



Date: November 26, 2018

To: May it Please the Court

From: Association of Independent Hospitality Professionals (AIHP)

Re: Class Action vs Expedia, Inc., Hotels.com, Orbitz LLC

Case No. 3:16-CV-04721-VC

May it please the court to accept this submission in support of the above referenced Class Action suit.

I – Robert Fulton – am the President / CEO of the Association of Independent Hospitality Professionals (AIHP), and have been in this position since January of 2016. AIHP is a not-for-profit organization, representing over 600 innkeeping-related businesses throughout the US, including 435 Bed and Breakfast Inn establishments. We focus on issues important to the small independent hospitality professionals, aspiring innkeepers or allied partner who provide products or services to the hospitality industry. We are an educational and advocacy focused association.

Our members are concerned and aware of the practice of Expedia and related OTA's in which they are taking the name and information of a Bed & Breakfast / Inn property and listing it on their site without any contractual or business relationship. The result is an unauthorized advertisement with false information, since Expedia has not been given room inventory by the property, and the egregious statement of "rooms sold out" (or variation) diverts the potential guest from attempting to make a reservation.

AIHP was made aware of the Class Action Suit in June 2018. We then surveyed our members regarding whether or not they had a business relationship with Expedia and whether their property was/is falsely advertised.

- Of those surveyed 56% stated that the verbiage "Rooms Sold Out" was displayed for their property, even when they used different date searches.
- 53% stated they had contacted Expedia about this issue.

- 94% of those surveyed were willing to share their experience with the law firm bringing the Class Action suit, since individually they did not get any relief from Expedia.

After thoroughly reading and studying the Class Action suit document, AIHP supports the relief sought by the Plaintiffs as described in the five prohibitions and mandates.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rob Fulton', written on a light-colored background.

Rob Fulton, AIHP President/CEO

P.O. Box 126639

Harrisburg, PA 17112

rob@independent-innkeeping.org

717-433-6813

www.independent-innkeeping.org