



One Liberty Place
1650 Market Street, Suite 3600
Philadelphia, PA 19103
Tel: 267-507-6085
Fax: 267-507-6048
www.GrabarLaw.com

Joshua H. Grabar, Esq.
E-Mail: jgrabar@grabarlaw.com

April 14, 2024

Via E-mail

Re: Vessel, Boat, and Yacht Broker Commission Antitrust Litigation Investigation

Dear _____:

I hope this letter finds you well. As you are aware, my firm has investigated possible violations of federal antitrust law by the major brokers for vessel, boat and yacht sales, including: Boats Group, LLC; Permira Advisers, LLC; Yatco, LLC; International Yacht Broker's Association, Inc.; Yacht Broker's Association of America; United Yacht Sales, LLC; Denison Yacht Sales, Inc.; Denison New Yachts, LLC; Northrop & Johnson Yacht Sales, LLC; HMY Yacht Sales, Inc.; Galati Yacht Sales, LLC; Marinemax, Inc.; Sharon & Jack Malatich, LLC; Tournament Yacht Sales, LLC; RJC Yacht Sales, Inc.; The Multihull Company, LLC; Sunshine Cruising Yachts LLC; and Catamaran Sales, Inc.

It is alleged that the aforementioned Defendants conspired to artificially inflate the broker commissions (commonly 10%) paid by those persons who sold a vessel, boat, or yacht (collectively referred to herein as a "Yacht") via relevant Multiple Listing Services (the "Yacht MLSs") from at least March 26, 2020, to the present. It is alleged that the Defendants have arranged the Yacht MLSs in a way that hides information from the public. This setup provides brokers with an unfair advantage, leading to commissions that are higher than what would exist in a competitive market. Additionally, the alleged conspiracy effectively prevents sellers from engaging in private transactions without involving brokers.

We understand that you paid commission(s) to at least one of the Defendants listed above during the damages period. Therefore, you likely have standing to bring a claim. Based on our investigation, we believe the matter has substantial merit.

Countersigning this letter will confirm that you have retained Grabar, LLC, d/b/a Grabar Law Office (the "Law Firm"), as your counsel to investigate, and if appropriate, bring an action alleging violations of federal law as previously described. The action will be brought as a class action on behalf of all persons and entities that we determine have been adversely affected by the violations alleged in the complaint. The Law Firm has agreed to bring this action on a contingency basis. **You will not be responsible for paying any of the Law Firm's fees in connection with this litigation.** Our attorneys' fees and reimbursement of our expenses will be paid as the Court may permit and approve out of any proceeds, by judgment or out-of-court settlement that may be obtained for the benefit of the plaintiffs and class members. The Law Firm will be working in coordination with, and may affiliate as co-counsel with, other law firms in litigating this matter. The Law Firm together with all other such attorneys will advance the costs of the case. **You will not be responsible for paying any of the attorneys' expenses in connection with this litigation.** The Law Firm together with all other such attorneys will also indemnify you for any direct costs associated with participation in the lawsuit, should there be any.

I am forwarding a filed complaint for you to review, and will forward a draft complaint for you to review and accept prior to filing on your behalf.

Grabar Law Office

Page 2

By countersigning this letter, you further confirm that I have advised you that you should not destroy or alter, and that you should retain and preserve, any and all papers or electronic files which relate in any way to your interactions and transactions with the Defendants in this action, and to the claims asserted in this action generally. This preservation confirmation includes not only preservation of hard copy paper but also of data generated by and/or stored on your electronic storage media (*e.g.*, hard drives, floppy disks, back-up tapes or other electronic media, if any).

Please countersign this letter and return it to me via DocuSign, e-mail at jgrabar@grabarlaw.com, or fax to 267-507-6048 to indicate your agreement and authorization to proceed with filing this case on your behalf. If you have any questions, please do not hesitate to call me at my office or my cellular phone. I will, of course, be pleased to answer any questions you may have.

I appreciate this opportunity to represent you in this matter and hope that it can be concluded to your satisfaction.

Agreed and Acknowledged:

Date _____

Joshua H. Grabar, Esq.
Grabar Law Office