

NOTICE OF CLASS ACTION SETTLEMENT

Francesca Graziano v. Royal Die & Stamping, LLC
Case No. 2019-L-000169

ABC1234567890

Claim Number: 1111111



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YOU MAY BE ENTITLED TO A CASH PAYMENT FROM A CLASS ACTION SETTLEMENT IF YOU WERE REQUIRED TO PROVIDE YOUR FINGERPRINT OR OTHER BIOMETRIC INFORMATION FOR EMPLOYEE TIMEKEEPING PURPOSES TO ROYAL DIE & STAMPING, LLC OR ROYAL DIE AND STAMPING, INC. AT ANY TIME BETWEEN FEBRUARY 11, 2014 AND MARCH 4, 2020.

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.

A proposed settlement has been reached in a class action lawsuit against Royal Die & Stamping, LLC (including its predecessor Royal Die Stamping, Inc.) (“Defendant”) regarding timekeeping devices used by Defendant from February 11, 2014 through March 4, 2020, which required employees to provide biometric information (e.g. fingerprints etc.) for timekeeping purposes, allegedly in violation of the Illinois’ Biometric Information Privacy Act (“BIPA”). The case is entitled *Francesca Graziano v. Royal Die & Stamping, LLC*, Case No. 2019-L-000169, pending in the Circuit Court of the Eighteenth Judicial Circuit, DuPage County, Illinois. The proposed settlement is not an admission of wrongdoing by Defendant, and Defendant denies that it 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 February 11, 2014 through March 4, 2020, you were required to provide your fingerprint for timekeeping purposes to Royal Die & Stamping, LLC or Royal Die & Stamping, Inc. within the state of Illinois.

What Can I Get From the Proposed Settlement?

Defendant has agreed to create a fund totaling \$508,300.00 from which all payments contemplated by the Settlement Agreement will be paid, including: (a) an Incentive Award to Plaintiff, Francesca Graziano, in an amount up to \$7,500; (b) reasonable attorneys’ fees to Class Counsel not to exceed one-third of the settlement fund plus reimbursement of reasonable costs; (c) costs incurred by or on behalf of the Settlement Administrator in administering the settlement; (d) an equal share of the remaining Settlement Fund to each Settlement Class Member; and (e) if applicable, any remaining amounts to Prairie State Legal Services. Defendant has also agreed to alter its biometric timekeeping practices, as explained in the detailed notice and Settlement Agreement at the website listed below.

What are my Options?

Please visit the website for Class Counsel at <https://fishlawfirm.com/royaldie/>, for details about your options and related deadlines. If you do not want to be legally bound by the Settlement Agreement, you must exclude yourself by May 4, 2020. If you do not exclude yourself from the settlement reached, you will release any claims you may have, as more fully described in the Settlement Agreement, available at <https://fishlawfirm.com/royaldie/>.

You may also object to the settlement by making a valid objection by May 4, 2020. The long form notice, available on the website explains how to exclude yourself or object. The Court will hold a hearing on June 17, 2020 at 9:30 a.m., to consider whether to approve the Settlement Agreement and a request by Class Counsel for attorneys' fees, costs, and expenses of up to one-third of the Settlement Fund for their work in the case, and an Incentive Award payment in an amount up to \$7,500 to Class Representative, Francesca Graziano. You may appear at the hearing, either by yourself or through an attorney hired by you, but you don't have to. The hearing will take place in Courtroom 2008 of the Eighteenth Judicial Circuit, DuPage County, Illinois, 505 County Farm Road, Wheaton, Illinois 60187.

Do I Have to Do Anything to Participate in the Settlement?

To receive your pro rata share of the Settlement Fund and be bound by the Settlement Agreement, including the release of claims against Defendant and its affiliated entities and agents, you do not need to do anything.