

# **EXHIBIT 6**

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

## **If You Bought Gray Line or CitySights “Hop-On, Hop-Off” Bus Tours in New York City,**

### **You May be Eligible for a Payment from a Class Action Settlement.**

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

- A Settlement has been reached with Twin America, LLC, Coach USA, Inc., International Bus Services, Inc., CitySights LLC, and City Sights Twin, LLC in a class action lawsuit about fixing ticket prices for “hop-on, hop-off” bus tours.
- Generally, the Settlement includes anyone who bought Gray Line or CitySights tickets for “hop-on, hop-off” bus tours in New York City from February 1, 2009 until Month 00, 2014 (*see* Question 6).
- The \$19 million Settlement will pay up to \$20 for each class member’s ticket to class members who file valid claims (*see* Question 12).

**Your legal rights are affected even if you do nothing. Please read this notice carefully.**

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>	
<b>SUBMIT A CLAIM</b>	The only way to get a payment.
<b>ASK TO BE EXCLUDED</b>	Get no benefits from the Settlement. This is the only option that allows you to participate in any other lawsuit against the Defendants about the claims in this case.
<b>OBJECT</b>	Write to the Court if you don’t like the Settlement.
<b>GO TO A HEARING</b>	Ask to speak in Court about the fairness of the Settlement.
<b>DO NOTHING</b>	Get no payment. Give up rights.

- These rights and options—**and the deadlines to exercise them**—are explained in this notice.
- The Court in charge of this case still has to decide whether to approve the Settlement. Payments will only be made if the Court approves the Settlement and after any appeals are resolved. Please be patient.

**QUESTIONS? CALL 1-800-000-0000 OR VISIT [WWW.TOURBUSSETTLEMENT.COM](http://WWW.TOURBUSSETTLEMENT.COM)**

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QUESTIONS? CALL 1-800-000-0000 OR VISIT [WWW.TOURBUSSETTLEMENT.COM](http://WWW.TOURBUSSETTLEMENT.COM)

## BASIC INFORMATION

### 1. Why is there a notice?

A Court authorized this notice because you have a right to know about a proposed Settlement of this class action lawsuit and about all of your options before the Court decides whether to give final approval to the Settlement. This notice explains the lawsuit, the Settlement, and your legal rights.

Judge Andrew L. Carter, Jr. of the United States District Court for the Southern District of New York is overseeing this case. This litigation is known as *In re NYC Bus Tour Antitrust Litigation*, No. 13-CV-0711. The people who sued are called the “Plaintiffs.” Coach USA, Inc. and International Bus Services, Inc. (collectively “Coach”), CitySights LLC and City Sights Twin, LLC (collectively, “CitySights”), and Twin America, LLC (“Twin America”) are the “Defendants.”

### 2. What is this lawsuit about?

The lawsuit claims that Coach and CitySights conspired to form a joint venture, Twin America, against state and federal law. The lawsuit claims that this new company dominated the “hop-on, hop-off” bus tour business in New York City enabling the Defendants to fix ticket prices and reduce competition – resulting in higher ticket prices for customers.

The Defendants deny these claims and maintain they did nothing wrong.

### 3. What is a “hop-on, hop-off” bus tour?

Hop-on, hop-off bus tours visit a city’s leading tourist attractions allowing customers to see places that interest them. As the bus travels a fixed route, a professional tour guide provides information about the attractions and the city. Customers may “hop-off” the bus at any of the stops to see particular attractions and then “hop-on” another bus to continue on the tour route using the same ticket. Tickets may be valid for one day or for multiple days.

### 4. Why is this a class action?

In a class action, one or more people called “class representatives” sue on behalf of themselves and other people with similar claims. All of these people together are the “class” or “class members.” In this case, the Class Representatives are Natasha Bhandari and Tracey L. Nobel. One court resolves the issues for all Class Members, except for those who exclude themselves from the Class.

### 5. Why is there a Settlement?

The Court has not decided in favor of the Plaintiffs or the Defendants. Instead, both sides have agreed to a Settlement. By agreeing to settle, both sides avoid the cost and risk of a trial, and the people affected will get a chance to receive compensation. The Class Representatives and their attorneys think the Settlement is best for all Class Members. The Settlement does not mean that the Defendants did anything wrong.

## WHO IS PART OF THE SETTLEMENT?

You need to decide whether you are included in the Settlement.

### 6. Who is included in the Settlement?

The Class includes all persons who, or entities that, purchased Defendants' "hop-on, hop-off" bus tours in New York City from February 1, 2009 until Month 00, 2014. Excluded from the Class are Defendants, their present and former parent companies, subsidiaries, affiliates, and employees.

### 7. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are included in the Settlement, you may call 1-800-000-0000 with questions or visit [www.TourBusSettlement.com](http://www.TourBusSettlement.com). You may also write with questions to NYC Hop-On Hop-Off Bus Tour Settlement, P.O. Box 0000, City, ST 00000.

## THE SETTLEMENT BENEFITS

### 8. What does the Settlement provide?

The Settlement will create a \$19 million Settlement Fund to pay eligible Class Members who submit valid claims. The cost to administer the Settlement as well as attorney fees and the payments to the Class Representatives will come out of this fund (*see* Question 17). If there is any money left in the Settlement Fund after claims, costs, and taxes have been paid, it will be given to the Department of Justice, Antitrust Division, and/or the New York Attorney General's Office.

More details are in a document called the Settlement Agreement, which is available at [www.TourBusSettlement.com](http://www.TourBusSettlement.com).

### 9. How much will my payment be?

You can get up to \$20 per class member ticket if you submit a valid Claim Form. The amount of your payment will depend on the number of claims filed. Payment amounts may be adjusted to ensure that all eligible Class Members receive a payment, as follows: If the total value of all approved claims is greater than the amount of money available to pay claims (after costs and fees have been deducted), eligible Class Members' payments will be reduced proportionally.

The actual amount available for each eligible Class Member will not be determined until after Month 00, 2014 and all Claims Forms have been received, and may not be determined until after the Settlement is final.

### 10. When will I receive my payment?

Class Members who are entitled to payments will receive their payments after the Court grants final approval to the Settlement and after any appeals are resolved (*see* "The Fairness Hearing" below). If there are appeals, resolving them can take time. Please be patient.

QUESTIONS? CALL 1-800-000-0000 OR VISIT [WWW.TOURBUSSETTLEMENT.COM](http://WWW.TOURBUSSETTLEMENT.COM)

**11. What am I giving up to stay in the Settlement Class?**

Unless you exclude yourself from the Settlement, you can't sue the Defendants or be part of any other lawsuit against Coach, CitySights, or Twin America about the issues in this case. Unless you exclude yourself, all of the decisions by the Court will bind you. If the Settlement becomes final, you will give up your right to sue the Defendants for the claims being resolved by this Settlement. You will be "releasing" the Defendants and all related people as described in Sections 13 and 14 of the Settlement Agreement.

The Settlement Agreement is available at [www.TourBusSettlement.com](http://www.TourBusSettlement.com) and describes the claims that you give up if you remain in the Settlement. If you have any questions you can talk to the law firms listed in Question 16 for free or you can, of course, talk to your own lawyer if you have questions about what this means.

## HOW TO RECEIVE A PAYMENT

**12. How can I receive a payment?**

To ask for a payment, simply complete and submit a Claim Form. Claim Forms are available at [www.TourBusSettlement.com](http://www.TourBusSettlement.com) or by calling 1-800-000-0000. Please read the instructions carefully, fill out the Claim Form and mail it postmarked no later than **Month 00, 0000** to:

NYC Hop-On Hop-Off Bus Tour Settlement  
P.O. Box 0000  
City, ST 00000

## EXCLUDING YOURSELF FROM THE SETTLEMENT

If you don't want a payment from this Settlement, and you want to keep the right to sue the Defendants about the issues in this case, then you must take steps to get out of the Settlement. This is called excluding yourself—or it is sometimes referred to as "opting out" of the Class.

**13. How do I get out of the Settlement?**

To exclude yourself, send a letter that says you want to be excluded from the Settlement in *In re NYC Bus Tour Antitrust Litigation*, No. 13-CV-0711. Include your name (or the name of the company or group that bought the tickets), address, and signature. You must mail your Exclusion Request postmarked by **Month 00, 2014**, to:

NYC Hop-On Hop-Off Bus Tour Settlement  
P.O. Box 0000  
City, ST 00000

**14. If I do not exclude myself, can I sue the Defendants for the same thing later?**

No. Unless you exclude yourself, you give up the right to sue Coach, CitySights, and Twin America for the claims that this Settlement resolves.

QUESTIONS? CALL 1-800-000-0000 OR VISIT [WWW.TOURBUSSETTLEMENT.COM](http://WWW.TOURBUSSETTLEMENT.COM)

**15. If I exclude myself, can I still get a payment?**

No. You will not get a payment if you exclude yourself from the Settlement.

**THE LAWYERS REPRESENTING YOU**

**16. Do I have a lawyer in the case?**

Yes. The Court appointed the following as “Class Counsel”:

William Christopher Carmody Arun Subramanian Mark Howard Hatch-Miller SUSMAN GODFREY LLP 560 Lexington Avenue, 15 <sup>th</sup> Floor New York, NY 10022 212-336-8330	Drew D. Hansen SUSMAN GODFREY LLP 1201 Third Avenue, Suite 3800 Seattle, WA 99101 206-373-7384
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You will not be charged for contacting these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

**17. How will the lawyers be paid?**

Class Counsel will ask the Court for attorneys’ fees up to one-third of the Settlement Fund, plus reimbursement of expenses. The fees and expenses awarded by the Court will be paid out of the Settlement Fund. The Court will decide the amount of fees to award. Class Counsel will also request that special service payments of up to \$20,000 each be paid from the Settlement Fund to the Class Representatives for their service as representatives on behalf of the whole Class.

**OBJECTING TO THE SETTLEMENT**

**18. How do I tell the Court if I do not like the Settlement?**

You can object to the Settlement if you don’t like some part of it. The Court will consider your views. To do so, you must send in a written objection in this case, *In re NYC Bus Tour Antitrust Litigation*, No. 13-CV-0711. Be sure to include:

- Your full name, address, telephone number; your signature;
- The specific reasons why you object to the settlement;
- Whether you plan on appearing at the Fairness Hearing, and
- Any legal support or evidence that supports your objection that you wish to bring to the Court’s attention.

Mail your objection to these addresses postmarked no later than **Month 00, 2014**:

**QUESTIONS? CALL 1-800-000-0000 OR VISIT [WWW.TOURBUSSETTLEMENT.COM](http://WWW.TOURBUSSETTLEMENT.COM)**

<b>COURT</b>	<b>CLASS COUNSEL</b>	<b>DEFENSE COUNSEL</b>
Clerk of the Court Court Name Street Address City, ST 00000	William Christopher Carmody Arun Subramanian Mark Howard Hatch-Miller SUSMAN GODFREY LLP 560 Lexington Avenue, 15 <sup>th</sup> Floor New York, NY 10022  Drew D. Hansen SUSMAN GODFREY LLP 1201 Third Avenue, Suite 3800 Seattle, WA 89101	<i>Counsel for Coach USA, Inc. and International Bus Services, Inc.:</i> Thomas O. Barrett Andrew D. Lazerow Alan M. Wiseman Ashley E. Bass COVINGTON & BURLING LLP 1201 Pennsylvania Avenue, NW Washington, DC 20004  <i>Counsel for Twin America, LLC, CitySights, LLC, and City Sights Twin, LLC:</i> Michael P. Cohen PAUL HASTINGS 875 15 <sup>th</sup> Street, NW Washington, DC 20005

#### **19. What is the difference between objecting and asking to be excluded?**

Objecting is simply telling the Court that you don't like something about the Settlement. You can object only if you don't exclude yourself from the Class. Excluding yourself is telling the Court that you don't want to be part of the Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

### **THE FAIRNESS HEARING**

The Court will hold a hearing to decide whether to approve the Settlement and any requests for fees and expenses. You may attend and you may ask to speak, but you do not have to.

#### **20. When and where will the Court decide whether to approve the Settlement?**

The Court will hold a Fairness Hearing at XX:00 x.m. on Month 00, 2014, at the [Courthouse], Street address, City, NY 00000. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check [www.TourBusSettlement.com](http://www.TourBusSettlement.com) or call 1-800-000-0000. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them and will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay Class Counsel. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

**21. Do I have to attend the hearing?**

No. Class Counsel will answer questions the Court may have. But, you or your own lawyer is welcome to attend at your expense. If you send an objection, you do not have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also have your own lawyer attend, but it is not necessary.

**22. May I speak at the hearing?**

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter stating that it is your “Notice of Intention to Appear in *In re NYC Bus Tour Antitrust Litigation*, No. 13-CV-0711.” Be sure to include your name, address, telephone number, and your signature. Your Notice of Intention to Appear must be postmarked no later than Month 00, 2014, and must be sent to the addresses listed in Question 18.

**GETTING MORE INFORMATION**

**23. How do I get more information?**

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement at [www.TourBusSettlement.com](http://www.TourBusSettlement.com). You also may write with questions to NYC Hop-On Hop-Off Bus Tour Settlement, P.O. Box 0000, City, ST 00000 or call the toll-free number, 1-800-000-0000. You can also get a Claim Form at the website, or by calling the toll free number, 1-800-000-0000.