

RADIOSHACK ERISA SETTLEMENT ADMINISTRATOR
C/O RUST CONSULTING INC -5030
PO BOX 2396
FARIBAULT MN 55021-9096

IMPORTANT LEGAL MATERIALS



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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE 2014 RADIOSHACK ERISA LITIGATION
THE DOCUMENT RELATES TO:
ALL ACTIONS

MASTER FILE NO. 4:14-cv-00959-O

NOTICE OF CLASS ACTION SETTLEMENT

YOUR LEGAL RIGHTS MIGHT BE AFFECTED IF YOU ARE A MEMBER OF THE FOLLOWING CLASS:

All Persons (excluding the Trustee Defendants and their immediate family members) who were participants in or beneficiaries of the RadioShack 401(k) Plan and RadioShack Puerto Rico 1165(e) Plan (collectively, the “Plans”) at any time from November 30, 2011 through January 7, 2016 (the “Class Period”), and whose accounts in the Plans included investments in RadioShack Stock.

PLEASE READ THIS NOTICE CAREFULLY. A FEDERAL COURT AUTHORIZED THIS NOTICE. THIS IS NOT A SOLICITATION FROM A LAWYER. YOU HAVE NOT BEEN SUED.

A class action lawsuit was filed in the United States District Court, Northern District of Texas by former employees of RadioShack Corporation, which now goes by the name RS Legacy Corporation (“RadioShack”), against members of the the RadioShack 401(k) Plan Administrative Committee, the RadioShack Puerto Rico Plan Administrative Committee, James F. Gooch, Joseph C. Magnacca, Robert E. Abernathy, Frank J. Belatti, Julia A. Dobson, Daniel A. Feehan, H. Eugene Lockhart, Jack L. Messman, Thomas G. Plaskell, Edwina D. Woodbury, Mark Barfield, Karina Davis, Eric Hales, Justin Johnson, Michael Keyser, Kevin Krautkramer, Martin Moad, Sri Reddy (together, the “RadioShack Defendants”), and Wells Fargo Bank, N.A. and Banco Popular de Puerto Rico (the “Trustee Defendants”), who all were alleged to be fiduciaries of the Plans. The litigation (the “Action”) alleged that RadioShack Defendants and Trustee Defendants breached their fiduciary duties under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). A Settlement has been reached between Plaintiffs and the Trustee Defendants (“Settling Parties”) for the amount of \$900,000.00 (Nine Hundred Thousand U.S. Dollars) (the “Settlement Payment”). **To be clear, the allegations against the RadioShack Defendants (the “Non-Settling Defendants”) have not been settled and are continuing.** The Settlement will provide for distribution of the Settlement Payment in accordance with the Plan of Allocation to members of the Settlement Class who had portions of their Plan accounts invested in RadioShack Stock.

The Court has scheduled a hearing (the “Fairness Hearing”) to consider Named Plaintiffs’ motion for final approval of the Settlement and Class Counsel’s petition for attorneys’ fees and litigation expenses and for Case Contribution Awards to the Named Plaintiffs. The Fairness Hearing before U.S. District Judge Reed O’Connor has been scheduled for July 18, 2016, at 10:00 a.m., in the United States District Court for the Northern District of Texas, Northern Division, 501 W. 10th St.,

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Fort Worth, TX, Room 201, or such other courtroom as the Court may designate. Any objections to the Settlement or the petition for attorneys' fees, reimbursement of litigation expenses, or for Case Contribution Awards to the Named Plaintiffs must be served in writing on Class Counsel and on the Trustee Defendants' attorneys, as identified on Page 9 of this Notice of Class Action Settlement ("Notice"). The procedure for objecting is described below.

This Notice contains summary information concerning the Settlement. The complete terms and conditions of the Settlement are set forth in a Class Action Settlement Agreement and Release Between Plaintiffs and Defendants Wells Fargo Bank, N.A. and Banco Popular de Puerto Rico ("Stipulation"). Capitalized terms used in this Notice, but not defined in this Notice, have the meanings assigned to them in the Stipulation. The Stipulation, and additional information with respect to this lawsuit and the Settlement is available at an Internet site dedicated to the Settlement, www.RSHTrusteeSettlement.com.

PLEASE READ THIS NOTICE CAREFULLY AND COMPLETELY. IF YOU ARE A MEMBER OF THE CLASS TO WHOM THIS NOTICE IS ADDRESSED, THE SETTLEMENT WILL AFFECT YOUR RIGHTS. YOU ARE NOT BEING SUED IN THIS MATTER. YOU DO NOT HAVE TO APPEAR IN COURT, AND YOU DO NOT HAVE TO HIRE AN ATTORNEY IN THIS CASE. IF YOU ARE IN FAVOR OF THE SETTLEMENT, YOU NEED NOT DO ANYTHING. IF YOU DISAPPROVE, YOU MAY OBJECT TO THE SETTLEMENT BY FOLLOWING THE PROCEDURES DESCRIBED BELOW.

YOUR LEGAL RIGHTS AND OPTIONS UNDER THE SETTLEMENT	
YOU ARE NOT REQUIRED TO FILE A CLAIM IF YOU ARE ENTITLED TO A PAYMENT UNDER THE STIPULATION.	If the Settlement is approved by the Court and you are a Settlement Class member, you will not need to file a claim in order to receive a payment if you are entitled to receive a payment under the Stipulation.
HOW SETTLEMENT PAYMENTS WILL BE DISTRIBUTED.	If you are a Settlement Class member entitled to a payment from the Settlement based on your losses in the Plans, a check will be mailed to you.
YOU MAY OBJECT TO THE SETTLEMENT BY JUNE 20, 2016.	If you wish to object to any part of the Settlement, you may (as discussed below) write to the Court and the attorneys for the Settling Parties about why you object to the Settlement.
YOU MAY ATTEND THE FAIRNESS HEARING TO BE HELD ON JULY 18, 2016.	If you submit a written objection to the Settlement to the Court and Counsel before the Court-approved deadline, you may (but do not have to) attend the Fairness Hearing about the Settlement and present your objections to the Court. You may attend the Fairness Hearing even if you do not file a written objection, but you will only be allowed to speak at the Fairness Hearing if you file a written objection in advance of the Fairness Hearing AND you file a Notice of Intention to Appear, as described in the answer to Question 16 in this Notice.

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court still has to decide whether to approve the Settlement. Payments will be made only if the Court approves the Settlement and that approval is upheld in the event of any appeal.

Further information regarding this litigation and this Notice may be obtained by contacting Class Counsel:

Edward W. Ciolko Mark K. Gyandoh KESSLER TOPAZ MELTZER & CHECK, LLP 280 King of Prussia Road Radnor, PA 19087 Telephone: (610) 667-7706 Facsimile: (610) 667-7056	Gerald D. Wells, III Robert J. Gray CONNELLY WELLS & GRAY LLP 2200 Renaissance Boulevard Suite 308 King of Prussia, PA 19406 Telephone: (610) 822-3700 Facsimile: (610) 822-3800	Michael J. Klein STULL, STULL & BRODY 6 East 45th Street New York, NY 10017 Telephone: (212) 687-7230 Facsimile: (212) 490-2022
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Class Counsel has established a toll-free phone number to receive your comments and questions: 1-877-522-0442. You may also send an email to: RSHTrusteeSettlement@ktmc.com. You should only contact Class Counsel with any questions regarding this Settlement, not the Court, RadioShack or the Trustee Defendants.

QUESTIONS? CALL 1-877-522-0442 TOLL-FREE, OR VISIT WWW.RSHTRUSTEESETTLEMENT.COM
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SUMMARY OF SETTLEMENT

This Action is a class action in which Named Plaintiffs allege that the Trustee Defendants and Non-Settling Defendants breached fiduciary duties owed to the participants in and beneficiaries of the Plans under ERISA arising from the Plans' investments in RadioShack Stock during the Class Period. A copy of the Complaint as well as other documents filed in the Action are available at www.RSHTrusteeSettlement.com, or from Class Counsel. The Net Settlement Fund will be allocated to Settlement Class members according to a Plan of Allocation to be approved by the Court. **To be clear, the allegations against the Non-Settling Defendants have not been settled and are continuing.**

STATEMENT OF POTENTIAL OUTCOME OF THE ACTION

The Trustee Defendants deny and have vigorously defended against the allegations and claims asserted in the Action. Plaintiffs would face an uncertain outcome if the Action were to continue, as continued litigation could result in a judgment greater or less than the benefits obtained as part of the Settlement, including the \$900,000 cash payment, or in no recovery at all.

The Named Plaintiffs and Trustee Defendants disagree on liability and do not agree on the amount that would be recoverable even if the Named Plaintiffs were to prevail at trial. The Trustee Defendants deny all claims and contentions by the Named Plaintiffs. The Trustee Defendants deny that they are liable to the Settlement Class and that the Settlement Class or the

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Plan has suffered any damages for which the Trustee Defendants could be held legally responsible. Having considered the uncertainty and risks inherent in any litigation, particularly in a complex case such as this, the Named Plaintiffs and Trustee Defendants have concluded that it is desirable that the Action be fully and finally settled on the terms and conditions set forth in the Stipulation.

STATEMENT OF ATTORNEYS' FEES AND EXPENSES SOUGHT IN THE ACTION

Class Counsel will apply to the Court for an order awarding attorneys' fees not in excess of thirty-three and one third percent (33 1/3%) of the Settlement Payment (a maximum amount of \$299,970), plus reimbursement of expenses. Any amount awarded will be paid from the Qualified Settlement Fund. The Trustee Defendants have no responsibility for payment of such fees and expenses.

WHAT WILL THE NAMED PLAINTIFFS GET?

The Named Plaintiffs will share in the allocation of the Net Settlement Fund on the same basis as all other Settlement Class members. In addition, the Named Plaintiffs will ask the Court to award up to \$5,000 to each of the Named Plaintiffs as Case Contribution Awards for their participation in the Action and representation of the Settlement Class. Any such awards will be paid solely from the Qualified Settlement Fund. The Trustee Defendants have no responsibility for payment of such Case Contribution Awards.

BASIC INFORMATION

1. WHY DID I GET THIS NOTICE PACKAGE?

You or someone in your family may have been a participant in or a beneficiary in one of the Plans from November 30, 2011 through January 7, 2016, during which time your Plan account included investment in the RadioShack Stock Fund.

The Court directed that this Notice be sent to you because, if you fall within the definition of the Settlement Class, you have a right to know about the Settlement and the options available to you regarding the Settlement before the Court decides whether to approve the Settlement. If the Court approves the Settlement, and after any objections and appeals are resolved, the Net Settlement Fund will be allocated among Settlement Class members according to a Court-approved Plan of Allocation. This Notice describes the Action, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of this case is the United States District Court for the Northern District of Texas, Fort Worth Division. The persons who sued on behalf of themselves and the Plans are called the "Named Plaintiffs," and the people they sued are called "Defendants." The Named Plaintiffs are Jeffrey Snyder, Manoj P. Singh, and William A. Gerhart. The Settling Defendants are the Trustee Defendants. The Action is known as *In Re 2014 RadioShack ERISA Litigation*, No. 4:14-cv-00959-O (N.D. Tex.).

2. WHAT IS THE ACTION ABOUT?

The Action claims that under ERISA, the Trustee Defendants owed a fiduciary duty of prudence to the Plans and that they violated that duty in connection with the Plans' investments in RadioShack Stock.

During the Class Period, participants in the Plans were able to allocate their account balances among various investment funds, including the RadioShack Stock Fund, a fund primarily invested in RadioShack Stock. Many Plan participants' Plan accounts included investments in the RadioShack Stock Fund.

Named Plaintiffs allege that the Trustee Defendants and Non-Settling Defendants violated ERISA by, among other things, failing to disregard directions from the Plans' investment committee to invest the Plans' assets in the RadioShack Stock Fund during the Class Period when the Trustee Defendants knew or should have known RadioShack Stock was an imprudent Plan investment option. Named Plaintiffs allege that the Trustee Defendants and Non-Settling Defendants knew or should have known that RadioShack Stock was imprudent due to, *inter alia*: (a) the massive consumer shift away from brick-and-mortar stores like RadioShack towards online retailers; (b) the drastic deterioration in consumer demand for RadioShack's outdated products and services; (c) because of the Company's shift to low margin sales, the inability to replace declining customer demand for traditional high-margin items; and (d) the severely deteriorating financial condition of the Company, including the collapse of the RadioShack Stock price, which inevitably led to the Company's bankruptcy.

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THE DEFENSES IN THE ACTION

The Trustee Defendants deny all of the claims made in this Action including that allowing the Plans to hold or purchase RadioShack Stock was imprudent or that they have liability to the Plans or its participants or beneficiaries. If the Action were to continue, the Trustee Defendants would raise numerous defenses to liability, including:

- Named Plaintiffs do not have standing to assert some or all of their claims;
- Named Plaintiffs' claims are barred by the applicable statute of limitations;
- The Trustee Defendants were not fiduciaries of the Plans, or if they were fiduciaries, their fiduciary duties did not extend to the matters at issue in the Action;
- RadioShack Stock was at all times a prudent investment for the Plans and its participants;
- To the extent that they were fiduciaries as to the matters at issue in the Action, the Trustee Defendants fully and prudently discharged all of their fiduciary duties under ERISA;
- Even if a court were to determine that the Trustee Defendants failed to discharge any duty under ERISA, any such breach of fiduciary duty did not cause the Plans or its participants to suffer any loss.

THE ACTION HAS BEEN AGGRESSIVELY LITIGATED

Class Counsel have extensively investigated the allegations in the Action. Among other efforts, Class Counsel reviewed Plan-governing documents and materials, communications with Plan participants, Securities and Exchange Commission filings, Bankruptcy pleadings, press releases, public statements, news articles and other publications, and other documents regarding the matters that the Named Plaintiffs allege made RadioShack Stock an imprudent Plan investment. Additionally, Class Counsel negotiated for and received documents produced to the U.S. Department of Labor in a related investigation. This Action was litigated by the Named Plaintiffs and Class Counsel for over a year before the Settling Parties agreed on settlement terms. The initial Complaint in this matter was filed against the Non-Settling Defendants on November 26, 2014, by Named Plaintiff Manoj Singh. On December 5, 2014, Plaintiff Jeffrey Snyder filed a Complaint asserting similar claims against the same defendants. William Gerhart filed his Complaint on December 17, 2014 also asserting similar claims against the same defendants. On January 9, 2015, the Court entered an Order Consolidating the three ERISA actions and appointing Interim Class Counsel. On February 8, 2015, RadioShack filed a suggestion of Bankruptcy and on the following day, February 9, 2015, Named Plaintiffs filed a Consolidated Complaint naming the Trustee Defendants as Defendants in this Action for the first time. Then, on May 18, 2015, Plaintiffs filed an Amended Consolidated Complaint. On August 18, 2015, the Defendants filed their respective motions to dismiss the Action. Later, on November 5, 2015, Named Plaintiffs filed their motion for class certification. Upon Plaintiffs and the Trustee Defendants agreeing to settle, the Settling Parties requested that the Court stay the Action as to the Trustee Defendants pending final approval of the Settlement. The Court granted the Settling Parties' request on November 25, 2015. On December 17, 2015, the Court granted the Settling Parties' request to extend the deadline to file Class Counsel's motion for preliminary approval from December 21, 2015 until January 7, 2016.

SETTLEMENT DISCUSSIONS

The proposed Settlement is the product of hard-fought, lengthy negotiations between Class Counsel and the Trustee Defendants' Counsel. The Settling Parties participated in several telephone discussions and a day-long mediation session on November 24, 2015, mediated under the auspices of John Bickerman, a highly respected and experienced mediator who is well-versed in ERISA matters. That same day, the Settling Parties reached an agreement to settle the Action on behalf of all persons who were participants in or beneficiaries of the Plans, at any time between November 30, 2011, and January 7, 2016, and whose Plan accounts included investments in RadioShack Stock, subject to the execution of definitive settlement documentation.

NON-SETTLING DEFENDANTS, BAR ORDER, AND JUDGMENT REDUCION

Named Plaintiffs will continue to litigate their claims against the Non-Settling Defendants. If the Court approves the Settlement, the Court will enter a "Bar Order" that will prevent the Non-Settling Defendants and any other Person against whom Plaintiffs might obtain any judgment in the future from suing the Trustee Defendants for "indemnification," "contribution," or any other Claims that have arisen, or arise, out of or because of Claims released pursuant to the Settlement.

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This means for example, that neither the Non-Settling Defendants, RadioShack, nor any other third party that may be held liable in connection with Plaintiffs' Claims may seek any relief whatsoever from the Trustee Defendants. The Bar Order also will provide that any verdict or judgment that might be obtained against the Non-Settling Defendants will be reduced pursuant to a proportionate offset method. Any Person or entity that objects to the Bar Order may appear at the Fairness Hearing on July 18, 2016, and be heard by the Court regarding why the Bar Order should not be entered by the Court.

3. WHY IS THIS CASE A CLASS ACTION?

In a class action, one or more plaintiffs, called "class representatives" or "named plaintiffs," sue on behalf of people with similar claims. All of these people who have similar claims collectively make up the "class" and are referred to as "class members." One case resolves the issues for all class members together. Because the wrongful conduct alleged in this Action is claimed to have affected all participants in the Plans during the Class Period in a similar way, the Named Plaintiffs filed this case as a class action. In such cases brought under ERISA, all class members bring their action as a representative action since claims under ERISA are both the class member's and the Plan's claims.

4. WHY IS THERE A SETTLEMENT?

As in any litigation, all parties face an uncertain outcome. On the one hand, continuation of the case against the Trustee Defendants could result in a judgment greater than this Settlement. On the other hand, continuing the case could result in no recovery at all, or could result in a recovery that is less than the amount of the Settlement. Based on these factors, the Named Plaintiffs and Class Counsel have concluded that the proposed Settlement is in the best interests of all Settlement Class members. **Again, the allegations against the Non-Settling Defendants have not been settled and are continuing.**

5. HOW DO I KNOW WHETHER I AM PART OF THE SETTLEMENT?

You are a member of the Settlement Class if you fall within the definition of the Settlement Class preliminarily approved by Judge Reed O'Connor:

All Persons who were participants in or beneficiaries of the RadioShack 401(k) Plan and RadioShack Puerto Rico 1165(e) Plan at any time from November 30, 2011 through January 7, 2016, and whose accounts in the Plans included investments in RadioShack Stock.

If you are a member of the Settlement Class, the amount of money you will receive, if any, will depend upon the Plan of Allocation, described below.

THE SETTLEMENT BENEFITS—WHAT YOU GET

6. WHAT DOES THE SETTLEMENT PROVIDE?

The Settlement Payment is \$900,000.00, which will be held in the Qualified Settlement Fund. The amount of money that will be allocated among the Settlement Class members, after the payment of Court-approved costs, fees, and expenses, including attorneys' fees and expenses of Class Counsel, any Court-approved Case Contribution Awards to the Named Plaintiffs, and payment of expenses incurred in calculating the Settlement Payments and administering the Settlement, is called the Net Settlement Fund. The value of the Net Settlement Fund will not be known until all other amounts are quantified and deducted. The Net Settlement Fund will be allocated to members of the Settlement Class according to a Plan of Allocation to be approved by the Court. The Plan of Allocation describes how Settlement Payments will be distributed to Settlement Class members who receive a payment. Not every Settlement Class member will receive a payment.

If the Settlement is approved by the Court, all Settlement Class members and anyone claiming through them shall be deemed to fully release Plaintiffs' Releasees from Plaintiffs' Released Claims. The Plaintiffs' Releasees include the Trustee Defendants, as well as the Trustee Defendants' heirs, trustees, estates, executors or administrators, attorneys, personal or legal representatives, accountants, auditors, and financial or investment advisors, in their capacity as such. The Released Claims are defined in the Stipulation and include all claims, known or unknown, that arise out of the same or substantially similar to any allegations or that were or could have been asserted in the Action. This means that Settlement Class members will not have the right to sue Plaintiffs' Releasees for claims related to the investment of Plan assets in the RadioShack Stock Fund or related matters that occurred during the Class Period.

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The above description of the proposed Settlement is only a summary. The complete terms, including the definitions of Plaintiffs' Releasees and Released Plaintiffs' Claims, are set forth in the Stipulation (including its exhibits), which may be obtained at a dedicated Settlement Internet site, www.RSHTrusteeSettlement.com, or by contacting Class Counsel listed on Page 2 above.

7. HOW MUCH WILL MY PAYMENT BE?

Your share (if any) of the Net Settlement Fund will depend on your alleged loss, compared to other Settlement Class members' alleged losses, related to Plan investments in the RadioShack Stock Fund from November 30, 2011 through January 7, 2016. Each Settlement Class member's share will be calculated by a third-party Settlement Administrator agreed to by the Settling Parties according to a Court-approved Plan of Allocation. Because the Settlement Payment and Net Settlement Fund are less than the total losses alleged by the Settlement Class, each Settlement Class member's portion of the Settlement Fund will be less than his or her alleged loss on their investment in RadioShack Stock. You are not required to calculate the amount you may be entitled to receive under the Settlement, as the Settlement Administrator will do so under the Plan of Allocation.

In general, your proportionate share of the Settlement will be calculated as follows: For each Settlement Class member, the Settlement Administrator shall determine his or her approximate alleged net loss ("Net Loss"). $\text{Net Loss} = A + B - C - D$, where for each Settlement Class member's Plan account:

- His or her Net Loss will be equal to: (A) the dollar value, if any, of his or her account balance invested in RadioShack Stock on the first day of the Class Period (November 30, 2011); plus (B) the dollar value, if any, of all contributions or purchases of interests in RadioShack Stock for his or her account during the Class Period, as of the time of the contribution(s) or purchase(s); minus (C) the dollar value, if any, of all dispositions of interests in RadioShack Stock in his or her account during the Class Period, as of the time of the sale(s); minus (D) the dollar value, if any, of the balance in RadioShack Stock remaining in his or her account on the close of the market on the last day of the Class Period January 7, 2016, or if a Settlement Class member terminated his or her participation in the Plan before the end of the Class Period, the last day the Settlement Class member was invested in RadioShack Stock.
- All Net Losses will be aggregated to yield the total loss over the Class Period and each Settlement Class member's percentage of that total loss will be calculated.
- Applying that percentage to the Net Settlement Fund, the Settlement Administrator will calculate each Settlement Class member's share of those proceeds on a preliminary basis.
- All Settlement Class members whose preliminary share is more than zero dollars (\$0) but less than or equal to five dollars (\$5.00) will be deemed to have a final share equal to zero dollars (\$0) and will not receive a Settlement distribution. Settlement Class members whose preliminary share is more than five dollars (\$5.00) but less than or equal to nine dollars and ninety-nine cents (\$9.99) will be deemed to have a final share equal to nine dollars and ninety-nine cents (\$9.99). The Settlement Administrator will then recalculate the loss percentage of those Settlement Class members whose preliminary share was greater than \$9.99, so as to arrive at each such Settlement Class member's final share.

You will not be required to produce records that show your Plan activity. If you are entitled to a share of the Net Settlement Fund, your share of the Settlement will be determined based on the Plans' records for your account. If you have questions regarding the allocation of the Settlement proceeds, please contact Class Counsel listed on Page 2, above.

8. HOW MAY I RECEIVE A PAYMENT?

You do not need to file a claim. If you are a Settlement Class member entitled to receive a share of the Settlement proceeds, a check will be mailed to you. The distribution will be made, if possible, such that you have the option to roll your distribution amount into an individual retirement account (IRA) without being subject to income tax withholding. If you are a former Plan participant and have not provided the Plan with your current address, please contact Class Counsel listed on Page 2, above.

9. WHEN WOULD I GET MY PAYMENT?

The Settlement cannot be completed unless and until several events occur, including final approval of the Settlement by the Court and calculation of the amount of the Settlement owed to each Settlement Class member. If objections are made to the Settlement or appeals are taken by objectors who oppose the approval of the Settlement, this process may take some time to complete, possibly several years.

There will be no payments if the Stipulation is terminated.

The Stipulation may be terminated for several reasons, including if (1) the Court does not approve, or materially modifies the Stipulation, or (2) the Court approves the Stipulation but the approval is reversed or materially modified by an appellate court. If the Settlement is terminated, the Action will proceed again as if the Stipulation had not been entered into. The Settlement is not conditioned upon the Court's approval of attorneys' fees and the reimbursement of expenses sought by Class Counsel, or Case Contribution Awards and any appeal solely related thereto.

10. CAN I GET OUT OF THE SETTLEMENT?

You do not have the right to exclude yourself from the Settlement. The Stipulation provides for certification of the Settlement Class as a non-opt-out class action under Federal Rule of Civil Procedure 23(b)(1) and (b)(2), and the Court has preliminarily determined that the requirements of that rule have been satisfied. As a Settlement Class member, you will be bound by any judgments or orders that are entered in the Action for all claims that were or could have been asserted in the Action or are otherwise released under the Settlement. As noted above, these claims are brought on behalf of the Plans pursuant to ERISA.

Although you cannot opt-out of the Settlement, you can object to the Settlement and ask the Court not to approve it. For more information on how to object to the Settlement, see the answer to Question 13 below.

THE LAWYERS REPRESENTING YOU

11. DO I HAVE A LAWYER IN THE CASE?

The Court has preliminarily appointed the law firms of Kessler Topaz Meltzer & Check, LLP, Stull, Stull & Brody, and Connelly Wells & Gray LLP as Class Counsel for the Named Plaintiffs in the Action. You will not be charged directly by these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

12. HOW WILL THE LAWYERS BE PAID?

Class Counsel will file a motion for attorneys' fees plus reimbursement of their expenses incurred in connection with the prosecution of the Action, all of which will be paid from the Settlement Fund if approved. This motion will be considered at the Fairness Hearing described below. The Trustee Defendants take no position on the matter.

OBJECTING TO THE ATTORNEYS' FEES

By following the procedures described in the answer to Question 13, you can tell the Court that you do not agree with the fees and expenses the attorneys intend to seek and ask the Court to deny their motion or limit the award.

13. HOW DO I TELL THE COURT IF I DO NOT LIKE THE SETTLEMENT?

The Court will hold a Fairness Hearing to decide whether to approve the Settlement as fair, reasonable, and adequate. You may attend the Fairness Hearing, and you may ask to speak, but you do not have to attend. **It is your obligation to ensure that your written objection is received by Counsel and filed with the Court by no later than June 20, 2016.**

If you are a Settlement Class member, you can object to the Settlement if you do not like any part of it. You can give reasons why you think the Court should not approve it. To object, you must send a letter or other writing saying that you object to the Settlement in *In re 2014 RadioShack ERISA Litigation*, Master File No. 4:14-cv-00959-O. Be sure to include your name, address, telephone number, signature, and a full explanation of all the reasons why you object to the Settlement. **Your written objection must be received by the following Counsel no later than June 20, 2016.**

CLASS COUNSEL

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BANCO POPULAR’S COUNSEL

Nancy J. Sennett
Aaron R. Wegrzyn
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777 East Wisconsin Avenue
Milwaukee, WI 53202-5306
Telephone: (414) 297-5522

You must also file your objection with the Clerk of the Court of the United States District Court for the Northern District of Texas, Fort Worth Division no later than June 20, 2016. The address is:

Clerk of the Court
United States District Court for the Northern District of Texas, Fort Worth Division
501 W. 10th St. #310, Room 310
Fort Worth, TX 76102-3673

The objection must refer prominently to “*In re 2014 RadioShack ERISA Litigation*, Master File No. 4:14-cv-00959-O, Fairness Hearing”.

FAIRNESS HEARING

14. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?

The Court will hold the Fairness Hearing at 10:00 a.m., on July 18, 2016, at the United States District Court for the Northern District of Texas, Fort Worth Division, 501 W. 10th Street, Room 201, the courtroom of Judge Reed C. O’Connor, or such other courtroom as the Court may designate. **The Court may adjourn the Fairness Hearing without further notice to the Settlement Class, so if you wish to attend, you should confirm the date and time of the Fairness Hearing with Class Counsel before doing so.** At that hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court also will rule on the motions for a Bar Order, attorneys’ fees and reimbursement of expenses and for Case Contribution Awards for the Named Plaintiffs. The Settling Parties do not know how long these decisions will take or whether appeals will be filed.

15. DO I HAVE TO COME TO THE HEARING?

You do not have to come to the Fairness Hearing, but you are welcome to come at your own expense. If you file a timely objection, it will be before the Court when the Court considers whether to approve the Settlement. You also may pay your own lawyer to attend the Fairness Hearing, but such attendance is also not necessary.

QUESTIONS? CALL 1-877-522-0442 TOLL-FREE, OR VISIT WWW.RSHTRUSTEESSETTLEMENT.COM
DO NOT CALL THE COURT WITH YOUR QUESTIONS

16. MAY I SPEAK AT THE HEARING?

If you submit a written objection to the Settlement to the Court and Counsel before the Court-approved deadline, you may (but do not have to) attend the Fairness Hearing and present your objections to the Court. You may attend the Fairness Hearing even if you do not file a written objection, but you will only be allowed to speak at the Fairness Hearing if you file a written objection in advance of the Fairness Hearing AND you file a Notice of Intention to Appear, as described in this paragraph. To do so, you must file with the Court a letter or other paper called a "Notice of Intention to Appear at Fairness Hearing in *In re 2014 RadioShack ERISA Litigation*, Master File No. 4:14-cv-00959-O." Be sure to include your name, address, telephone number, and your signature. Your Notice of Intention to Appear must be received by the attorneys listed in the answer to Question 13, above, no later than June 20, 2016, and must be filed with the Clerk of the Court at the address listed in the answer to Question 13.

IF YOU DO NOTHING

17. WHAT HAPPENS IF I DO NOTHING AT ALL?

If you do nothing and you are a Settlement Class member, you will participate in the Settlement as described above in this Notice.

GETTING MORE INFORMATION

18. ARE THERE MORE DETAILS ABOUT THE SETTLEMENT?

Yes. This Notice summarizes the proposed Settlement. The complete terms are set forth in the Stipulation. You may obtain a copy of the Stipulation by making a written request to Class Counsel listed on Page 2, above. Copies may also be obtained at a dedicated Settlement website, www.RSHTrusteeSettlement.com, which also contains a link to frequently asked questions, by calling the toll-free number, 1-877-522-0442, or by sending an email to RSH@ktmc.com. You are encouraged to read the complete Stipulation.

DATED: April 8, 2016

DO NOT CONTACT THE COURT, RADIOSHACK, OR THE TRUSTEE DEFENDANTS OR THEIR COUNSEL REGARDING THIS NOTICE. THEY WILL NOT BE ABLE TO ANSWER YOUR QUESTIONS.