

# EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ROBERT FISCHER, STEPHANIE LUKIS,  
ALESSANDRA FISSINGER-FIGUEROA,  
ERIC CARVALHO, JOSE CAMACHO,  
RHONDA COTTA, ROGELIO RAMIREZ,  
JAKE WEBB, JAMES ANDERSON,  
THERESE BACKOWSKI, JUSTIN  
ROGALSKY, NATEEMA LEWIS, and  
NICHOLAS FIORITTO, individually and on  
behalf of all others similarly situated,

*Plaintiffs,*

v.

INSTANT CHECKMATE LLC,  
TRUTHFINDER LLC, INTELIOUS LLC, THE  
CONTROL GROUP MEDIA COMPANY,  
LLC, and PEOPLECONNECT, INC.,

*Defendants.*

Case No.: 19-cv-4892

Hon. Manish S. Shah

**DECLARATION OF JACOB KAMENIR  
OF SIMPLURIS, INC. IN SUPPORT OF FINAL APPROVAL OF SETTLEMENT**

Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I, Jacob Kamenir, certify that the statements set forth in this instrument are true and correct, except as to matters herein stated to be on information and belief, and as to such matters, I certify as foresaid that I verily believe the same to be true:

1. I am the Senior Director of Notice at Simpluris, Inc. (“Simpluris”), the court-appointed Settlement Administrator in the above-captioned case, whose principal office is located at 3194-C Airport Loop Dr., Costa Mesa, CA 92626. I am over twenty-one years of age and authorized to make this declaration on behalf of Simpluris and myself. I have personal knowledge of the information set forth herein.

2. Simpluris is a class action administrator located in Costa Mesa, California. Established in 2007, Simpluris has administered over 9,000 cases nationwide, with class sizes ranging from a few hundred to over one million class members. Representative cases include: *Myart v. AutoZone, Inc.* and *Aceves v. Autozone, Inc.* (US District Court, CA Central Division) (208,050 class members), *Diaz v. SeaWorld* (Superior Court of the State of California) (1,281,123 class members), and *Woods v. Vector Marketing* (US District Court, Northern District of California) (194,500 class members).

3. Simpluris was appointed as the Settlement Administrator to provide notification and settlement administration services in accordance with the Class Action Settlement Agreement (the “Settlement Agreement”) filed with the Court on August 30, 2023, in connection with the *Fischer, et al. v. Instant Checkmate LLC, et al.*, Case No. 19-cv-04892, matter referred to herein as the “Settlement.”<sup>1</sup> Simpluris’ duties in this Settlement have and will include: (a) receiving and analyzing the class member data (the “Class List”); (b) establishing a post office box for the receipt of general mail and correspondence; (c) creating a website that allows individuals to submit Claim Forms and Form W-9s online; (d) establishing an email address to receive class member inquiries; (e) establishing a toll-free number with an Interactive Voice Response (“IVR”) system and voicemail support, with live agent response; (f) preparing and sending Notice via U.S. Mail; (g) preparing and sending Notice via email; (h) receiving and processing Notices returned as undeliverable with a forwarding address and resending such Notices; (i) processing Notices returned as undeliverable as addressed with no forwarding address, performing a skip trace in search of a new address, and resending Notices for which a new address is obtained; (j) receiving

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<sup>1</sup> Except as otherwise indicated, all defined terms used in this declaration shall have the same meanings ascribed to them in the Settlement Agreement.

and processing any opt-outs and objections; (k) receiving and processing Claim Forms; and (l) such other tasks as counsel for the Parties or the Court orders Simpluris to perform.

4. Class List: On or about September 6, 2023, Simpluris received 7 folders of data files in JSON format organized by Settlement Payment Class. On September 19, 2023, Simpluris received supplemental data files in JSON format organized by Settlement Payment Class state. Thereafter Simpluris processed the various data files to extract contact information associated with each Settlement Payment Class Member including, but not limited to, names, email addresses and mailing addresses. On or about September 27, 2023, Simpluris performed a reverse look up on the name of each Settlement Payment Class Member to obtain additional email addresses, and mailing addresses for members with no contact information. Thereafter, Simpluris “scrubbed” the data to ensure it was in proper format for distributing the Notice via U.S. Mail. In an effort to ensure that the Notice would be delivered to members, Simpluris compared the address data against the United States Postal Service (“USPS”) National Change of Address (“NCOA”) database and updated the data with the changes received from NCOA.

5. After processing class data and removing duplicate records, there were 83,445 records, which was confirmed to be the full Settlement Payment Class List, distributed between Settlement Payment Classes as follows:

- a. Alabama Settlement Payment Class: 4,094 member records;
- b. California Settlement Payment Class: 30,914 member records;
- c. Illinois Settlement Payment Class: 26,530 members records;
- d. Indiana Settlement Payment Class: 2,538 members records;
- e. Nevada Settlement Payment Class: 3,635 members records;
- f. Ohio Settlement Payment Class: 15,197 members records; and

g. South Dakota Settlement Payment Class: 537 members records.

6. CAFA Notice: On September 8, 2023, pursuant to the Class Action Fairness Act of 2005 and 28 U.S.C. § 1715 (“CAFA”), Simpluris completed a mailing that informed the appropriate state and federal Attorneys General about the Settlement on behalf of Defendants Instant Checkmate LLC; Truthfinder LLC; Intelius LLC; PeopleConnect, Inc.; and The Control Group Media Company, LLC. Attached hereto as **Exhibit A** is a true and correct copy of the CAFA notice letter sent to the Attorneys General and the list of recipients.

7. Post Office Box: On or about August 16, 2022, Simpluris obtained a post office box with the mailing address Fischer et al v Instant Checkmate LLC et al, P.O. Box 25043, Santa Ana, California 92799, in order to receive completed paper Claim Forms, requests for exclusion, objections to the Settlement, and correspondence from Settlement Payment Class Members.

8. Toll-Free Number: On or about September 29, 2023, Simpluris established and is still maintaining the toll-free number of (833) 200-7004 for individuals to call and obtain additional information regarding the Settlement utilizing an automated IVR. Callers have the option to leave a voicemail for a return call by a live agent. As of January 18, 2024, the toll-free line has received 897 calls.

9. Settlement Website: On or about September 29, 2023, Simpluris published and since such date has been hosting a dedicated website at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) (the “Settlement Website”). The Settlement Website contains a summary of the Settlement; important dates and deadlines, such as the Claims Deadline, Objection/Exclusion Deadline, and the Final Approval Hearing date; and answers to frequently-asked questions. It also offers the Long Form Notice in both English and Spanish, and the capability to electronically submit a Claim Form and Form W-9. Attached hereto as **Exhibits B - D** are true and correct copies of the Long Form

Notice in English and Spanish and the website Claim Form, respectively. During the claim submission period, Settlement Payment Class Members were able to log in and submit a Claim Form using the Class Member ID provided in mailed Notices and email Notices along with their last name. Settlement Payment Class Members also had the option to submit a non-login Claim Form that did not require a Class Member ID, but did require that the individual provide contact information that was found to be associated with a Settlement Payment Class Member. The online Claim Form also allowed Settlement Payment Class Members to select the method by which they wish to receive their settlement payment: via Venmo, Zelle, or check. Finally, the Settlement Website contains relevant case documents including the Class Action Settlement Agreement; Plaintiff's Motion for and Memorandum in Support of Preliminary Approval of the Class Action Settlement; the Order Preliminarily Approving Class Action Settlement; Plaintiff's Motion and Memorandum of Law in Support of Attorneys' Fees, Expenses, and Incentive Award and exhibits in support; and the Notification of Docket Entry extending the deadline for claims, objections to the Settlement, and requests for exclusion to December 27, 2023.

10. Email Address: On or about September 20, 2023, Simpluris established a dedicated email address, [info@PeopleConnectRightofPublicity.com](mailto:info@PeopleConnectRightofPublicity.com), as an alternative method for Settlement Payment Class Members to submit requests for exclusion and correspondence to Simpluris.

11. Email Notice: On or about September 11, 2023, Simpluris received from counsel Microsoft Word versions of the email Notices to be emailed to Settlement Payment Class Members in the forms attached to the Settlement Agreement as Exhibit C (the Alabama Settlement Payment Class), Exhibit D (the California Settlement Payment Class), Exhibit E (the Illinois Settlement Payment Class), Exhibit F (the Indiana Settlement Payment Class), Exhibit G (the Nevada Settlement Payment Class), Exhibit H (the Ohio Settlement Payment Class), and Exhibit I (the

South Dakota Settlement Payment Class). Simpluris prepared and formatted drafts of the email Notices, which counsel reviewed and approved. True and correct copies of the finalized email Notices are attached hereto as **Exhibit E**. Simpluris sent email Notices to the Settlement Payment Class Members as below and, after accounting for emails that “bounced-back,” an email Notice was successfully delivered to at least one email address for Settlement Payment Class Members as follows:

a. Alabama Settlement Payment Class:

<b>Email Campaign Date</b>	<b>Members Sent at least one Email</b>	<b>Members with at least one Delivered Email</b>
September 29, 2023	3,390	3,146
November 2, 2023	2,490	2,374
December 15, 2023	3,417	2,837
December 22, 2023	3,323	3,223

b. California Settlement Payment Class:

<b>Email Campaign Date</b>	<b>Members Sent at least one Email</b>	<b>Members with at least one Delivered Email</b>
September 29, 2023	22,404	20,695
November 2, 2023	15,130	14,093
December 15, 2023	22,848	18,232
December 22, 2023	22,325	21,425

c. Illinois Settlement Payment Class:

<b>Email Campaign Date</b>	<b>Members Sent at least one Email</b>	<b>Members with at least one Delivered Email</b>
September 29, 2023	21,124	19,629
November 2, 2023	14,324	13,459
December 15, 2023	20,033	17,730
December 22, 2023	19,226	18,575

## d. Indiana Settlement Payment Class:

<b>Email Campaign Date</b>	<b>Members Sent at least one Email</b>	<b>Members with at least one Delivered Email</b>
September 29, 2023	2,034	1,896
November 2, 2023	1,448	1,347
December 15, 2023	2,096	1,699
December 22, 2023	2,026	1,952

## e. Nevada Settlement Payment Class:

<b>Email Campaign Date</b>	<b>Members Sent at least one Email</b>	<b>Members with at least one Delivered Email</b>
September 29, 2023	2,912	2,699
November 2, 2023	2,046	1,896
December 15, 2023	2,946	2,394
December 22, 2023	2,877	2,777

## f. Ohio Settlement Payment Class:

<b>Email Campaign Date</b>	<b>Members Sent at least one Email</b>	<b>Members with at least one Delivered Email</b>
September 29, 2023	12,309	11,388
November 2, 2023	8,846	8,217
December 15, 2023	12,309	10,172
December 22, 2023	11,975	11,577

## g. South Dakota Class:

<b>Email Campaign Date</b>	<b>Members Sent at least one Email</b>	<b>Members with at least one Delivered Email</b>
September 29, 2023	428	393
November 2, 2023	300	279
December 15, 2023	441	398
December 22, 2023	421	404

12. Mailed Notice: On or about September 11, 2023, Simpluris received from counsel Microsoft Word versions of the postcard Notice, with a fold-over Claim Form attached, to be mailed to Settlement Payment Class Members in the forms attached to the Settlement Agreement



as Exhibit J (the Alabama Settlement Payment Class), Exhibit K (the California Settlement Payment Class), Exhibit L (the Illinois Settlement Payment Class), Exhibit M (the Indiana Settlement Payment Class), Exhibit N (the Nevada Settlement Payment Class), Exhibit O (the Ohio Settlement Payment Class), and Exhibit P (the South Dakota Settlement Payment Class). Simpluris prepared and formatted drafts of the postcard Notices, which counsel reviewed and approved. True and correct copies of the finalized postcard Notices are attached hereto as **Exhibit F**. On October 11, 2023, Simpluris caused the mailing of the postcard Notice with a detachable, postage prepaid Claim Form to all Settlement Payment Class Members who had not received a deliverable email Notice and who had not filed a claim. On November 20, 2023, at the direction of counsel, Simpluris performed a skip-trace search to locate additional mailing addresses for all Settlement Payment Class Members. On November 29, 2023, Simpluris caused the mailing of reminder mail Notices to all Settlement Payment Class Members who had not filed a claim, using the addresses from the supplemental skip-trace which confirmed, updated, or located new mailing addresses. True and correct copies of the finalized reminder postcard Notices are attached hereto as **Exhibit G**. For postcard Notices returned by the USPS as undeliverable as addressed with no forwarding address, Simpluris submitted the addresses through an additional skip-trace process to search for updated addresses. If a new address was found, Simpluris re-mailed the Notice; if no additional address was available, the mailing was deemed undeliverable. The postcard Notice campaigns concluded as follows:

a. Alabama Settlement Payment Class:

<b>Mail Campaign Date</b>	<b>Mail Notices Sent</b>	<b>Mail Notices Delivered</b>
October 11, 2023	933	855
November 29, 2023	3,981	3,766

## b. California Settlement Payment Class:

<b>Mail Campaign Date</b>	<b>Mail Notices Sent</b>	<b>Mail Notices Delivered</b>
October 11, 2023	10,219	9,932
November 29, 2023	29,880	28,457

## c. Illinois Settlement Payment Class:

<b>Mail Campaign Date</b>	<b>Mail Notices Sent</b>	<b>Mail Notices Delivered</b>
October 11, 2023	6,804	6,206
November 29, 2023	25,441	23,888

## d. Indiana Settlement Payment Class:

<b>Mail Campaign Date</b>	<b>Mail Notices Sent</b>	<b>Mail Notices Delivered</b>
October 11, 2023	635	597
November 29, 2023	2,485	2,351

## e. Nevada Settlement Payment Class:

<b>Mail Campaign Date</b>	<b>Mail Notices Sent</b>	<b>Mail Notices Delivered</b>
October 11, 2023	936	852
November 29, 2023	3,527	3,301

## f. Ohio Settlement Payment Class:

<b>Mail Campaign Date</b>	<b>Mail Notices Sent</b>	<b>Mail Notices Delivered</b>
October 11, 2023	3,809	3,536
November 29, 2023	14,759	13,963

## g. South Dakota Class:

<b>Mail Campaign Date</b>	<b>Mail Notices Sent</b>	<b>Mail Notices Delivered</b>
October 11, 2023	144	134
November 29, 2023	526	481

13. After performing advanced skip-trace searches on Settlement Payment Class Members' email addresses on or about October 27, 2023, and an additional skip-trace on Settlement Payment Class Members' mailing addresses on or about November 21, 2023, Simpluris sent three (3) reminder email Notices on November 2, 2023, December 15, 2023, and December

22, 2022, and one (1) reminder postcard Notice on November 29, 2023. Deliverability across all four (4) reminder notice campaigns after skip-tracing is calculated as follows:

<b>SETTLEMENT PAYMENT CLASS</b>	<b>CLASS MEMBER COUNT</b>	<b>MEMBERS WHO RECEIVED AT LEAST 1 NOTICE</b>	<b>PERCENTAGE OF MEMBERS WHO RECEIVED NOTICE</b>
Alabama	4,094	3,962	96.78%
California	30,914	29,628	95.84%
Illinois	26,530	25,175	94.89%
Indiana	2,538	2,463	97.04%
Nevada	3,635	3,486	95.90%
Ohio	15,197	14,656	96.44%
South Dakota	537	512	95.34%
<b>TOTAL CLAIMS</b>	<b>83,445</b>	<b>79,882</b>	<b>95.73%</b>

14. Objections and Exclusions: The extended Objection/Exclusion Deadline was December 27, 2023. As of January 18, 2024, Simpluris has received two (2) requests for exclusion from the Settlement and zero (0) objections to the Settlement. True and correct copies of the requests for exclusion are attached hereto as **Exhibit H**.

15. Claim Form Submissions: The extended deadline to submit a Claim Form was December 27, 2023. Simpluris received and processed a total of 13,892 Claim Forms from Settlement Payment Class Members. The total number of Claim Forms submitted by Settlement Payment Class Members in each Claim Form category is as follows:

<b>SETTLEMENT PAYMENT CLASS</b>	<b>POSTCARD CLAIM FORMS</b>	<b>WEBSITE CLAIM FORMS</b>	<b>WEBSITE VALIDATED UNKNOWN CLAIMS</b>	<b>TOTAL CLAIMS SUBMITTED</b>
Alabama	309	302	19	630
California	2,341	1,955	65	4,361
Illinois	2,649	3,033	123	5,805
Indiana	189	151	6	346
Nevada	238	186	8	432
Ohio	1,262	963	29	2,254
South Dakota	37	26	1	64
<b>TOTAL CLAIMS</b>	<b>7,025</b>	<b>6,616</b>	<b>251</b>	<b>13,892</b>

16. Approved Claims: After performing claim validation and deduplicating submissions, as of January 18, 2024, Simpluris has identified 12,880 valid claims submitted by Settlement Payment Class Members as follows:

<b>SETTLEMENT PAYMENT CLASS</b>	<b>CLASS MEMBER COUNT</b>	<b>TOTAL VALID CLAIMS</b>	<b>FINAL CLAIMS RATE</b>
Alabama	4,094	588	14.36%
California	30,914	4,052	13.11%
Illinois	26,530	5,372	20.25%
Indiana	2,538	328	12.92%
Nevada	3,635	394	10.84%
Ohio	15,197	2,084	13.71%
South Dakota	537	62	11.55%
<b>TOTAL CLAIMS</b>	<b>83,445</b>	<b>12,880</b>	<b>15.44%</b>

17. Deficient or Rejected Claims: As of January 18, 2024, of the 13,892 Claim Forms submitted by Settlement Payment Class Members, Simpluris has rejected a total of 1,012 claims for the following deficiencies (some claims are deficient in more than one category):

<b>SETTLEMENT PAYMENT CLASS</b>	<b>DUPLICATE CLAIMS</b>	<b>LATE CLAIMS</b>	<b>MISSING REQUIRED INFORMATION</b>
Alabama	21	14	8
California	111	90	114
Illinois	226	130	84
Indiana	7	4	8
Nevada	13	10	17
Ohio	59	57	61
South Dakota	1	1	0
<b>TOTAL CLAIMS</b>	<b>438</b>	<b>306</b>	<b>292</b>

Additionally, Simpluris has received 46 generic, mailed Claim Forms that were downloaded in PDF on the Settlement Website, and which have been reviewed against the original Class List and addresses as updated in the NCOA and skip-trace processes. All 46 generic claims are denied because they do not match to a Settlement Class member record. Simpluris continues to review any incoming timely mailed Claim Forms for validity.

18. As of January 18, 2024, Simpluris anticipates incurring \$323,495.00 in fees and expenses through the course of this administration. The settlement administration was initially bid at \$160,453 on or about July 26, 2023. The proposal was revised to add a reverse look-up for noticing purposes on September 29, 2023, in the amount of \$11,871.00, and again revised on October 26, 2023, to add sequential levels of skip-tracing for emails in the amount of \$39,701.00, and skip-tracing for mailing addresses and a reminder postcard in the amount of \$111,470.00.

I declare under penalty of the perjury that the foregoing is true and correct. Executed on January 23, 2024, at Albert Lea, Minnesota.

  
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JACOB KAMENIR

# **EXHIBIT A**



September 8, 2023

**Re: *Fischer v. Instant Checkmate LLC***  
**Case No. 19-cv-04892 (N.D. Ill.)**  
**Notice of Proposed Settlement**

Dear Mr./Madam Attorney General:

Defendants Instant Checkmate LLC; Truthfinder LLC; Intelius LLC; PeopleConnect, Inc.; and The Control Group Media Company, LLC provide this notice pursuant to the Class Action Fairness Act of 2005 and 28 U.S.C.A. § 1715. The parties to the above-referenced class action have reached a proposed class settlement. The settlement includes seven (7) damages classes consisting of individuals in the SEO Directory who were either searched for or otherwise navigated to on InstantCheckmate.com, Truthfinder.com, Intelius.com or US Search.com (“Defendants’ Websites”) on or after various dates through the date of preliminary approval and for whom a report was purchased through the SEO Directory as a result of the search or navigation that displayed an address in the States of Alabama, California, Indiana, Nevada, Ohio, and South Dakota per Defendant’s records or, for the Illinois class only, for whom a report was purchased as a result of the search or navigation or after a follow-up e-mail was sent. The settlement also includes seven (7) injunctive relief classes consisting of all residents in the States of Alabama, California, Illinois, Indiana, Nevada, Ohio, and South Dakota, for whom Defendants can generate a name, age, and one or more locations(s) and relative(s) in either the SEO Directory or the search results of Defendants’ Websites.

Pursuant to 28 U.S.C. § 1715(b), please visit the website link listed below to view documents which contain of all the necessary information regarding the proposed Settlement. The documents available on the website are listed below.

**Document Site:** <https://transfer.simpluris.com/link/Q1Oda2tQsbNt7t3Atm5rvX>

**Available Documents:** **Exhibit A – Class Action Complaint**  
**Exhibit B – First Amended Class Action Complaint**  
**Exhibit C – Second Amended Class Action Complaint**  
**Exhibit D – Class Action Settlement Agreement**  
**Exhibit E – Motion and Memorandum in Support of Preliminary Approval**  
**Exhibit F – Proposed Notices to Class Members by Subclass**

The Court has not granted conditional preliminary approval. There is currently a hearing scheduled for September 14, 2023, on Plaintiffs’ Motion for and Memorandum in Support of Preliminary Approval of Class Action Settlement (see Exhibit E).

Pursuant to 28 U.S.C. § 1715(b)(7)(B), the current estimate of the number of damages class members per subclass and proportionate percentage of shares of class member claims by state is as follows:<sup>1</sup>

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<sup>1</sup> The following information consists only of rough estimates, as Defendants’ records contain only addresses associated with individuals, which are not necessarily their residences. Additionally, this information is expected to change, as the classes will include individuals who may be added through the date of preliminary approval of the settlement, which has not yet occurred.





STATE	EST. CLASS SIZE	% SHARE OF SETTLEMENT
Alabama	3,900	4.83%
California	29,735	36.85%
Illinois	25,284	31.33%
Indiana	2,371	2.94%
Nevada	3,532	4.38%
Ohio	5,359	19.03%
South Dakota	509	0.63%
<b>ESTIMATED TOTAL:</b>	<b>80,690</b>	<b>100.00%</b>

For additional information about this Settlement, please contact:

Settlement Administrator:	Class Counsel:	Defense Counsel:
Amy Lechner Simpluris, Inc. 3194 Airport Loop Dr., Ste. C Costa Mesa, CA 92663 alechner@simpluris.com	J. Eli Wade-Scott Edelson PC 150 California St, 18th Floor San Francisco, CA 94111	Debbie L. Berman Jenner & Block LLP 353 N. Clark Street Chicago, IL 60654-3456

Materials filed in this action can be obtained through PACER, which is accessible at <https://www.pacer.uscourts.gov/file-case/court-cmecf-lookup>.

Regards,

Michael Bui  
Client Services Director





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Salem, OR 97301

Office of the Attorney General  
Michelle A. Henry  
Pennsylvania Office of Attorney General  
16th Floor, Strawberry Square  
Harrisburg, PA 17120

PR Department of Justice  
Domingo Emanuelli Hernández  
P.O. Box 9020192  
San Juan, PR 00902-0192

Office of the Attorney General  
Peter F. Neronha  
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Columbia, SC 29211-1549

Office of the Attorney General  
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1302 E. Highway 14, Suite 1  
Pierre, SD 57501-8501

Office of the Attorney General  
Jonathan Skrmetti  
425 5th Avenue North  
Nashville, TN 37243

Office of the Attorney General  
Ken Paxton  
Capitol Station  
P.O. Box 12548  
Austin, TX 78711-2548

Office of the Attorney General  
Sean Reyes  
Utah State Capitol Complex  
350 North State Street, Suite 230  
Salt Lake City, UT 84114-2320

Office of the Attorney General  
Charity R. Clark  
109 State St  
Montpelier, VT 05609-1001

Office of the Attorney General  
Carol Thomas-Jacobs  
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GERS Building, 2nd Floor  
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Office of the Attorney General  
Jason Miyares  
202 North Ninth Street  
Richmond, VA 23219

Office of the Attorney General  
Patrick Morrissey  
State Capitol  
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Charleston, WV 25305

Office of the Attorney General  
Joshua Kaul  
State Capitol, Room 114 East  
P.O. Box 7857  
Madison, WI 53707-7857

Office of the Attorney General  
Bridget Hill  
109 State Capitol  
200 W. 24th St.  
Cheyenne, WY 82002

Office of the Attorney General  
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VIA email only at:  
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Letitia James  
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New York, NY 10005

Office of the Attorney General  
Bob Ferguson  
VIA email only at:  
privatecpa@ATG.WA.GOV  
Olympia, WA 98504-0100

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS**

**IF YOU LIVE IN ALABAMA, CALIFORNIA, ILLINOIS, INDIANA, NEVADA, OHIO OR SOUTH DAKOTA AND SOMEONE SEARCHED YOUR NAME AND PURCHASED A REPORT ON INSTANTCHECKMATE.COM, INTELIUS.COM, TRUTHFINDER.COM, OR USSEARCH.COM YOU CAN CLAIM A PAYMENT FROM A CLASS ACTION SETTLEMENT.**

*Don't worry, you are not being sued. This is an official court notice, not an ad for a lawyer.*

- A Settlement has been reached in a class action lawsuit between people from certain U.S. States and Instant Checkmate LLC, Truthfinder LLC, Intelius LLC, PeopleConnect, Inc., and The Control Group Media Company, LLC (“Defendants”). The Defendants operate websites that provide directory services offering information about people. The lawsuit claims that Defendants violated these states’ right of publicity laws when they used individuals’ names, ages, contact information, former residence locations, lists of possible relatives, likenesses, photographs, images, or other identifying information to advertise or promote subscriptions to Defendants’ people-search websites. Defendants deny that they violated any law. The Court has not decided who is right or wrong.
- If you received a notice of the Settlement in the mail or by e-mail, our records indicate that you are included in the Settlement, and you may submit a claim form online or by mail to receive a payment through Venmo, Zelle, or a check. Those included in the Settlement (i) have an Alabama, California, Illinois, Indiana, Nevada, Ohio, or South Dakota address, (ii) were searched for on InstantCheckmate.com, Intelius.com, Truthfinder.com, or USSearch.com, and (iii) had a report on them purchased.
- If the Court approves the Settlement, those included who submit valid claims will receive an equal share of a settlement fund that Defendants will provide for each state, after all notice and administration costs, incentive award, and attorneys’ fees have been paid. Individual payments are expected to be as follows for each state: Alabama, \$577 to \$960; California, \$82 to \$137; Illinois, \$635 to \$1,058; Indiana, \$111 to \$185; Nevada, \$82 to \$137; Ohio, \$286 to \$477; and South Dakota, \$107 to \$178. These payments could be more or less than these amounts depending on the number of valid claims submitted. Those eligible to submit claims and all residents in these states in Defendants’ database will also receive prospective relief: their names will not be displayed on pages of Defendants’ websites that include a subscription offer to Defendants’ products or services.
- Please read this notice carefully. Your legal rights are affected whether you act, or don’t act.

Questions? Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com)

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>	
<b>SUBMIT A CLAIM FORM</b>	This is the only way to receive a payment. You must submit a complete and valid claim form either online or by mail by <b>December 1, 2023</b> .

<b>DO NOTHING</b>	You will receive no payment under the Settlement and give up your rights to sue Defendants and certain related companies and individuals about the issues in this case.
<b>EXCLUDE YOURSELF</b>	If you don't want to be a part of the Settlement, you must submit a request to be excluded by <b>December 1, 2023</b> . You will receive no payment, but you will retain any rights you currently have to sue Defendants and certain related companies and individuals about the issues in this case.
<b>OBJECT</b>	Write to the Court explaining why you don't like the Settlement by <b>December 1, 2023</b>
<b>ATTEND A HEARING</b>	Ask to speak in Court about the fairness of the Settlement.

These rights and options—**and the deadlines to exercise them**—are explained in this notice.

The Court in charge of this case must still decide whether to approve the Settlement. Payments will be provided only after any issues with the Settlement are resolved. Please be patient.

### BASIC INFORMATION

#### 1. What is this notice and why should I read it?

This notice explains the lawsuit, the Settlement, your rights, what payments are available, and how to get them.

Judge Manish S. Shah of the United States District Court for the Northern District of Illinois is overseeing this class action. The case is called *Fischer, et al. v. Instant Checkmate LLC, et al.*, No. 19-cv-04892 (N.D. Ill.).

#### 2. What is a class action and who is involved?

In a class action lawsuit, one or more people called “class representatives” bring a single lawsuit on behalf of other people who have similar claims. All of these people together are a “class” or “class members.” Once a class is certified, a class action settlement finally approved by the Court resolves the issues for all settlement class members, except for those who exclude themselves from the settlement classes.

In this case, the Court appointed the people who filed the lawsuit, Robert Fischer, Stephanie Lukis, Alessandra Fissinger-Figueroa, Eric Carvalho, Jose Camacho, Rhonda Cotta, Rogelio Ramirez, Jake Webb, James Anderson, Therese Backowski, Justin Rogalsky, Nateema Lewis, and Nicholas Fioritto as class representatives. The companies they sued, Instant Checkmate LLC, Truthfinder LLC, Intelius LLC, PeopleConnect, Inc., and The Control Group Media Company, LLC, are the Defendants.

## THE CLAIMS IN THE LAWSUIT AND THE SETTLEMENT

### 3. What is this lawsuit about?

Defendants run websites that provide reports, including offering various information about people. It's free to search any person's first and last name, which results in a free preview of the information potentially related to the person searched. Reports about individuals—which may include those individuals' names, ages, contact information, locations, lists of possible relatives, or other identifying information—can be purchased via a subscription to the website. Certain state laws prohibit using a person's name or other identifying information to advertise, promote, or in connection with an offer for sale any of its products or services without prior written consent. These lawsuits allege that Defendants violated these laws by allegedly displaying individual's identifying information on their websites' preview pages in response to a search on the websites and, once those individuals' names were clicked on, offering to sell the searcher a subscription to that website. These state laws permit damages for each violation of their right of publicity law. Defendants deny that they violated any law.

More information about Plaintiffs' complaint in the lawsuit and the Defendants' defenses can be found in the "Court Documents" section of the Settlement Website at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com).

### 4. Who is included in the Settlement Payment Classes?

You are a member of the Settlement Payment Classes if (i) you have an Alabama, California, Illinois, Indiana, Nevada, Ohio, or South Dakota address, (ii) you were searched for on InstantCheckmate.com, Intelius.com, Truthfinder.com, or USSearch.com, and (iii) the person who searched for you purchased a report in connection with that search. If you received a notice of the Settlement via email or in the mail, our records indicate that you are a Settlement Payment Class Member and are included in the Settlement. You may call or email the Settlement Administrator at (833) 200-7004 or [info@PeopleConnectRightofPublicity.com](mailto:info@PeopleConnectRightofPublicity.com) to ask whether you are a Settlement Payment Class Member.

### 5. What are the differences between the Multistate Injunction Settlement Classes and the Settlement Payment Classes?

The Multistate Injunction Settlement Classes include Alabama, California, Illinois, Indiana, Nevada, Ohio, or South Dakota residents whose name, age, location, and relatives were listed in Defendants' directory, not just those individuals who were searched on the website. The Settlement Payment Classes are a subset of individuals listed in Defendants' directory: those individuals who were searched for on the directory and for whom a report was purchased. Individuals who are only members of the Multistate Injunction Settlement Classes—those who were in Defendants' directory but were not searched for and did not have a report on them purchased—will receive Prospective Relief (described below in Question 6), but they will not be eligible to receive a cash payment under the Settlement. Settlement Payment Settlement Class Members will be eligible to receive both Prospective Relief and a cash payment.

## THE SETTLEMENT BENEFITS

### 6. What does the Settlement provide?

**Cash Payments.** If you're eligible, you can file a claim to receive a cash payment. The amount of the payment will depend on a variety of factors, including which state's class you are in (because each state's laws allow for different amounts of damages to be awarded for violation of their right of publicity laws) and how many claims are filed. The settlement creates seven State-Specific Settlement Funds: Alabama, \$877,500; California, \$1,003,556; Illinois, \$6,245,148; Indiana, \$106,695; Nevada, \$119,205; Ohio,

\$1,727,888; and South Dakota, \$22,905.

Individual payments are expected to be as follows for each state: Alabama, \$577 to \$960; California, \$82 to \$137; Illinois, \$635 to \$1,058; Indiana, \$111 to \$185; Nevada, \$82 to \$137; Ohio, \$286 to \$477; and South Dakota, \$107 to \$178. These settlement payments will be an equal share of each State-Specific Settlement Fund after the payment of settlement expenses, attorneys' fees, and any incentive award for the Class Representatives, as approved by the Court.

**Prospective Relief.** Under the Settlement, Defendants agree not to display the name of any person included in the Settlement who has an address, according to Defendants' database, in Alabama, California, Illinois, Indiana, Nevada, Ohio, or South Dakota on any page of the Instant Checkmate, Intelius, Truthfinder, and U.S. Search products that includes a subscription offer. Defendants will implement this change within thirty (30) days of the entry of a Final Approval Order.

## HOW TO GET SETTLEMENT BENEFITS

### 7. How do I get a payment?

If you are eligible and you want to get a payment, you must complete and submit a valid Claim Form by **December 1, 2023**. If you received an email notice, it contained a link to the online Claim Form, which is also available as the [Online Claim Form](#) on the website where it can be filled out and submitted online. The online claim form lets you select to receive your payment by Venmo, Zelle, or check. A paper Claim Form with pre-paid postage was attached to the postcard notice you may have received in the mail. Those who submit a paper Claim Form will receive a check by mail, if the claim is approved. These individuals will no longer be able to bring their own lawsuit against Defendants for any of the issues or claims in the case. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) to view a copy of the Settlement Agreement including language regarding the release.

The Claim Form requires you to provide the following information: (i) full name, (ii) current U.S. Mail address, and (iii) current contact telephone number.

Depending on the number of valid claims submitted, certain Settlement Payment Class members may need to complete an IRS Form W-9 to satisfy tax reporting obligations. Alabama, Illinois, and Ohio Settlement Payment Class Members may complete the [Form W-9](#) on the website now; doing so now will ensure that Alabama, Illinois, and Ohio Settlement Payment Class Members receive full payment as soon as possible.

### 8. When will I get my payment?

The hearing to consider the fairness of the Settlement is scheduled **for January 11, 2024 at 11:00 a.m.** If the Court approves the Settlement, Settlement Payment Class Members whose claims were approved by the Settlement Administrator and, if necessary, who have completed a W-9 Form on the Settlement Website, will be issued a check or electronic payment (as chosen by the Class Member) within 28 days after the Settlement's Effective Date. Even if the Court approves the Settlement, there may be appeals. It is always uncertain whether and when appeals can be resolved and resolving them can take more than a year. Please be patient.

Uncashed checks and electronic payments that are unable to be completed will expire and become void 180 days after they are issued and will revert to their respective State-Specific Settlement Fund to be distributed equally to claiming class members or in a manner as otherwise directed by the Court upon application made by Class Counsel.



## THE LAWYERS REPRESENTING YOU

### 9. Do I have a lawyer in the case?

Yes, the Court has appointed lawyers from the law firms Edelson PC, Bursor & Fisher, P.A., Beaumont Costales LLC, and East End Trial Group as the attorneys to represent you and other Class Members. These attorneys are called “Class Counsel.” Class Counsel can be reached by calling at (312) 242-0859.

### 10. Should I get my own lawyer?

You don’t need to hire your own lawyer because Class Counsel is working on your behalf. You may hire your own lawyer, but if you do so, you will have to pay that lawyer.

### 11. How will the lawyers be paid?

Class Counsel will ask the Court for attorneys’ fees and expenses of up to 35% of each State- Specific Settlement Fund, after first deducting Settlement Administration Expenses and any incentive awards to the Class Representatives. Class Counsel will file with the Court and post on the Settlement Website its request for attorneys’ fees and incentive awards on November 17, 2023.

Class Counsel will also request an incentive award for each Class Representative from the State- Specific Settlement Fund associated with the class they represent as follows: Alabama, \$5,000; California, \$750; Illinois, \$10,000 to the Illinois Injunction Settlement Class Representatives Fischer and Lukis, and \$1,000 each to the Illinois Injunction Settlement Class Representative Fissinger-Figueroa and the Illinois Settlement Payment Class Representative Carvalho; Indiana, \$1,000; Nevada, \$750; Ohio, \$2,500; South Dakota, \$1,000. If the Settlement is finally approved, the Court will determine the proper amount of any attorneys’ fees and expenses to award Class Counsel and the proper amount of any incentive award to the Class Representatives. The Court may award less than the amounts requested.

## YOUR RIGHTS AND OPTIONS

### 12. What happens if I do nothing at all?

If you do nothing, you will receive no money from any State-Specific Settlement Fund, but you will still be bound by all orders and judgments of the Court. Unless you exclude yourself from the Settlement, you will not be able to file or continue a lawsuit against Defendants or other Released Parties regarding any of the Released Claims as those terms are defined in the Settlement Agreement. **Submitting a valid and timely Claim Form is the only way to receive a payment from this Settlement.**

To submit a Claim Form, or for information on how to request exclusion from the class or file an objection, please visit the Settlement Website, [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) or call (833) 200-7004.

### 13. What happens if I ask to be excluded?

You may exclude yourself from the Settlement if you are a member of a Settlement Payment Class. If you do so, you will not receive any cash payment, but you will not release any claims you may have against the Released Parties (as that term is defined in the Settlement Agreement) and are free to pursue whatever legal rights you may have by pursuing your own lawsuit against the Released Parties at your own risk and expense. If you stay in the Settlement Class, you will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case. (See Question 15).

#### 14. How do I ask to be excluded?

You can mail or email a letter stating that you want to be excluded from the Settlement. Your letter must: (a) be in writing; (b) identify the case name, *Fischer, et al. v. Instant Checkmate LLC, et al.*, No. 19-cv-04892 (N.D. Ill.); (c) identify if the person seeking exclusion is a member of the Alabama Settlement Class, the California Settlement Class, the Illinois Settlement Payment Class, the Indiana Settlement Class, the Ohio Settlement Class, the South Dakota Settlement Class, or the Nevada Settlement Class; (d) state the full name and current address of the person seeking exclusion; (e) be signed by the person(s) seeking exclusion; and (f) be postmarked or received by the Settlement Administrator on or before **December 1, 2023**. Each request for exclusion must also contain a statement to the effect that “I hereby request to be excluded from the proposed Settlement Payment Class in *Fischer, et al. v. Instant Checkmate LLC, et al.*, No. 19-cv-04892 (N.D. Ill).” You must mail or e-mail your exclusion request no later than **December 1, 2023** to:

Fischer v. Instant Checkmate LLC  
c/o Settlement Administrator  
P.O. Box 25043  
Santa Ana, CA 92799-25043  
-or-  
info@PeopleConnectRightofPublicity.com

You can't exclude yourself over the phone. No person may request to be excluded from the Settlement Class through “mass” or “class” opt-outs. This means that each individual who seeks to exclude themselves must send an individual, separate request to the Settlement Administrator that complies with each of the above requirements.

#### 15. If I don't exclude myself, can I sue Defendants for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Defendants and any other Released Party for the claims being resolved by this Settlement.

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

No. If you exclude yourself, you will not receive a payment.

#### 17. How do I object to the Settlement?

If you do not exclude yourself from the Settlement, you can object to the Settlement if you don't like any part of it. You may object to the entire settlement or to only a part of it, including the request for attorneys' fees and incentive awards. All class members, whether they are eligible to claim money or not, can object to the Settlement. You can give reasons why you think the Court should deny approval by filing an objection. To object, you must file a letter or brief with the Court stating that you object to the proposed Settlement in *Fischer, et al. v. Instant Checkmate LLC, et al.*, No. 19-cv-04892 (N.D. Ill.), no later than **December 1, 2023**. Your objection must be electronically filed or delivered to the Court at the following address:

Clerk of the United States District Court for the Northern District of Illinois  
Everett McKinley Dirksen United States Courthouse  
219 South Dearborn Street Chicago, Illinois 60604

Filing instructions for *pro se* litigants can be found [here](#).

The objection must be in writing, must be signed by the objector, and must include the following information: (a) your full name and current address, (b) a statement that you believe you are a member of the Alabama Injunction Settlement Class, Alabama Settlement Payment Class, California Injunction Settlement Class, California Settlement Payment Class, Illinois Injunction Settlement Class, Illinois Settlement Payment Class, Indiana Injunction Settlement Class, Indiana Settlement Payment Class, Nevada Injunction Settlement Class, Nevada Settlement Payment Class, Ohio Injunction Settlement Class, Ohio Settlement Payment Class, South Dakota Injunction Settlement Class, or South Dakota Settlement Payment Class, (c) whether the objection applies only to the objector, to a specific subset of the objector’s respective Settlement Class, or to the entirety of the objector’s Settlement Class, (d) the specific grounds for your objection, (e) all documents or writings that you wish the Court to consider, (f) the name and contact information of any attorneys representing, advising, or in any way assisting you in connection with the preparation or submission of the objection or who may profit from the pursuit of the objection, and (g) a statement indicating whether you intend to appear at the Final Approval Hearing.

If you hire an attorney in connection with making an objection, that attorney must file an appearance with the Court or seek *pro hac vice* admission to practice before the Court, and electronically file the objection by the objection deadline of **December 1, 2023**. If you do hire your own attorney, you will be solely responsible for payment of any fees and expenses the attorney incurs on your behalf. If you exclude yourself from the Settlement, you cannot file an objection.

In addition to filing your objection with the Court, by no later than **December 1, 2023**, you must send via mail, email, or delivery service copies of your objection and any supporting documents to both Class Counsel and Defendants’ lawyers at the addresses listed below:

Class Counsel	Defendants’ Counsel
Eli Wade-Scott ewadescott@edelson.com EDELSON PC 350 North LaSalle Street, 14th Floor Chicago, Illinois 60654	Debbie L. Berman dberman@jenner.com Jenner & Block LLP 353 N. Clark Street Chicago, IL 60654-3456

Class Counsel will file with the Court and post on the Settlement Website its request for attorneys’ fees and incentive awards on November 17, 2023.

**18. What’s the difference between objecting to and excluding myself from the Settlement?**

Objecting simply means telling the Court that you don’t like something about the Settlement. You can only object if you remain a member of the class. Only class members entitled to a payment can request exclusion. Excluding yourself from a Settlement Payment Class is telling the Court that you don’t want to be a Settlement Payment Class Member. If you exclude yourself, you have no basis to object because the case no longer affects you.

**THE COURT’S FINAL APPROVAL HEARING**

**19. When and where will the Court decide whether to approve the Settlement?**

The Court will hold the Final Approval Hearing at **11:00 a.m. on January 11, 2024** before the Honorable Manish S. Shah in Room 1919 at the Everett McKinley Dirksen United States Courthouse, 219 South

Dearborn Street, Chicago, Illinois 60604, or via remote means as instructed by the Court. The purpose of the hearing is for the Court to determine whether the Settlement is fair, reasonable, adequate, and in the best interests of the Class. At the hearing, the Court will hear any objections and arguments concerning the fairness of the proposed Settlement, including those related to the amount requested by Class Counsel for attorneys' fees and expenses and the incentive award to the Class Representatives.

**Note:** The date and time of the Final Approval Hearing are subject to change by Court Order. Any changes will be posted at the Settlement Website, [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com).

#### **20. Do I have to come to the hearing?**

No. Class Counsel will answer any questions the Court may have. You are welcome to come at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as your written objection was filed or mailed on time and meets the other criteria required in the objection (*see* Question 17), the Court will consider it. You may also pay your own lawyer to attend, but you don't have to.

#### **21. May I speak at the hearing?**

Yes. If you do not exclude yourself, you may ask the Court for permission to speak at the hearing concerning any part of the proposed Settlement. If you filed an objection (*see* Question 17 above) and intend to appear at the hearing, you must state your intention to do so in your objection.

### **GETTING MORE INFORMATION**

#### **22. Where do I get more information?**

This notice summarizes the proposed Settlement. More details, including the complete Settlement Agreement and other documents are available at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) or at the Clerk's Office in the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604, between 8:30 a.m. and 4:30 p.m., Monday through Friday, excluding Court holidays. You can also contact the Settlement Administrator at [info@PeopleConnectRightofPublicity.com](mailto:info@PeopleConnectRightofPublicity.com) or (833) 200-7004, or Class Counsel at (312) 242-0859, with any questions about the Settlement.

**PLEASE DO NOT CONTACT THE COURT, THE JUDGE, THE DEFENDANTS OR THE DEFENDANTS' LAWYERS WITH QUESTIONS ABOUT THE SETTLEMENT OR DISTRIBUTION OF SETTLEMENT PAYMENTS.**

# **EXHIBIT C**

**TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS PARA EL DISTRITO NORTE DE ILLINOIS**

**SI VIVES EN ALABAMA, CALIFORNIA, ILLINOIS, INDIANA, NEVADA, OHIO O DAKOTA DEL SUR, Y ALGUIEN BUSCÓ TU NOMBRE Y COMPRÓ UN INFORME EN INSTANTCHECKMATE.COM, INTELIUS.COM, TRUTHFINDER.COM O USSEARCH.COM, PUEDES RECLAMAR UN PAGO EN VIRTUD DE UN ACUERDO DE ACCIÓN COLECTIVA.**

*No te preocupes, no estás siendo demandado. Esto es un aviso oficial del tribunal, no es un anuncio de un abogado.*

- Se ha llegado a un acuerdo en una demanda colectiva entre personas de ciertos estados de los Estados Unidos e Instant Checkmate LLC, Truthfinder LLC, Intelius LLC, PeopleConnect, Inc. y The Control Group Media Company, LLC ("Demandados"). Los Demandados operan sitios web que ofrecen servicios de directorio que proporcionan información sobre personas. La demanda alega que los Demandados violaron las leyes de derechos de publicidad de estos estados al utilizar los nombres, edades, información de contacto, ubicaciones anteriores de residencia, listas de posibles familiares, semejanzas, fotografías, imágenes u otra información identificativa de individuos para promocionar o publicitar sus sitios web de búsqueda de personas. Los Demandados niegan haber violado ninguna ley. El tribunal no ha decidido quién tiene la razón o quién está equivocado.
- Si recibió un aviso del Acuerdo por correo o por correo electrónico, nuestros registros indican que está incluido en el Acuerdo y puede presentar un formulario de reclamo en línea o por correo para recibir un pago a través de Venmo, Zelle o un cheque. Aquellos incluidos en el Acuerdo (i) tienen una dirección en Alabama, California, Illinois, Indiana, Nevada, Ohio o Dakota del Sur, (ii) fueron buscados en InstantCheckmate.com, Intelius.com, Truthfinder.com o USSearch.com, y (iii) tuvieron un informe sobre ellos comprado.
- Si el tribunal aprueba el Acuerdo, aquellos incluidos que presenten formularios de reclamos válidos recibirán una parte igual del fondo de acuerdo que los Demandados proporcionarán para cada estado, después de que se hayan pagado todos los costos de notificación y administración, el incentivo del representante de clase y los honorarios de abogados. Se espera que los pagos individuales sean los siguientes para cada estado: Alabama, de \$577 a \$960; California, de \$82 a \$137; Illinois, de \$635 a \$1,058; Indiana, de \$111 a \$185; Nevada, de \$82 a \$137; Ohio, de \$286 a \$477; y Dakota del Sur, de \$107 a \$178. Estos pagos podrían ser más o menos que estas cantidades dependiendo del número de reclamos válidos presentados. Aquellos elegibles para presentar reclamos y todos los residentes en estos estados en la base de datos de los Demandados también recibirán un alivio prospectivo: sus nombres no se mostrarán en las páginas de los sitios web de los Demandados que incluyan una oferta de suscripción a los productos o servicios de los Demandados.
- Por favor, lea atentamente este aviso. Sus derechos legales se ven afectados tanto si decide actuar como si no lo hace.

¿Preguntas? Visite <http://www.PeopleConnectRightofPublicity.com>

<b>TUS DERECHOS LEGALES Y OPCIONES EN ESTE ACUERDO</b>	
<b>PRESENTAR UN FORMULARIO DE RECLAMO</b>	Esta es la única manera de recibir un pago. Debe presentar un formulario de reclamo completo y válido ya sea en línea o por correo antes del <b>1 de diciembre de 2023</b> .

<b>NO HACER NADA</b>	No recibirá ningún pago bajo el Acuerdo y renunciará a sus derechos para demandar a los Demandados y ciertas compañías e individuos relacionados sobre los problemas en este caso.
<b>EXCLUIRSE</b>	Si no desea ser parte del Acuerdo, debe presentar una solicitud para ser excluido antes del <b>1 de diciembre de 2023</b> . No recibirá ningún pago, pero conservará cualquier derecho que tenga actualmente para demandar a los Demandados y ciertas compañías e individuos relacionados sobre los problemas en este caso.
<b>OBJETAR</b>	Escriba al Tribunal explicando por qué no le gusta el Acuerdo antes del <b>1 de diciembre de 2023</b> .
<b>ASISTIR A UNA AUDIENCIA</b>	Solicite hablar en el Tribunal acerca de la equidad del Acuerdo.

Estos derechos y opciones, **junto con los plazos para ejercerlos**, se explican en este aviso.

El Tribunal encargado de este caso todavía debe decidir si aprueba el Acuerdo. Los pagos se proporcionarán solo después de que se resuelvan cualquier problema con el Acuerdo. Por favor, sea paciente.

#### INFORMACIÓN BÁSICA

##### 1. ¿Qué es este aviso y por qué debería leerlo?

Esta notificación explica la demanda, el acuerdo, sus derechos, los pagos disponibles y cómo obtenerlos.

El Juez Manish S. Shah del Tribunal de Distrito de los Estados Unidos para el Distrito Norte de Illinois supervisa esta acción colectiva. El caso se llama *Fischer, et al. contra Instant Checkmate LLC, et al.*, No. 19-cv-04892 (N.D. Ill.).

##### 2. ¿Qué es una acción colectiva y quiénes están involucrados?

En una demanda de acción colectiva, una o más personas llamadas "representantes de la clase" presentan una sola demanda en nombre de otras personas que tienen reclamos similares. Todas estas personas juntas conforman una "clase" o "miembros de la clase". Una vez que se certifica una clase, un acuerdo de acción colectiva finalmente aprobado por el tribunal resuelve los problemas para todos los miembros de la clase de acuerdo con el acuerdo, excepto para aquellos que se excluyen de las clases de acuerdo con el acuerdo.

En este caso, el tribunal nombró representantes de la clase a las personas que presentaron la demanda, Robert Fischer, Stephanie Lukis, Alessandra Fissinger-Figueroa, Eric Carvalho, Jose Camacho, Rhonda Cotta, Rogelio Ramirez, Jake Webb, James Anderson, Therese Backowski, Justin Rogalsky, Nateema Lewis y Nicholas Fioritto. Las empresas a las que demandaron, Instant Checkmate LLC, Truthfinder LLC, Intelius LLC, PeopleConnect, Inc. y The Control Group Media Company, LLC, son los Demandados.

### 3. ¿De qué se trata la demanda?

Los Demandados operan sitios web que proporcionan informes, incluyendo ofrecer datos sobre personas. Es gratuito buscar el nombre y apellido de cualquier persona, lo que resulta en una vista previa gratuita de la información potencialmente relacionada con la persona buscada. Los informes sobre individuos, que pueden incluir nombres, edades, información de contacto, ubicaciones, listas de posibles familiares u otra información identificativa, pueden comprarse mediante una suscripción al sitio web. Ciertas leyes estatales prohíben el uso del nombre de una persona u otra información identificativa para publicitar, promocionar o en conexión con una oferta de venta de productos o servicios sin el consentimiento escrito previo. Estas demandas alegan que los Demandados violaron estas leyes al supuestamente mostrar información identificativa de individuos en las páginas de vista previa de sus sitios web en respuesta a una búsqueda en los sitios web y, una vez que se hizo clic en los nombres de esas personas, ofrecieron vender al buscador una suscripción al sitio web. Estas leyes estatales permiten daños por cada violación de su ley de derechos de publicidad. Los Demandados niegan haber violado ninguna ley.

Más información sobre la demanda de los Demandantes en la demanda y las defensas de los Demandados se puede encontrar en la sección "Documentos del Tribunal" del sitio web del Acuerdo en [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com).

### 4. ¿Quiénes están incluidos en la Clase de Pagos del Acuerdo?

Eres miembro de las Clases de Pagos del Acuerdo si (i) tienes una dirección en Alabama, California, Illinois, Indiana, Nevada, Ohio o Dakota del Sur, (ii) fuiste buscado en InstantCheckmate.com, Intelius.com, Truthfinder.com o USSearch.com y (iii) la persona que te buscó compró un informe en relación con esa búsqueda. Si recibiste un aviso del Acuerdo por correo electrónico o por correo, nuestros registros indican que eres un Miembro de la Clase de Pagos del Acuerdo y estás incluido en el Acuerdo. Puedes llamar o enviar un correo electrónico al Administrador del Acuerdo al (833) 200-7004 o [info@PeopleConnectRightofPublicity.com](mailto:info@PeopleConnectRightofPublicity.com) para preguntar si eres un Miembro de la Clase de Pagos del Acuerdo.

### 5. ¿Quiénes están incluidos en la Clase de Pagos del Acuerdo?

Las Clases de Conformidad con la Orden judicial de restricción multiestatal incluyen a los residentes de Alabama, California, Illinois, Indiana, Nevada, Ohio o Dakota del Sur cuyos nombres, edades, ubicaciones y familiares fueron listados en el directorio de los Demandados, no solo aquellas personas que fueron buscadas en el sitio web. Las Clases de Pagos del Acuerdo son un subconjunto de las personas listadas en el directorio de los Demandados: aquellas personas que fueron buscadas en el directorio y para quienes se compró un informe. Las personas que solo son miembros de las Clases de Conformidad con la Orden judicial de restricción multiestatal, es decir, aquellas que estaban en el directorio de los Demandados, pero no fueron buscadas y no se compró un informe sobre ellas, recibirán un Alivio Prospectivo (descrito a continuación en la Pregunta 6), pero no serán elegibles para recibir un pago en efectivo en virtud del Acuerdo. Los Miembros de la Clase de Pagos del Acuerdo serán elegibles para recibir tanto un Alivio Prospectivo como un pago en efectivo.

## LOS BENEFICIOS DEL ACUERDO

### 6. ¿Quiénes están incluidos en la Clase de Pagos del Acuerdo?

**Pagos en Efectivo.** Si eres elegible, puedes presentar un formulario de reclamo para recibir un pago en efectivo. La cantidad del pago dependerá de varios factores, incluyendo a qué clase estatal perteneces (porque las leyes de cada estado permiten diferentes cantidades de daños por violación de sus leyes de derechos de publicidad) y cuántos reclamos se presenten. El acuerdo crea siete Fondos de Acuerdo Específicos por Estado: Alabama, \$877,500; California, \$1,003,556; Illinois, \$6,245,148; Indiana,



\$106,695; Nevada, \$119,205; Ohio, \$1,727,888; y Dakota del Sur, \$22,905.

Se espera que los pagos individuales sean los siguientes para cada estado: Alabama, de \$577 a \$960; California, de \$82 a \$137; Illinois, de \$635 a \$1,058; Indiana, de \$111 a \$185; Nevada, de \$82 a \$137; Ohio, de \$286 a \$477; y Dakota del Sur, de \$107 a \$178. Estos pagos de acuerdo serán una parte igual de cada Fondo de Acuerdo Específico por Estado después del pago de los gastos del acuerdo, honorarios de abogados y cualquier incentivo para los Representantes de la Clase, según lo aprobado por el Tribunal.

**Alivio Prospectivo.** Bajo el Acuerdo, los Demandados acuerdan no mostrar el nombre de ninguna persona incluida en el Acuerdo que tenga una dirección, según la base de datos de los Demandados, en Alabama, California, Illinois, Indiana, Nevada, Ohio o Dakota del Sur en ninguna página de los productos Instant Checkmate, Intelius, Truthfinder y U.S. Search que incluya una oferta de suscripción. Los Demandados implementarán este cambio dentro de los treinta (30) días posteriores a la entrada de una Orden de Aprobación Final.

## CÓMO OBTENER LOS BENEFICIOS DEL ACUERDO

### 7. ¿Cómo puedo obtener un pago?

Si eres elegible y deseas recibir un pago, debes completar y presentar un Formulario de reclamo válido antes del **1 de diciembre de 2023**. Si recibiste un aviso por correo electrónico, este contenía un enlace al [Formulario de reclamo en línea](#), que también está disponible como el Formulario de reclamo en línea en el sitio web, donde puedes completarlo y enviarlo en línea. El formulario de reclamo en línea te permite seleccionar cómo deseas recibir tu pago, ya sea a través de Venmo, Zelle o cheque. Un Formulario de reclamo en papel con franqueo prepagado se adjuntó al aviso postal que pudiste haber recibido por correo. Aquellos que presenten un Formulario de reclamo en papel recibirán un cheque por correo, si el reclamo es aprobado. Estas personas ya no podrán presentar su propia demanda contra los Demandados por ninguno de los problemas o reclamos en el caso. Visita [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) para ver una copia del Acuerdo de Resolución, que incluye el lenguaje relacionado con la exención.

El Formulario de reclamo requiere que proporciones la siguiente información: (i) nombre completo, (ii) dirección actual de correo en los EE. UU. y (iii) número de teléfono de contacto actual.

Dependiendo del número de reclamos válidos presentadas, es posible que algunos miembros de la Clase de Pagos del Acuerdo deban completar un Formulario [W-9](#) del IRS para cumplir con las obligaciones de informe fiscal. Los Miembros de la Clase de Pagos del Acuerdo de Alabama, Illinois y Ohio pueden completar el Formulario W-9 en el sitio web ahora; hacerlo garantizará que reciban el pago completo lo antes posible.

### 8. ¿Cuándo recibiré mi pago?

La audiencia para considerar la equidad del Acuerdo está programada para el **11 de enero de 2024 a las 11:00 a.m.** Si el Tribunal aprueba el Acuerdo, a los Miembros de la Clase de Pagos del Acuerdo cuyos reclamos sean aprobados por el Administrador del Acuerdo y, si es necesario, que hayan completado un Formulario W-9 en el Sitio Web del Acuerdo, se les emitirá un cheque o un pago electrónico (según lo elegido por el Miembro de la Clase) dentro de los 28 días posteriores a la Fecha Efectiva del Acuerdo. Incluso si el Tribunal aprueba el Acuerdo, puede haber apelaciones. Siempre es incierto si y cuándo se pueden resolver las apelaciones, y su resolución puede llevar más de un año. Por favor, tenga paciencia.

Los cheques no cobrados y los pagos electrónicos que no se puedan completar caducarán y se volverán nulos 180 días después de su emisión y se revertirán a su respectivo Fondo de Acuerdo Específico por

Estado para ser distribuidos por igual entre los miembros de la clase que presenten reclamos o de la manera que el Tribunal disponga previa solicitud presentada por el Abogado de la Clase.

## LOS ABOGADOS QUE LO REPRESENTAN

### 9. ¿Tengo un abogado en el caso?

Sí, el Tribunal ha designado a abogados de los bufetes de abogados Edelson PC, Bursor & Fisher, P.A., Beaumont Costales LLC y East End Trial Group como los abogados que te representarán a ti y a otros Miembros de la Clase. A estos abogados se les llama "Abogados de la Clase". Puedes ponerte en contacto con los Abogados de la Clase llamando al (312) 242-0859.

### 10. ¿Tengo un abogado en el caso?

No necesitas contratar a tu propio abogado porque el Abogado de la Clase está trabajando en tu nombre. Puedes contratar a tu propio abogado, pero si lo haces, tendrás que pagarle a ese abogado.

### 11. ¿Cómo serán pagados los abogados?

El Abogado de la Clase solicitará al Tribunal honorarios de abogados y gastos de hasta el 35% de cada Fondo Específico del cada Estado, después de deducir primero los Gastos de Administración del Acuerdo y cualquier premio de incentivo a los Representantes de la Clase. El Abogado de la Clase presentará ante el Tribunal y publicará en el Sitio Web del Acuerdo su solicitud de honorarios de abogados y premios de incentivo el 17 de noviembre de 2023.

El Abogado de la Clase también solicitará un premio de incentivo para cada Representante de la Clase del Fondo de Específico del Estado asociado con la clase que representan de la siguiente manera: Alabama, \$5,000; California, \$750; Illinois, \$10,000 para los Representantes de la Clase del Acuerdo de la Orden de Restricción de Illinois Fischer y Lukis, y \$1,000 cada uno para la Representante de la Clase del Acuerdo de la Orden de Restricción de Illinois Fissinger-Figueroa y el Representante de la Clase de Pago del Acuerdo de Illinois Carvalho; Indiana, \$1,000; Nevada, \$750; Ohio, \$2,500; Dakota del Sur, \$1,000. Si el Acuerdo propuesto es finalmente aprobado, el Tribunal determinará la cantidad adecuada de honorarios de abogados y gastos que se otorgarán al Abogado de la Clase y la cantidad adecuada de premio de incentivo para los Representantes de la Clase. El Tribunal puede otorgar una cantidad menor que las cantidades solicitadas.

## TUS DERECHOS Y OPCIONES

### 12. ¿Qué sucede si no hago nada en absoluto?

Si no haces nada, no recibirás dinero de ningún Fondo de Específico del Estado, pero seguirás estando obligado por todas las órdenes y sentencias del Tribunal. A menos que te excluyas del Acuerdo, no podrás presentar o continuar una demanda contra los Demandados u otras Partes Eximidas con respecto a ninguna de las Reclamos Eximidas, según se definen esos términos en el Acuerdo de Resolución. Enviar un Formulario de reclamo válido y dentro del plazo es la única manera de recibir un pago de este Acuerdo.

Para enviar un Formulario de Reclamo, o para obtener información sobre cómo solicitar la exclusión de la clase o presentar una objeción, visita el Sitio Web del Acuerdo, [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) o llamar al (833) 200-7004.

### 13. ¿Qué sucede si pido ser excluido?

Puedes excluirte del Acuerdo si eres miembro de una Clase de Pago del Acuerdo. Si decides hacerlo, no recibirás ningún pago en efectivo, pero tampoco renunciarás ningún reclamo que puedas tener contra las Partes Eximidas (según se define ese término en el Acuerdo de Resolución) y estarás libre de perseguir tus derechos legales por medio de una demanda propia contra las Partes Eximidas bajo tu propio riesgo y gastos. Si te mantienes en la Clase de Pagos del Acuerdo, ya no podrás presentar tu propia demanda contra los Demandados por ninguno de los asuntos o reclamos en el caso. (Ver Pregunta 15).

**14. ¿Cómo solicito ser excluido?**

Puedes enviar una carta por correo o por correo electrónico indicando que deseas ser excluido del Acuerdo. Tu carta debe: (a) estar por escrito; (b) identificar el nombre del caso, *Fischer, et al. contra Instant Checkmate LLC*, et al., No. 19-cv-04892 (N.D. Ill.); (c) indicar si la persona que solicita la exclusión es miembro de la Clase de Pagos del Acuerdo de Alabama, la Clase de Pagos del Acuerdo de California, la Clase de Pago del Acuerdo de Illinois, la Clase de Pagos del Acuerdo de Indiana, la Clase de Pagos del Acuerdo de Ohio, la Clase de Pagos del Acuerdo de Dakota del Sur o la Clase de Pagos del Acuerdo de Nevada; (d) indicar el nombre completo y la dirección actual de la persona que solicita la exclusión; (e) estar firmada por la(s) persona(s) que solicita(n) la exclusión; y (f) tener matasellos o ser recibida por el Administrador del Acuerdo a más tardar el **1 de diciembre de 2023**. Cada solicitud de exclusión debe también contener una declaración en el sentido de que "Por la presente solicito ser excluido de la propuesta Clase de Pago del Acuerdo en *Fischer, et al. contra Instant Checkmate LLC*, et al., No. 19-cv-04892 (N.D. Ill.)". Debes enviar tu solicitud de exclusión por correo o por correo electrónico a más tardar el **1 de diciembre de 2023** a:

Fischer contra Instant Checkmate LLC  
c/o Administrador del Acuerdo  
P.O. Box 25043  
Santa Ana, CA 92799-25043

-o-

[info@PeopleConnectRightofPublicity.com](mailto:info@PeopleConnectRightofPublicity.com)

No puedes excluirte por teléfono. Ninguna persona puede solicitar ser excluida de la Clase de Pagos del Acuerdo a través de exclusiones "masivas" o de "clase". Esto significa que cada individuo que desee excluirse debe enviar una solicitud individual y separada al Administrador del Acuerdo que cumpla con cada uno de los requisitos anteriores.

**15. Si no me excluyo, ¿puedo demandar a los Demandados por lo mismo más adelante?**

No. A menos que te excluyas, renuncias al derecho de demandar a los Demandados y cualquier otra Parte Eximida por los reclamos que se están resolviendo mediante este Acuerdo.

**16. Si me excluyo, ¿puedo recibir algo de este Acuerdo?**

No. Si te excluyes, no recibirás ningún pago.

**17. ¿Cómo presento una objeción al Acuerdo?**

Si no te excluyes del Acuerdo, puedes presentar una objeción a Acuerdo si no estás de acuerdo con alguna parte del mismo. Puedes objetar contra toda el Acuerdo o solo contra una parte de él, incluida la solicitud de honorarios de abogados y premios de incentivo. Todos los miembros de la clase ya sean elegibles para reclamar dinero o no, pueden objetar al Acuerdo. Puedes dar razones por las cuales crees que el Tribunal debería negar la aprobación presentando una objeción. Para objetar, debes presentar una carta o escrito ante el Tribunal indicando que objetas a Acuerdo propuesto en *Fischer, et al. contra Instant Checkmate*

LLC, et al., No. 19-cv-04892 (N.D. Ill.), a más tardar el **1 de diciembre de 2023**.

Tu objeción debe presentarse electrónicamente o entregarse al Tribunal en la siguiente dirección:

Secretaría del Tribunal de Distrito de los Estados Unidos para el Distrito Norte de Illinois  
 Everett McKinley Dirksen United States Courthouse  
 219 South Dearborn Street Chicago, Illinois 60604

Las instrucciones de presentación para litigantes sin representación legal se pueden encontrar [aquí](#).

La objeción debe estar por escrito, firmada por el objetante, e incluir la siguiente información: (a) tu nombre completo y dirección actual, (b) una declaración de qué crees ser miembro de la Clase de la orden de restricción del Acuerdo de Alabama, Clase de Pago del Acuerdo de Alabama, la Clase de la orden de restricción del Acuerdo de California, Clase de Pago del Acuerdo de California, la Clase de la orden de restricción del Acuerdo de Illinois, Clase de Pago del Acuerdo de Illinois, la Clase de la orden de restricción del Acuerdo de Indiana, Clase de Pago del Acuerdo de Indiana, la Clase de la orden de restricción del Acuerdo de Nevada, Clase de Pago del Acuerdo de Nevada, la Clase de la orden de restricción del Acuerdo de Ohio, Clase de Pago del Acuerdo de Ohio, la Clase de la orden de restricción del Acuerdo de Dakota del Sur o Clase de Pago del Acuerdo de Dakota del Sur, (c) si la objeción se aplica solo al objetante, a un subconjunto específico de la Clase de Pagos del Acuerdo respectiva del objetante o a la totalidad de la Clase de Pagos del Acuerdo del objetante, (d) los motivos específicos de tu objeción, (e) todos los documentos o escritos que desees que el Tribunal considere, (f) el nombre e información de contacto de cualquier abogado que te represente, asesore o de alguna manera te ayude en relación con la preparación o presentación de la objeción o que pueda beneficiarse de la persecución de la objeción, y (g) una declaración indicando si tienes la intención de comparecer en la Audiencia de Aprobación Final.

Si contratas a un abogado en relación con la presentación de una objeción, ese abogado debe presentar una comparecencia ante el Tribunal o buscar la admisión *pro hac vice* para ejercer ante el Tribunal, y presentar electrónicamente la objeción antes de la fecha límite de objeción del **1 de diciembre de 2023**. Si contratas a tu propio abogado, serás el único responsable del pago de los honorarios y gastos en los que incurra el abogado en tu nombre. Si te excluyes del Acuerdo, no puedes presentar una objeción.

Además de presentar tu objeción ante el Tribunal, a más tardar el **1 de diciembre de 2023**, debes enviar por correo, correo electrónico o servicio de entrega copias de tu objeción y cualquier documento de respaldo tanto al Abogado de la Clase como a los abogados de los Demandados en las direcciones indicadas a continuación:

Abogado de la Clase	Abogado del Demandado
Eli Wade-Scott ewadescott@edelson.com EDELSON PC 350 North LaSalle Street, 14th Floor Chicago, Illinois 60654	Debbie L. Berman dberman@jenner.com Jenner & Block LLP 353 N. Clark Street Chicago, IL 60654-3456

El Abogado de la Clase presentará ante el Tribunal y publicará en el Sitio Web del Acuerdo su solicitud de honorarios de abogados y premios de incentivo el 17 de noviembre de 2023.

**18. ¿Cuál es la diferencia entre objetar y excluirme del Acuerdo?**

Objetar simplemente significa informar al Tribunal que no estás de acuerdo con algo sobre e. Solo puedes

objetar si sigues siendo miembro de la clase. Solo los miembros de la clase con derecho a un pago pueden solicitar la exclusión. Excluirte de una Clase de Pago del Acuerdo significa informar al Tribunal que no deseas ser miembro de la Clase de Pago del Acuerdo. Si te excluyes, no tienes motivo para objetar porque el caso ya no te afecta.

#### AUDIENCIA FINAL PARA LA APROBACIÓN DEL TRIBUNAL

#### 19. ¿Cuándo y dónde decidirá el Tribunal si aprueba el Acuerdo?

La Audiencia de Aprobación Final se llevará a cabo a las 11:00 a.m. el 11 de enero de 2024 ante el Honorable Manish S. Shah en la Sala 1919 del Palacio de Justicia de los Estados Unidos Everett McKinley Dirksen, ubicado en 219 South Dearborn Street, Chicago, Illinois 60604, o a través de medios remotos según lo indique el Tribunal. El propósito de la audiencia es que el Tribunal determine si el Acuerdo es justo, razonable, adecuado y en el mejor interés de la Clase. Durante la audiencia, el Tribunal escuchará cualquier objeción y argumento relacionado con la equidad del Acuerdo propuesto, incluidos aquellos relacionados con la cantidad solicitada por el Abogado de la Clase para honorarios de abogados y gastos, así como el premio de incentivo a los Representantes de la Clase.

**Nota:** La fecha y hora de la Audiencia de Aprobación Final están sujetas a cambios por Orden del Tribunal. Cualquier cambio se publicará en el Sitio Web del Acuerdo, [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com).

#### 20. ¿Debo asistir a la audiencia?

No. El Abogado de la Clase responderá cualquier pregunta que pueda tener el Tribunal. Eres bienvenido a asistir por tu cuenta y a tu propio costo. Si envías una objeción, no es necesario que acudas al Tribunal para hablar sobre ello. Siempre y cuando tu objeción por escrito haya sido presentada o enviada por correo a tiempo y cumpla con los demás criterios requeridos en la objeción (ver Pregunta 17), el Tribunal la considerará. También puedes pagar a tu propio abogado para que asista, pero no es obligatorio.

#### 21. ¿Puedo hablar en la audiencia?

Sí. Si no te excluyes, puedes pedir permiso al Tribunal para hablar en la audiencia sobre cualquier parte del Acuerdo propuesto. Si presentaste una objeción (ver Pregunta 17 arriba) y tienes la intención de comparecer en la audiencia, debes indicar tu intención en tu objeción.

#### OBTENIENDO MÁS INFORMACIÓN

#### 22. ¿Dónde puedo obtener más información?

Este aviso resume el Acuerdo propuesto. Más detalles, incluido el Acuerdo de Resolución completo y otros documentos, están disponibles en [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) o en la Oficina del secretario en el Palacio de Justicia de los Estados Unidos Everett McKinley Dirksen, ubicado en 219 South Dearborn Street, Chicago, Illinois 60604, de 8:30 a.m. a 4:30 p.m., de lunes a viernes, excluyendo días feriados del Tribunal. También puedes contactar al Administrador del Acuerdo en [info@PeopleConnectRightofPublicity.com](mailto:info@PeopleConnectRightofPublicity.com) o al (833) 200-7004, o al Abogado de la Clase al (312) 242-0859, si tienes preguntas sobre el Acuerdo.

**POR FAVOR, NO TE COMUNIQUES CON EL TRIBUNAL, EL JUEZ, LOS DEMANDADOS O LOS ABOGADOS DE LOS DEMANDADOS CON PREGUNTAS SOBRE EL ACUERDO O LA DISTRIBUCIÓN DE LOS PAGOS DEL ACUERDO.**

# **EXHIBIT D**

## CLAIM FORM

*Fischer, et al. v. Instant Checkmate, LLC*, No. 1:19-cv-04892 (N.D. Ill.)  
UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

THIS CLAIM FORM MUST BE SUBMITTED BY **DECEMBER 1, 2023**, AND MUST BE FULLY COMPLETED, BE SIGNED, AND MEET ALL CONDITIONS OF THE SETTLEMENT AGREEMENT.

**Instructions:** You may be eligible for a payment as part of the Settlement for this case. Fill out each section of this Claim Form and sign where indicated. If your Claim Form is approved, you will receive a check in the mail at the address you provide below.

<u>First Name</u>		<u>Last Name</u>	
<u>Street Address</u>			
<u>City</u>	<u>State</u>	<u>ZIP Code</u>	
<u>Email Address (Optional)</u>			
<u>Contact Phone #:</u> (You may be contacted if further information is required)			

Signature: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

The Settlement Administrator will review your Claim Form. If accepted, you will receive payment for an equal, or *pro rata*, share depending on the number of valid Claim Forms received. This process takes time; please be patient.

**Questions? Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) or call toll-free (833) 200-7004.**

# **EXHIBIT E**



Fischer v. Instant Checkmate LLC – Email Notice  
**Alabama Settlement Payment Class**

From: donotreply@PeopleConnectRightofPublicity.com  
To: «Class Member Email»  
Re: Legal Notice of Proposed Class Action Settlement – Alabama Class

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**OUR RECORDS INDICATE THAT YOU LIVE IN ALABAMA AND SOMEONE SEARCHED YOUR NAME AND PURCHASED A REPORT ON INSTANTCHECKMATE.COM, INTELIOUS.COM, TRUTHFINDER.COM, OR USSEARCH.COM. YOU MAY BE ENTITLED TO A PAYMENT FROM A CLASS ACTION SETTLEMENT.**

*Don't worry, you are not being sued. This is an official court notice, not an ad for a lawyer.*

**Class Member Name:** «Firstname» «Lastname»

**Class Member ID:** «SIMID»

This is an official notice to inform you that a Settlement has been reached in a class action lawsuit between individuals in Alabama and certain other states and Instant Checkmate LLC, Truthfinder LLC, Intelius LLC, PeopleConnect, Inc., and The Control Group Media Company, LLC (“Defendants”). Defendants operate websites that provide directory services offering information about people. The lawsuit claims that Defendants violated these states’ right of publicity laws when they used individuals’ names, ages, contact information, former residence locations, lists of possible relatives, likenesses, photographs, images, or other identifying information to advertise or promote subscriptions to Defendants’ people-search websites. Defendants deny that they violated any law. The Court has not decided who is right or wrong. Please read this notice carefully. Your legal rights are affected whether you act or don’t act.

**Who is included in the Settlement Class?** Our records indicate that you are included in the Alabama Settlement Payment Class. This class includes people (i) who were searched for on websites Instant Checkmate, Truthfinder, Intelius, or U.S. Search on or after August 11, 2019, and (ii) had a report about them purchased that displayed an Alabama address per the Defendants’ records.

**What can I get out of the Settlement?** If you’re eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The payment is estimated to be approximately \$577–\$960 but could be more or less depending on the number of claims submitted. This amount is an equal share of a \$877,500 fund that Defendants agreed to create for this class, after any Court-approved payment of Settlement expenses, attorneys’ fees, and any incentive award. Separate funds were created for individuals from other states. You will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) to view a copy of the Settlement Agreement, including language regarding the release.

**How do I get my payment?** Just complete and verify the short and simple Claim Form online by clicking [here](#), or you can visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) and download a paper Claim Form and submit it by mail. By submitting online, you can choose to receive your payment via Venmo, Zelle, or a check. *All Claim Forms must be submitted online or postmarked by December 1, 2023.*

**What are my other options?** If you are part of the class but do not want payment from the Settlement and want to keep your right to file your own lawsuit against Defendants for any of the issues or claims in the case, you must exclude yourself from the class **no later than December 1, 2023**.

If you stay in the class, you may object to any aspect of the Settlement, including the requests for attorneys' fees, costs, expenses, and award to the Class Representatives. You and/or your lawyer also have the right to appear before the Court. Your written objection must be filed no later than **December 1, 2023**. Specific instructions about how to object or exclude yourself from the class are available at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com).

If you do nothing, and the Court approves the Settlement, you will receive no money, but will be bound by all orders of the Court and judgments in this case. In addition, you will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case.

**Do I have a lawyer?** Yes. The Court has appointed lawyers from the law firms Edelson PC, Bursor & Fisher, P.A., Beaumont Costales LLC, and East End Trial Group as "Class Counsel." They represent you and other Alabama Settlement Payment Class Members. You can hire your own lawyer, but you'll need to pay that lawyer's legal fees if you do. The Court has also chosen Jose Camacho—a class member like you—to represent the Alabama Settlement Payment Class.

**When will the Court decide whether to approve the Settlement?** The Court will hold a final approval hearing on **January 11, 2024 at 11:00 a.m.** before the Hon. Manish S. Shah in Room 1919 at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604 or via remote means as instructed by the Court. During the hearing, the Court will hear objections, determine if the Settlement is fair, and consider Class Counsel's request for fees and expenses of up to 35% of the Alabama Settlement Fund and a \$5,000 incentive award for the Alabama Settlement Payment Class Representative. The fee request will be posted on the Settlement website by November 17, 2023.

Fischer v. Instant Checkmate LLC – Email Notice  
**California Settlement Payment Class**

From: donotreply@PeopleConnectRightofPublicity.com  
To: «Class Member Email»  
Re: Legal Notice of Proposed Class Action Settlement – California Class

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**OUR RECORDS INDICATE THAT YOU LIVE IN CALIFORNIA AND SOMEONE SEARCHED YOUR NAME AND PURCHASED A REPORT ON INSTANTCHECKMATE.COM, INTELIUS.COM, TRUTHFINDER.COM, OR USSEARCH.COM. YOU MAY BE ENTITLED TO A PAYMENT FROM A CLASS ACTION SETTLEMENT.**

*Don't worry, you are not being sued. This is an official court notice, not an ad for a lawyer.*

**Class Member Name:** «Firstname» «Lastname»

**Class Member ID:** «SIMID»

This is an official notice to inform you that a Settlement has been reached in a class action lawsuit between individuals in California and certain other states and Instant Checkmate LLC, Truthfinder LLC, Intelius LLC, PeopleConnect, Inc., and The Control Group Media Company, LLC (“Defendants”). Defendants operate websites that provide directory services offering information about people. The lawsuit claims that Defendants violated these states’ right of publicity laws when they used individuals’ names, ages, contact information, former residence locations, lists of possible relatives, likenesses, photographs, images, or other identifying information to advertise or promote subscriptions to Defendants’ people-search websites. Defendants deny that they violated any law. The Court has not decided who is right or wrong. Please read this notice carefully. Your legal rights are affected whether you act or don’t act.

**Who is included in the Settlement Class?** Our records indicate that you are included in the California Settlement Payment Class. This class includes people (i) who were searched for on websites Instant Checkmate, Truthfinder, Intelius, or U.S. Search on or after August 11, 2019, and (ii) had a report about them purchased that displayed a California address per the Defendants’ records.

**What can I get out of the Settlement?** If you’re eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The payment is estimated to be approximately \$82–\$137 but could be more or less depending on the number of claims submitted. This amount is an equal share of a \$1,003,556 fund that Defendants agreed to create for this class, after any Court-approved payment of Settlement expenses, attorneys’ fees, and any incentive award. Separate funds were created for individuals from other states. You will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) to view a copy of the Settlement Agreement, including language regarding the release.

**How do I get my payment?** Just complete and verify the short and simple Claim Form online by clicking [here](#), or you can visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) and download a paper Claim Form and submit it by mail. By submitting online, you can choose to receive your payment via Venmo, Zelle, or a check. *All Claim Forms must be submitted online or postmarked by December 1, 2023.*

**What are my other options?** If you are part of the class but do not want payment from the Settlement and want to keep your right to file your own lawsuit against Defendants for any of the issues or claims in the case, you must exclude yourself from the class **no later than December 1, 2023**.

If you stay in the class, you may object to any aspect of the Settlement, including the requests for attorneys' fees, costs, expenses, and award to the Class Representatives. You and/or your lawyer also have the right to appear before the Court. Your written objection must be filed no later than **December 1, 2023**. Specific instructions about how to object or exclude yourself from the class are available at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com).

If you do nothing, and the Court approves the Settlement, you will receive no money, but will be bound by all orders of the Court and judgments in this case. In addition, you will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case.

**Do I have a lawyer?** Yes. The Court has appointed lawyers from the law firms Edelson PC, Bursor & Fisher, P.A., Beaumont Costales LLC, and East End Trial Group as "Class Counsel." They represent you and other California Settlement Payment Class Members. You can hire your own lawyer, but you'll need to pay that lawyer's legal fees if you do. The Court has also chosen Jake Webb—a class member like you—to represent the California Settlement Payment Class, and Rhonda Cotta, Rogelio Ramirez, and Jake Webb to represent the California Injunction Settlement Class.

**When will the Court decide whether to approve the Settlement?** The Court will hold a final approval hearing on **January 11, 2024 at 11:00 a.m.** before the Hon. Manish S. Shah in Room 1919 at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604 or via remote means as instructed by the Court. During the hearing, the Court will hear objections, determine if the Settlement is fair, and consider Class Counsel's request for fees and expenses of up to 35% of the California Settlement Fund, a \$750 incentive award for the California Settlement Payment Class Representative Webb, and a \$750 incentive award for each of the California Injunction Settlement Class Representatives Cotta and Ramirez. The fee request will be posted on the Settlement website by November 17, 2023.

Fischer v. Instant Checkmate LLC – Email Notice  
**Illinois Settlement Payment Class**

From: donotreply@PeopleConnectRightofPublicity.com  
To: «Class Member Email»  
Re: Legal Notice of Proposed Class Action Settlement – Illinois Class

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**OUR RECORDS INDICATE THAT YOU LIVE IN ILLINOIS AND SOMEONE SEARCHED YOUR NAME AND PURCHASED A REPORT ON INSTANTCHECKMATE.COM, INTELIUS.COM, TRUTHFINDER.COM, OR USSEARCH.COM. YOU MAY BE ENTITLED TO A PAYMENT FROM A CLASS ACTION SETTLEMENT.**

*Don't worry, you are not being sued. This is an official court notice, not an ad for a lawyer.*

**Class Member Name:** «Firstname» «Lastname»

**Class Member ID:** «SIMID»

This is an official notice to inform you that a Settlement has been reached in a class action lawsuit between individuals in Illinois and certain other states and Instant Checkmate LLC, Truthfinder LLC, Intelius LLC, PeopleConnect, Inc., and The Control Group Media Company, LLC (“Defendants”). Defendants operate websites that provide directory services offering information about people. The lawsuit claims that Defendants violated these states’ right of publicity laws when they used individuals’ names, ages, contact information, former residence locations, lists of possible relatives, likenesses, photographs, images, or other identifying information to advertise or promote subscriptions to Defendants’ people-search websites. Defendants deny that they violated any law. The Court has not decided who is right or wrong. Please read this notice carefully. Your legal rights are affected whether you act or don’t act.

**Who is included in the Settlement Class?** Our records indicate that you are included in the Illinois Settlement Payment Class. This class includes people (i) who were searched for on websites Instant Checkmate, Truthfinder, Intelius, or U.S. Search on or after June 21, 2018, and (ii) had a report about them purchased that displayed an Illinois address per the Defendants’ records.

**What can I get out of the Settlement?** If you’re eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The payment is estimated to be approximately \$635–\$1,058 but could be more or less depending on the number of claims submitted. This amount is an equal share of a \$6,245,148 fund that Defendants agreed to create for this class, after any Court-approved payment of Settlement expenses, attorneys’ fees, and any incentive award. Separate funds were created for individuals from other states. You will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) to view a copy of the Settlement Agreement, including language regarding the release.

**How do I get my payment?** Just complete and verify the short and simple Claim Form online by clicking [here](#), or you can visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) and download a paper Claim Form and submit it by mail. By submitting online, you can choose to receive your payment via Venmo, Zelle, or a check. *All Claim Forms must be submitted online or postmarked by December 1, 2023.*

**What are my other options?** If you are part of the class but do not want payment from the Settlement and want to keep your right to file your own lawsuit against Defendants for any of the issues or claims in the case, you must exclude yourself from the class **no later than December 1, 2023**.

If you stay in the class, you may object to any aspect of the Settlement, including the requests for attorneys' fees, costs, expenses, and award to the Class Representatives. You and/or your lawyer also have the right to appear before the Court. Your written objection must be filed no later than **December 1, 2023**. Specific instructions about how to object or exclude yourself from the class are available at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com).

If you do nothing, and the Court approves the Settlement, you will receive no money, but will be bound by all orders of the Court and judgments in this case. In addition, you will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case.

**Do I have a lawyer?** Yes. The Court has appointed lawyers from the law firms Edelson PC, Bursor & Fisher, P.A., Beaumont Costales LLC, and East End Trial Group as "Class Counsel." They represent you and other Illinois Settlement Payment Class Members. You can hire your own lawyer, but you'll need to pay that lawyer's legal fees if you do. The Court has also chosen Eric Carvalho a class member like you—to represent the Illinois Settlement Payment Class, and Eric Carvalho, Robert Fischer, Stephanie Lukis, and Alessandra Fissinger-Figueroa to represent the Illinois Injunction Settlement Class.

**When will the Court decide whether to approve the Settlement?** The Court will hold a final approval hearing on **January 11, 2024 at 11:00 a.m.** before the Hon. Manish S. Shah in Room 1919 at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604 or via remote means as instructed by the Court. During the hearing, the Court will hear objections, determine if the Settlement is fair, and consider Class Counsel's request for fees and expenses of up to 35% of the Illinois Settlement Fund, \$1,000 incentive awards for each of the Illinois Settlement Payment Class Representative Carvalho and Illinois Injunction Settlement Class Representative Fissinger-Figueroa, and \$10,000 to each of the Illinois Injunction Settlement Class Representatives Fischer and Lukis. The fee request will be posted on the Settlement website by November 17, 2023.

Fischer v. Instant Checkmate LLC – Email Notice  
**Indiana Settlement Payment Class**

From: donotreply@PeopleConnectRightofPublicity.com  
To: «Class Member Email»  
Re: Legal Notice of Proposed Class Action Settlement – Indiana Class

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**OUR RECORDS INDICATE THAT YOU LIVE IN INDIANA AND SOMEONE SEARCHED YOUR NAME AND PURCHASED A REPORT ON INSTANTCHECKMATE.COM, INTELIUS.COM, TRUTHFINDER.COM, OR USSEARCH.COM. YOU MAY BE ENTITLED TO A PAYMENT FROM A CLASS ACTION SETTLEMENT.**

*Don't worry, you are not being sued. This is an official court notice, not an ad for a lawyer.*

**Class Member Name:** «Firstname» «Lastname»

**Class Member ID:** «SIMID»

This is an official notice to inform you that a Settlement has been reached in a class action lawsuit between individuals in Indiana and certain other states and Instant Checkmate LLC, Truthfinder LLC, Intelius LLC, PeopleConnect, Inc., and The Control Group Media Company, LLC (“Defendants”). Defendants operate websites that provide directory services offering information about people. The lawsuit claims that Defendants violated these states’ right of publicity laws when they used individuals’ names, ages, contact information, former residence locations, lists of possible relatives, likenesses, photographs, images, or other identifying information to advertise or promote subscriptions to Defendants’ people-search websites. Defendants deny that they violated any law. The Court has not decided who is right or wrong. Please read this notice carefully. Your legal rights are affected whether you act or don’t act.

**Who is included in the Settlement Class?** Our records indicate that you are included in the Indiana Settlement Payment Class. This class includes people (i) who were searched for on websites Instant Checkmate, Truthfinder, Intelius, or U.S. Search on or after December 6, 2020, and (ii) had a report about them purchased that displayed an Indiana address per the Defendants’ records.

**What can I get out of the Settlement?** If you’re eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The payment is estimated to be approximately \$111–\$185 but could be more or less depending on the number of claims submitted. This amount is an equal share of a \$106,695 fund that Defendants agreed to create for this class, after any Court-approved payment of Settlement expenses, attorneys’ fees, and any incentive award. Separate funds were created for individuals from other states. You will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) to view a copy of the Settlement Agreement, including language regarding the release.

**How do I get my payment?** Just complete and verify the short and simple Claim Form online by clicking [here](#), or you can visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) and download a paper Claim Form and submit it by mail. By submitting online, you can choose to receive your payment via Venmo, Zelle, or a check. *All Claim Forms must be submitted online or postmarked by December 1, 2023.*

**What are my other options?** If you are part of the class but do not want payment from the Settlement and want to keep your right to file your own lawsuit against Defendants for any of the issues or claims in the case, you must exclude yourself from the class **no later than December 1, 2023**.

If you stay in the class, you may object to any aspect of the Settlement, including the requests for attorneys' fees, costs, expenses, and award to the Class Representatives. You and/or your lawyer also have the right to appear before the Court. Your written objection must be filed no later than **December 1, 2023**. Specific instructions about how to object or exclude yourself from the class are available at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com).

If you do nothing, and the Court approves the Settlement, you will receive no money, but will be bound by all orders of the Court and judgments in this case. In addition, you will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case.

**Do I have a lawyer?** Yes. The Court has appointed lawyers from the law firms Edelson PC, Bursor & Fisher, P.A., Beaumont Costales LLC, and East End Trial Group as "Class Counsel." They represent you and other Indiana Settlement Payment Class Members. You can hire your own lawyer, but you'll need to pay that lawyer's legal fees if you do. The Court has also chosen James Anderson—a class member like you—to represent the Indiana Settlement Payment Class.

**When will the Court decide whether to approve the Settlement?** The Court will hold a final approval hearing on **January 11, 2024 at 11:00 a.m.** before the Hon. Manish S. Shah in Room 1919 at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604 or via remote means as instructed by the Court. During the hearing, the Court will hear objections, determine if the Settlement is fair, and consider Class Counsel's request for fees and expenses of up to 35% of the Indiana Settlement Fund and a \$1,000 incentive award for the Indiana Settlement Payment Class Representative. The fee request will be posted on the Settlement website by November 17, 2023.



Fischer v. Instant Checkmate LLC – Email Notice  
**Nevada Settlement Payment Class**

From: donotreply@PeopleConnectRightofPublicity.com  
To: «Class Member Email»  
Re: Legal Notice of Proposed Class Action Settlement – Nevada Class

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**OUR RECORDS INDICATE THAT YOU LIVE IN NEVADA AND SOMEONE SEARCHED YOUR NAME AND PURCHASED A REPORT ON INSTANTCHECKMATE.COM, INTELIUS.COM, TRUTHFINDER.COM, OR USSEARCH.COM. YOU MAY BE ENTITLED TO A PAYMENT FROM A CLASS ACTION SETTLEMENT.**

*Don't worry, you are not being sued. This is an official court notice, not an ad for a lawyer.*

**Class Member Name:** «Firstname» «Lastname»

**Class Member ID:** «SIMID»

This is an official notice to inform you that a Settlement has been reached in a class action lawsuit between individuals in Nevada and certain other states and Instant Checkmate LLC, Truthfinder LLC, Intelius LLC, PeopleConnect, Inc., and The Control Group Media Company, LLC (“Defendants”). Defendants operate websites that provide directory services offering information about people. The lawsuit claims that Defendants violated these states’ right of publicity laws when they used individuals’ names, ages, contact information, former residence locations, lists of possible relatives, likenesses, photographs, images, or other identifying information to advertise or promote subscriptions to Defendants’ people-search websites. Defendants deny that they violated any law. The Court has not decided who is right or wrong. Please read this notice carefully. Your legal rights are affected whether you act or don’t act.

**Who is included in the Settlement Class?** Our records indicate that you are included in the Nevada Settlement Payment Class. This class includes people (i) who were searched for on websites Instant Checkmate, Truthfinder, Intelius, or U.S. Search on or after December 6, 2018, and (ii) had a report about them purchased that displayed a Nevada address per the Defendants’ records.

**What can I get out of the Settlement?** If you’re eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The payment is estimated to be approximately \$82–\$137 but could be more or less depending on the number of claims submitted. This amount is an equal share of a \$119,205 fund that Defendants agreed to create for this class, after any Court-approved payment of Settlement expenses, attorneys’ fees, and any incentive award. Separate funds were created for individuals from other states. You will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) to view a copy of the Settlement Agreement, including language regarding the release.

**How do I get my payment?** Just complete and verify the short and simple Claim Form online by clicking [here](#), or you can visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) and download a paper Claim Form and submit it by mail. By submitting online, you can choose to receive your payment via Venmo, Zelle, or a check. *All Claim Forms must be submitted online or postmarked by December 1, 2023.*

**What are my other options?** If you are part of the class but do not want payment from the Settlement and want to keep your right to file your own lawsuit against Defendants for any of the issues or claims in the case, you must exclude yourself from the class **no later than December 1, 2023**.

If you stay in the class, you may object to any aspect of the Settlement, including the requests for attorneys' fees, costs, expenses, and award to the Class Representatives. You and/or your lawyer also have the right to appear before the Court. Your written objection must be filed no later than **December 1, 2023**. Specific instructions about how to object or exclude yourself from the class are available at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com).

If you do nothing, and the Court approves the Settlement, you will receive no money, but will be bound by all orders of the Court and judgments in this case. In addition, you will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case.

**Do I have a lawyer?** Yes. The Court has appointed lawyers from the law firms Edelson PC, Bursor & Fisher, P.A., Beaumont Costales LLC, and East End Trial Group as "Class Counsel." They represent you and other Nevada Settlement Payment Class Members. You can hire your own lawyer, but you'll need to pay that lawyer's legal fees if you do. The Court has also chosen Nicholas Fioritto—a class member like you—to represent the Nevada Settlement Payment Class.

**When will the Court decide whether to approve the Settlement?** The Court will hold a final approval hearing on **January 11, 2024 at 11:00 a.m.** before the Hon. Manish S. Shah in Room 1919 at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604 or via remote means as instructed by the Court. During the hearing, the Court will hear objections, determine if the Settlement is fair, and consider Class Counsel's request for fees and expenses of up to 35% of the Nevada Settlement Fund and a \$750 incentive award for the Nevada Settlement Payment Class Representative. The fee request will be posted on the Settlement website by November 17, 2023.

Fischer v. Instant Checkmate LLC – Email Notice  
**Ohio Settlement Payment Class**

From: donotreply@PeopleConnectRightofPublicity.com  
To: «Class Member Email»  
Re: Legal Notice of Proposed Class Action Settlement – Ohio Class

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**OUR RECORDS INDICATE THAT YOU LIVE IN OHIO AND SOMEONE SEARCHED YOUR NAME AND PURCHASED A REPORT ON INSTANTCHECKMATE.COM, INTELIUS.COM, TRUTHFINDER.COM, OR USSEARCH.COM. YOU MAY BE ENTITLED TO A PAYMENT FROM A CLASS ACTION SETTLEMENT.**

*Don't worry, you are not being sued. This is an official court notice, not an ad for a lawyer.*

**Class Member Name:** «Firstname» «Lastname»

**Class Member ID:** «SIMID»

This is an official notice to inform you that a Settlement has been reached in a class action lawsuit between individuals in Ohio and certain other states and Instant Checkmate LLC, Truthfinder LLC, Intelius LLC, PeopleConnect, Inc., and The Control Group Media Company, LLC (“Defendants”). Defendants operate websites that provide directory services offering information about people. The lawsuit claims that Defendants violated these states’ right of publicity laws when they used individuals’ names, ages, contact information, former residence locations, lists of possible relatives, likenesses, photographs, images, or other identifying information to advertise or promote subscriptions to Defendants’ people-search websites. Defendants deny that they violated any law. The Court has not decided who is right or wrong. Please read this notice carefully. Your legal rights are affected whether you act or don’t act.

**Who is included in the Settlement Class?** Our records indicate that you are included in the Ohio Settlement Payment Class. This class includes people (i) who were searched for on websites Instant Checkmate, Truthfinder, Intelius, or U.S. Search on or after January 29, 2017, and (ii) had a report about them purchased that displayed an Ohio address per the Defendants’ records.

**What can I get out of the Settlement?** If you’re eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The payment is estimated to be approximately \$286–\$477 but could be more or less depending on the number of claims submitted. This amount is an equal share of a \$1,727,888 fund that Defendants agreed to create for this class, after any Court-approved payment of Settlement expenses, attorneys’ fees, and any incentive award. Separate funds were created for individuals from other states. You will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) to view a copy of the Settlement Agreement, including language regarding the release.

**How do I get my payment?** Just complete and verify the short and simple Claim Form online by clicking [here](#), or you can visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) and download a paper Claim Form and submit it by mail. By submitting online, you can choose to receive your payment via Venmo, Zelle, or a check. *All Claim Forms must be submitted online or postmarked by December 1, 2023.*

**What are my other options?** If you are part of the class but do not want payment from the Settlement and want to keep your right to file your own lawsuit against Defendants for any of the issues or claims in the case, you must exclude yourself from the class **no later than December 1, 2023**.

If you stay in the class, you may object to any aspect of the Settlement, including the requests for attorneys' fees, costs, expenses, and award to the Class Representatives. You and/or your lawyer also have the right to appear before the Court. Your written objection must be filed no later than **December 1, 2023**. Specific instructions about how to object or exclude yourself from the class are available at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com).

If you do nothing, and the Court approves the Settlement, you will receive no money, but will be bound by all orders of the Court and judgments in this case. In addition, you will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case.

**Do I have a lawyer?** Yes. The Court has appointed lawyers from the law firms Edelson PC, Bursor & Fisher, P.A., Beaumont Costales LLC, and East End Trial Group as "Class Counsel." They represent you and other Ohio Settlement Payment Class Members. You can hire your own lawyer, but you'll need to pay that lawyer's legal fees if you do. The Court has also chosen Justin Rogalsky—a class member like you—to represent the Ohio Settlement Payment Class, and Justin Rogalsky and Therese Backowski to represent the Ohio Injunction Settlement Class.

**When will the Court decide whether to approve the Settlement?** The Court will hold a final approval hearing on **January 11, 2024 at 11:00 a.m.** before the Hon. Manish S. Shah in Room 1919 at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604 or via remote means as instructed by the Court. During the hearing, the Court will hear objections, determine if the Settlement is fair, and consider Class Counsel's request for fees and expenses of up to 35% of the Ohio Settlement Fund, a \$2,500 incentive award for the Ohio Settlement Payment Class Representative Rogalsky, and a \$2,500 incentive award for the Ohio Injunction Class Representative Backowski. The fee request will be posted on the Settlement website by November 17, 2023.

Fischer v. Instant Checkmate LLC – Email Notice  
**South Dakota Settlement Payment Class**

From: donotreply@PeopleConnectRightofPublicity.com  
To: «Class Member Email»  
Re: Legal Notice of Proposed Class Action Settlement – South Dakota Class

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**OUR RECORDS INDICATE THAT YOU LIVE IN SOUTH DAKOTA AND SOMEONE SEARCHED YOUR NAME AND PURCHASED A REPORT ON INSTANTCHECKMATE.COM, INTELIOUS.COM, TRUTHFINDER.COM, OR USSEARCH.COM. YOU MAY BE ENTITLED TO A PAYMENT FROM A CLASS ACTION SETTLEMENT.**

*Don't worry, you are not being sued. This is an official court notice, not an ad for a lawyer.*

**Class Member Name:** «Firstname» «Lastname»

**Class Member ID:** «SIMID»

This is an official notice to inform you that a Settlement has been reached in a class action lawsuit between individuals in South Dakota and certain other states and Instant Checkmate LLC, Truthfinder LLC, Intelious LLC, PeopleConnect, Inc., and The Control Group Media Company, LLC (“Defendants”). Defendants operate websites that provide directory services offering information about people. The lawsuit claims that Defendants violated these states’ right of publicity laws when they used individuals’ names, ages, contact information, former residence locations, lists of possible relatives, likenesses, photographs, images, or other identifying information to advertise or promote subscriptions to Defendants’ people-search websites. Defendants deny that they violated any law. The Court has not decided who is right or wrong. Please read this notice carefully. Your legal rights are affected whether you act or don’t act.

**Who is included in the Settlement Class?** Our records indicate that you are included in the South Dakota Settlement Payment Class. This class includes people (i) who were searched for on websites Instant Checkmate, Truthfinder, Intelious, or U.S. Search on or after December 6, 2019, and (ii) had a report about them purchased that displayed a South Dakota address per the Defendants’ records.

**What can I get out of the Settlement?** If you’re eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The payment is estimated to be approximately \$107–\$178 but could be more or less depending on the number of claims submitted. This amount is an equal share of a \$22,905 fund that Defendants agreed to create for this class, after any Court-approved payment of Settlement expenses, attorneys’ fees, and any incentive award. Separate funds were created for individuals from other states. You will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) to view a copy of the Settlement Agreement, including language regarding the release.

**How do I get my payment?** Just complete and verify the short and simple Claim Form online by clicking [here](#), or you can visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) and download a paper Claim Form and submit it by mail. By submitting online, you can choose to receive your payment via Venmo, Zelle, or a check. *All Claim Forms must be submitted online or postmarked by December 1, 2023.*

**What are my other options?** If you are part of the class but do not want payment from the Settlement and want to keep your right to file your own lawsuit against Defendants for any of the issues or claims in the case, you must exclude yourself from the class **no later than December 1, 2023**.

If you stay in the class, you may object to any aspect of the Settlement, including the requests for attorneys' fees, costs, expenses, and award to the Class Representatives. You and/or your lawyer also have the right to appear before the Court. Your written objection must be filed no later than **December 1, 2023**. Specific instructions about how to object or exclude yourself from the class are available at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com).

If you do nothing, and the Court approves the Settlement, you will receive no money, but will be bound by all orders of the Court and judgments in this case. In addition, you will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case.

**Do I have a lawyer?** Yes. The Court has appointed lawyers from the law firms Edelson PC, Bursor & Fisher, P.A., Beaumont Costales LLC, and East End Trial Group as "Class Counsel." They represent you and other South Dakota Settlement Payment Class Members. You can hire your own lawyer, but you'll need to pay that lawyer's legal fees if you do. The Court has also chosen Nateema Lewis—a class member like you—to represent the South Dakota Settlement Payment Class.

**When will the Court decide whether to approve the Settlement?** The Court will hold a final approval hearing on **January 11, 2024 at 11:00 a.m.** before the Hon. Manish S. Shah in Room 1919 at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604 or via remote means as instructed by the Court. During the hearing, the Court will hear objections, determine if the Settlement is fair, and consider Class Counsel's request for fees and expenses of up to 35% of the South Dakota Settlement Fund and a \$1,000 incentive award for the South Dakota Settlement Payment Class Representative. The fee request will be posted on the Settlement website by November 17, 2023.

# **EXHIBIT F**

# **EXHIBIT G**



**IMPORTANT REMINDER:** This is an official notice to remind you that a Settlement has been reached in a class action lawsuit between individuals in Alabama and certain other states and Instant Checkmate LLC, Truthfinder LLC, Intelius LLC, PeopleConnect, Inc., and The Control Group Media Company, LLC (“Defendants”). Defendants operate websites that provide directory services offering information about people. The lawsuit claims that Defendants violated these states’ right of publicity laws when they used individuals’ names, ages, contact information, former residence locations, lists of possible relatives, likenesses, photographs, images, or other identifying information to advertise or promote subscriptions to Defendants’ people-search websites. Defendants deny that they violated any law. Please read this notice carefully. Your legal rights are affected whether you act or don’t act.

**Who is included in the Settlement Class?** Our records indicate that you are included in the Alabama Settlement Payment Class. This includes all people (i) who were searched for on Instant Checkmate, Truthfinder, Intelius, or U.S. Search on or after August 11, 2019, and (ii) had a report about them purchased that displayed an Alabama address per the Defendants’ records.

**What can I get out of the Settlement?** If you’re eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The payment is estimated to be approximately \$577–\$960 but could be more or less depending on the number of claims submitted. This amount is an equal share of a \$877,500 fund that Defendants agreed to create for this class, after any Court-approved payment of Settlement expenses, attorneys’ fees, and any incentive award. Separate funds were created for individuals from other states. You will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) to view a copy of the Settlement Agreement, including language regarding the release.

**How do I get my payment?** Just complete and return the attached Claim Form by mail, or you can visit the Settlement Website, [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com), and submit a Claim Form online **by December 27, 2023**.

**What are my other options?** You can do nothing, comment on or object to any of the Settlement terms, or exclude yourself from the Settlement. If you do nothing, you won’t get a payment, will be bound by all orders of the court, and you won’t be able to sue Defendants in a future lawsuit about the claims addressed in the case. You can also comment on or object to the Settlement if you disagree with any of its terms by writing to the Court. If you exclude yourself, you won’t get a payment, but you’ll keep your right to sue Defendants on the issues the Settlement concerns. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) for instructions on how to exclude yourself or object to the Settlement. **All Requests for Exclusion and Objections must be received by December 27, 2023.**

**Do I have a lawyer?** Yes. The Court appointed lawyers from the law firms Edelson PC, Bursor & Fisher, P.A., Beaumont Costales LLC, and East End Trial Group as “Class Counsel.” They represent you and other Alabama Settlement Payment Class Members. You can hire your own lawyer, but you’ll need to pay that lawyer’s legal fees. The Court chose Jose Camacho—a class member like you—to represent the Alabama Settlement Payment Class.

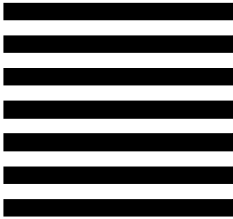
**When will the Court decide whether to approve the Settlement?** The Court will hold a final approval hearing on **February 15, 2024 at 12:30 p.m.** before the Hon. Manish S. Shah in Room 1919 at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604 or via remote means as instructed by the Court. During the hearing, the Court will hear objections, determine if the Settlement is fair, and consider Class Counsel’s request for fees and expenses of up to 35% of the Alabama Settlement Fund and a \$5,000 incentive award to the Alabama Settlement Payment Class Representative. Plaintiffs’ Motion for Attorneys’ Fees Expenses and Incentive Awards is now available on the Settlement Website.



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**Fischer v. Instant Checkmate LLC**  
**c/o Settlement Administrator**  
**P.O. Box 25043**  
**Santa Ana, CA 92799-25043**



Fischer v. Instant Checkmate LLC  
c/o Settlement Administrator  
P.O. Box 25043  
Santa Ana, CA 92799-25043

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## IMPORTANT REMINDER – COURT AUTHORIZED NOTICE

**OUR RECORDS INDICATE THAT YOU LIVE IN ALABAMA AND SOMEONE SEARCHED YOUR NAME AND PURCHASED A REPORT ON INSTANTCHECKMATE.COM, INTELIOUS.COM, TRUTHFINDER.COM, OR USSEARCH.COM. YOU MAY BE ENTITLED TO A PAYMENT FROM A CLASS ACTION SETTLEMENT.**

«IMb|ullBarcodeEncoded»

«FirstName» «LastName»

«Address1» «Address2»

«City», «State» «Zip»

SIMID «SIMID»  
•••••

By Order of the Court Dated: September 8, 2023

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### CLAIM FORM

**Class Member Name:** «FirstName» «LastName»

**Class Member ID:** «SIMID»

**Mailing Address:** «Address1» «Address2»  
«City», «State» «Zip»

THIS CLAIM FORM MUST BE SUBMITTED ONLINE OR POSTMARKED BY **DECEMBER 27, 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. If you prefer to receive payment via Venmo or Zelle, you must submit a Claim Form online on the Settlement Website at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com). If you submit this paper Claim Form by mail and it is approved, you will receive a check in the mail at the address you provide below.

New Mailing Address (only complete if incorrect above): \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Email Address (optional): \_\_\_\_\_

Contact Phone #: ( \_\_\_\_\_ ) \_\_\_\_\_ – \_\_\_\_\_ (You may be contacted if further information is required.)

Signature: \_\_\_\_\_ Date: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

Print Name: \_\_\_\_\_

The Settlement Administrator will review your Claim Form. If accepted, you will be mailed a check payment for an equal share of your state's State-Specific Settlement Fund based on the number of valid Claim Forms received and after first deducting Settlement Administration Expenses, any Fee Award, and any incentive award to the Class Representative, as approved by the Court. This process takes time; please be patient.

Questions? Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com)  
or call toll-free (833) 200-7004.

**IMPORTANT REMINDER:** This is an official notice to remind you that a Settlement has been reached in a class action lawsuit between individuals in California and certain other states and Instant Checkmate LLC, Truthfinder LLC, Intelius LLC, PeopleConnect, Inc., and The Control Group Media Company, LLC (“Defendants”). Defendants operate websites that provide directory services offering information about people. The lawsuit claims that Defendants violated these states’ right of publicity laws when they used individuals’ names, ages, contact information, former residence locations, lists of possible relatives, likenesses, photographs, images, or other identifying information to advertise or promote subscriptions to Defendants’ people-search websites. Defendants deny that they violated any law. Please read this notice carefully. Your legal rights are affected whether you act or don’t act.

**Who is included in the Settlement Class?** Our records indicate that you are included in the California Settlement Payment Class. This includes all people (i) who were searched for on Instant Checkmate, Truthfinder, Intelius, or U.S. Search on or after August 11, 2019, and (ii) had a report about them purchased that displayed a California address per the Defendants’ records.

**What can I get out of the Settlement?** If you’re eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The payment is estimated to be approximately \$82–\$137 but could be more or less depending on the number of claims submitted. This amount is an equal share of a \$1,003,556 fund that Defendants agreed to create for this class, after any Court-approved payment of Settlement expenses, attorneys’ fees, and any incentive award. Separate funds were created for individuals from other states. You will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) to view a copy of the Settlement Agreement, including language regarding the release.

**How do I get my payment?** Just complete and return the attached Claim Form by mail, or you can visit the Settlement Website, [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com), and submit a Claim Form online **by December 27, 2023**.

**What are my other options?** You can do nothing, comment on or object to any of the Settlement terms, or exclude yourself from the Settlement. If you do nothing, you won’t get a payment, will be bound by all orders of the court, and you won’t be able to sue Defendants in a future lawsuit about the claims addressed in the case. You can also comment on or object to the Settlement if you disagree with any of its terms by writing to the Court. If you exclude yourself, you won’t get a payment, but you’ll keep your right to sue Defendants on the issues the Settlement concerns. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) for instructions on how to exclude yourself or object to the Settlement. **All Requests for Exclusion and Objections must be received by December 27, 2023.**

**Do I have a lawyer?** Yes. The Court appointed lawyers from the law firms Edelson PC, Bursor & Fisher, P.A., Beaumont Costales LLC, and East End Trial Group as “Class Counsel.” They represent you and other California Settlement Payment Class Members. You can hire your own lawyer, but you’ll need to pay that lawyer’s legal fees. The Court chose Jake Webb—a class member like you—to represent the California Settlement Payment Class, and Rhonda Cotta, Rogelio Ramirez, and Jake Webb to represent the California Injunction Settlement Class.

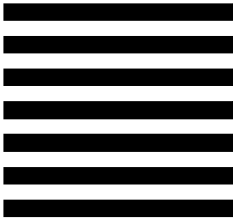
**When will the Court decide whether to approve the Settlement?** The Court will hold a final approval hearing on **February 15, 2024 at 12:30 p.m.** before the Hon. Manish S. Shah in Room 1919 at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604 or via remote means as instructed by the Court. During the hearing, the Court will hear objections, determine if the Settlement is fair, and consider Class Counsel’s request for fees and expenses of up to 35% of the California Settlement Fund, a \$750 incentive award for the California Settlement Payment Class Representative Webb, and a \$750 incentive award for each of the California Injunction Settlement Class Representatives Cotta and Ramirez. Plaintiffs’ Motion for Attorneys’ Fees Expenses and Incentive Awards is now available on the Settlement Website.



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**Fischer v. Instant Checkmate LLC**  
**c/o Settlement Administrator**  
**P.O. Box 25043**  
**Santa Ana, CA 92799**



Fischer v. Instant Checkmate LLC  
c/o Settlement Administrator  
P.O. Box 25043  
Santa Ana, CA 92799

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## IMPORTANT REMINDER – COURT AUTHORIZED NOTICE

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«IMb|ullBarcodeEncoded»

«FirstName» «LastName»

«Address1» «Address2»

«City», «State» «Zip»

SIMID «SIMID»  
» «P» «I» «D»

By Order of the Court Dated: September 8, 2023

### CLAIM FORM

**Class Member Name:** «FirstName» «LastName»

**Class Member ID:** «SIMID»

**Mailing Address:** «Address1» «Address2»  
«City», «State» «Zip»

THIS CLAIM FORM MUST BE SUBMITTED ONLINE OR POSTMARKED BY **DECEMBER 27, 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. If you prefer to receive payment via Venmo or Zelle, you must submit a Claim Form online on the Settlement Website at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com). If you submit this paper Claim Form by mail and it is approved, you will receive a check in the mail at the address you provide below.

New Mailing Address (only complete if incorrect above): \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_ Zip Code: \_\_\_\_\_

Email Address (optional): \_\_\_\_\_

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

Signature: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Print Name: \_\_\_\_\_

The Settlement Administrator will review your Claim Form. If accepted, you will be mailed a check payment for an equal share of your state's State-Specific Settlement Fund based on the number of valid Claim Forms received and after first deducting Settlement Administration Expenses, any Fee Award, and any incentive award to the Class Representative, as approved by the Court. This process takes time; please be patient.

Questions? Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com)  
or call toll-free (833) 200-7004.

**IMPORTANT REMINDER:** This is an official notice to remind you that a Settlement has been reached in a class action lawsuit between individuals in Illinois and certain other states and Instant Checkmate LLC, Truthfinder LLC, Intelius LLC, PeopleConnect, Inc., and The Control Group Media Company, LLC (“Defendants”). Defendants operate websites that provide directory services offering information about people. The lawsuit claims that Defendants violated these states’ right of publicity laws when they used individuals’ names, ages, contact information, former residence locations, lists of possible relatives, likenesses, photographs, images, or other identifying information to advertise or promote subscriptions to Defendants’ people-search websites. Defendants deny that they violated any law. Please read this notice carefully. Your legal rights are affected whether you act or don’t act.

**Who is included in the Settlement Class?** Our records indicate that you are included in the Illinois Settlement Payment Class. This includes all people (i) who were searched for on Instant Checkmate, Truthfinder, Intelius, or U.S. Search on or after June 21, 2018, and (ii) had a report about them purchased that displayed an Illinois address per the Defendants’ records.

**What can I get out of the Settlement?** If you’re eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The payment is estimated to be approximately \$635–\$1,058 but could be more or less depending on the number of claims submitted. This amount is an equal share of a \$6,245,148 fund that Defendants agreed to create for this class, after any Court-approved payment of Settlement expenses, attorneys’ fees, and any incentive award. Separate funds were created for individuals from other states. You will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) to view a copy of the Settlement Agreement, including language regarding the release.

**How do I get my payment?** Just complete and return the attached Claim Form by mail, or you can visit the Settlement Website, [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com), and submit a Claim Form online **by December 27, 2023**.

**What are my other options?** You can do nothing, comment on or object to any of the Settlement terms, or exclude yourself from the Settlement. If you do nothing, you won’t get a payment, will be bound by all orders of the court, and you won’t be able to sue Defendants in a future lawsuit about the claims addressed in the case. You can also comment on or object to the Settlement if you disagree with any of its terms by writing to the Court. If you exclude yourself, you won’t get a payment, but you’ll keep your right to sue Defendants on the issues the Settlement concerns. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) for instructions on how to exclude yourself or object to the Settlement. **All Requests for Exclusion and Objections must be received by December 27, 2023.**

**Do I have a lawyer?** Yes. The Court appointed lawyers from the law firms Edelson PC, Bursor & Fisher, P.A., Beaumont Costales LLC, and East End Trial Group as “Class Counsel.” They represent you and other Illinois Settlement Payment Class Members. You can hire your own lawyer, but you’ll need to pay that lawyer’s legal fees. The Court chose Eric Carvalho—a class member like you— to represent the Illinois Settlement Payment Class, and Eric Carvalho, Robert Fischer, Stephanie Lukis, and Alessandra Fissinger-Figueroa to represent the Illinois Injunction Settlement Class.

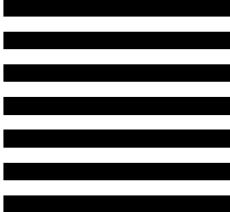
**When will the Court decide whether to approve the Settlement?** The Court will hold a final approval hearing on **February 15, 2024 at 12:30 p.m.** before the Hon. Manish S. Shah in Room 1919 at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604 or via remote means as instructed by the Court. During the hearing, the Court will hear objections, determine if the Settlement is fair, and consider Class Counsel’s request for fees and expenses of up to 35% of the Illinois Settlement Fund, \$1,000 incentive awards for each of the Illinois Settlement Payment Class Representative Carvalho and Illinois Injunction Settlement Class Representative Fissinger-Figueroa, and \$10,000 to each of the Illinois Injunction Settlement Class Representatives Fischer and Lukis. Plaintiffs’ Motion for Attorneys’ Fees Expenses and Incentive Awards is now available on the Settlement Website.



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**P.O. Box 25043**  
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«IMb|ullBarcodeEncoded»

«FirstName» «LastName»

«Address1» «Address2»

«City», «State» «Zip»

SIMID «SIMID»  
» « « « « « « « « « «

By Order of the Court Dated: September 8, 2023

**CLAIM FORM**

**Class Member Name:** «FirstName» «LastName»

**Class Member ID:** «SIMID»

**Mailing Address:** «Address1» «Address2»  
«City», «State» «Zip»

THIS CLAIM FORM MUST BE SUBMITTED ONLINE OR POSTMARKED BY **DECEMBER 27, 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. If you prefer to receive payment via Venmo or Zelle, you must submit a Claim Form online on the Settlement Website at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com). If you submit this paper Claim Form by mail and it is approved, you will receive a check in the mail at the address you provide below.

New Mailing Address (only complete if incorrect above): \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Email Address (optional): \_\_\_\_\_

Contact Phone #: ( \_\_\_\_\_ ) \_\_\_\_\_ – \_\_\_\_\_ (You may be contacted if further information is required.)

Signature: \_\_\_\_\_

Date: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

Print Name: \_\_\_\_\_

The Settlement Administrator will review your Claim Form. If accepted, you will be mailed a check payment for an equal share of your state's State-Specific Settlement Fund based on the number of valid Claim Forms received and after first deducting Settlement Administration Expenses, any Fee Award, and any incentive award to the Class Representative, as approved by the Court. This process takes time; please be patient.

Questions? Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com)  
or call toll-free (833) 200-7004.



**IMPORTANT REMINDER:** This is an official notice to remind you that a Settlement has been reached in a class action lawsuit between individuals in Indiana and certain other states and Instant Checkmate LLC, Truthfinder LLC, Intelius LLC, PeopleConnect, Inc., and The Control Group Media Company, LLC (“Defendants”). Defendants operate websites that provide directory services offering information about people. The lawsuit claims that Defendants violated these states’ right of publicity laws when they used individuals’ names, ages, contact information, former residence locations, lists of possible relatives, likenesses, photographs, images, or other identifying information to advertise or promote subscriptions to Defendants’ people-search websites. Defendants deny that they violated any law. Please read this notice carefully. Your legal rights are affected whether you act or don’t act.

**Who is included in the Settlement Class?** Our records indicate that you are included in the Indiana Settlement Payment Class. This includes all people (i) who were searched for on Instant Checkmate, Truthfinder, Intelius, or U.S. Search on or after December 6, 2020, and (ii) had a report about them purchased that displayed an Indiana address per the Defendants’ records.

**What can I get out of the Settlement?** If you’re eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The payment is estimated to be approximately \$111–\$185 but could be more or less depending on the number of claims submitted. This amount is an equal share of a \$106,695 fund that Defendants agreed to create for this class, after any Court-approved payment of Settlement expenses, attorneys’ fees, and any incentive award. Separate funds were created for individuals from other states. You will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) to view a copy of the Settlement Agreement, including language regarding the release.

**How do I get my payment?** Just complete and return the attached Claim Form by mail, or you can visit the Settlement Website, [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com), and submit a Claim Form online **by December 27, 2023**.

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**Do I have a lawyer?** Yes. The Court appointed lawyers from the law firms Edelson PC, Bursor & Fisher, P.A., Beaumont Costales LLC, and East End Trial Group as “Class Counsel.” They represent you and other Indiana Settlement Payment Class Members. You can hire your own lawyer, but you’ll need to pay that lawyer’s legal fees. The Court chose James Anderson—a class member like you—to represent the Indiana Settlement Payment Class.

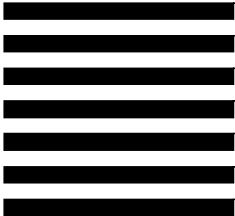
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«IMb|ullBarcodeEncoded»

«FirstName» «LastName»

«Address1» «Address2»

«City», «State» «Zip»

SIMID «SIMID»  
«Barcode\_180226»

By Order of the Court Dated: September 8, 2023

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### CLAIM FORM

**Class Member Name:** «FirstName» «LastName»

**Class Member ID:** «SIMID»

**Mailing Address:** «Address1» «Address2»  
«City», «State» «Zip»

THIS CLAIM FORM MUST BE SUBMITTED ONLINE OR POSTMARKED BY **DECEMBER 27, 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. If you prefer to receive payment via Venmo or Zelle, you must submit a Claim Form online on the Settlement Website at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com). If you submit this paper Claim Form by mail and it is approved, you will receive a check in the mail at the address you provide below.

New Mailing Address (only complete if incorrect above): \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Email Address (optional): \_\_\_\_\_

Contact Phone #: ( \_\_\_\_\_ ) \_\_\_\_\_ – \_\_\_\_\_ (You may be contacted if further information is required.)

Signature: \_\_\_\_\_ Date: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

Print Name: \_\_\_\_\_

The Settlement Administrator will review your Claim Form. If accepted, you will be mailed a check payment for an equal share of your state's State-Specific Settlement Fund based on the number of valid Claim Forms received and after first deducting Settlement Administration Expenses, any Fee Award, and any incentive award to the Class Representative, as approved by the Court. This process takes time; please be patient.

Questions? Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com)  
or call toll-free (833) 200-7004.

**IMPORTANT REMINDER:** This is an official notice to remind you that a Settlement has been reached in a class action lawsuit between individuals in Nevada and certain other states and Instant Checkmate LLC, Truthfinder LLC, Intelius LLC, PeopleConnect, Inc., and The Control Group Media Company, LLC (“Defendants”). Defendants operate websites that provide directory services offering information about people. The lawsuit claims that Defendants violated these states’ right of publicity laws when they used individuals’ names, ages, contact information, former residence locations, lists of possible relatives, likenesses, photographs, images, or other identifying information to advertise or promote subscriptions to Defendants’ people-search websites. Defendants deny that they violated any law. Please read this notice carefully. Your legal rights are affected whether you act or don’t act.

**Who is included in the Settlement Class?** Our records indicate that you are included in the Nevada Settlement Payment Class. This includes all people (i) who were searched for on Instant Checkmate, Truthfinder, Intelius, or U.S. Search on or after December 6, 2018, and (ii) had a report about them purchased that displayed a Nevada address per the Defendants’ records.

**What can I get out of the Settlement?** If you’re eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The payment is estimated to be approximately \$82–\$137 but could be more or less depending on the number of claims submitted. This amount is an equal share of a \$119,205 fund that Defendants agreed to create for this class, after any Court-approved payment of Settlement expenses, attorneys’ fees, and any incentive award. Separate funds were created for individuals from other states. You will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) to view a copy of the Settlement Agreement, including language regarding the release.

**How do I get my payment?** Just complete and return the attached Claim Form by mail, or you can visit the Settlement Website, [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com), and submit a Claim Form online **by December 27, 2023**.

**What are my other options?** You can do nothing, comment on or object to any of the Settlement terms, or exclude yourself from the Settlement. If you do nothing, you won’t get a payment, will be bound by all orders of the court, and you won’t be able to sue Defendants in a future lawsuit about the claims addressed in the case. You can also comment on or object to the Settlement if you disagree with any of its terms by writing to the Court. If you exclude yourself, you won’t get a payment, but you’ll keep your right to sue Defendants on the issues the Settlement concerns. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) for instructions on how to exclude yourself or object to the Settlement. **All Requests for Exclusion and Objections must be received by December 27, 2023.**

**Do I have a lawyer?** Yes. The Court appointed lawyers from the law firms Edelson PC, Bursor & Fisher, P.A., Beaumont Costales LLC, and East End Trial Group as “Class Counsel.” They represent you and other Nevada Settlement Payment Class Members. You can hire your own lawyer, but you’ll need to pay that lawyer’s legal fees. The Court chose Nicholas Fioritto—a class member like you—to represent the Nevada Settlement Payment Class.

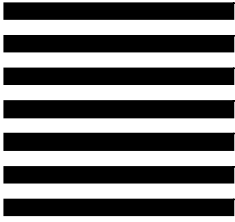
**When will the Court decide whether to approve the Settlement?** The Court will hold a final approval hearing on **February 15, 2024 at 12:30 p.m.** before the Hon. Manish S. Shah in Room 1919 at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604 or via remote means as instructed by the Court. During the hearing, the Court will hear objections, determine if the Settlement is fair, and consider Class Counsel’s request for fees and expenses of up to 35% of the Nevada Settlement Fund and a \$750 incentive award to the Nevada Settlement Payment Class Representative. Plaintiffs’ Motion for Attorneys’ Fees Expenses and Incentive Awards is now available on the Settlement Website.



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**Fischer v. Instant Checkmate LLC**  
**c/o Settlement Administrator**  
**P.O. Box 25043**  
**Santa Ana, CA 92799**



Fischer v. Instant Checkmate LLC  
c/o Settlement Administrator  
P.O. Box 25043  
Santa Ana, CA 92799

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## IMPORTANT REMINDER – COURT AUTHORIZED NOTICE

**OUR RECORDS INDICATE THAT YOU LIVE IN NEVADA AND SOMEONE SEARCHED YOUR NAME AND PURCHASED A REPORT ON INSTANTCHECKMATE.COM, INTELIOUS.COM, TRUTHFINDER.COM, OR USSEARCH.COM. YOU MAY BE ENTITLED TO A PAYMENT FROM A CLASS ACTION SETTLEMENT.**

«IMb|ullBarcodeEncoded»

«FirstName» «LastName»

«Address1» «Address2»

«City», «State» «Zip»

SIMID «SIMID»  
» « « « « «

By Order of the Court Dated: September 8, 2023

-----  
**CLAIM FORM**

**Class Member Name:** «FirstName» «LastName»

**Class Member ID:** «SIMID»

**Mailing Address:** «Address1» «Address2»  
«City», «State» «Zip»

THIS CLAIM FORM MUST BE SUBMITTED ONLINE OR POSTMARKED BY **DECEMBER 27, 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. If you prefer to receive payment via Venmo or Zelle, you must submit a Claim Form online on the Settlement Website at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com). If you submit this paper Claim Form by mail and it is approved, you will receive a check in the mail at the address you provide below.

New Mailing Address (only complete if incorrect above): \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Email Address (optional): \_\_\_\_\_

Contact Phone #: ( \_\_\_\_\_ ) \_\_\_\_\_ – \_\_\_\_\_ (You may be contacted if further information is required.)

Signature: \_\_\_\_\_

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Print Name: \_\_\_\_\_

The Settlement Administrator will review your Claim Form. If accepted, you will be mailed a check payment for an equal share of your state's State-Specific Settlement Fund based on the number of valid Claim Forms received and after first deducting Settlement Administration Expenses, any Fee Award, and any incentive award to the Class Representative, as approved by the Court. This process takes time; please be patient.

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**Who is included in the Settlement Class?** Our records indicate that you are included in the Ohio Settlement Payment Class. This includes all people (i) who were searched for on Instant Checkmate, Truthfinder, Intelius, or U.S. Search on or after January 29, 2017, and (ii) had a report about them purchased that displayed an Ohio address per the Defendants’ records.

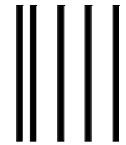
**What can I get out of the Settlement?** If you’re eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The payment is estimated to be approximately \$286–\$477 but could be more or less depending on the number of claims submitted. This amount is an equal share of a \$1,727,888 fund that Defendants agreed to create for this class, after any Court-approved payment of Settlement expenses, attorneys’ fees, and any incentive award. Separate funds were created for individuals from other states. You will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) to view a copy of the Settlement Agreement, including language regarding the release.

**How do I get my payment?** Just complete and return the attached Claim Form by mail, or you can visit the Settlement Website, [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com), and submit a Claim Form online **by December 27, 2023**.

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**Do I have a lawyer?** Yes. The Court appointed lawyers from the law firms Edelson PC, Bursor & Fisher, P.A., Beaumont Costales LLC, and East End Trial Group as “Class Counsel.” They represent you and other Ohio Settlement Payment Class Members. You can hire your own lawyer, but you’ll need to pay that lawyer’s legal fees. The Court chose Justin Rogalsky—a class member like you—to represent the Ohio Settlement Payment Class, and Justin Rogalsky and Therese Backowski to represent the Ohio Injunction Settlement Class.

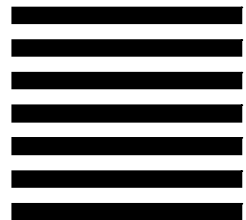
**When will the Court decide whether to approve the Settlement?** The Court will hold a final approval hearing on **February 15, 2024 at 12:30 p.m.** before the Hon. Manish S. Shah in Room 1919 at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604 or via remote means as instructed by the Court. During the hearing, the Court will hear objections, determine if the Settlement is fair, and consider Class Counsel’s request for fees and expenses of up to 35% of the Ohio Settlement Fund, a \$2,500 incentive award for the Ohio Settlement Payment Class Representative Rogalsky, and a \$2,500 incentive award for the Ohio Injunction Class Representative Backowski. Plaintiffs’ Motion for Attorneys’ Fees Expenses and Incentive Awards is now available on the Settlement Website.



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**Fischer v. Instant Checkmate LLC**  
**c/o Settlement Administrator**  
**P.O. Box 25043**  
**Santa Ana, CA 92799**



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«IMb|ullBarcodeEncoded»

«FirstName» «LastName»

«Address1» «Address2»

«City», «State» «Zip»

SIMID «SIMID»  
» «P» «1» »

By Order of the Court Dated: September 8, 2023

-----  
**CLAIM FORM**

**Class Member Name:** «FirstName» «LastName»

**Class Member ID:** «SIMID»

**Mailing Address:** «Address1» «Address2»  
«City», «State» «Zip»

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**Instructions:** Fill out each section of this form and sign where indicated. If you prefer to receive payment via Venmo or Zelle, you must submit a Claim Form online on the Settlement Website at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com). If you submit this paper Claim Form by mail and it is approved, you will receive a check in the mail at the address you provide below.

New Mailing Address (only complete if incorrect above): \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Email Address (optional): \_\_\_\_\_

Contact Phone #: ( \_\_\_\_\_ ) \_\_\_\_\_ – \_\_\_\_\_ (You may be contacted if further information is required.)

Signature: \_\_\_\_\_

Date: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

Print Name: \_\_\_\_\_

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**Who is included in the Settlement Class?** Our records indicate that you are included in the South Dakota Settlement Payment Class. This includes all people (i) who were searched for on Instant Checkmate, Truthfinder, Intelius, or U.S. Search on or after December 6, 2019, and (ii) had a report about them purchased that displayed a South Dakota address per the Defendants’ records.

**What can I get out of the Settlement?** If you’re eligible and the Court approves the Settlement, you can file a claim to receive a cash payment. The payment is estimated to be approximately \$107–\$178 but could be more or less depending on the number of claims submitted. This amount is an equal share of a \$22,905 fund that Defendants agreed to create for this class, after any Court-approved payment of Settlement expenses, attorneys’ fees, and any incentive award. Separate funds were created for individuals from other states. You will no longer be able to file your own lawsuit against Defendants for any of the issues or claims in the case. Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com) to view a copy of the Settlement Agreement, including language regarding the release.

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**Do I have a lawyer?** Yes. The Court appointed lawyers from the law firms Edelson PC, Bursor & Fisher, P.A., Beaumont Costales LLC, and East End Trial Group as “Class Counsel.” They represent you and other South Dakota Settlement Payment Class Members. You can hire your own lawyer, but you’ll need to pay that lawyer’s legal fees. The Court chose Nateema Lewis—a class member like you—to represent the South Dakota Settlement Payment Class.

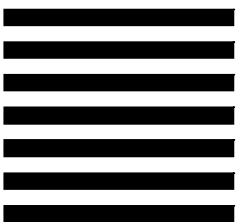
**When will the Court decide whether to approve the Settlement?** The Court will hold a final approval hearing on **February 15, 2024 at 12:30 p.m.** before the Hon. Manish S. Shah in Room 1919 at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604 or via remote means as instructed by the Court. During the hearing, the Court will hear objections, determine if the Settlement is fair, and consider Class Counsel’s request for fees and expenses of up to 35% of the South Dakota Settlement Fund and a \$1,000 incentive award to the South Dakota Settlement Payment Class Representative. Plaintiffs’ Motion for Attorneys’ Fees Expenses and Incentive Awards is now available on the Settlement Website.



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**Fischer v. Instant Checkmate LLC**  
**c/o Settlement Administrator**  
**P.O. Box 25043**  
**Santa Ana, CA 92799**



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Santa Ana, CA 92799

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**IMPORTANT REMINDER – COURT AUTHORIZED NOTICE**

**OUR RECORDS INDICATE THAT YOU LIVE IN SOUTH DAKOTA AND SOMEONE SEARCHED YOUR NAME AND PURCHASED A REPORT ON INSTANTCHECKMATE.COM, INTELIOUS.COM, TRUTHFINDER.COM, OR USSEARCH.COM. YOU MAY BE ENTITLED TO A PAYMENT FROM A CLASS ACTION SETTLEMENT.**

«IMb|ullBarcodeEncoded»

«FirstName» «LastName»

«Address1» «Address2»

«City», «State» «Zip»

SIMID «SIMID»  
«Barcode\_180241»

By Order of the Court Dated: September 8, 2023

**CLAIM FORM**

**Class Member Name:** «FirstName» «LastName»

**Class Member ID:** «SIMID»

**Mailing Address:** «Address1» «Address2»  
«City», «State» «Zip»

THIS CLAIM FORM MUST BE SUBMITTED ONLINE OR POSTMARKED BY **DECEMBER 27, 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. If you prefer to receive payment via Venmo or Zelle, you must submit a Claim Form online on the Settlement Website at [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com). If you submit this paper Claim Form by mail and it is approved, you will receive a check in the mail at the address you provide below.

New Mailing Address (only complete if incorrect above): \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Email Address (optional): \_\_\_\_\_

Contact Phone #: ( \_\_\_\_\_ ) \_\_\_\_\_ – \_\_\_\_\_ (You may be contacted if further information is required.)

Signature: \_\_\_\_\_ Date: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

Print Name: \_\_\_\_\_

The Settlement Administrator will review your Claim Form. If accepted, you will be mailed a check payment for an equal share of your state’s State-Specific Settlement Fund based on the number of valid Claim Forms received and after first deducting Settlement Administration Expenses, any Fee Award, and any incentive award to the Class Representative, as approved by the Court. This process takes time; please be patient.

Questions? Visit [www.PeopleConnectRightofPublicity.com](http://www.PeopleConnectRightofPublicity.com)  
or call toll-free (833) 200-7004.

# **EXHIBIT H**




**Fischer v. Instant Checkmate LLC Class Exclusion**

Aashna Chand <[chand.aashna.03@gmail.com](mailto:chand.aashna.03@gmail.com)>

Tue 11/28/2023 10:07 PM

To:Info\_InstantCheckmate\_6703 <[info@peopleconnectrightofpublicity.com](mailto:info@peopleconnectrightofpublicity.com)>

 1 attachments (66 KB)

Signed. Fisher Class Exclusion Letter.pdf;

Hi, please see attached letter requesting to be excluded from the proposed Settlement Payment Class in Fischer, et al. v. Instant Checkmate LLC, et al., No. 19-cv-04892 (N.D. Ill.).

- Aashna

## Aashna Chand

3823 Bridgemeanow Way  
Sacramento, CA 95834  
chand.aashna.03@gmail.com

November 28, 2023

Fischer v. Instant Checkmate LLC  
c/o Settlement Administrator  
P.O. Box 25043  
Santa Ana, CA 92799

Dear Settlement Administrator,

This is in regards to Fischer, et al. v. Instant Checkmate LLC, et al., No. 19-cv-04892 (N.D. Ill.). I am a member of the California Settlement Class. My full name is Aashna K. Chand and address is 3823 Bridgemeanow Way, Sacramento, CA 95834. I hereby request to be excluded from the proposed Settlement Payment Class in Fischer, et al. v. Instant Checkmate LLC, et al., No. 19-cv-04892 (N.D. Ill.).

*Aashna Chand*

Aashna Chand



**Exclusion from class action settlement**

Craig Long <craigrlong@gmail.com>

Wed 12/6/2023 9:50 PM

To:Info\_InstantCheckmate\_6703 <info@peopleconnectrightofpublicity.com>

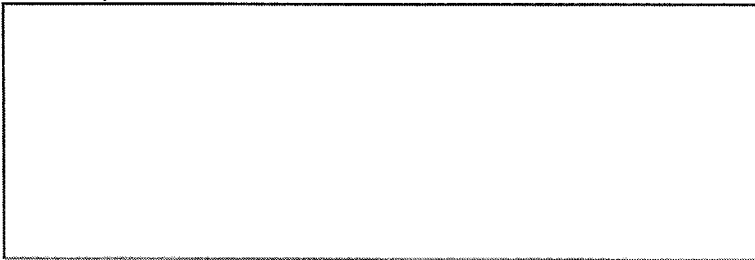
December 6, 2023

Fischer v. Instant Checkmate LLC  
c/o Settlement Administrator  
P.O. Box 25043  
Santa Ana, CA 92799

Dear Fischer v. Instant Checkmate LLC, Settlement Administrator:

I, Craig Ross Long, a member of the California Settlement Class, hereby request to be excluded from the proposed Settlement Payment Class in Fischer, et al. v. Instant Checkmate LLC, et al., No. 19-cv-04892 (N.D. Ill.).

Sincerely,



Craig Ross Long  
810 S Agate Street  
Anaheim, CA 92804  
[craigrlong@gmail.com](mailto:craigrlong@gmail.com)

