

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

DAVID MOSKOWITZ, *et al.*,

Plaintiffs,

v.

AMERICAN EXPRESS COMPANY and
AMERICAN EXPRESS TRAVEL RELATED
SERVICES COMPANY, INC.,

Defendants.

Civ. No. 1:19-cv-00566 (NGG)(JRC)

CLASS ACTION

PLAN OF DISTRIBUTION

This Plan of Distribution will govern distributions from the net proceeds of the \$17.5 million settlement fund created by the January 15, 2026 Settlement Agreement entered into by the parties in the *Moskowitz v. American Express*, Civ. No. 1:19-cv-00566 (NGG)(JRC) litigation. To receive a distribution under this Plan of Distribution, an Illinois Non-Reward Credit-Card Class Member must timely submit a Claim Form that is accepted by the Claims Administrator as valid in order to be an Eligible Claimant.

The manner in which payments will be allocated and distributed to Eligible Claimants is described below. If an individual submitting a Claim Form is not an Illinois Non-Reward Credit-Card Class Member or does not provide the required information, then that individual shall not be entitled to any distribution under this Plan of Distribution. If an individual is an Illinois Non-Reward Credit-Card Class Member and provides the requisite information, their eligibility to participate in this Plan of Allocation and the amount of payment the Eligible Claimant shall receive is described below.

I. General Definitions¹

As used in this Plan of Distribution, the following terms shall have the indicated meanings:

1. “Claim Form” shall mean the document titled “AMEX SETTLEMENT CLAIM FORM” which is available for download at www.AmexAntitrust.com, or by calling 1-877-315-0587. The criteria for the timeliness and validity of a Claimant’s Claim Form are set forth in the Notice and shall be determined by the Claims Administrator.

2. “Claims Administrator” means A.B. Data, Ltd.

3. “Illinois Non-Reward Credit-Card Class Member” means any individual falling within the definition of the Illinois non-reward credit-card class certified by this Court and who has not opted out of the Class.

4. “Eligible Claimant” means an Illinois Non-Reward Credit-Card Class Member who submits a Claim Form that is accepted by the Claims Administrator. Class opt-outs are not Eligible Claimants.

5. “Class Counsel” means the law firms of Berman Tabacco and Gordon Ball PLLC and the law firms of Plaintiffs’ Executive Committee.

6. “Net Settlement Fund” means the Settlement Fund Amount (\$17,500,000), less Court-approved attorneys’ fees, reimbursement of costs and expenses, class representative service awards, taxes, and fees and costs associated with issuing notice and claims and escrow administration in accordance with the Settlement.

7. “Notice” shall mean the legal notice authorized by the Court in *Moskowitz v. American Express*, Civ. No. 1:19-cv-00566 (NGG)(JRC).

¹ If not otherwise defined herein, capitalized terms shall be as defined in the Settlement Agreement.

8. “Qualifying Claim” shall mean a valid and timely Claim Form that is accepted by the Claims Administrator.

9. “Settlement” shall mean the Settlement Agreement dated January 15, 2026 and as described in the Notice.

II. Distribution Among Eligible Claimants

10. No Eligible Claimant shall be permitted to recover from the Net Settlement Fund unless that Claimant submits a Claim Form, that is a Qualifying Claim. Claimants who opted out of the Class shall not receive any distributions pursuant to this Plan of Distribution.

11. The Net Settlement Fund shall be distributed to Eligible Claimants on an equal, *per capita* basis. To determine each Eligible Claimant’s share of the Net Settlement Fund, the Claims Administrator shall divide the total value of the Net Settlement Fund by the number of Eligible Claimants.

12. Eligible Claimants must attest, under penalty of perjury, and certify that they meet the requirements of membership in the Illinois Non-Reward Credit-Card Class. Eligible Claimants may be required to submit additional claim documentation at the discretion of the Claims Administrator.

13. Settlement payments will be sent digitally to each Eligible Claimant using the email address they provided on their submitted Claim Form. At the time of distribution, each Eligible Claimant will be provided with a number of digital options to instantaneously receive their payment, such as through a virtual debit card, PayPal, Venmo, or other ecommerce platform. They can also request a traditional paper check payment by mail.

14. All funds in the Net Settlement Fund must be exhausted if possible. Should a balance remain in the Net Settlement Fund after a reasonable amount of time from the initial date

of distribution thereof—whether by reason of tax refunds, uncashed checks, or otherwise—the Claims Administrator shall, if feasible, and subject to Court approval, reallocate such balance, in an equitable and economic fashion, among Eligible Claimants who successfully received and deposited, cashed, or otherwise accepted a distribution amount. Subject to Court approval, these redistributions shall be repeated until the balance remaining in the Net Settlement Fund is no longer economically feasible to distribute to Eligible Claimants.

15. If any funds remain undistributed pursuant to the terms of this Plan of Distribution, Class Counsel shall make an application to the Court for final disposition.

III. Administration

16. All determinations under this Plan of Distribution shall be made by the Claims Administrator, subject to review by Class Counsel and approval by the Court.

17. Each Illinois Non-Reward Credit-Card Class Member shall certify that any information it submits to the Claims Administrator is true, accurate, and complete to the best of its knowledge. To verify the accuracy of claim information and to prevent duplication of claims, the Claims Administrator may reasonably request additional information from claimants as the Claims Administrator deems appropriate.

IV. Amendments to the Plan of Distribution

18. This Plan of Distribution may be amended. To obtain the most up-to-date information regarding the Plan of Distribution visit www.AmexAntitrust.com.