

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Marenya Montgomery v. Vayan Group, LLC
(Case No. 1:26-cv-01154-MMM-RLH, Central District of Illinois)

This notice is to inform you that a Settlement has been reached in a class action lawsuit between Vayan Group, LLC (“Defendant”) and individuals who used Defendant’s biometric timekeeping system to clock in and out of work between March 1, 2021 and September 8, 2026. The lawsuit claims that Defendant violated Illinois’ Biometric Information Privacy Act (“BIPA”) by collecting individuals’ biometric data without complying with BIPA’s requirements. Defendant denies that it violated BIPA. The Court has not decided who is right or wrong. Please read this notice carefully. Your legal rights are affected whether you act, or fail to act.

You are receiving this Notice because you have been identified as a member of the proposed Settlement Class in a lawsuit filed against Defendant. The Settlement Class includes the following people:

The approximately 272 individuals identified whose biometric identifiers or information were allegedly captured, obtained, used, or disclosed in Illinois by Defendant between March 1, 2021 and September 8, 2026. (the “Settlement Class”).

LITIGATION SUMMARY: Plaintiff has a pending lawsuit against Defendant in the United States District Court for the Central District of Illinois alleging that Defendant violated the Illinois Biometric Information Privacy Act (“BIPA”), 740 ILCS 14/1 et seq. Specifically, Plaintiff alleges that Defendant collected, captured, received through trade, or otherwise obtained biometric identifiers and/or biometric information from individuals in Illinois without first providing the disclosures and obtaining the written informed consent required by BIPA. Defendant has denied all liability and presented defenses to the claim prior to entering into this Class Settlement.

To resolve this matter without the expense, delay and uncertainties of litigation, Plaintiff and Defendant have reached a Settlement. All Settlement Class Members will release Defendant and Released Parties from all liability arising from the BIPA claim alleged in the lawsuit.

MONETARY BENEFITS: Defendant shall create a \$104,720 common fund, and each Settlement Class Member who does not opt out of the settlement shall be entitled to their pro rata share of the common fund, after a deduction of attorney’s fees, litigation costs, class representative award, and class administration costs. The net payment to Settlement Class Members is estimated to be around \$194 per person (this amount is subject to be higher or lower).

PARTICIPATING IN THE SETTLEMENT: You do not need to do anything to receive your pro rata settlement payment. If your address changes, make sure to notify the settlement administrator of your new address, so you can receive the check.

All Settlement Class Members who do not exercise their right to exclude themselves from the Settlement Class in the manner set forth below will release Defendant and Released Parties from all Released Claims, including any and all claims arising out of the cause of action advanced in the class action complaint.

ATTORNEYS' FEES AND COSTS: Class Counsel will petition the Court for 36% of the Settlement Fund, and seek reimbursement of the case filing fee and service of process fee.

OPTING OUT OF THE SETTLEMENT CLASS: If you wish to be excluded from the Settlement Class, and receive **no settlement benefits**, you must send a written Request for Exclusion to Montgomery v. Vayan, c/o Settlement Administrator, PO Box 23369, Jacksonville, FL 32241 no later than **December 7, 2026**, stating your name, address, and the following statement: "Requests exclusion from the Settlement Class in *Marenya Montgomery v. Vayan Group, LLC*. Requests for Exclusion must be signed and postmarked by **December 7, 2026**. Requesting exclusion from the Settlement Class removes your ability to receive the benefits of the settlement set forth above, but doing so preserves any claims you may have against Defendant.

OBJECTING TO THE SETTLEMENT: As a Settlement Class Member, you may appear at the Final Fairness Hearing to be heard in opposition to the fairness of the settlement, provided that you send a written Notice of Objection to the Settlement to Montgomery v. Vayan, c/o Settlement Administrator, PO Box 23369, Jacksonville, FL 32241, Class Counsel, Matthew T. Peterson of Consumer Law Advocate, PLLC, 1000 Brickell Ave, Suite 715, Miami, FL 33131, and, Defense Counsel, Catherine Miller, Akerman, 71 South Wacker Drive, 47th Floor, Chicago, IL 60606. Your written objection must include: (a) a notice of intent to appear; (b) a detailed statement of each objection asserted; (c) the grounds for each objection; (d) any documents and writings which you want the Court to consider; and (e) a list of witnesses you intend to call, if any. **OBJECTIONS MUST BE RECEIVED NO LATER THAN DECEMBER 7, 2026.**

FINAL FAIRNESS HEARING: The Court will hold a Final Fairness Hearing on December 21, 2026 before the Honorable Michael Mihm, to determine whether the proposed settlement is fair, reasonable and adequate. **YOU ARE NOT REQUIRED TO ATTEND BUT YOU MAY DO SO IF YOU WISH.**

ADDITIONAL INFORMATION: This is a summary Notice of the terms of the settlement. You may view the Settlement Agreement and complaint on the settlement website (www.vayanbipasettlement.com). You can also contact the Settlement Administrator via email at info@vayanbipasettlement.com or via mail at: Montgomery v. Vayan, c/o Settlement Administrator, PO Box 23369, Jacksonville, FL 32241

This Notice has been Approved and Ordered by:
Honorable Michael Mihm