

PLAINTIFFS EXHIBIT A:

**NOTICE TO ALL MEMBERS OF THE CERTIFIED CLASS IN GERALD K. KANDEL v. UNITED STATES, No. 06-872C, WITH RESPECT TO YOUR LAWYERS' MOTION TO HAVE THE UNITED STATES GOVERNMENT PAY ALL THE FEES AND EXPENSES INCURRED BY YOUR LAWYERS AND BY THE CLASS ACTION ADMINISTRATOR**

PLAINTIFFS' COUNSEL HAS MADE A MOTION TO THE COURT **FOR PAYMENT BY THE UNITED STATES** OF THE COURT-APPOINTED PLAINTIFFS' COUNSELS' ATTORNEY FEES AND OUT-OF-POCKET EXPENSES IN THE LITIGATION OF THIS CASE FOR FIFTEEN YEARS SINCE 2006, INCLUDING THE FEES AND COSTS OF THE COURT-APPOINTED CLASS ACTION ADMINISTRATOR TO THE END OF THE CASE—

**YOU AND ALL OTHER MEMBERS OF THE CERTIFIED CLASS WILL NOT PAY ANY OF THE FEES AND EXPENSES BECAUSE IF THE COURT ORDERS SUCH PAYMENT, ONLY THE UNITED STATES GOVERNMENT WILL BE REQUIRED TO PAY ALL OF THE FEES AND EXPENSES**

*Because you will not pay any fees and costs*, Class Counsel will retain any payment by the United States of fees and costs which they have incurred as fees and out-of-pocket expenses in this litigation. Class Counsel has requested that the Court award them reasonable fees and expenses pursuant to the Equal Access To Justice Act, 28 U.S.C. § 2412(a), (b) (and/or Section (d)(1)(A) of the “Equal Access to Justice Act”). Class Counsel has also requested that the Court award Epic Class Action and Claims Adjustments, Inc. (“Epic”) reasonable fees and costs which the court-appointed Class Action Administrator has incurred in this litigation over a period of years.

**Read this notice carefully. If you wish to object to the proposed motion by Class Counsel *to have the United States pay all the fees and expenses of your lawyers*, and all the fees and costs of the Class Action Administrator (“Epic”), either in writing or during a forthcoming hearing to be held by the Court as to whether or not to approve your lawyers' motion to have the UNITED STATES GOVERNMENT PAY THE FEES AND EXPENSES, you may do so by filing your objection in this case to the United States Court of Federal Claims in writing in Washington, D.C.**

**This notice is intended to inform you and all class members that you are not required to take any additional action as a class member at this time but as a member of the Class, you may approve of, object to, or comment on the motion of Class Counsels' request for fees and expenses to be paid only by the United States.**

This notice is intended to provide you with general information about the Motion by your lawyers **TO HAVE THE UNITED STATES GOVERNMENT PAY ALL THE FEES AND EXPENSES OF THE LAWYERS AND THE FEES AND COSTS OF THE CLASS ACTION ADMINISTRATOR**, and any proposed settlement of the motion to pay the fees and expenses of this class action. You may request additional information, including information concerning Class Counsel's request for fees, by contacting THE CLASS ACTION ADMINISTRATOR at the address listed on this website.

If the Court holds a hearing via video conferencing at the United States Court of Federal Claims, 717 Madison Place, NW, Washington, DC 20439, to determine whether it should approve the proposed motion to have the United States Government pay all the fees and expenses of Plaintiffs' lawyers and the fees and costs of the Class Action Administrator, you will be notified on THIS WEBSITE. If you have an objection to this motion, you must so state as part of your timely filed objection. Written objections to the proposed settlement by class members will be considered by the Court, but only if such objections are filed in writing with the Clerk of the Court by mail postmarked no later than a date which will be posted on THIS WEBSITE.

**Class members who support the proposed MOTION do not need to take any action to indicate their approval.** For more information about this case, you may call the Class Administrator toll-free at (866) 329-5558, or visit the class website at [www.FedLumpSum.com](http://www.FedLumpSum.com).