

**CIRCUIT COURT OF THE
FIRST CIRCUIT OF ILLINOIS
SALINE COUNTY**

**If you worked for JRN, Inc. and used a finger scanner to clock in and out of work,
you may be a settlement class member**

A Court authorized this notice. This is not a solicitation from a lawyer.

- A court in Saline County, Illinois preliminarily approved a class action settlement to which you may be a part of. The Court has approved this Notice to inform you of your rights in the settlement. As described in more detail below, you may:
 - (1) File a timely and valid claim, receive a Settlement payment, and give up certain legal claims you have;
 - (2) Object to the Settlement and not receive a Settlement payment; or
 - (3) Request to be excluded from the Settlement and not receive a Settlement payment
- Before any money is paid, the Court must first decide whether to grant Final Approval of the Settlement.
- Please read this notice carefully. Your legal rights are affected whether you act, or don't act.

BASIC INFORMATION

1. Why was this Notice issued?

A Court authorized this notice because you have a right to know about this class action settlement and about all of your options before the settlement is approved. This Notice explains the lawsuit and your legal rights.

The Lawsuit is known as *D'Lisa Williams v. JRN, Inc.* (Cir. Ct. Saline Cnty.). Ms. Williams, the person who sued, is called the Plaintiff/Class Representative. The Defendant is JRN.

2. What is a Class Action?

In a class action, one or more named plaintiffs called Class Representatives (in this case, D'Lisa Williams) sues on behalf of a group or a "class" of people who have similar claims. In a class action, the court resolves the issues for all Class Members, except for those who exclude themselves from the Class.

3. What is this Lawsuit about?

This lawsuit alleges that JRN violated the Illinois Biometric Information Privacy Act (“BIPA” or “the Act”), 740 ILCS 14/1 *et seq.* Williams alleges that JRN violated BIPA by collecting biometric information from employees using a finger-scan timekeeping system, without obtaining prior express consent or informing said employees that their biometric information was being collected.

JRN denies that it violated any law and maintains that it could have asserted several defenses.

The Court has not determined who is right at this time. Rather, the Parties have reached a settlement.

WHO’S INCLUDED IN THE LAWSUIT?

4. How do I know if I am in the Class?

If you received this Notice and it is addressed to you, then JRN’s records indicate that you are a Settlement Class Member.

HOW TO GET BENEFITS

5. How do I get any benefits awarded to the Class?

If you are a Settlement Class Member and wish to receive a Settlement payment, you must complete the claim form and mail it back to the Settlement Administrator by **April 14, 2025**. Claim forms may be downloaded from the settlement website www.rg2claims.com/krm/html. You will receive a payment in the pro rata amount of \$750, less deductions which will be made for administrative costs, attorneys’ fees and expenses, and an incentive award for Ms. Williams. The total Maximum Settlement Fund is \$960,500, from which all payments (including payments for attorneys’ fees, expenses, incentive award, and administrative costs) will be made.

If you do nothing, and the Court grants Final Approval of the settlement, you will be bound by the Settlement Agreement and its terms, including the Released Claims.

OBJECTING TO THE LAWSUIT OR REQUEST EXCLUSION

6. How do I object or opt-out?

4.1 If you so choose, you may request to be excluded from the settlement. Class Members may request to be excluded from the Class in writing by a request postmarked on or before **April 21, 2025**. To exercise the right to be excluded, a member of the Class must timely send a written request for exclusion to the Settlement Administrator providing his/her name and address, the name and number of the case, and a statement that such Person intends to be excluded from the Settlement. A request to be excluded that does not include all of this information, that is sent to an address other than that designated in the Notice, or that is not postmarked within the time specified shall be invalid, and the Person(s) serving such a request shall be a member(s) of the Class and shall be bound as

Class Members by the Agreement, if approved. Any Class Member who elects to be excluded shall not: (i) be bound by any orders of the Final Order; (ii) be entitled to relief under this Settlement Agreement; (iii) gain any rights by virtue of this Agreement; or (iv) be entitled to object to any aspect of this Agreement. The request for exclusion must be personally signed by the Person requesting exclusion. So-called “mass” or “class” opt-outs shall not be allowed.

You also have a right to object to the settlement. Any Person who intends to object to this settlement must include in the objection his/her name and address; include all arguments, citations, and evidence supporting the objection (including copies of any documents relied on); state that he or she is a Class Member; and provide a statement indicating whether the objector intends to appear at the Final Approval Hearing and, if so, whether the appearance will be with or without counsel. Any Class Member who fails to timely file a written objection with the Court and notice of his or her intent to appear at the Final Approval Hearing in accordance with the terms of this section and as detailed in this Notice, and at the same time provide copies to designated counsel for the Parties, shall not be permitted to object to this Agreement at the Final Approval Hearing, and shall be foreclosed from seeking any review of this Agreement by appeal or other means and shall be deemed to have waived his, her, or its objections and be forever barred from making any such objections in the Action or any other action or proceeding. To be valid, the objection must be filed with the Court and delivered or postmarked and sent via mail to Plaintiff’s Counsel and JRN’s Counsel on or before the Objection/Exclusion Deadline, which is **April 21, 2025**.

THE LAWYERS REPRESENTING YOU

8. Do I have a lawyer in the case?

Yes, Patrick H. Peluso is the attorney representing the Settlement Class. If you want to be represented by your own lawyer in this case, you may hire one at your expense. You may also enter an appearance though an attorney if you so desire.

9. How will the lawyers be paid?

Settlement Class Counsel will seek, and the Court may award, an amount of reasonable attorney’s fees to be paid from the Settlement Fund.

MISCELLANEOUS

11. If I don’t exclude myself, can I sue the Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue JRN for the claims being adjudicated by this lawsuit.

16. If I exclude myself, can I get anything from this Lawsuit?

No. If you exclude yourself, you will not be able to receive benefits from the settlement.

20. Do I have to come to any hearings?

No. Settlement Class Counsel will answer any questions the Court may have and will call any necessary witnesses. But you are welcome to come to any Court hearings at your own expense. You may also pay another lawyer to attend, but it's not required.

GETTING MORE INFORMATION

22. Where do I get more information?

This Notice summarizes the Lawsuit. You can request further information by writing the Class Administrator at P.O. Box 59479, Philadelphia, PA 19102-9479 or by visiting www.rg2claims.com/jrn.html. You can call the Settlement Administrator at 1-866-742-4955 or Settlement Class Counsel at 1-720-213-0676, if you have any questions. Before doing so, however, please read this full Notice carefully.