newspaper websites: thestate.com (The State, Columbia), postandcourier.com (The Post & Courier, Charleston), scnow.com (The Morning News, Florence), greenvilleonline.com (The Greenville News), thesunnews.com (The Sun News, Myrtle Beach), goupstate.com (Spartanburg Herald Journal), and islandpacket.com (Beaufort Gazette/Island Packet, Lowcountry). The advertisements will direct class members to www.SCstucco.com to obtain information regarding the Settlement Agreement. The advertisements will run for two consecutive weeks.
- 4) **Website Development.** Within sixty (60) days after the entry of an order granting preliminary approval of the Settlement Agreement, Class Counsel will develop and operate a Dryvit Settlement Section on the Finkel Law Firm LLC website (www.finkellaw.com) that will be linked to www.SCstucco.com. The Dryvit

Settlement Section will eventually contain, *inter alia*, downloadable copies of both Class Notice and Summary Class Notice, the Settlement Agreement, and relevant pleadings.

- 5) **Additional Notice and Information.** Class Counsel, both collectively and individually, may use the Class Notice and Summary Class Notice to provide additional notice to the Class at their own expense. Class Counsel may direct Class Members to sources of information other than the information provided at www.SCstucco.com.