

NOTICE OF CLASS ACTION LAWSUIT

Martinez-Santiago v. Public Storage
United States District Court
District of New Jersey
Case No. 1:14-cv-302-JBS-AMD

DO NOT BE ALARMED. YOU ARE NOT BEING SUED. PUBLIC STORAGE'S RECORDS SHOW THAT YOU ARE A MEMBER OF THE CLASS DEFINED BELOW

**DO NOT DISCARD THIS NOTICE. A FEDERAL COURT AUTHORIZED THIS NOTICE.
THIS NOTICE AFFECTS YOUR LEGAL RIGHTS.
THIS IS NOT A SOLICITATION.
Please take time to read this notice carefully**

TO: All persons who, on or after September 24, 2007 through October 21, 2014, entered into lease agreements with Public Storage in New Jersey.

WHY DID I GET THIS NOTICE?

You received this Notice because Public Storage's records show that you entered into a lease agreement with Public Storage in New Jersey at some point from September 24, 2007 through October 21, 2014. Since Jackeline Martinez-Santiago filed this lawsuit as a "class action" and the Court certified it as a class action, the Court is requiring that you be sent this notice to give you a chance to make a decision.

If you are a member of the class, you have to make a choice:

ASK TO BE EXCLUDED	Get out of the lawsuit. Get no benefits from this lawsuit. Keep certain rights. If you do not wish to stay in this lawsuit, you may ask to be excluded. If any money or benefits are later awarded, you will not share in them. But you will keep any rights to sue Public Storage separately about the same legal claims in the lawsuit. If you wish to be excluded from the class, you must send a letter post-marked by April 15, 2016, as explained below.
DO NOTHING	Stay in the lawsuit. Await the outcome. Give up certain rights. If you wish to remain in the lawsuit, you do not need to do anything. You will keep the possibility of getting money or benefits that may come from a trial or settlement. But you will give up any rights to sue Public Storage separately about the same legal claims in the lawsuit.

SUMMARY

This notice is to inform you about the existence of a class-action lawsuit concerning Public Storage's lease agreements used in New Jersey. The lawsuit claims that Public Storage violated the New Jersey Truth-

In-Consumer Contract Warranty and Notice Act (“TCCWNA”). The Federal District Court for the District of New Jersey has certified this matter as a class action with regard to Plaintiff Jackeline Martinez-Santiago’s claim that the form lease agreements used by Public Storage between September 24, 2007 and October 21, 2014 violated TCCWNA. The lawsuit is ongoing and Public Storage denies that it said or did anything unlawful, asserts that it fully complied with its contract, and has not violated the law.

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

In a class-action lawsuit, one or more people sue on behalf of all other people who have claims that are the same or similar. The group of similar people is called the “Class” or “Class Members.” Because everyone in the Class has the same claims against the company being sued, one court can resolve the case for everyone in the Class. In this case, members of the Class may not want to be included in the Class because they wish to file their own lawsuit or for other reasons. Those consumers who are members of the Class and want to get out of the class-action lawsuit may do so by letting the Court know.

The Class to which this notice applies is defined as:

All natural persons who on or after September 24, 2007 through October 21, 2014 entered into lease agreements with Public Storage in the State of New Jersey. Excluded from the Class are Public Storage, each of its parents, subsidiaries, authorized distributors and affiliates, and its legal representatives, officers, board members and the heirs, successors, and assigns of any excluded person.

NOTICE TO ALL CLASS MEMBERS

The Court has certified this action as a class action as to whether the form lease agreements used by Public Storage in New Jersey between September 24, 2007 through October 21, 2014 violated the TCCWNA by (1) requiring the occupant to indemnify Public Storage for any loss arising out of consumers’ or their invitees’ use of the facility, including losses caused by Public Storage’s own negligence; (2) requiring consumers to hold Public Storage harmless for injuries or damage to property for any reason, including but not limited to Public Storage’s own negligence, gross negligence, or recklessness; (3) limiting consumers’ rights to raise defenses in lawsuits arising from the lease agreement to one year from the date of the occurrence giving rise to the claim; and (4) failing to identify the specific provisions in the contract that are unenforceable in New Jersey. The Court has not decided whether Public storage has violated TCCWNA. By establishing the Class and authorizing this Notice, the Court is not suggesting that Plaintiffs will win or lose this case. Plaintiffs must prove their claims at trial.

The Court has not made a determination of whether Public Storage is liable to Plaintiff or the Class. Under the TCCWNA, the Plaintiff is only seeking “a civil penalty of not less than \$100.00” for each Class Member. The Plaintiff is not seeking actual money damages, which would be a Class Member’s economic loss, if any.

If you wish to pursue actual damages, or wish to pursue your own lawsuit for any damages, you must do so by opting out or excluding yourself from this lawsuit and then commencing your own lawsuit. Your lawsuit must be filed within six (6) years after your signing of the lease agreement.

Once the Court makes a determination as to liability and the monetary award, if any, to Jackeline Martinez-Santiago and the Class, and the award of fees and expenses to class counsel and enters a final judgment, any party will have an opportunity to file an appeal to challenge the Court’s determinations. No

Class Member will receive any monetary award until all appeals are completed and there is a final judgment that can no longer be appealed. There is therefore, no guarantee that any Class Member will receive any monetary award, or if a monetary award is entered, when it will be received by Class Members.

HOW TO ASK TO BE EXCLUDED FROM THE CLASS

If you are a member of the Class and wish to exclude yourself from this matter you must notify the Class Action Notice Administrator in writing. The request must be signed and your name and address printed below your signature. All requests for exclusion from members of the Class must be postmarked on or before April 15, 2016 and mailed to the Class Action Notice Administrator at the following address:

**PS Notice Administrator
ATTN: PS Exclusion
1801 Market Street, Suite 660
Philadelphia, PA 19103**

If the request to be excluded from this matter as a member of the Class is not postmarked by April 15, 2016 you will not be excluded and you will be bound by the results of this lawsuit. If you send your request to be excluded by means other than the U.S. Postal Service your request to be excluded must be received by the Class Action Notice Administrator no later than 5:00pm on April 15, 2016

For change of address or other questions you can also contact the Class Action Notice Administrator via email NoticePS@angeiongroup.com.

GETTING MORE INFORMATION

Which lawyers represent the Class and Public Storage?

The following lawyers have been appointed as Class Counsel by the Court and represent the Class:

Michael A. Galpern, Esq.
Andrew P. Bell, Esq.
James A. Barry, Esq.
Locks Law Firm, LLC
801 N. Kings Highway
Cherry Hill, NJ 08034
mgalpern@lockslaw.com
abell@lockslaw.com
jbarry@lockslaw.com
(856) 663-8200

Charles N. Riley, Esq.
Law Offices of Charles N. Riley, LLC
900 N. Kings Highway, Suite 308
Cherry Hill, NJ 08034
criley@rileysandilos.com
(609) 206-2529

These attorneys are experienced in handling similar consumer class-action cases. You will not be charged for their services. These attorneys will get paid if the class-action lawsuit is ultimately successful and the Court approves an award of attorneys' fees. You may choose to have your own attorney represent you in this matter. If you want to be represented by your own lawyer, you will be responsible for paying his or her fees, if any. Please note that Class Counsel represents you only in this matter. Therefore, if you choose to pursue any claims that you may have in a separate matter, Class Counsel does not represent you in that separate matter.

The following lawyers represent Public Storage:

John Kearney, Esquire
Christopher Tomlin, Esquire
BALLARD SPAHR LLP
210 Lake Drive East, Ste. 200
Cherry Hill, NJ 08002
kearneyj@ballardspahr.com
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John W. Keker, Esquire
Ashok Ramani, Esquire
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633 Battery Street
San Francisco, CA 94111
JKeker@kvn.com
ARamani@kvn.com
QTa@kvn.com
RMullen@kvn.com
(415)391-5400

If your address has changed, or changes in the future, you should send your new address to the Class Action Notice Administrator at the address provided above. **DO NOT CALL THE COURT.**

HOW CAN I GET DOCUMENTS ABOUT THE CASE?

If you wish to obtain any additional information, you may get copies of the Complaint, the Answer and the Court's Orders and Opinions through the website www.NoticePS.com. Should you wish to obtain any other unsealed documents that have been filed in this case, you may request them by calling or emailing Class Counsel.

Any questions concerning the matters contained in this Notice may be directed to the Class Counsel identified above. Do not telephone the Court or the Clerk of the Court. You may also seek advice from your own individual attorney at your own expense, if you desire.

This Notice was authorized by the Honorable Jerome B. Simandle, Chief Judge, U.S. District Court for the District of New Jersey.