

If You Are An Illinois Resident And Answered A Call From Holiday Cruise Line, A Class Action Lawsuit May Affect Your Rights.

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

- A lawsuit has been filed against Consolidated World Travel, Inc., doing business as Holiday Cruise Line (“Defendant” or “CWT”), claiming that Defendant directed another company called Virtual Voice Technologies Pvt. Ltd. (“VVT”) to place telephone calls using a prerecorded voice to individuals without prior consent in violation of the Telephone Consumer Protection Act (“TCPA”). If you were an Illinois resident and answered one of these calls from December 29, 2014 through March 20, 2016, you may be included in this class action lawsuit.
- The Court has allowed the lawsuit to be a class action on behalf of all Illinois residents (1) whom VVT called from December 29, 2014 through March 20, 2016, to market a cruise aboard the Grand Celebration cruise liner sold by CWT, and (2) who answered such calls.
- The Court has not decided whether Defendant did anything wrong. There are no benefits available now, and no guarantee there will be. However, if you received one of these calls, your legal rights are affected, and you have a choice to make now:

YOUR LEGAL RIGHTS AND OPTIONS	
DO NOTHING	Stay in the lawsuit. Await the outcome. Give up certain rights. By doing nothing, you keep the possibility of getting money or benefits that may come from a trial or a settlement. But, you give up any rights to sue Defendant separately about the same legal claims made in this lawsuit.
EXCLUDE YOURSELF	Get out of this lawsuit. Keep rights. Give up possibility of getting money or benefits if obtained. If you ask to be excluded and money or benefits are later awarded, you won’t share in those. But, you keep any rights to sue Defendant separately about the same legal claims made in this lawsuit.

- Your options – and the deadlines to exercise them – are explained in this notice. To ask to be excluded, you must act before November 15, 2019.
- Lawyers must prove the claims against Defendant at a trial. If money or benefits are obtained from Defendant, you will be notified about how to ask for a share.

BASIC INFORMATION

1. Why did I get this notice?

This notice explains that the Court has allowed, or “certified,” a class action lawsuit that may affect you. You have legal rights and options that you may exercise before the Court holds a trial. The trial is to decide whether the claims being made against Defendant, on your behalf, are correct. Judge Harry D. Leinenweber of the United States District Court for the Northern District of Illinois is overseeing this class action. The lawsuit is known as *Angel Bakov v. Consolidated World Travel, Inc.*, Case No. 1:15-cv-02980.

2. What is this lawsuit about?

The lawsuit alleges that Defendant placed calls using prerecorded voice to individuals without prior consent in violation of the federal Telephone Consumer Protection Act.

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called “Class Representatives” (in this case, Angel Bakov, Julie Herrera, and Kinaya Hewlett) sue on behalf of other people who have similar claims. Together, these people are referred to as a “Class” or “Class Members.” The named plaintiffs who sued – and all the Class Members like them – are called the Plaintiffs. The company they sued (in this case, Consolidated World Travel, Inc.) is called the Defendant. One court resolves the issues for everyone in the Class – except for those people who choose to exclude themselves from the Class.

4. Am I part of this Class?

The Court has allowed the lawsuit to be a class action on behalf of all Illinois residents (1) whom VVT called from December 29, 2014 through March 20, 2016, to market a cruise aboard the Grand Celebration cruise liner sold by CWT, and (2) who answered such calls.

5. What did the calls say?

Calls to Class Members all began the same way: “Hi, this is Jennifer with Holiday Cruise Line on a recorded line. Can you hear me okay?”

6. Why is this lawsuit a class action?

The Court decided that this lawsuit can be a class action and move towards a trial because it meets the requirements of Federal Rule of Civil Procedure 23, which governs class actions in federal courts.

More information about why the Court is allowing this lawsuit to be a class action is in the [Court’s Order Certifying the Class](#), which is available at www.cruisecallsclassaction.com.

THE CLAIMS IN THE LAWSUIT

7. What does the lawsuit complain about?

Plaintiffs allege that from December 29, 2014 through March 20, 2016, Defendant made or caused calls to be made using a prerecorded voice in violation of the federal Telephone Consumer Protection Act. You can read [Plaintiffs’ Complaints](#) at www.cruisecallsclassaction.com.

8. How does Defendant answer?

Defendant denies any wrongdoing and denies the Plaintiffs’ allegations. You can read [Defendant’s answers to the complaints](#) at www.cruisecallsclassaction.com.

9. Has the Court decided who is right?

The Court hasn’t decided whether the Defendant or the Plaintiffs are right. By establishing the Class and issuing this notice, the Court is not suggesting that the Plaintiffs will win or lose this case. The Plaintiffs must prove their claims in the litigation, including at a trial, if necessary.

10. What are the Plaintiffs asking for?

The Plaintiffs are generally asking the Court to award at least \$500 per call answered by Class Members.

No money or benefits are available now because the Court has not yet made a final decision whether Defendant did anything wrong, and the two sides have not settled the case. There is no guarantee that money or benefits ever will be obtained. If they are, you will be notified about how to ask for a share.

YOUR RIGHTS AND OPTIONS

You have to decide now whether to stay in the Class or ask to be excluded before the trial, and you have to decide this now.

11. What happens if I do nothing at all?

You don't have to do anything now if you want to keep the possibility of getting money or benefits from this lawsuit. By doing nothing, you are staying in the Class. If you stay in the Class and money or benefits are awarded, either as a result of the trial or a settlement, you will be notified about how to apply for a share.

Keep in mind that if you do nothing now, regardless of whether the Class Representatives win or lose the trial, you will not be able to separately sue, or continue to sue, Defendant – as part of any other lawsuit – for the same legal claims that are included in this lawsuit. You will also be legally bound by all of the Orders the Court issues and judgments the Court makes in this class action.

12. Why would I ask to be excluded?

If you exclude yourself from the Class – which is sometimes called “opting out” of the Class – you won't get any money or benefits from this lawsuit even if the Plaintiffs obtain them as a result of the trial or from any settlement (that may or may not be reached) between Defendant and Plaintiffs. However, you will be able to separately sue or continue to sue Defendant for the legal claims that are included in this lawsuit. If you exclude yourself, you will not be legally bound by the Court's judgments in this class action.

If you exclude yourself so you can start or continue your own lawsuit against Defendant, you should talk to your own lawyer soon, because your claims may be subject to a statute of limitations. If you decide to bring your own lawsuit against Defendant, you will have to hire and pay your own lawyer for that lawsuit, and you will have to prove your claims.

13. How do I exclude myself from the Class?

To exclude yourself from the Class, you must send a request for exclusion *postmarked no later than* November 15, 2019 to:

Bakov v. Consolidated World Travel Class Administrator
c/o KCC Class Action Services
P. O. Box 43501
Providence, RI 02940-3501

Your request for exclusion *must* contain: (1) the name of this lawsuit, “*Angel Bakov v. Consolidated World Travel, Inc.*, Case No. 1:15-cv-02980 (N.D. Ill.)”; (2) your full name and current address; (3) a clear statement of your intention to exclude yourself, for example “I wish to be excluded from the Class”; and (4) your signature. You may also use the [Exclusion Request Form](#) available at www.cruisecallsclassaction.com.

THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in this case?

Yes, the Court appointed the law firms of Bursor & Fisher, P.A. and Lite DePalma Greenberg, LLC to represent the Plaintiffs and all Class Members as “Class Counsel.” More information about these law firms, their practices, and their lawyers' experience is available at www.bursor.com and www.litedepalma.com.

15. Should I get my own lawyer?

If you choose to remain in the Class, you do not need to hire your own lawyer because Class Counsel are working on your behalf. But, if you want your own lawyer, you may hire one at your own expense. For example, you can ask him or her to appear in Court for you if you want someone other than Class Counsel to speak for you.

16. How will the lawyers 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 pay these fees and expenses. If the Court grants Class Counsel's request, the fees and expenses would be either deducted from any money obtained for the Class or be paid separately by Defendant.

THE TRIAL

17. How and when will the Court decide who is right?

As long as the case isn't resolved by a settlement or otherwise, Class Counsel will have to prove the Plaintiffs' claims in this litigation at a trial. There is no guarantee that the Plaintiffs will win, or that they will get any money for the Class. The Court has not scheduled a trial date yet. If and when it occurs, the trial will be held at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604.

18. Do I have to come to the trial?

You do not need to attend the trial. Class Counsel will present the case for the Class Members, and Defendant will present the defenses. You are welcome to come at your own expense. If you wish to participate in the trial, you should contact Class Counsel.

19. Will I get money after the trial?

If the Class obtains money or benefits as a result of the trial or a settlement, you will be notified about how to participate and how to apply for a determination as to whether or not you are a Class Member. You may be required to establish membership in the class by affidavit or other evidence to receive benefits.

GETTING MORE INFORMATION

20. Are more details available?

Visit the website, at www.cruisecallsclassaction.com, where you will find the [Court's Order Certifying the Class](#), the [Plaintiffs' Complaints](#), [Defendant's Answers](#), and an [Exclusion Request Form](#).

You may also contact the Class Administrator by calling 1-855-445-9439, or by writing to: *Bakov v. Consolidated World Travel* Class Administrator, c/o KCC Class Action Services, P. O. Box 43501, Providence, RI 02940-3501.

PLEASE DO NOT CALL OR WRITE TO THE COURT FOR INFORMATION OR ADVICE.

DATED: September 16, 2019

**BY ORDER OF THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS**