

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

GRANT GALLAGHER, *et. al*,
and all others similarly situated,

Plaintiffs,

v.

JUST4VETERANS LLC, *et. al*,

Defendants.

Case No.: C-15-CV-23-003578

PROPOSED FINAL APPROVAL ORDER AND JUDGMENT

Upon consideration of Plaintiff's Unopposed Motion for Final Approval of Class Action Settlement filed by Plaintiffs Grant Gallagher and Emily Heibel, individually and on behalf of the Certified Class (collectively, the "Plaintiffs"), and Defendants Just4Veterans LLC and Frederick Castanos Justo (collectively, the "Defendants," and together with the Plaintiffs, the "Parties") having no opposition to the requested relief, the Class Action Settlement Agreement¹ executed on May 22, 2026 ("Settlement Agreement"), including all exhibits, the Court's Order Granting Preliminary Approval dated June 30, 2026, the Declaration(s) of the Settlement Administrator, the arguments of counsel, and the entire record, and after notice to the Settlement Class and a Final Fairness Hearing conducted on October 14, 2026, the Court hereby **FINDS** and **ORDERS** as follows:

1. The Court has jurisdiction over the subject matter of the Action, the Parties, the Class Representatives, the Settlement Class Members, and the Settlement Administrator pursuant to Md. Rule 2-231.

Entered: Clerk, Circuit Court for
Montgomery County, MD
October 16, 2026

¹ All capitalized terms not otherwise defined in this Final Approval Order and Judgment shall have the same meaning as in the Settlement Agreement.

2. The Court confirms its February 13, 2025 Class Certification Order and the clarification adopted at Preliminary Approval. For Settlement purposes, the Court finally certifies the following Settlement Class under Md. Rule 2-231:

“All veterans who were charged by or paid a fee to Just4Veterans LLC in connection with a VA disability claim on or after September 20, 2020.”

3. The Court maintains the appointment of Grant Gallagher and Emily Heibel as Class Representatives for the Settlement Class and Jon D. Pels, Esq., Alvaro A. Llosa, Esq., and Jesus Zelaya, Esq., of The Pels Law Firm, LLC as Class Counsel for the Settlement Class.

4. The Court finds that the Settlement Class has received proper and adequate notice of the Settlement, the Fairness Hearing, Class Counsel’s intention to seek Attorneys’ Fees and Expenses and Service Awards, and the Plan of Allocation, such notice having been given in accordance with the Preliminary Approval Order, and complies with the requirements of Md. Rule 2-231 and due process. The notice was reasonably calculated to apprise Settlement Class Members of the Settlement, their rights, and relevant deadlines.

5. The Claim Form, claim-processing procedures, deficiency cure procedures, and eligibility determinations were fair, reasonable, and adequate.

6. The Court grants Final Approval of the Settlement as fair, reasonable, and adequate pursuant to Md. Rule 2-231, and more particularly finds that:

- (a) The Settlement was reached after arm’s-length negotiations by capable counsel;
- (b) The Settlement provides substantial monetary and non-monetary benefits;
- (c) The Settlement treats Class Members equitably, distinguishing between “paid” and “charged-only” members in a permissible and rational manner;
- (d) The Plan of Allocation fairly and reasonably distributes the Net Settlement Fund to Eligible Claimants;

- (e) The release and fee-forgiveness provisions are appropriately tailored to the claims asserted;
- (f) The injunctive relief provisions are appropriately tailored to the claims asserted;
- (g) Continued litigation would be lengthy, expensive, and uncertain;
- (h) The Court has duly considered and overruled any filed objection(s) to the Settlement to the extent there were any.

7. The Settlement Administrator has submitted a Declaration identifying all persons who timely and validly requested exclusion (“Opt-Out Clients”). Those individuals who have timely and validly requested exclusion shall not receive Settlement benefits, and are not bound by the Settlement.

8. Upon the Effective Date, as defined in the Settlement Agreement,² the Settlement Agreement and this Judgment shall be binding on all Settlement Class Members who have not timely and validly requested exclusion.

9. Settlement Class Members (except Opt-Out Clients) are deemed to have fully released and forever discharged the Released Parties from all Released Claims as defined in the Settlement Agreement.

10. The Class Representatives and the Class Members, acting individually or together, or in combination with others, are hereby permanently and finally barred and enjoined from suing the Released Parties in any action or proceeding alleging any of the Released Claims.

11. Each Class Member (except Opt-Out Clients) hereby releases the Released Parties, Defense Counsel, and Class Counsel for any claims, liabilities, and Attorneys’ Fees and Expenses

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Montgomery County, MD
October 16, 2026

² The Effective Date is the first date on which all the following have occurred: (a) all parties and counsel have executed the Agreement, (b) the Court has entered a Final Approval Order, (c) the time for all appeals have expired, and (d) the Action has not been dismissed or vacated in a manner other than pursuant to settlement. *See* Settlement Agreement at ¶ 15.

arising from the allocation of the Net Settlement Fund and for all tax liability and associated penalties and interest as well as related Attorneys' Fees and Expenses.

12. Without limiting the foregoing:

- J4V shall not collect, enforce, or accept payment of any unpaid fees or charges from any Settlement Class Member for VA-Related Services provided before the Effective Date.
- J4V may collect unpaid fees from the Opt-Out Clients who excluded themselves from the Settlement, and individuals who do not meet the Class Member definition.

13. The Court approves the Plan of Allocation as fair, reasonable, and adequate. The Settlement Administrator shall distribute the Net Settlement Fund in accordance with the Plan of Allocation and the Settlement Agreement. The Settlement Administrator shall have final authority to determine the share of the Net Settlement Fund to be allocated to each Class Member in accordance with the Plan of Allocation, subject to Court oversight as provided therein.

14. No Eligible Claimant shall receive more than the total amount they actually paid J4V during the Class Period.

15. Residual funds, if any, shall be distributed in accordance with the Plan of Allocation and subject to Court approval, as necessary.

16. Class Counsel's application for Attorneys' Fees and Expenses shall be determined separately by the Court following submission of the application in accordance with the Preliminary Approval Order's deadline of October 30, 2026.

17. Class Counsel's application for Service Awards to the Class Representatives Grant Gallagher and Emily Heibel shall likewise be determined separately by the Court following submission of the application in accordance with the Preliminary Approval Order's deadline of October 30, 2026.

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18. The Court approves the injunctive relief provisions set forth in the Settlement Agreement, requiring J4V to cease entering into new agreements to provide VA-Related Services and to cease soliciting or accepting new clients for VA-Related Services, beginning on the Execution Date of May 22, 2026. Consistent with the Settlement Agreement, this obligation applies solely to J4V, the Maryland entity, and nothing herein imposes obligations upon any nonparty.

19. Upon the Effective Date, Defendants shall fully discharge, waive, and release all rights to collect fees from Settlement Class Members for VA-Related Services provided before the Effective Date, as provided in the Settlement Agreement. Any corresponding contracts, invoices, or payment obligations shall be null, void, and unenforceable to the extent provided in the Settlement Agreement.

20. The Court approves payment of the Settlement Administrator's fees and expenses by Defendants as provided in the Settlement Agreement.

21. The Settlement Administrator shall complete administration and file a Final Report upon completion of all distributions.

22. The Court retains continuing and exclusive jurisdiction over:

- implementation of the Settlement;
- interpretation of the Settlement Agreement;
- administration and distribution of the Settlement Fund;
- enforcement of the Release and Judgment;
- resolution of any disputes;
- entry of any further orders necessary to effectuate the Settlement.

This jurisdiction is retained without limitation as to duration.

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Montgomery County, MD
October 16, 2026

23. Any motion to enforce this Final Approval Order or the Settlement Agreement, including by way of injunction, may be filed in this Court, and the provisions of the Settlement Agreement and/or this Final Approval Order may also be asserted by way of an affirmative defense or counterclaim in response to any action that is asserted to violate the Settlement Agreement.

24. In the event that the Settlement Agreement is terminated, in accordance with its terms, this Final Approval Order shall be rendered null and void, *ab initio*, and shall be vacated *nunc pro tunc*, and the Action shall revert to its status as of the day immediately before the day the Settlement was executed. The Parties shall be afforded a reasonable opportunity to negotiate a new case management schedule.

25. Upon entry of this Final Approval Order, all Parties, and the Settlement Class shall be bound by the Settlement Agreement and this Final Approval Order.

26. This Final Approval Order constitutes **Final Judgment** pursuant to Md. Rule 2-601, and the Parties are hereby directed to take the necessary steps to effectuate the terms of the Settlement Agreement.

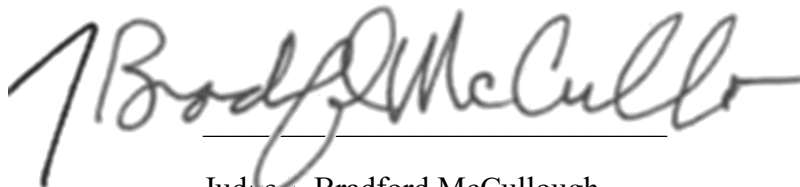
27. The Clerk is directed to enter this Judgment forthwith.

28. This Action is hereby **dismissed with prejudice**, with each Party bearing its own costs except as provided in the Settlement Agreement or Orders of this Court.

10/14/2026 9:24:51 AM

SO ORDERED this ____ day of 10/14/2026, 2026.

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Judge J. Bradford McCullough
Circuit Court for Montgomery County, Maryland