

YOU MAY BE ENTITLED TO A CASH PAYMENT FROM A CLASS ACTION SETTLEMENT IF YOU WERE REQUIRED TO PROVIDE YOUR HAND SCAN OR FINGER SCAN OR OTHER BIOMETRIC INFORMATION FOR TIMEKEEPING PURPOSES TO NORTHWEST PALLET SERVICES, LLC WITHOUT CONSENT AT ANY TIME BETWEEN MARCH 5, 2015 AND MARCH 5, 2020.

ABC1234567890

Claim Number 1111111



JOHN Q CLASSMEMBER
123 MAIN ST
APT 1
ANYTOWN, ST 12345

This is a court-authorized notice of a proposed class action settlement. This is not a solicitation from a lawyer and is not notice of a lawsuit against you.

What is this Notice About?

A proposed settlement has been reached in a class action lawsuit against Northwest Pallet Service, LLC d/b/a Northwest Pallet Supply and Northwest Pallet Holdings, LLC (“Defendants”) regarding timekeeping devices used by Defendants from March 5, 2015 through March 5, 2020, which alleges that Defendants required employees to provide biometric information (e.g. handprints, fingerprints, etc.) for timekeeping purposes without advanced written consent, allegedly in violation of the Illinois Biometric Information Privacy Act (“BIPA”). The case is entitled *Castaneda v. Northwest Pallet Service, LLC, et al*, Case No. 2020 CH 2749, currently pending in the Circuit Court of Cook County, Illinois. The proposed settlement is not an admission of wrongdoing by Defendants, and Defendants deny that they violated the law. The Court has not decided who is right or wrong. Rather, to save the time, expense, and distraction of litigation, the parties have agreed to settle the lawsuit. The settlement has been preliminarily approved by a court in Chicago, Illinois.

Am I a Member of the Settlement Class?

You are a member of the Settlement Class if, at any time between March 5, 2015 through March 5, 2020, you were required to provide your hand scan or finger scan for timekeeping purposes at Defendants’ facility within the state of Illinois and did not provide written consent in advance.

What Can I Get From the Proposed Settlement?

Defendants have agreed to create a fund totaling \$506,350.00 from which all payments contemplated by the Settlement Agreement will be paid, including: (a) Incentive Award to Plaintiff, Rene Castaneda, in an amount up to \$7,500; (b) reasonable attorneys’ fees to Class Counsel not to exceed 35% percent of the Settlement Fund plus reimbursement of reasonable costs; (c) costs incurred by or on behalf of the Settlement Administrator in administrating the settlement; (d) an equal share of the remaining Settlement Fund to each Settlement Class Member; and (e) if applicable, any remaining amounts distributed to *cy pres* recipient Prairie State Legal Services. More detailed information about the Settlement Agreement is available at the website www.fishlawfirm.com/northwestpallet.

The Settlement Administrator will issue a check to each Class Member who does not otherwise exclude themselves following the final approval of the settlement. It is believed that each Class Member will receive approximately \$575.00 from the Settlement Fund, but the exact amount is not yet known and could be more or less.

Who Represents the Class?

The Court has approved the following attorney to represent the Settlement Class, who is referred to as “Class Counsel,” Fish Potter Bolaños, P.C., 200 E. 5th Ave Ste. 123, Naperville, IL 60563, admin@fishlawfirm.com, (312) 861-1800. You will not be charged for this lawyer. If you want to be represented by your own lawyer instead, you may hire one at your own expense.

What Are Your Options?

1. If you want to participate in the settlement and receive a settlement payment, do nothing. A check will be mailed to you if the Court grants final approval of the settlement.
2. If you do not want to be legally bound by the settlement, you must exclude yourself by February 7, 2022. To do so, you must mail your written request for exclusion to the Settlement Administrator, Analytics, at Castaneda v Northwest Pallet Service, LLC, c/o Analytics Consulting LLC, P.O. Box 2002, Chanhassen, MN 55317-2002. Your written request for exclusion must identify the name of the case and case number, *Castaneda v. Northwest Pallet Service, LLC, et al*, Case No. 2020 CH 2749 (Cook County), include your full name and current address, a statement that you wish to be excluded from the settlement and must be personally signed by you. If you exclude yourself, you will not receive money from this settlement, but you will retain your legal rights regarding any claims that you may have against Defendants.
3. You may object to the settlement by February 7, 2022 if you have not already excluded yourself from the settlement. If you want to object to the settlement, you must file the objection with the Clerk of the Court in Cook County and mail or e-mail a copy of the written statement to Class Counsel and Defendants' Counsel at the addresses below by February 7, 2022.

Class Counsel

David Fish
Fish Potter Bolaños, P.C.
Fifth Avenue Station
200 E. 5th Avenue, Suite 123
Naperville, IL 60563
admin@fishlawfirm.com

Defendant's Counsel

Abad Lopez
Dykema, PLLC
10 South Wacker Drive
Suite 2300
Chicago, IL 60606
ALopez@dykema.com

The written objection must include the case name and number, *Castaneda v. Northwest Pallet Service, LLC, et al*, Case No. 2020 CH 2749 (Cook County), your full name and current address, the specific grounds for the objection, all information you wish for the Court to consider, the name and contact information of your attorney, if any, and a statement indicating whether you intend to appear at the Final Approval hearing. No Class Member will be entitled to object to the settlement unless written notice of the Class Member's intention has been mailed to the Clerk of the Court by February 7, 2022, and copies provided to Class Counsel and Defendants' Counsel.

How do I update my Contact Information?

You must notify the Settlement Administrator of any changes in your mailing address so that your settlement award will be sent to the correct address. To update your address, contact Analytics, the Settlement Administrator, at the address listed below.

When is the Final Approval Hearing?

The Court will hold a hearing in this case on **March 17, 2022 at 10:00 a.m.**, in Courtroom 2402 of the Circuit Court of Cook County, 50 W. Washington St., Chicago, Illinois 60602 via Zoom Video Conference Meeting ID: 955 0046 1687, Password: 640378, to consider, among other things, (1) whether to approve the Settlement; (2) a request by the lawyers representing all class members for an award of no more than 35% of the settlement fund plus costs; and (3) a request for a service award of \$7,500 for the Class Representative. You may appear at the hearing, but you are not required to do so.

If you have any questions or for more information, contact the Settlement Administrator or Class Counsel at:

Settlement Administrator

Castaneda v Northwest Pallet Service, LLC
c/o Analytics Consulting LLC
P.O. Box 2002
Chanhassen, MN 55317-2002
(833) 676-2623
NWPalletBIPA@noticeadministrator.com

Class Counsel

David Fish
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Fifth Avenue Station
200 E. 5th Avenue, Suite 123
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