
Dynamic Manufacturing BIPA
Settlement Administrator
c/o Analytics Consulting LLC
P.O. Box 2006
Chanhassen, MN 55317-9800

A settlement has been reached in a class action lawsuit alleging that Defendant, Dynamic Manufacturing, Inc. ("Dynamic Manufacturing"), unlawfully possessed, collected, captured, stored, received, transmitted, converted, or otherwise obtained or disclosed its Illinois employees' and temporary workers' alleged Biometric Identifiers and/or Biometric Information through its finger clock-in system(s). Dynamic Manufacturing denies the claims in the lawsuit and contends that it did not do anything wrong and denies that class certification is warranted or appropriate. The Court did not resolve the claims and defenses raised in this action. Nor has the Court determined that Dynamic Manufacturing did anything wrong or that this matter should be certified as a class action except if the Settlement is fully approved by the Court. The parties have agreed to settle the dispute to avoid the cost and risk of a trial.

Am I a Class Member? Our records indicate that you are a current or former employee of Dynamic Manufacturing in the State of Illinois or a temporary worker who worked for Dynamic Manufacturing in the State of Illinois and may be a Class Member. Class Members are persons who worked or are currently working for Dynamic Manufacturing in Illinois and had their alleged Biometric Identifiers and/or Biometric Information collected, captured, stored, possessed, received, transmitted, converted, or otherwise obtained or disclosed by Dynamic Manufacturing or its agent(s), vendor(s) or payroll provider(s) from February 3, 2016 to December 27, 2022, in connection with Dynamic Manufacturing timekeeping system(s) without first executing a written release.

What Can I Get? If approved by the Court, a Gross Settlement Amount in the total amount of \$1,826,400.00 will be established to pay all claims to the Settlement Class, including all notice and administration expenses, approved attorneys' fees and costs, and an incentive award to the named plaintiff. In addition, Dynamic Manufacturing has represented that it is in full compliance with the BIPA.

How Do I Get a Payment? You must submit a properly completed Claim Form **no later than May 22, 2023**. You may use the Claim Form attached to this Notice or you can submit one online at www.DynamicBIPASettlement.com.

What Are My Other Options? You may exclude yourself from the Settlement Class by sending a letter to the settlement administrator no later than **May 22, 2023**. If you exclude yourself, you cannot get a settlement payment, but you keep any rights you may have to sue Dynamic Manufacturing over the legal issues in the lawsuit. If you don't exclude yourself from the Settlement Class, then you and/or your lawyer also have the right to appear before the Court, at your own cost, to object to the proposed settlement, if you wish to do so, but you don't have to. Your written objection must be filed no later than **May 22, 2023**. Specific instructions about how to object to, or exclude yourself from, the Settlement are available at www.DynamicBIPASettlement.com. If you do nothing, and the Court approves the Settlement, you will be bound by all of the Court's orders and judgments, and your claims relating to Dynamic Manufacturing's alleged unlawful collection, capture, receipt, possession, storage, transmission, conversion, or otherwise obtaining or disclosing of its Illinois employees' and temporary workers' alleged Biometric Identifiers and/or Biometric Information without first obtaining an executed written release, as well as any other claims listed in the Settlement Agreement, will be released.

Who Represents Me? The Court has appointed Bursor & Fisher, P.A. to represent the class. These attorneys are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

When Will the Court Consider the Proposed Settlement? The Court will hold the Final Approval Hearing at **9:30 a.m. on June 20, 2023** at the DuPage County Courthouse, 505 N. County Farm Road, Wheaton, IL 60187. At that hearing, the Court will: hear any objections concerning the fairness of the Settlement; determine the fairness of the Settlement; decide whether to approve Class Counsel's request for attorneys' fees and costs; and decide whether to award the Class Representative up to \$5,000 from the Gross Settlement Amount for their services in helping to bring and settle this case. Dynamic Manufacturing has agreed that Class Counsel may be paid attorneys' fees out of the Gross Settlement Amount in an amount to be determined by the Court. Class Counsel is entitled to seek no more than 35% of the Gross Settlement Amount, plus reimbursement of reasonable costs and expenses, but the Court may award less than this amount.

How Do I Get More Information? This is only a summary. For more information, including the full Notice, Claim Form and Settlement Agreement go to www.DynamicBIPASettlement.com, contact the settlement administrator at **833-821-6836** or Dynamic Manufacturing BIPA Settlement Administrator, P.O. Box 2006, Chanhassen, MN 55317-2006, or call Class Counsel at 646-837-7150. Please do not telephone the Court to inquire about the settlement or the claims process.

DYNAMIC MANUFACTURING BIPA SETTLEMENT CLAIM FORM

THIS CLAIM FORM MUST BE SUBMITTED ONLINE OR POSTMARKED BY MAY 22, 2023 AND MUST BE FULLY COMPLETED, BE SIGNED, AND MEET ALL CONDITIONS OF THE SETTLEMENT AGREEMENT.

Instructions: Fill out each section of this form and sign where indicated.

Name (First, M.I., Last): _____

Address: _____

City

State

Zip Code

Address Where You Lived When Working At Dynamic Manufacturing, Inc. (if different): _____

Email Address (optional): _____

Contact Phone #: (____) ____ - ____ (You may be contacted if further information is required.)

Class Member Verification: By submitting this claim form and checking the boxes below, I declare that I believe I am a member of the Settlement Class and that the following statements are true (each box must be checked to receive a payment):

- I worked for or was a temporary worker assigned to Dynamic Manufacturing, Inc. in the State of Illinois between February 3, 2016 and December 27, 2022, and had my alleged Biometric Identifiers and/or Biometric Information collected, captured, stored, possessed, received, transmitted, converted, or otherwise obtained or disclosed by Dynamic Manufacturing, Inc. or its agent(s), vendor(s) or payroll provider(s) in connection with Dynamic Manufacturing, Inc.'s timekeeping system(s) without first executing a written release.
- I have not filed for an Opt-Out or to be excluded from this Settlement.
- I have not submitted any other Claim for the same account and have not authorized any other person or entity to do so, and know of no other person or entity having done so on my behalf. If I maintained account(s) jointly with any other person or entity, only one Claim has or will be submitted per account.
- Under penalty of perjury, all information provided in this Claim Form is true and correct to the best of my knowledge and belief.

_____/_____/_____
Signature Print Name Date

Before you complete and submit this Claim Form by mail or online, you should read and be familiar with the information contained in this Notice and Claim Form and available at www.DynamicBIPASettlement.com. The Settlement Administrator will review your Claim Form; you may be required to submit additional documentation to validate your claim. If accepted, you will be mailed a check for a *pro rata* share of the Net Settlement Fund. This process takes time. Please be patient.

Questions, visit www.DynamicBIPASettlement.com or call (833) 821-6836

COURT AUTHORIZED NOTICE
OF CLASS ACTION AND
PROPOSED SETTLEMENT

**OUR RECORDS
INDICATE YOU
WORK OR HAVE
WORKED AT DYNAMIC
MANUFACTURING,
INC. IN THE STATE
OF ILLINOIS. YOU
MAY BE ENTITLED
TO A PAYMENT FROM
A CLASS ACTION
SETTLEMENT**

**Dynamic Manufacturing
BIPA Settlement Administrator**
c/o Analytics Consulting LLC
P.O. Box 2006
Chanhassen, MN 55317-2006

Postal Service: Please Do Not Mark Barcode

By Order of the Court
Dated: March 22, 2023