

Circuit Court of Cook County, Illinois

Hugo Roman v. ZK Technology LLC

Case No. 2022-CH-06727

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

YOU MAY BE ENTITLED TO A CASH PAYMENT FROM A CLASS ACTION SETTLEMENT IF YOU SCANNED YOUR FINGER OR FACE FOR TIMEKEEPING PURPOSES WHILE WORKING FOR ALLIANCE GROUND INTERNATIONAL, LLC IN ILLINOIS ANYTIME BETWEEN SEPTEMBER 2020 AND AUGUST 12, 2026.

For more information, visit www.ZKBIPASettlement.com.

Para informacion en Espanol, visitar www.ZKBIPASettlement.com.

Please read this notice carefully. A court has authorized this notice.

This is not a solicitation from a lawyer. You are not being sued.

Please read this Notice carefully and completely.

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Basic Information

1. Why did I get a notice in the mail?

The notice you received is a court-authorized notice of a proposed settlement that would resolve two class action lawsuits: *Hugo Roman v. ZK Technology LLC*, No. 2022-CH-06727, pending in the Circuit Court of Cook County, Illinois before the Honorable Joel Chupack, and *Hugo Roman v. ZK Technology LLC*, No. 23-CV-15058, pending in the U.S. District Court for the Northern District of Illinois before the Honorable Joan H. Lefkow. The Settlement would resolve these two lawsuits brought on behalf of persons who allege that ZK Technology LLC (“Defendant”) violated the law by failing to provide legally-required written disclosures and obtain written consent from them in order for their employers to share biometric information with Defendant. One such employer was Alliance Ground International, LLC (“AGI”).

If you received a notice in the mail, you have been identified as someone who may have scanned your finger or face using AGI’s timekeeping system while working for AGI in Illinois sometime between September 2020 and August 12, 2026 without consent having been obtained to share your biometric information with Defendant. The Court has granted preliminary approval of the Settlement and has conditionally certified the Settlement Class for purposes of settlement only. This notice explains the nature of the class action lawsuit, the terms of the Settlement, and the legal rights and obligations of the Settlement Class Members. *Please read the instructions and explanations below so that you can better understand your legal rights.*

2. What is this lawsuit about?

The Illinois Biometric Information Privacy Act (“BIPA”), 740 ILCS 14/1, *et seq.*, prohibits private companies from capturing, obtaining, storing, transferring, and/or using the biometric identifiers and/or information, such as fingerprints or facial geometries, of another individual for any purpose, including timekeeping, without first providing such individual with certain written disclosures and obtaining written consent. This lawsuit alleges that Defendant violated BIPA by using scans of AGI’s workers’ fingers, fingerprints, faces, or facial geometries for timekeeping purposes within the state of Illinois without first obtaining the required consent. Defendant contests these claims and denies that it violated BIPA.

3. Why is this a class action?

A class action is a lawsuit in which an individual called a “Class Representative” brings 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 Class.

4. Why is there a Settlement?

To resolve this matter without the expense, delay, and uncertainties of litigation, the Parties have reached a Settlement, which resolves all claims against Defendant, AGI, and their affiliated entities. The Settlement requires Defendant to pay money to the Settlement Class, as well as pay settlement Administration Expenses, attorneys’ fees and costs to Class Counsel, and a Service Award to the Class Representative, if approved by the Court. The Settlement is not an admission of wrongdoing by Defendant and does not imply that there has been, or would be, any finding that Defendant violated the law.

The Court has already preliminarily approved the Settlement. Nevertheless, because the settlement of a class action determines the rights of all members of the class, the Court overseeing this lawsuit must give final approval to the Settlement before it can be effective. The Court has conditionally certified the Settlement Class for settlement purposes only, so that members of the Settlement Class can be given this notice and

the opportunity to exclude themselves from the Settlement Class, to voice their support or opposition to final approval of the Settlement, and to submit a Claim Form to receive the relief offered by the Settlement. If the Court does not give Final Approval to the Settlement, or if it is terminated by the Parties, the Settlement will be void, and the lawsuit will proceed as if there had been no settlement and no certification of the Settlement Class.

Who is in the Settlement?

5. Who is in the Settlement class?

You are a member of the Settlement Class if, at any time between September 2020 and August 12, 2026 you were an employee of AGI and scanned your finger or face using AGI's timekeeping system in Illinois without consent having been obtained from you to share your biometric information with Defendant. If you are a member of the Settlement Class, then you may visit the settlement website, www.ZKBIPASettlement.com, to submit a claim for payment. You may also fill out the claim form available on the settlement website or that you may have received in the mail and mail it to the Settlement Administrator as explained below.

The Settlement Benefits

6. What does the Settlement provide?

Cash Payments. Defendant has agreed to create a \$635,160.00 Settlement Fund for the Class Members, which will be used to pay valid claims; settlement administration expenses; attorneys' fees, costs and expenses; and a Class Representative Service Award.

All Settlement Class Members are entitled to submit a Claim Form in order to receive a cash payment out of the Settlement Fund. If the Settlement is approved, each Settlement Class Member who submits a timely Claim Form that is deemed valid will be entitled to an equal payment from the Settlement Fund, up to a maximum of \$2,000.00. The exact amount of each Class Member's payment is unknown at this time. The per-person payment to each valid claimant is estimated to be \$800-\$2,000, but depends on unknown factors to be determined, including the total number of valid Claim Forms submitted.

On your claim form, you can choose whether to receive your payment by check or by electronic payment (e.g., PayPal, Venmo, and Zelle). Payments will be distributed following Final Approval of the Settlement. All checks issued to Settlement Class Members will expire and become void 120 days after they are issued.

Additionally, the attorneys who brought this lawsuit (listed below) will ask the Court to award them attorneys' fees in an amount up to 38% of the Settlement Fund, plus their reasonable costs and expenses, for the substantial time, expense and effort spent investigating the facts, litigating the case and negotiating the Settlement.

The Class Representative also will apply to the Court for a payment of up to \$5,000.00 for his time, effort, and service in this matter.

If you have questions about these benefits, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@ZKBIPASettlement.com
- Call toll free, 24/7: (888) 406-0864
- By mail: ZK Technology LLC BIPA Settlement
c/o Settlement Administrator

Submitting a Claim Form for a Settlement Payment

7. What are my options?

Submit a Claim for a Cash Payment

To obtain money from the Settlement, you must submit a Claim Form by **November 10, 2026**. You may submit a claim directly at www.ZKBIPASettlement.com. You may also complete and mail in the Claim Form that was attached to the notice you may have received in the mail. You may also obtain a copy of the Claim Form at www.ZKBIPASettlement.com and submit it by U.S. Mail to the Settlement Administrator. If submitting your Claim Form by mail, it must be postmarked by **November 10, 2026**. If the Settlement is approved and your claim is deemed valid, you will be sent payment based on the payment method you select on your Claim Form. ***Submitting a valid and timely Claim Form is the only way to receive a payment from this Settlement, and it is the only thing you need to do to receive a payment.***

Excluding Yourself from the Settlement

8. How do I opt out of the Settlement?

Exclude Yourself

You may exclude yourself from the Settlement. 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. To exclude yourself from the Settlement, you must mail a signed letter to the Settlement Administrator, postmarked by **October 23, 2026**. You may also exclude yourself online at www.ZKBIPASettlement.com by **October 23, 2026**.

The exclusion letter must state that you exclude yourself from this Settlement and must include:

- (i) your name, address, telephone number, and email address;
- (ii) the case name and number (identified at the top of this Notice);
- (iii) a statement that you wish to be excluded from the Settlement Class; and
- (iv) your signature.

Commenting on or Objecting to the Settlement

9. How do I tell the Court if I like or do not like the Settlement?

Object to the Settlement

If you wish to object to the Settlement, you must submit your objection in writing to the Clerk of the Court of the Circuit Court of Cook County, Illinois, Office of the Clerk of the Circuit Court of Cook County, 50 West Washington Street, Suite 1001, Chicago, Illinois 60602. The objection must be postmarked no later than **October 23, 2026**. You must also send a copy of your objection to the Settlement Administrator and the attorneys for all Parties to the lawsuit, including Class Counsel (Donald Cuba of McGuire Law, P.C., 55 West Wacker Drive, 9th Floor, Chicago, Illinois 60601), as well as Defendant's counsel (Jacob Radecki of McDonald

Hopkins LLC, 300 North LaSalle Street, Suite 1400, Chicago, IL 60654), postmarked no later than **October 23, 2026**.

Any objection to the proposed Settlement must include:

- (i) full name, address, telephone number, and email address;
- (ii) the case name and number (identified at the top of this Notice);
- (iii) all grounds for the objection, with factual and legal support for the stated objection, including any supporting materials;
- (iv) the identification of any other objections you have filed, or have had filed on your behalf, in any other class action cases in the last four years; and
- (v) your signature.

If you hire an attorney in connection with making an objection, that attorney must also file with the court a notice of appearance by the objection deadline of **October 23, 2026**. 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.

The Court's Final Approval Hearing

10. When is the Court's Final Approval Hearing?

You may appear at the Final Approval Hearing, which will be held on **November 23, 2026, at 9:30 a.m.**, in **Courtroom 2601** of the **Circuit Court of Cook County, 50 West Washington Street, Chicago, Illinois 60602** and via **Zoom [Zoom Meeting ID: 940 2104 4687, Passcode: 296476]**, personally or through counsel to show cause why the proposed Settlement should not be approved as fair, reasonable, and adequate.

Participating in the hearing is not necessary; however, persons wishing to be heard orally in opposition to the Final Approval of the Settlement, the request for attorneys' fees and expenses, and/or the request for a Service Award to the Class Representative are required to indicate in their written objection their intention to appear at the hearing on their own behalf or through counsel and to identify the names of any witnesses they intend to call to testify at the Final Approval Hearing, as well as any exhibits they intend to introduce at the Final Approval Hearing.

The hearing date and time, and whether the hearing will be conducted solely in person, is subject to change by the Court, so please check the Settlement Website, www.ZKBIPASettlement.com, for updates.

If I Do Nothing

11. What happens if I do nothing at all?

Do Nothing

If you do nothing, you will receive no money from the 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 Defendant or other Released Parties regarding any of the Released Claims. *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.ZKBIPASettlement.com, or call (888) 406-0864.

12. What rights am I giving up in this Settlement?

Unless you exclude yourself from this Settlement, you will be considered a member of the Settlement Class, which means you give up your right to file or continue a lawsuit against Defendant and/or AGI relating to the use of the biometric data of AGI's employees for timekeeping purposes. Giving up your legal claims is called a release. The precise terms of the release are contained in the Settlement Agreement, which is available on the Settlement Website. Unless you formally exclude yourself from this Settlement, you will release your claims whether or not you submit a Claim Form and receive payment. If you have any questions, you can talk for free to the attorneys identified below who have been appointed by the Court to represent the Settlement Class, or you are welcome to talk to any other lawyer of your choosing at your own expense.

13. When will I be paid?

The Parties cannot predict exactly when (or whether) the Court will give Final Approval of the Settlement, so please be patient. However, if the Court grants final approval of the Settlement, you will be paid as soon as possible after the court order becomes final, which should occur within approximately 45 days after the Settlement has been finally approved. If there is an appeal of the Settlement, payment may be delayed. Updated information about the case is available at www.ZKBIPASettlement.com, or you can call the Settlement Administrator at (888) 406-0864 or contact Class Counsel with the information provided below.

14. When will the court rule on the Settlement?

The Court has already given preliminary approval to the Settlement. A final hearing on the Settlement, called a Final Approval Hearing, will be held to determine the fairness of the Settlement. At the Final Approval Hearing, the Court will also consider whether to make final the certification of the Class for settlement purposes, hear any proper objections and arguments to the Settlement, as well as any requests for an award of attorneys' fees, costs, and expenses and the Class Representative Service Award that may be sought by Class Counsel. The Court will hold the Final Approval Hearing on **November 23, 2026, at 9:30 a.m.** [Zoom Meeting ID: 940 2104 4687, Passcode: 296476].

The hearing date and time is subject to change by the Court, so please check the Settlement Website, www.ZKBIPASettlement.com, for updates. If the Settlement is given final approval, the Court will not make any determination as to the merits of the claims against Defendant or its defenses to those claims. Instead, the Settlement's terms will take effect and the lawsuit will be dismissed on the merits with prejudice. Both sides have agreed to the Settlement in order to achieve an early and certain resolution to the lawsuit, in a manner that provides specific and valuable benefits to the members of the Settlement Class.

If the Court does not approve the Settlement, if it approves the Settlement and the approval is reversed on appeal, or if the Settlement does not become final for some other reason, you will not be paid at this time and Class Members will receive no benefits from the Settlement Fund. Plaintiff, Defendant, and all of the Class Members will be in the same position as they were prior to the execution of the Settlement, and the Settlement will have no legal effect, no class will remain certified (conditionally or otherwise), and Plaintiff and Defendant will continue to litigate the lawsuit. There can be no assurance that if the Settlement is not approved, the Settlement Class will recover more than is provided in the Settlement, or indeed, anything at all.

The Lawyers Representing You

15. Who represents the class?

The Court has approved the following attorneys to represent the Settlement Class. They are called “Class Counsel.” You will not be charged for these lawyers. If you want to be represented by your own lawyer instead, you may hire one at your own expense.

Evan M. Meyers
Jordan R. Frysinger
Joseph M. Dunklin
Donald S. Cuba II
MCGUIRE LAW, P.C
55 W. Wacker Dr., 9th Floor
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jdunklin@mcgpc.com
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Getting More Information

16. Where can I get additional information?

This Notice is only a summary of the proposed Settlement of this lawsuit. More details are contained in the Settlement Agreement which, along with other relevant case documents, can be obtained at www.ZKBIPASettlement.com.

If you have any questions, you can also call the Settlement Administrator at (888) 406-0864 or contact Class Counsel at the numbers or email addresses set forth above. In addition to the documents available on the case website, all pleadings and documents filed in court may be reviewed or copied in the Office of the Clerk. Please do not call the Judge or the Clerk of the Court about this case. They will not be able to give you advice on your options.

If you have additional questions, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: info@ZKBIPASettlement.com
- Call toll free, 24/7: (888) 406-0864
- By mail: ZK Technology LLC BIPA Settlement
c/o Settlement Administrator
P.O. Box 25226
Santa Ana, CA 92799-9958

You can obtain copies of publicly filed documents by visiting the office of the Clerk of the Court, Circuit Court of Cook County, Illinois.

DO NOT CONTACT THE COURT OR CLERK OF COURT REGARDING THIS SETTLEMENT