

NOTICE OF PENDENCY OF CLASS ACTION

This is a Court-approved notice. It is not an attorney advertisement.

Please read this notice carefully as it explains a lawsuit that affects your legal rights. This notifies you that you are a member of a class (the “Class”) in the case *Perez v. Public Storage* (the “Lawsuit”), which is now pending in the Superior Court of California for the County of Los Angeles (“Court”). On May 3, 2018, the Court certified the Lawsuit as a class action.

As a member of the Class, your legal rights are affected and you have a choice to make now:

DO NOTHING: **Stay in the Lawsuit. Await the Outcome of this case. Give up the right to sue Public Storage separately for this claim.**

If you wish to remain in the Lawsuit, you do not need to do anything at this time. You may be entitled to money and other benefits if the plaintiffs prevail at trial or obtain a favorable settlement. But you will give up any rights to sue Public Storage separately for the same legal claims at issue in this Lawsuit.

ASK TO BE EXCLUDED: **Get out of the Lawsuit. You will get no benefits from the underlying Lawsuit if a recovery is obtained through trial or settlement. Keep the right to sue Public Storage separately for this claim.**

If you do not wish to remain in the Lawsuit, you file a request to opt out of the Lawsuit. If any money or benefits are later awarded, you will not share in them. But if you timely exclude yourself, you will keep any rights to sue Public Storage separately for the same legal claim at issue in this Lawsuit.

This Notice explains your options. To be excluded, you must act before October 1, 2018.

The purpose of this notice is to explain to you:

1. Why you are getting this notice;
2. What the Lawsuit is about;
3. Why this is a class action;
4. Who is included in the Class;
5. Who represents the Class;
6. Your rights and options as a Class member;
7. How to exclude yourself from the Class; and
8. How to obtain further information about the Lawsuit.

1. Why did I get this notice?

The Court authorized this notice because you have a right to know about the Lawsuit and about your legal rights and options as they pertain to the Lawsuit. This notice explains the Lawsuit and your legal rights as a Class member.

Judge Carolyn B. Kuhl, of the Superior Court of California for the County of Los Angeles, presides over this Lawsuit. This Lawsuit is styled *Perez v. Public Storage*, No. BC611584. The people who sued, Carolina Perez, Paulina Cardona, Guilliana Amico and Richard Mojica, are called the “Plaintiffs.” The Defendant is Public Storage, a Maryland Real Estate Investment Trust.

2. What is the Lawsuit about?

The Lawsuit involves the self-storage insurance sold at Public Storage’s California facilities. The Plaintiffs allege that Public Storage deceived its California tenants by representing that tenants had to purchase insurance for their possessions stored in Public Storage units through an insurance plan offered at Public Storage locations. Among other misrepresentations, the Lawsuit alleges Public Storage led tenants to believe that they had to purchase insurance through Public Storage, and concealed from its tenants that they had other options to fulfill the requirement in their lease that they have insurance. The Plaintiffs allege that this violated California’s Unfair Competition Law (“UCL”). Public Storage denies that it said or did anything unfair, unlawful or fraudulent, and asserts that it fully complied with all applicable laws.

This Lawsuit does not impact whether your Public Storage insurance coverage is in effect or not.

The Court has not decided whether the Plaintiffs or Public Storage are correct. By establishing the Class and authorizing this notice, the Court is not suggesting that the Plaintiffs will win or lose this case. The Plaintiffs must prove their claims at trial.

3. Why is this a class action?

In a class action, one or more people called class representatives (in this case, four Public Storage tenants who purchased the self-storage tenant insurance offered at Public Storage) sue on behalf of people who have similar claims. All of the people who have claims similar to the class representative are members of the Class, except for those who timely exclude themselves from the Class.

4. Who is included in the Class?

The Court certified the Lawsuit as a class action based on the Class’ claim that Public Storage violated California’s Unfair Competition Law, Business & Professions Code § 17200 and following.

The Class is defined as:

All persons who rented storage units from Public Storage within the state of California and who purchased self-storage insurance policies on the same date through Public Storage between February 3, 2012 and February 8, 2016.

Excluded from the Class are: (1) Defendant and any entity in which Defendant has a controlling interest or which has a controlling interest in Defendants; (2) Defendant's legal representatives, assigns, and successors; and (3) the judge(s) to whom this case is assigned and any member of the judge's immediate family.

5. Who represents the Class?

The following law firms and attorneys have been certified by the Court as Class counsel:

William M. Audet
Steven R. Weinmann
David Kuang
Audet & Partners, LLP
711 Van Ness Avenue
San Francisco, CA 94102

Brad N. Baker
Albro L. Lundy, III
Baker, Burton & Lundy, P.C.
515 Pier Avenue
Hermosa Beach, CA 90254

Gillian L. Wade
Sara D. Avila
Marc A. Castaneda
Milstein Jackson
Fairchild & Wade, LLP
10250 Constellation Blvd., 14th Fl.
Los Angeles, CA 90067

Dale E. Washington
Law Office Of Dale E. Washington
4470 W. Sunset Blvd., Suite 90094
Los Angeles, CA 90027

Raymond V. Zakari
Zakari Law, APC
310 South Vermont Avenue
Glendora, CA 91741

These attorneys will represent you as part of the Class unless you choose to hire your own attorney. You have the right to hire your own attorney at your own expense. Class counsel represents the Class on a contingency basis and will only receive attorneys' fees and reimbursement of their expenses if there is a recovery for the Class and the Court awards fees and costs.

6. What are your rights and options as a Class member?

If you want to be a member of the Class, you do not need to take any action. If you are a Class member, you will be bound by any judgment, favorable or unfavorable, in this Lawsuit. This means that you will participate in any settlement or favorable judgment in the Lawsuit, but you will give up any rights to sue Public Storage separately for the same legal claim at issue in this Lawsuit.

7. How to exclude yourself from the Class.

If you **DO NOT** wish to remain in the Class, then you must make your request to be excluded by clicking here www.PublicStorageCAInsuranceLawsuit.com and completing an online form requesting to be excluded or by sending a request in writing to:

Perez v. Public Storage
P.O. Box 404075
Louisville, KY 40233-4075

postmarked no later than October 1, 2018.

If you request exclusion on behalf of anyone other than yourself, you must describe your legal authority to make this request. If you exclude yourself from the Class, you will not participate in any settlement or favorable judgment in the Lawsuit but you also will not be bound by an unfavorable judgment. Requesting exclusion from the Class is the only way to pursue your own lawsuit against the Defendant for the alleged claims. Otherwise, the Class representative will pursue these claims for you and the other members of the Class.

8. How to obtain further information.

If you need additional information about the Lawsuit, you should visit the website www.PublicStorageCAInsuranceLawsuit.com for answers to frequently asked questions and periodic updates, or, if you cannot find the information you need there, write to Class counsel at the addresses and phone numbers above. The pleadings and other records in this Lawsuit, including copies of the operative Complaint and the Class Certification Order, may also be examined during regular office hours at the offices of the Superior Court of California for the County of Los Angeles, located at 312 North Spring Street, Los Angeles, California 90012. Please do not contact the Court or the Defendant Public Storage with questions regarding the Lawsuit.