

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

If you signed up to compete in the canceled “Energy for Swim 2018” event organized by the International Swimming League and the Italian Swimming Federation that was scheduled to be held in December of 2018; or signed a contract to compete in the 2019 International Swimming League season, your rights may be affected by a class action lawsuit.

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

- A class action lawsuit has been filed against the Defendant World Aquatics (formerly Fédération Internationale de Natation).
- The lawsuit alleges that World Aquatics violated federal antitrust law by organizing a group boycott against the International Swimming League (“ISL”), which prevented ISL from holding professional swimming competitions in 2018 and 2019 that otherwise would have given elite swimmers opportunities to collectively earn appearances fees and prize money.
- You may be included in the lawsuit if you signed a contract with the ISL to compete in the ISL’s swimming events in 2018 or 2019.

YOUR LEGAL RIGHTS AND OPTIONS	
DO NOTHING	If you do nothing, you are choosing to stay in the lawsuit. You will be eligible to share in any money that may be obtained through continued litigation or settlement. You will be bound by past and any future court rulings on, or settlement of, the claims against Defendant, and you will not be able to pursue your own claims against them.
EXCLUDE YOURSELF	If you exclude yourself from the lawsuit (<i>i.e.</i> , opt out), you will not share in any money that may be obtained in this case through continued litigation or settlement. You will not be bound by any past or future rulings against Defendant. You may pursue your own claims against Defendant.

- These rights and options—and the deadlines to exercise them—are explained in this notice.
- Your legal rights are affected whether you act or not. Please read this entire notice carefully.

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION.....	3
1. Why was this notice issued?	3
2. What is a class action?	3
3. Why is this lawsuit a class action?	3
THE CLAIMS IN THE LAWSUIT	3
4. What is this lawsuit about?	3
5. How does the Defendant answer?	3
6. Has the Court decided who is right?	3
7. What are the class representatives asking for on behalf of the classes?	3
WHO IS INCLUDED?	4
8. How do I know if I am included in the lawsuit?	4
YOUR RIGHTS & OPTIONS	4
9. What are my options?	4
10. What happens if I do nothing?	4
11. What happens if I ask to be excluded from the Damages Class?	4
12. How do I opt out of the Damages Class?	4
13. How do I stay up to date on the status of the lawsuit?	5
THE LAWYERS REPRESENTING YOU.....	5
14. Do I have a lawyer in the case?.....	5
15. Should I get my own lawyer?	5
16. How will the lawyers be paid?	5
THE TRIAL	5
17. How and when will the Court decide who is right?	5
18. Do I have to come to the trial?	5
19. Will I get money after the trial?	5
GETTING MORE INFORMATION.....	5
20. How do I get more information?	5

BASIC INFORMATION

1. Why was this notice issued?

This notice was issued because the Court has allowed, or “certified,” a class action lawsuit that may affect you. This notice explains the lawsuit, who is included, and your legal rights and options.

Judge Jacqueline Scott Corley of the United States District Court for the Northern District of California is overseeing this lawsuit. The case is titled *Shields, et al. v. Fédération Internationale de Natation*, Case No. 3:18-cv-07393-JSC. The people who initiated this case are called the Plaintiffs. The entity the Plaintiffs sued is World Aquatics (formerly Fédération Internationale de Natation), which is called the Defendant.

2. What is a class action?

In a class action, one or more people called class representatives (in this case, Thomas A. Shields and Katinka Hosszú) sue on behalf of people who have similar claims. Together, the class representatives and the people represented by them are called a class or class members. One court resolves the claims of all class members, except for those who exclude themselves from the litigation.

3. Why is this lawsuit a class action?

The Court decided that this lawsuit can be a class action because it meets the requirements of Federal Rule of Civil Procedure 23(b)(3), which governs class actions in federal courts. Specifically, the Court found that:

- The number of individuals alleged to have been affected by World Aquatics’ conduct is sufficiently numerous;
- There are legal questions of fact that are common to the class;
- The class representatives’ claims are typical of the claims of the rest of the class;
- The class representatives, and the lawyers representing the class, will fairly and adequately represent the interests of the class;
- The common legal questions and facts are more important than questions that affect only individuals; and
- This class action will be more efficient than having many individual lawsuits.

THE CLAIMS IN THE LAWSUIT

4. What is this lawsuit about?

Plaintiffs filed this class action lawsuit against World Aquatics. The Plaintiffs allege that World Aquatics violated federal antitrust law by using its power as the international governing body for swimming to block ISL’s efforts to launch a competing swimming league in 2018 and then damaging its ability to compete beginning in 2019. The Plaintiffs allege that World Aquatics’ actions prevented ISL from hosting a swimming competition in Turin, Italy in December of 2018, and additional ISL events in 2019, harming swimmers who would have earned prize money and appearance fees at those events if they had taken place. The Plaintiffs also seek a court order preventing World Aquatics from enacting or enforcing any rules that restrict or penalize swimmers for competing in events or leagues not sanctioned by World Aquatics, or rules that restrict the ability of competing leagues or competitions to conduct events either separately or with national federations.

A copy of the Class Action Complaint is available at www.SwimmersClassAction.com.

5. How does the Defendant answer?

World Aquatics denies that it engaged in anticompetitive conduct that prevented swimmers from competing in ISL events and denies that World Aquatics’ conduct prevented or impeded ISL from hosting swimming competitions in 2018 and 2019.

A copy of Defendant’s Answer to the Class Action Complaint is available at www.SwimmersClassAction.com.

6. Has the Court decided who is right?

No, the Court has not decided whether the Plaintiffs or Defendant are correct. By establishing the class and issuing this notice, the Court is not suggesting that the class representatives will win or lose the case. The class representatives must prove their claims at a trial.

7. What are the class representatives asking for on behalf of the classes?

The class representatives are asking for money damages to compensate swimmers who had contracts to compete in ISL events in 2018 and 2019 that did not occur because of the alleged anticompetitive conduct by World Aquatics. The monetary damages

represent the remaining amounts in 2018 that class members would have received in prize money and appearance fees from ISL had the swimming competition scheduled for December 2018 in Turin, Italy occurred, and the estimated amounts that class members would have received in 2019 in appearance fees and prize money had ISL been able to hold additional events in 2019. In addition, the class representatives are seeking a court order (or “injunction”) on behalf of an injunctive relief class (defined below) to prevent World Aquatics from interfering with swimmers’ ability to earn additional compensation by competing in professional swimming events, including events held by swimming leagues that are not sanctioned by World Aquatics, in the future.

There is no money available now and no guarantee there ever will be.

WHO IS INCLUDED?

8. How do I know if I am included in the lawsuit?

The lawsuit includes two types of groups or “classes” of swimmers, Damages and Injunctive, as defined below:

Damages Class, consisting of two subclasses:

- **2018 Damages Class:** All swimmers who signed contracts to participate in the International Swimming League’s December 2018 event set to take place in Turin, Italy;
- **2019 Damages Class:** All swimmers who signed contracts to participate in the International Swimming League’s 2019 season.

Injunctive Class:

- All Swimmers who signed contracts to participate in the International Swimming League from January 1, 2018 through the date of trial.

YOUR RIGHTS & OPTIONS

9. What are my options?

If you are a member of one of the classes (altogether, the “class”), you have two options:

- Do nothing, remain in the lawsuit, and await the outcome; or
- Exclude yourself (*i.e.*, opt out) from the lawsuit.

If you are a member of the Injunctive Class:

- You will be bound by the outcome of the litigation. You do not have the ability to opt out of the Injunctive Class.

The Injunctive Class does not seek any money damages. If you are a member of the Damages Class and you would like to be eligible for money damages if Plaintiffs are successful at trial or settle on behalf of the Damages Class, you must remain in the Damages Class.

10. What happens if I do nothing?

If you do nothing, you are choosing to remain in the lawsuit as part of the Damages Class. You will keep the right to share in any money or benefits that may come from a trial or settlement of this lawsuit. However, you will give up your right to start another lawsuit, continue another lawsuit, or be part of any other lawsuit against the Defendant about the legal issues raised or that could have been raised in this case. All of the Court’s orders in the case will apply to you and legally bind you. You will also be bound by any judgment in the lawsuit.

11. What happens if I ask to be excluded from the Damages Class?

If you ask to be excluded or “opt out” of the lawsuit on behalf of the Damages Class, you won’t get any portion of the money that the Plaintiffs may obtain from the trial or any settlement. However, you will not be legally bound by any of the Court’s orders in this class action or any judgment or release entered in this lawsuit. You will keep your right to start another lawsuit, continue another lawsuit, or be part of another lawsuit against World Aquatics in the future about the legal issues in this case. If you exclude yourself so that you can start, or continue, your own lawsuit against the Defendant, you should talk to your own lawyer soon. Your claims may be subject to a statute of limitations defense, which means your claims may expire.

12. How do I opt out of the Damages Class?

To exclude yourself, you must send a letter or an email to the Notice Administrator stating that you want to be excluded from the Class in *Shields, et al. v. Fédération Internationale de Natation*, Case No. 3:18- cv-07393-JSC. Your letter must include your name,

address, telephone number, which Damages Class subclass(es) you are a part of (*i.e.*, 2018 Damages Class and/or 2019 Damages Class) and your signature.

You must either mail your exclusion request to the Notice Administrator at the below address, so it is postmarked by **July 12, 2025**, **OR** email your exclusion request to the Notice Administrator at info@swimmersclassaction.com

Shields, et al. v. Fédération Internationale de Natation Notice Administrator
P.O. Box 301132
Los Angeles, CA 90030-1132.

You cannot opt out of the Injunctive Class.

13. How do I stay up to date on the status of the lawsuit?

If you would like to receive updates about the lawsuit, including any compensation that may become available, go to www.SwimmersClassAction.com and enter your contact information. The information you provide will be used to send you an email or postal mailing as updates become available.

THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in the case?

If you remain in the class, yes, the Court has already appointed lawyers from Winston & Strawn LLP to represent you and other class members. These lawyers are called class counsel. More information about this law firm and lawyers can be found at www.winston.com/en. You can contact Jeffrey Kessler of Winston & Strawn at jkessler@winston.com and Jeanifer Parsigian of Winston & Strawn at jparsigian@winston.com.

15. Should I get my own lawyer?

You do not need to hire your own lawyer because class counsel is working on your behalf. However, if you wish to do so, you may hire your own lawyer at your own expense.

16. How will the lawyers be paid?

If class counsel obtains money or benefits for the Damages and/or Injunctive Class, they will ask the Court to award them reasonable attorneys' fees, as well as reimbursement of expenses. If the Court grants class counsel's requests, these fees and expenses would either be deducted from any money obtained for the Damages Class or would be paid separately by the Defendant.

THE TRIAL

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

The Court will hold a trial in this case which is scheduled to begin January 12, 2026, at the United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102. During the trial, a jury will hear all of the evidence to help them reach a decision about whether the Plaintiffs or Defendant are right about the claims in the lawsuit.

18. Do I have to come to the trial?

No, you do not need to attend the trial. Class counsel will present the case for the Plaintiffs, and counsel for the Defendant will present the defenses. You or your own lawyers are welcome to come at your own expense.

19. Will I get money after the trial?

If class counsel obtains money or benefits as a result of the trial or a settlement, a new notice will be issued and contain information on the money or benefits, including whether you are entitled to any share of the money damages and how to obtain your share.

GETTING MORE INFORMATION

20. How do I get more information?

More information is available at www.SwimmersClassAction.com; by sending an email to info@SwimmersClassAction.com; or by writing to *Shields, et al. v. Fédération Internationale de Natation* Notice Administrator, P.O. Box 301132, Los Angeles CA 90030-1132.

Complete copies of public pleadings, court rulings, and other filings are also available by accessing the court docket for this case, for a fee, through the Court's PACER system at <https://ecf.cand.uscourts.gov>, or visiting the Clerk of the Court at the address listed above between 9:00 a.m. and 4:00 p.m. on Monday through Friday, excluding court holidays.